

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Well 17-3226 - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region III

Subject: POLREP #4
Progress of Removal Action
Well 17-3226
Z3MH
near Market, WV
Latitude: 39.1920000 Longitude: -80.6952000

To: Jerry Heston, US EPA R3
Response Center RRC, EPA
USCG NPFC, USCG
David Gilbert, WVDEP
John Hahn, USCG

From: Michael Towle, On-Scene Coordinator

Date: 3/31/2014

Reporting Period: thru 3/27/2014

1. Introduction

1.1 Background

Site Number:	Z3MH	Contract Number:	
D.O. Number:		Action Memo Date:	
Response Authority:	OPA	Response Type:	Emergency
Response Lead:	EPA	Incident Category:	
NPL Status:		Operable Unit:	
Mobilization Date:		Start Date:	3/6/2014
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	#09-5295(A)
FPN#:	E14306	Reimbursable Account #:	

1.1.1 Incident Category

This incident is a medium discharge of oil from a deep well into the navigable waters of the United States.

1.1.2 Site Description

The Site is the location of a deep well (API #17-3226) from which WVDEP estimates approximately 25 barrels of oil has discharged. The oil pooled and then ran overland then through a small tributary into the flowing waters of Toms Fork. The discharge has resulted in oil and oily sheen several miles in length.

1.1.2.1 Location

The Site is located near Market in rural Doddridge County, West Virginia. The oil flowed overland into a small tributary and then into and along Toms Fork. The oil sheen was reportedly stopped before reaching Meathouse Fork a tributary of Middle Island Creek.

1.1.2.2 Description of Threat

The discharge resulted in oily sheen upon the flowing waters of Toms Fork which is tributary to Meathouse Fork and Middle Island Creek. Middle Island Creek is a water source and a tributary of the Ohio River. The oil discharge is approximated to exceed 1000 gallons by WVDEP inspectors on-scene making this a medium-sized discharge. The discharge is upon the navigable waters of the United States and is several miles in length. After considering the information offered by the WVDEP Inspectors and examining pictures of the discharge, the OSC concluded that the Site has discharged and poses substantial threat to the navigable waters. EPA contractor resources further verified this information on 3/7/14.

1.1.2.3 Preliminary Removal Assessment/Removal Site Inspection Results

The OSC relied upon the on-scene information provided by WVDEP oil and gas inspectors who did respond to the discharge. The well discharged oil from wellhead piping which then ran overland, entered a small tributary of Toms Fork, and then entered the flowing waters of Toms Fork. Toms Fork flows to Meathouse

Fork, but demonstrable oil was not found on Meathouse Fork on 3/7/14. It does appear that accumulations of biological material were identified on Meathouse Fork and may have been mistaken for oil. Meathouse Fork flows into Middle Island Creek near Smithburg. State and Local Responders were able to place boom ahead of the oil to reportedly prevent oil in Toms Fork from entering Meathouse Fork.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

At approximately 1430 hours Local Responders began to identify an oil discharge into tributaries of Middle Island Creek. Fire and Law Enforcement officials responded. Doddridge County 911 notified the WV Spill Line at approximately 1500 hours about an approximate 2 BBL Spill into the tributary waters of Middle Island Creek. WVDEP Inspectors responded. At 1630 hours, the OSC contacted the OSC and notified the OSC that the source of the oil discharge had been traced to a deep gas well presently unattended by an owner. The oil had flowed down Toms Fork toward Middle Island Creek covering a distance of at least 3 to 4 miles (more stream miles).

The OSC and WVDEP Inspector Gilbert discussed appropriate response actions to prevent further migration of oil, stop the source of the oil discharge and to remove oil from the waters. The OSC and WVDEP also discussed the necessity of searching for a Responsible Party. The OSC was requested to provide assistance. The OSC and WVDEP discussed the appropriate response actions and the OSC requested WVDEP to implement those actions.

The OSC agreed upon the substantial threat and on 3/6/2014 obtained a FPN (E14306) and a project ceiling of \$50,000.

At 2100 hrs. 3/6/2014, the OSC and WVDEP again discussed actions. Skirt boom was placed before the confluence of Meathouse Fork and Toms Fork to prevent oil from entering Meathouse Fork. The source of the oil, a split in the piping, was stopped by operating certain valves on the piping attached to the well. The owner of the well was identified, but could not be located. The State is not sure at this time if the owner can be reached or can be capable of completing actions. The OSC requested that actions continue towards removal of oil from the affected water.

On 3/7/14, the OSC mobilized an EPA contractor (START contractor Techlaw) to the scene to document site conditions. The START contractor reported that oil migrated from the wellhead overland to enter a small tributary to Toms Fork. An underflow dam was constructed in the tributary. Several strings of boom were placed along Toms Fork to collect oil.

According to discussions with WVDEP, cleanup operations involved the removal of oil using leafblowers, absorbent pads, and a vacuum truck. Operations also involved excavation of a trench to collect oil migrating from the well.

Importantly, the EPA contractor reported that it did appear that oil had not ultimately migrated onto Meathouse Fork as originally thought.

