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Water Enforcement: Arkansas Department of Energy and Enforcement - Division of Environmental Quality and Columbia County Produced Saltwater Transfer Pipeline Enter into Consent Administrative Order

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The Arkansas Department of Energy and Enforcement - Division of Environmental Quality ("DEQ") and White Rock Oil & Gas, LLC, ("White Rock") entered into an August 25th Consent Administrative Order ("CAO") addressing an alleged violation of the Arkansas statute prohibiting unpermitted water discharges. See LIS No. 22-094.

The CAO provides that White Rock operates the Magnolia Field produced saltwater transfer pipeline ("Facility").

The Arkansas Department of Emergency Management and Nuclear Regulatory Commission are stated to have notified DEQ on May 28, 2019, that White Rock reported a release of approximately 2000 barrels of production saltwater.

DEQ is stated to have subsequently performed a site assessment on June 11, 2019, in response. The assessment allegedly revealed the following violation:

- Approximately 2300 barrels of production saltwater was discharged from White Rock's pipeline near Magnolia. Some of the production saltwater entered an unnamed tributary of the Little Cornie Bayou.

White Rock is not authorized to discharge production saltwater from this Facility to waters of the state.

The CAO provides that the alleged unpermitted discharge was a violation of Ark. Code Ann. § 8-4-217(b)(1)(E).

White Rock, after certain DEQ extensions, submitted an inspection response detailing its response actions, remediation actions, as well as current monitoring actions at the spill site. Such response was submitted on December 8, 2019.

DEQ subsequently deemed the response inadequate and asked White Rock to submit sample data and photographic documentation demonstrating that the cleanup was complete.

White Rock submitted chlorine analysis results on February 24, 2020, and requested an extension to continue with remediation efforts until August 31, 2020. After an extension, DEQ is stated to have received White Rock's response actions, remediation actions, and current monitoring activities at the site on June 22, 2021.

The CAO requires that White Rock continue to implement the June 22, 2021, remediation, sampling, and monitoring activities at the spill site. It is also required to follow:

ADEQ Guidelines for Reporting, Responding to and Remediating Crude Oil Saltwater, and Brine Spills, Revised September 1994.

Quarterly reports are required regarding progress that has been made toward remediating the spill site. Further, once remediation is complete, White Rock is required to submit a final compliance report that includes, but is not limited to, photographic documentation of the cleanup at the spill site and sampling data.

A civil penalty of \$4,800 is assessed which could have been reduced to one-half if the document was signed and returned to DEQ within 20 calendar days of its receipt.

A copy of the CAO can be downloaded [here](#).