

ADEQ

ARKANSAS
Department of Environmental Quality

September 9, 2013

Frank Patton
Capstone Oilfield Disposal of Arkansas, Inc.
PO Box 698
Hennessey, OK 72742-0698

RE: Bohannon No. 4 SWD System AFIN: 66-00602 Permit No.: 0745-WG-SW-1

Dear Mr. Patton:

On August 23, 2013, I performed a compliance inspection of the waste treatment and disposal facility. The inspection was performed in accordance with the provisions of the Arkansas Water and Air Pollution Control Act and the regulations promulgated thereunder. The site was in compliance at the time of the inspection.

Also noted during my inspection is that the facility is exposed to stormwater. Please submit a full description of your process in detail (day to day operation) to the Water Division Inspection Branch of this Department. This response should be mailed to the address at the bottom of this letter or e-mailed to Water-Inspection-report@adeq.state.ar.us. This written process description is due by **September 23, 2013**. After review of the submitted information, the Department will determine if additional permits are required for your facility.

If I can be of any assistance, please contact me at 479-424-0331 or via email at Coats@adeq.state.ar.us.

Sincerely,



Angela Coats
Inspector
Water Division

cc: Water Division Permits Branch

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
NO DISCHARGE INDUSTRIAL PERMIT INSPECTION FORM

AFIN: 66-00602 Log No.: _____
Permit No.: 0745-WG-SW-1 Inspection Date: August 23, 2013
Media: Water Inspector: Angela Coats

Compliance Status: IN / OUT

1A. Name of Facility: Bohannon No. 4 Commercial SWD System –
Capstone Oilfield Disposal of Arkansas, LLC
Address: Hwy 59 South, near Arkansas River
County: Crawford

2A. Name of On-Site Representative: David Moore

3A. Name of Responsible Official: Tom and Randy Holder, Owners
PO Box 698
Address: Hennessey, OK 772742-0698 Telephone: (405) 853-7170

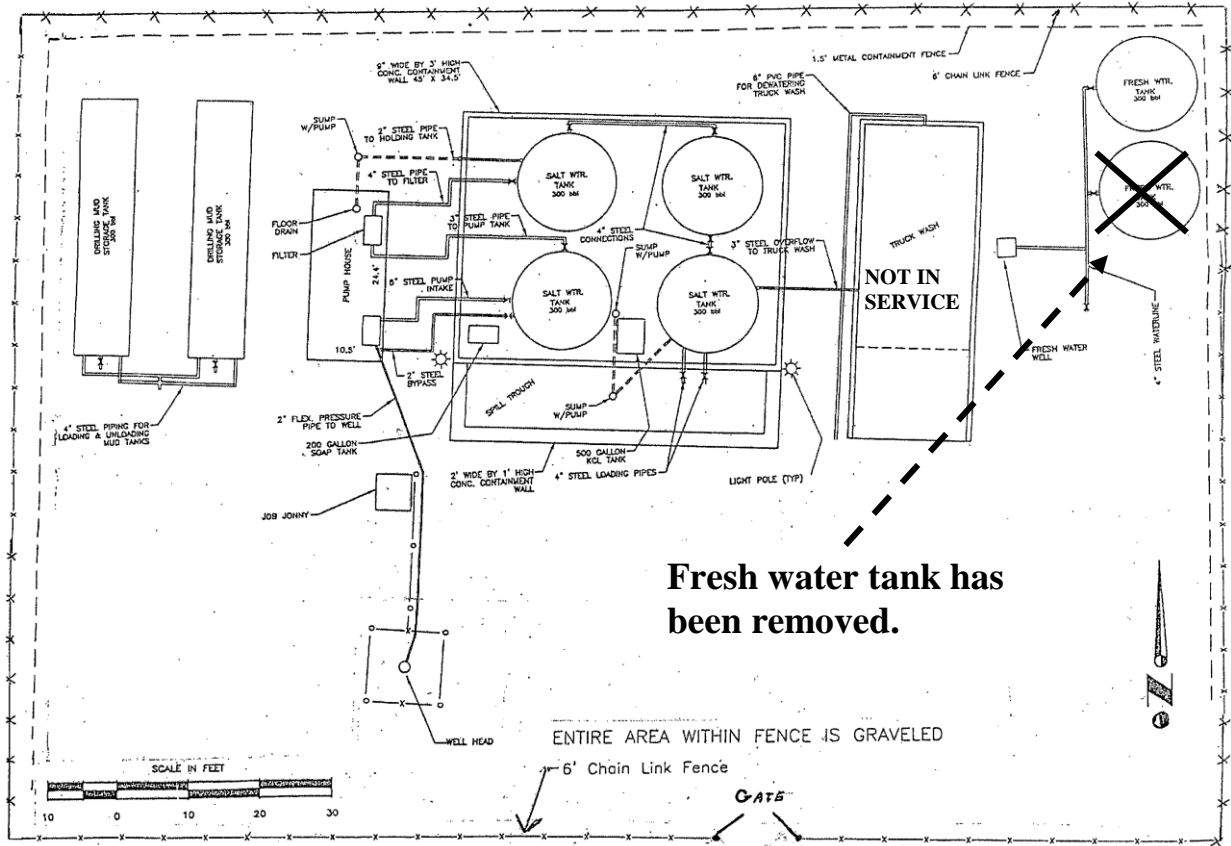
4A. Parent Company: N/A
Address: N/A Telephone: N/A

5A. Description of Process (including type of industry, materials produced, and major by-products): Injection well for waste fluids generated during natural gas drilling and production activities.

