



ENVIROTECH

ENGINEERING & CONSULTING, INC.

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August 21th, 2020

State of New Mexico
Energy, Minerals, and Natural Resources Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Re: *Devon Energy Trionyx Containment and Recycling Facility C-147 Extension*

To Whom It May Concern:

On behalf of Devon Energy, ENVIROTECH ENGINEERING & CONSULTING, INC. respectfully submits the enclosed C-147 form and summary of monthly inspections and leak detection for the Trionyx Containment. For original site plans and submittals, please refer to the facility's original registration application, OCD Registration number 2RF-103, received August 6th, 2015. In accordance with NMAC 19.15.34.10 RECYCLING CONTAINMENTS, Devon Energy wishes to seek a one-year extension to the facility.

NMAC 19.15.34.10 RECYCLING CONTAINMENTS

C. Registered recycling containments may be operated for five years from the date on which the registration is filed with the division. The operator may extend the allowed time on an annual basis thereafter with division approval if, 30 days prior to the registration expiration, the operator files a form C-147 with an attached summary showing all monthly inspections at the containment, including the monitoring of the leak detection system, showing the containment's integrity has not been compromised.

Should you have any questions or require additional information, please do not hesitate to contact me at your convenience.

Sincerely,
ENVIROTECH ENGINEERING & CONSULTING, INC.


Jimmy Stallings, P.E.
President

Enclosures

*Updated C-147 Form
Summary of Monthly Inspections and Leak Detection Reports*



020193-00

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources
Department
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-147
Revised April 3, 2017

Recycling Facility and/or Recycling Containment

Type of Facility: ☒ Recycling Facility ☒ Recycling Containment*
Type of action: ☒ Permit ☐ Registration
☐ Modification ☒ Extension
☐ Closure ☐ Other (explain) _____

* At the time C-147 is submitted to the division for a Recycling Containment, a copy shall be provided to the surface owner.

Be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Devon Energy Corporation (For multiple operators attach page with information) OGRID #: 6137
Address: 333 West Sheridan, Oklahoma City, Oklahoma 737102-8260
Facility or well name (include API# if associated with a well): Trionyx Containment and Recycling Facility
OCD Permit Number: 2RF-104 (For new facilities the permit number will be assigned by the district office)
U/L or Qtr/Qtr _____ Section 2 Township 25 South Range 31 East County: Eddy
Surface Owner: ☐ Federal ☒ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☒ **Recycling Facility:**
Location of recycling facility (if applicable): Latitude 32.154854 Longitude -103.741236 NAD83
Proposed Use: ☒ Drilling* ☒ Completion* ☒ Production* ☒ Plugging *
**The re-use of produced water may NOT be used until fresh water zones are cased and cemented*
☐ Other, *requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.*
☒ Fluid Storage
☒ Above ground tanks ☒ Recycling containment ☐ Activity permitted under 19.15.17 NMAC explain type _____
☐ Activity permitted under 19.15.36 NMAC explain type: _____ ☐ Other explain _____
☐ For multiple or additional recycling containments, attach design and location information of each containment
☐ **Closure Report (required within 60 days of closure completion):** ☐ Recycling Facility Closure Completion Date: _____

3.
☒ **Recycling Containment:**
☐ Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)
Center of Recycling Containment (if applicable): Latitude 32.154854 Longitude -103.741236 NAD83
☐ For multiple or additional recycling containments, attach design and location information of each containment
☒ Lined ☒ Liner type: Thickness 30 mil (secondary) 60-mil (primary) ☒ LLDPE ☒ HDPE ☐ PVC ☐ Other _____
☒ String-Reinforced
Liner Seams: ☒ Welded ☒ Factory ☒ Other Field Welds Volume: 393,244 bbl Dimensions: L 400 x W 400 x D 18
☐ Recycling Containment Closure Completion Date: _____

4.

Bonding:

- ☒ Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (These containments are limited to only the wells owned or operated by the owners of the containment.)
- ☐ Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ _____ (work on these facilities cannot commence until bonding amounts are approved)
- ☐ Attach closure cost estimate and documentation on how the closure cost was calculated.

5.

Fencing:

- ☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
- ☒ Alternate. Please specify Chain Link Game Fence

6.

Signs:

- ☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

7.

Variances:

Justifications and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health, and the environment.

Check the below box only if a variance is requested:

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. If a Variance is requested, include the variance information on a separate page and attach it to the C-147 as part of the application.
- If a Variance is requested, it must be approved prior to implementation.**

8.

Siting Criteria for Recycling Containment

Instructions: The applicant must provide attachments that demonstrate compliance for each siting criteria below as part of the application. Potential examples of the siting attachment source material are provided below under each criteria.

General siting

Ground water is less than 50 feet below the bottom of the Recycling Containment.

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☒ No
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

☐ Yes ☒ No
☐ NA

- Written confirmation or verification from the municipality; written approval obtained from the municipality

Within the area overlying a subsurface mine.

☐ Yes ☒ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division

Within an unstable area.

☐ Yes ☒ No

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map

Within a 100-year floodplain. FEMA map

☐ Yes ☒ No

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

☐ Yes ☒ No

- Topographic map; visual inspection (certification) of the proposed site

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☒ No

- Visual inspection (certification) of the proposed site; aerial photo; satellite image

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

☐ Yes ☒ No

- NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site

Within 500 feet of a wetland.