2.1.2 Response Actions to Date

Local Responders and the WVDEP responded to this incident. The WVDEP also engaged contractors to assist in the cleanup efforts. The source of the discharge was stopped by operating certain valves on the discharging well. Responders also arranged for the placement of skirt boom and absorbent boom at various points in the watercourse to facilitate removal and to prevent the migration of oil.

The OSC obtained FPN E14306 and an initial ceiling of \$50,000. The OSC will continue to coordinate with WVDEP to identify a Responsible Party to voluntarily or otherwise continue to conduct cleanup actions. Meanwhile the OSC and WVDEP will continue to coordinate on the ongoing oil removal operations.

A trench was excavated near the well to intercept oil flowing overland towards a small tributary to Toms Fork.

An underflow dam was constructed in the small tributary to Toms Fork.

Absorbent boom and skirted boom were placed into Toms Fork. Leafblowers were used to herd oil.

A vacuum truck and absorbent materials were used to remove oil from the Site. Cold weather made the oil difficult to vacuum.

On March 10, 2014, the OSC and WVDEP discussed the need for continuing actions. WVDEP reported that a Responsible Party had not come forward to voluntarily conduct cleanup actions. The EPA OSC was requested to assist in the conduct of continued response actions. On 3/11/2014, the OSC contacted USCG NPFC and requested a ceiling increase in the FPN to a level of \$158,000. Included was a request to obligate funding through the Pollution Removal Funding Authorization (PRFA) with WVDEP to a level of \$120,000. Such funding would allow for the continuance of oil removal activities.

On March 11, 2014, contractors completed access to the well location enabling removal of heavily oiled soil. The oiled soil was placed into roll off containers and transported from the Site for treatment elsewhere. The soil removal allowed for the reduction of oil moving towards and into the tributary of Toms Fork and towards the underflow dam placed into the tributary. Free oil was herded and absorbed.

On March 13, 2014, the EPA START contractor again observed the Site conditions and reported to the OSC. Oil was still observed on Toms Fork behind booms strung across the stream. Oil was lodged in

vegetation along the course of Toms Fork. Oil also continued to migrate (albeit significantly reduced due to soil removal) into the small tributary of Toms Fork. The WVDEP will continue to direct contractor resources to remove oil from the waterway.

On March 26, 2014, the status of the cleanup was observed by the OSC. Oil continued to migrate along the small tributary to Toms Fork. The oil was within the vegetation along the bank of the tributary and was also observable in areas of slack water within the tributary. The underflow dam had been removed. The OSC and WVDEP placed absorbent boom at the point where the tributary flows beneath Route 18 before entering Toms Fork. The OSC observed only small amounts of oil on the swift flowing Toms Fork and none was observed within about 20 feet of the confluence of Toms Fork and the small tributary which drains the well site.

Oiled soil is still being treated at an off-site location.

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

The owner of the discharging well has been identified but not yet located. Initial information indicates that the owner is not local to the well.

The record owner of the well is deceased. The WVDEP received information inclusive of a telephone number for a relative of the deceased owner. The WVDEP requested the individual to conduct cleanup actions. The individual was placed in contact with the cleanup contractors on the scene. No agreement was reached.

With additional investigation, the OSC and WVDEP have identified records to indicate that the well continued to be operated to produce gas after the death of the record owner. Additionally, the deceased owner willed the property to other living individuals. The OSC sent Legal Notice to the individual which signed a well inspection form in 2012 at the address of the well location. Since the individual is believed to be a relative, the OSC is expecting the letter to be forwarded. The OSC also sent a Legal Notice to the individual acting with Power of Attorney for the individual to which the property was willed.

On March 27, 2014, the OSC was notified by the WVDEP that the probable Responsible Party indeed received Legal Notice. At this time the OSC continues to try and determine the Responsible Party.

2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

2.2 Planning Section

2.2.1 Anticipated Activities

Complete removal of oil from the tributary to Toms Fork.

Prevent oil from entering Toms Fork.

Identify Responsible Party to conduct / continue / complete oil removal actions.

Assure source well does not further discharge.

2.2.1.1 Planned Response Activities

2.2.1.2 Next Steps

Continue to coordinate with WVDEP, complete assessment of the source, identify Responsible Party, determine proper party to continue / complete removal actions.

2.2.2 Issues

The OSC has obtained RP information, but is not yet able to definitively determine the owner / operator of the well. The record owner / operator is deceased in 2009, but the well continued to operate beyond that date. The OSC is trying to verify an operator or owner.

2.3 Logistics Section

No information available at this time.

2.4 Finance Section

2.4.1 Narrative

The OSC, through CANAPs, obtained an FPN (E14306) and a ceiling of \$50,000 on 3/6/2014. The OSC requested an obligation of \$38,000 to a PRFA with the WVDEP to conduct removal activities.

On 3/11/2104, the OSC, through the USCG NPFC Case Officer, obtained a ceiling increase for the FPN to \$158,000. Additionally, \$120,000 was to be obligated to the PRFA.

At this time, the WVDEP is conducting activities pursuant to a PRFA.

2.5 Other Command Staff

No information available at this time.

3. Participating Entities

No information available at this time.

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

No information available at this time.

7. Situational Reference Materials

For more information visit www.epaosc.org/well173226

POLREP #4 Last Updated 6/4/2014