

**United States Environmental Protection Agency  
Region VI  
POLLUTION REPORT**

**Date:** Tuesday, May 9, 2006

**From:** Wally Cooper

**To:** Wally Cooper, 6SF-RO R6 PolRep LA, Response and Prevention Branch  
R6 PolRep OPA, Response and Prevention Branch Lamonica Collins, USEPA  
USCG NPFC, USCG - NPFC

**Subject:** (FPN E05625) Jackson Well Service - Underwood A  
Oil City, LA  
Latitude: 32.7271343  
Longitude: -93.9432880

<b>POLREP No.:</b>	3	<b>Site #:</b>	N/A
<b>Reporting Period:</b>		<b>D.O. #:</b>	N/A
<b>Start Date:</b>	12/1/2004	<b>Response Authority:</b>	OPA
<b>Mob Date:</b>		<b>Response Type:</b>	
<b>Demob Date:</b>		<b>NPL Status:</b>	Non NPL
<b>Completion Date:</b>		<b>Incident Category:</b>	Removal Assessment
<b>CERCLIS ID #:</b>	N/A	<b>Contract #</b>	
<b>RCRIS ID #:</b>		<b>Reimbursable Account #</b>	
<b>FPN#</b>	E05625		

#### Site Description

##### Site Location

The Jackson Well Service - Underwood A abandoned oil production facility (EPA ID 09-E-1129) was referred to the United States Environmental Protection Agency (EPA) on February 9, 2005, by the State of Louisiana to be considered for Oil Pollution Act (OPA) response actions. This facility is located in Caddo Pine Island Oil and Gas Field (Field ID 2152), approximately 2.25 miles southeast of Oil City in Section 017, Township 20 North, Range 15 West, of Caddo Parish, Louisiana, at Latitude 32.7266666 North and Longitude 93.942694 West. The facility is accessed from the northwest via an unnamed dirt oilfield access road. There are no security features restricting access to the facility.

##### Site Description

The facility consisted of seven above ground storage tanks (AST), two secondary containment areas (CONT), one oil-impacted area (OA), and seven production wells. See POLREP 2 for a detailed description of the facility.

#### Current Activities

On June 9, 2005, EPA Federal On-Scene Coordinator (FOSC), Wally Cooper, and the United States Army Corps of Engineers (USACE) FOSC-Representative (FOSC-R) conducted a reconnaissance of the facility to determine if the facility has the potential to release a harmful quantity of oil, within the meaning of Section 311 (b)(3) of the Clean Water Act (CWA), 33 United States Code (U.S.C.) § 1321(b)(3), and 40 Code of Federal Regulations (CFR) § 110.3(b), into the waters of the United States. An access agreement was signed by the landowner on May 19, 2005.

During the site visit, the FOSC noted fresh oil on the ground, which indicated recent oily discharge from one or more of the containers.

Drainage from the facility flows east into an unnamed tributary of Caddo Lake that is part of the National Hydrology Dataset (NHD). The tributary of Caddo Lake is contiguous with, hydrologically connected to, and a primary tributary of Caddo Lake. Caddo Lake is navigable "in fact" and subject to interstate commerce. The Caddo Lake Lieberman Plant raw surface water intake is located approximately 2.75 miles downstream of the facility (See. Site Drainage Map attached at the website for this facility).

The condition of all the containers was deemed to be inadequate due to rust, corrosion, and delaminating of metal, predominantly around the base of each tank. AST1 was actively discharging its oily contents to

the environment via seeps at the valves and base. Oil-stained soil surrounding AST1, AST3, and AST4 indicated prior releases. CONT1 and CONT2 were both breached significantly, reducing the capacity of the basins and allowing the contents to drain into adjacent waterways. Volume of the containment appeared to be inadequate to the FOSC (See. attached photographs at the website for this facility).

The FOSC has determined that a failure of the storage and process components through corrosion, vandalism or force majeure has a high potential to release a harmful quantity of oil, within the meaning of Section 311 (b)(3) of the CWA, 33 U.S.C. § 1321(b)(3), and 40 CFR § 110.3(b), into the site drainage and Caddo Lake.

The EPA Region 6 FOSC has determined from his reconnaissance that this facility meets the revised Region 6 substantial threat criteria.

### **Next Steps**

The Site Assessment (SA) and Enforcement Summary reports obtained legally defensible field data that objectively quantifies and verifies the findings of substantial threat by the FOSC, and the enforcement/administrative support necessary to build the administrative record and a cost recovery case for the site. These actions are consistent with the criteria found in the U.S.C.G. National Pollution Fund Center (NPFC) Users Guide, July 2002.

POLREP No. 4 will advise of any potential responsible party (PRP) response or actions in response to the Notice of Federal Interest (NOFI), and the EPA FOSC intentions for this abandoned facility.

If necessary, a Removal Project Plan (RPP) will be submitted to detail the planned corrective actions to address the substantial threat of discharge of oil to the navigable waters of the United States, as defined in Section 311(a)(2) of Federal Waters Pollution Control Act (FWPCA), U.S.C. § 1321, 40 CFR Part 110.1 and Section 1001(7) of OPA, 33 U.S.C. § 2701(7), and 33 CFR 154.120, that is posed by this facility, as determined by the standard EPA threat analysis protocols, which are consistent with the criteria for determination of a substantial threat of discharge found in the U.S.C.G. NPFC Users Guide, July 2002.

### **Key Issues**

#### **Enforcement**

The last Operator of Record/ PRP has been identified through the file maintained by the Louisiana Department of Natural Resources (LDNR), Office of Conservation as: Jackson Well Service (Operator Code 2953). The wells identified in the assessment report as being associated with this facility, specifically the: Underwood A Well No. 001 (SN 052317), Underwood A Well No. 002 (SN 052991), Underwood A Well No. 003 (SN 053779), Underwood A Well No. 004 (SN 055015), Underwood A Well No. 005 (SN 054781), Underwood A Well No. 006 (SN 055016), and Underwood A Well No. 007 (SN 054780), were reported by LDNR as last operated by this operator. All previous enforcement efforts by LDNR have produced no timely or technically appropriate responsible party actions, as evident by the current conditions at the facility. LDNR records indicate these wells have been orphaned.

A deed and title search was conducted to identify any other PRPs. All identified PRPs will be sent a NOFI.

The EPA FOSC will formally offer the PRPs the opportunity to conduct the necessary mitigation actions to abate any potential sources of release at the site through issuance of a NOFI. If the PRP declines to participate, or fails to initiate a timely response to the notice, EPA plans to proceed with an Oil Spill Liability Trust Fund (OSLTF) financed cleanup action. The NOFI will clearly advise the PRP they may be subsequently held liable for the cost of government funded cleanup actions.

#### **Attachments**

- USGS National Hydrography Data Set (NHD) Drainage Map (documents box on website)
- FOSC Minimum Threshold Requirement Checklist for E05625 (documents box on the website)

All of the attachments are available on the epaossc.net website as uploaded documents.

[response.epa.gov/E05625](https://response.epa.gov/E05625)