UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS TX 75202-2733

May 18, 2016

Kary L. Stackelbeck, Ph.D.
State Archaeologist
Oklahoma Archeological Survey
University of Oklahoma
111 Chesapeake Street
Norman, OK 73019-5111

RE: Wilcox Oil Company Superfund Site and national Historic Preservation Action Section 106

Dear Dr. Stackelbeck:

The Environmental Protection Agency (EPA), Region 6, is conducting remedial investigations on the Wilcox Oil Company Superfund Site located north of Bristow, Creek County, Oklahoma. This area included an abandoned crude oil refinery and associated tank farm that operated from 1915 until 1963 and housed over 80 storage tanks and 10 buildings. After the refinery ceased operations in November of 1963, many buildings were demolished, tanks were sold for scrap, and eventually the property was sold to private landowners. In 2013, due to the former crude oil operations and potential pollutions, the site was listed as a National Priorities List Superfund Site.

The Wilcox Oil Company Superfund project has progressed in several stages since 2013. Since that time, the EPA has coordinated with the US Army Corps of Engineers (USACE), Oklahoma State Historic Preservation Office (SHPO), Oklahoma Archaeological Survey (OAS) and the Muscogee (Creek) Nation Historic and Cultural Preservation Department on the Section 106 consultation process. Between 2015 and 2016 the EPA conducted several on-site visits to include all consulting parties.

In September 2015, the representatives from the Muscogee (Creek) National Historic and Cultural Preservation Department visited the site and stated, "At that time, we were able to discern that there were no traditional cultural properties located within the project area. Due to this, the Muscogee (Creek) Nation Historic and Cultural Preservation Department has no objections to the proposed project and offers their concurrence" (LeeAnne Wendt, personal communication, March 18, 2016).

In March 2016, the EPA, USACE, OAS and SHPO conducted a site visit to ensure compliance measures would be met in accordance with Section 106 of the National Historic Preservation Act. All parties agreed that due to the significant soil contamination associated with the crude oil refinery, that subsurface cultural investigations would not be conducted. Furthermore, the land and surrounding terrain has undergone significant alterations over the last century therefore, the potential for significant intact cultural

resources would be low. In addition, by letter dated September 9, 2015, from the OAS, the area of interest was refined to include and focus on the East Tank Farm area of the site, specifically the eastern portion associated with the drainage. Due to these circumstances, EPA, USACE, OAS and SHPO agreed the most appropriate path forward would be to develop a historic context document to cover the East Tank Farm, including prehistoric and other time periods prior to the operations of these refineries as well as land use changes, disturbances and impacts. The completion of the history review will fulfill the Section 106 compliance requirement.

As part of this multi-step process, an inventory of intact buildings and structures related to the Wilcox Oil Company Superfund Site was compiled. In 2016, all standing structures (with roofs) were recorded and inventoried on separate Oklahoma State Preservation Inventory Forms. Because investigation and remediation efforts will be undertaken in multiple steps over the next several years, the cultural compliance efforts will be completed in stages. The attached report of the standing structures is enclosed for your review and comment, and is the first step in this process.

Ongoing consultation efforts throughout the multiple phases of the project will continue with the OAS, SHPO and Muskogee (Creek) Nation to ensure all Section 106 requirements are met. If you have questions or concerns, please contact me, at 214-665-8143, or via email at coltrain.katrina@epa.gov.

Sincerely,

Katrina Higgins-Coltrain
Remedial Project Manager
LA/NM/OK Section, Superfund Division

Cc:
Ms. Catherine M. Wood, Historical Archaeologist, Oklahoma Historical Society, State Preservation Office, letter copy via email only
Mr. Todd Downham, Project Manager, Oklahoma Department of Environmental Quality, letter copy via email only
Ms. Melvena Heisch, Deputy State Historic Preservation Officer Oklahoma Historical Society State Historic, letter copy via email only
Ms. RaeLynn A. Butler, Tribal Historic Preservation Officer, Muscogee (Creek) Nation, letter copy via email only