

U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
(E10607) United Production Tank Battery - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region VI

Subject: POLREP #2
Progress
(E10607) United Production Tank Battery
V6KD
Lockport, LA
Latitude: 29.5992000 Longitude: -90.4531500

To:
From: Paige Delgado, OSC
Date: 7/11/2015
Reporting Period: April to September, 2015

1. Introduction

1.1 Background

Site Number:	V6KD	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:	4/1/2015
Demob Date:		Completion Date:	
CERCLIS ID:		RCRIS ID:	
ERNS No.:		State Notification:	
FPN#:	E10607	Reimbursable Account #:	

1.1.1 Incident Category

Orphaned Oil Production Facility

1.1.2 Site Description

The United Production Tank Battery Site is an orphaned oil production facility (United Facility) associated with the Warren Harang ET AL gas wells #002 and 003 (LDNR Well Serial Numbers 212993 and 213022, respectively). The facility consists of one 210 barrel (bbls) above-ground storage tank (AST), two separators, and one glycol dehydrator located within an inadequate secondary containment area. These surface components of this facility contain approximately 169 bbls of oil, oil emulsion, and oily produced water. Based on information provided by the Louisiana Department of Natural Resources (LDNR), the facility and associated wells have been in Orphan Status since March 2008.

1.1.2.1 Location

The site is located approximately 4.3 miles northwest of Larose, Louisiana. Furthermore, the facility is located within the Valentine Oil and Gas Field (LDNR Field ID: 9096) at Latitude 29.59894° North/ Longitude 90.45314° West in Section 06 of Township 17 South, Range 20 East, Lafourche Parish, Louisiana. The site is accessible from the south by an access road that is off of LA Hwy 308.

1.1.2.2 Description of Threat

Drainage from the site flows north approximately 50 feet into an unnamed tributary of Bayou Lafourche then to Bayou Lafourche, which is navigable waters.

In April 2015, a substantial threat of discharge was determined to exist at the United Facility by Federal On-Scene Coordination (FOSC) Paige Delgado.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

In December 2009 and January 2010, EPA and its technical contractor conducted a preliminary removal assessment and removal site inspection of the United Facility. The facility was found to contain a significant quantity of oil stored in containers within a secondary containment area that were both deemed inadequate. During this time, FOSC Chris Ruhl determined that the facility did have deficiencies, but it did not meet the substantial threat criteria during this time.

In April 2015, FOSC Delgado conducted a follow-up removal site inspection. The facility remained in an inactive orphaned status and in a deteriorating condition.

Based on the quantity of oil present, the abandonment status, and current condition of the facility, as well as the distance to navigable waters of the US, FOSC Delgado determined the United Facility had potential to release a harmful quantity of oil, within the meaning of Section 311 (b)(3) of the Clean Water Act, 33 U.S.C. § 1321(b)(3), and 40 CFR § 110.3(b), into the site drainage and ultimately into Bayou Lafourche, and therefore met the substantial threat criteria required for removal action.

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

Following the threat determination made by OSC Delgado, EPA took response actions in preparation to potentially conduct removal activities at the orphaned production facility in order to mitigate the actual or substantial threat of release of oil into navigable waters of the US. The response actions included: well history, potential responsible party (RP), and landowner research; issue of Notices of Federal Interest (NOFIs) to identified potential RPs; and acquired consent for access to property

2.1.2 Response Actions to Date

In December 2009, EPA FOSC Chris Ruhl visited the United Facility determined from his reconnaissance that the facility posed a threat of release, thereby prompting a site assessment.

In January 2010, EPA utilized their START contractor to conduct a site assessment. After review of site assessment data, FOSC Ruhl determined that the facility does have deficiencies, but does not meet the EPA Region 6 substantial threat criteria and no further action at the facility and will refer the site back to LDNR.

In April 2015, FOSC Delgado conducted a follow-up removal site inspection of the facility, at the request of LDNR. Based on site observations that included inadequate secondary containment overgrown with vegetation and eroded berms; deteriorating condition of AST; inactive and abandoned status of the facility; and the facility's relative location to navigable water of the US, OSC Delgado determined that the facility met the substantial threat criteria required for removal action.

On 26 June and 1 July 2015, EPA issued 7 NOFIs via certified mail to the last operator of record. The last operator of record was discovered through potential RP research conducted by reviewing LDNR Lafourche Parish Clerk of Court records.

On 9 July 2015, EPA was granted consent for access to property as a result of information gathered from the Tax Assessor's office and coordination with property owner.

By September 2015, none of the NOFIs issued via certified mail on 26 June and 1 July 2015 were delivered to the last operator of record. Based on the threat posed by the abandoned facility; the unresponsiveness of the same operator for another abandoned facility where EPA conducted a removal action under FPN E09617; and the lack of response to these NOFIs, EPA determined a RP-lead clean-up would not be conducted in a timely manner and an emergency removal action was warranted to remove the threat of the discharge of oil into a navigable waterway.

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

LDNR and Lafourche Clerk of Court records indicated the United Facility and its associated wells were last operated by United Production Company (LDNR Organization ID U028). EPA issued 7 NOFIs to representatives and business addresses identified during the potential RP research. As of 01 September 2015, none of the NOFIs were delivered. Of the seven NOFIs issued via certified mail, three were unable to be delivered and returned; three were returned because they were never picked-up and exceeded maximum holding time at the post office; and status of one is unknown, but believed to be lost and undelivered.

2.2 Planning Section

2.2.1 Anticipated Activities

Since a viable RP was not found, EPA plans to conduct a removal actions at the United Facility in order to remove the threat posed by the facility in a timely manner.

2.2.1.1 Planned Response Activities

During May 2016, plans to complete the removal at the United Facility. The removal will include the removal and disposal of the liquids inside the storage tanks as well as the tanks themselves.

2.2.1.2 Next Steps

- Coordinate removal action with technical and removal contractors.
- Notify LDNR and land owner planned action and schedule.
- Commence and complete removal action.

2.2.2 Issues

None at this time.

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

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

No information available at this time.