

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Three"N" One Product - FPN E12625 - Removal Polrep
Final Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Update and Final
Three"N" One Product - FPN E12625
V6NM
Shreveport, LA
Latitude: 32.6304540 Longitude: -93.8205060

To:
From: Bryant Smalley, OSC
Date: 9/5/2013
Reporting Period: 12/1/2012 - 9/3/2013

1. Introduction

1.1 Background

Site Number:	V6NM	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	Removal Assessment
NPL Status:	Non NPL	Operable Unit:	
Mobilization Date:		Start Date:	8/31/2012
Demob Date:		Completion Date:	9/3/2013
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E12625	Reimbursable Account #:	

1.1.1 Incident Category

Assessment, potential removal of a tank battery and plugging and abandonment (P&A) of the orphaned well.

1.1.2 Site Description

The facility consists of a tank battery with one 200 barrel oil tank, an oil/water separator and a produced water tank, and an orphaned production well, identified as the Oden 001; (SN 990180).

1.1.2.1 Location

The facility is located in a rural area on the East side of Hwy 71, approximately 3 miles North of State Route 538, North of Shreveport, Caddo Parish, LA, in the Caddo Pines Island Field. Section 20, Township 19N, Range 14W.

Lat: 32.6304N Long: -93.820636W

1.1.2.2 Description of Threat

The well is unsecured and reportedly leaking oil. The oil tank is partially full and secondary containment is circumvented due to open drain pipes through the containment wall. Drainage from the facility will travel South approximately 75 yards into an unnamed creek; thence to the Southwest approximately .5 miles to a perennial drainage channel; thence to Twelvemile Bayou.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

Due to the unsecured condition of the wellhead, it appears that rainwater is entering the wellhead and displacing the oil, causing the oil to overflow and spill on to the ground. Additionally, the tanks in the tank battery are in degraded condition and currently have no actual secondary containment. An actual and substantial threat of discharge was determined to exist by the Federal On-scene Coordinator (FOSC). Catastrophic failure of the oil tank is possible and discharge of oil from the wellhead into site drainage appears imminent. As a result, the drainage channel and Twelvemile Bayou would be impacted if action is not taken to mitigate this threat.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

On August 3, 2012, Louisiana Department of Natural Resources (LDNR), Office of Conservation, referred this leaking orphaned well to the Environmental Protection Agency (EPA) Region 6, to be considered for Oil Pollution Act (OPA) response actions.

2.1.2 Response Actions to Date

On October 3, 2012, EPA and EPA's technical contractor (START) visit the site with LDNR Agent, William Sniffen to conduct a more comprehensive assessment. The assessment confirmed the well is definitely leaking oil and the Tank Battery is in poor condition.

After EPA notified the Responsible Party, Mr. Lee A. Green, Jr. - of Three "N" One Production, Inc., expressed an interest in doing the Removal and P&A himself and has filed the appropriate paperwork with LDNR to obtain a work permit. LDNR and EPA agreed to give Mr. Green until March 18, 2013, to commence P&A operations.

With site preparation conducted (disconnecting electric lines and moving the pump jack), on March 20, 2013, Arch Henderson (P&A contractor) mobilized to the Three "N" One facility to commence plugging and abandonment (P&A) of well SN 990180 and to conduct removal of the tank battery and its contents. The well P&A and removal activities were conducted under the supervision of LDNR CES Sniffen.

From March 20-21, 2013, Mr. Henderson conducted the well plugging and well site restoration. On 21 March 2013, Mr. Henderson completed plugging the well following the P&A procedure outlined within the Work Permit and restored the well site. During the well P&A and tank battery removal actions, CES Sniffen completed daily narrative reports describing the on-site activities, which is included in the document page at www.epaosc.org/Three_N_OneProduction.

On March 22, 2013, the contents of the on-site vessels were removed and with LDNR approval, the oil was used for lease road improvement on a nearby lease.

On March 27, 2013, Mr. Henderson removed a portion of the facility component that included the well head, pumping unit, and associated flow lines.

Between April 9, 2013 and May 14, 2013, Three "N" One removed the facility storage tanks, process vessel and other equipment on-site. By May 14, 2013, the only remaining equipment on the site was power lines & poles and the concrete foundations for the old Pumping unit. The OSC has worked with the RP and LDNR to get the remaining items removed from the site. The RP has contracted a company to bury the remaining concrete and is awaiting the power company to disconnect the power to remove the lines and poles. Since the remaining items hold no threat to Waters of the US, and LDNR has requirements to assure these are removed, the OSC is Finalizing EPAs site activities.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA has conducted an RP research at the Caddo Parish courthouse and sent Notices of Federal Interest (NOFIs) to the potential Responsible Parties. According to LDNR information, the last known Owner/Operator was Three "N" One Production. Due to unclear information uncovered in the Title search, NOFIs were sent to Nadel & Gussman-Jetta Operating, Franks Farms, LLC, and Three "N" One Production, Inc. All three Parties responded to the NOFIs and after review of the provided information, Three "N" One Production, Inc. was identified as the RP. Mr. Lee A. Green, Jr., of Three "N" One Production, Inc., expressed an interest in doing the Removal and P&A himself and has filed the appropriate paperwork with LDNR to obtain a work permit.

2.1.4 Progress Metrics

Remaining tank content (Oil/Sediment and water) were removed and with LDNR approval, was used for lease road improvement on a nearby lease.

2.2 Planning Section

2.2.1 Anticipated Activities

No further activities anticipated by EPA. The RP has committed to make sure the power lines, poles and concrete are removed. Oversight turned over to LDNR.

2.2.1.1 Planned Response Activities

Non Known.

2.2.1.2 Next Steps

Non Known.

2.2.2 Issues

Non Known.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

No information available at this time.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

3.1 Unified Command

3.2 Cooperating Agencies

Louisiana Department of Natural Resources (LDNR)

4. Personnel On Site

No information available at this time.

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

www.epaosc.org/Three_N_OneProduction

6.2 Reporting Schedule

N/A

7. Situational Reference Materials

No information available at this time.