6A. Any complaints registered against this permitted facility? Yes No
If yes, give date and description of complaint: _____

7A. Are there any additions, modifications, or corrections to the facility since the last inspection? Yes No

1B. Furnish a simplified flow diagram of the treatment system and include main components, flow sequence through plant, and calculated or estimated flows.



2B. Nearest Stream: Arkansas River

3B. Does wastewater from this facility cause adverse effect on the waters of the State:

Yes No

If yes, describe: _____

4B. Are operating records kept as required by permit? Yes No N/A

If no, explain: Inspection records were kept on-site.

5B. Are maintenance records kept as required by permit? Yes No N/A

If no, explain: _____

6B. Are Samples routinely taken? Yes No N/A

7B. Does the sampling program meet the requirements of the permit?

Yes No N/A

If no, explain: _____

8B. What laboratory does the facility use? NA

Address: NA Telephone: NA

1C. Do laboratory procedures and records meet the requirements of the permit?
 Yes No N/A

If no, explain: _____

2C. Is contaminated runoff a problem? Yes No N/A
If yes, explain: **None observed at time of inspection.**

3C. Is sludge disposal required? Yes No N/A
If yes, describe (including final destination): _____

4C. Is the treatment system being properly operated and maintained as required by permit?
 Yes No N/A
If no, explain _____

SUMMARY OF FINDINGS/COMMENTS

A minor spill was observed by the pump house. According to Mr. Moore, the spill was a soap solution. He stated that the spill would be cleaned up that afternoon.

Bohannon #1 instead of #4 is shown on the identification sign due to a naming system difference with the Arkansas Oil and Gas Commission.

PDS #073425

Inspector Signature:

Angela Coats

Date of Report:

August 28, 2013

Signature of Reviewer:



Date of Review: 8/28/13

Water Division No Discharge Industrial Photographic Evidence Sheet

Location: Hwy 59 South, south of Van Buren near the Arkansas River in Crawford County

Photographer: Angela Coats **Witness:** None

Photo # 1 **Of** 3 **Date:** 8/23/2013 **Time:** 1026

Description: Injection well identification sign. Bohannon #1 is shown due to the Arkansas Oil and Gas Commission naming system.



Photographer: Angela Coats **Witness:** None

Photo # 2 **Of** 3 **Date:** 8/23/2013 **Time:** 1028

Description: Minor spill. According to Mr. Moore, the spill is a soap solution.



Water Division No Discharge Industrial Photographic Evidence Sheet

Location:	Hwy 59 South, south of Van Buren near the Arkansas River in Crawford County						
Photographer:	Angela Coats			Witness:	None		
Photo #	3	Of	3	Date:	8/23/2013	Time:	1037
Description:	Overview of facility.						



Oil & Gas Violation Summary Sheet

- No Violations Noted
- Placing Waste
- Permitting Issues
- Spills & Leaks
- Turbidity, Sedimentation, etc. (Regulation #2 Violations)
- Stormwater &/or Erosion Issues
- Notification/Reporting Violations
- Unpermitted Discharges
- Record Keeping/Paperwork Violations
- Trash/Unauthorized Fluids in Pits
- Improper Closure of Pit
- Insufficient Freeboard
- Poor Pit Construction
- Other (Describe):

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A R K A N S A S
Department of Environmental Quality

November 19, 2013

Frank Patton
Capstone Oilfield Disposal of Arkansas, Inc.
PO Box 698
Hennessey, OK 72742-0698


**RE: Response Letter to ADEQ Inspection (Crawford Co);
ADEQ Reference #: 0745-WG-SW-1; AFIN: 66-00602**

Dear Mr. Patton:

The Water Division Permits Branch has reviewed your response pertaining to my August 23, 2013 inspection of your disposal facility. It has been determined your facility will need coverage under the Industrial Stormwater General Permit. Please provide the ADEQ Water Division Inspection Branch with a Notice of Intent (NOI) for the Industrial Stormwater General Permit, ARR000000. Please provide the NOI no later than **December 3, 2013**.

Thank you for your attention to this matter. If you have questions pertaining to the NOI, please contact Jamal Solaimanian, Engineer Supervisor, at 501-682-0620 or Jamal@adeq.state.ar.us. Should you have any questions regarding my inspection, feel free to contact me at 479-424-0331 or you may e-mail me at Coats@adeq.state.ar.us.

Sincerely,



Angela Coats
Oil & Gas Field Inspector
Water Division

cc: Water Division Permits Branch

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A R K A N S A S
Department of Environmental Quality

January 28, 2014

Frank Patton
Capstone Oilfield Disposal of Arkansas, Inc.
PO Box 698
Hennessey, OK 72742-0698

**RE: Response Letter to ADEQ Inspection (Crawford Co);
Permit #: 0745-WG-SW-1; AFIN: 66-00602**

Dear Mr. Patton:

The Permits Branch has reviewed your response pertaining to my August 23, 2013, inspection of your disposal facility. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-424-0331 or you may e-mail me at Coats@adeq.state.ar.us.

Sincerely,



Angela Coats
Oil & Gas Field Inspector
Water Division