☐ Yes ☒ No

- US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site

9.

Recycling Facility and/or Containment Checklist:

Instructions: Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.

- ☒ Design Plan - based upon the appropriate requirements.
- ☒ Operating and Maintenance Plan - based upon the appropriate requirements.
- ☒ Closure Plan - based upon the appropriate requirements.
- ☒ Site Specific Groundwater Data -
- ☒ Siting Criteria Compliance Demonstrations -
- ☒ Certify that notice of the C-147 (only) has been sent to the surface owner(s)

10.

Operator Application Certification:

I hereby certify that the information and attachments submitted with this application are true, accurate and complete to the best of my knowledge and belief.

Name (Print): Josh Bruening Title: Completions Engineer
 Signature:  Date: 6/17/2020
 e-mail address: josh.bruening@dvn.com Telephone: (405) 552-7882

11.

OCD Representative Signature: Victoria Venegas  Approval Date: 01/28/2021

Title: Environmental Specialist OCD Permit Number: 2RF-103

- ☒ OCD Conditions _____
- ☒ Additional OCD Conditions on Attachment _____

Devon Energy
Trionyx Containment and Recycling Facility
OCD Registration Number 2RF-103

	DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
	10/15/2015					X		Fence repair near entry, need cap for leak detect pipe
	10/18/2015							
	11/3/2015			X				Fluid in leak detection, tested fresh
	12/7/2016	10.0						
	12/9/2015	10.0						minor erosion on berm, fence gate needs lock
	1/10/2016	10.0						aerator hung up on depth pole
	1/18/2016	10.0						
	1/24/2016	3.0						minor erosion on perimeter
	1/26/2016	0.0						
	2/2/2016	0.0						
	2/10/2016	0.0						
	2/15/2016	0.0						
	2/24/2016	0.0						
	3/16/2016	1.0						
	3/24/2016							
	3/30/2016	1.0						
	4/4/2016	1.0						
	4/13/2016	1.0						
	4/20/2016							
	4/28/2016							
	5/4/2016							
	5/13/2016							
	5/17/2016							
	5/24/2016							
	5/31/2016							
	6/2/2016							
	6/8/2016							
	6/14/2016							
	6/22/2016							
	6/29/2016							
	7/7/2016							sandbagged around bottom toe
	7/14/2016							
	7/18/2016							
	7/27/2016							
	8/5/2016							
	8/8/2016							
	8/26/2016	X						no power to SCADA
	8/31/2016							
	9/8/2016							
	9/14/2016							
	9/20/2016							
	9/27/2016							
	10/1/2016							
	10/13/2016							
	10/18/2016							
	10/26/2016							

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	DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
	11/1/2016						X	slight erosion
	11/21/2016						X	slight erosion
	11/28/2016						X	slight erosion
	12/11/2016						X	small erosion
	12/17/2016							
	12/26/2016						X	slight erosion
	1/2/2017						X	small erosion
	1/9/2017						X	slight erosion
	1/16/2017						X	slight erosion on outside slope
	1/23/2017						X	slight erosion
	1/30/2017						X	slight erosion
	2/6/2017						X	slight erosion
	2/13/2017	6.5						
	2/20/2017	6.5						
	2/27/2017	8.5					X	slight erosion
	3/6/2017	8.5						
	3/13/2017	6.5						
	3/20/2017	3.0					X	erosion
	3/27/2017	3.0					X	slight erosion
	4/3/2017	3.0					X	slight erosion
	4/10/2017	3.0					X	slight erosion
	4/17/2017	3.0					X	slight erosion
	4/24/2017	3.0					X	slight erosion
	5/5/2017						X	slight erosion
	5/12/2017	3.5					X	some erosion
	5/19/2017	3.5					X	some erosion
	5/24/2017	3.5					X	some erosion
	6/2/2017	3.0						
	6/9/2017	3.0						
	6/15/2017	3.0						
	6/23/2017	3.5						
	6/30/2017	3.5						
	7/8/2017	4.0						
	7/13/2017	4.0						
	7/13/2017	4.0						
	7/21/2017	4.0						
	7/27/2017	4.0						
	8/4/2017	4.0						
	8/10/2017	4.0						
	8/16/2017	4.0						
	8/24/2017	4.0						
	9/1/2017	4.0						
	9/7/2017	4.0						
	9/15/2017	4.5						
	9/21/2017	4.5						
	9/29/2017	4.5						
	10/6/2017	4.0						

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	DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
	10/12/2017	4.0					X	slight erosion
	10/20/2017	2.0						
	10/26/2017	2.0						
	11/2/2017	2.0						
	11/9/2017	3.0						
	11/16/2017	3.0						
	11/25/2017	3.0						
	12/1/2017	3.0						
	12/8/2017	3.0						
	12/14/2017	1.0						
	12/22/2017	1.0						
	12/30/2017	1.0						
	1/5/2018	1.0						
	1/12/2018	1.0						
	1/19/2018	1.0						
	1/26/2018	1.0						
	2/2/2018	1.0						
	2/9/2018	1.0						
	2/16/2018	1.0						
	2/23/2018	1.0						
	3/2/2018	1.0						
	3/9/2018	1.0						
	3/16/2018	1.0						
	3/23/2018	1.0						
	3/30/2018	1.0						
	4/6/2018	1.0						
	4/13/2018	1.0						
	4/20/2018	1.0						
	4/27/2018	1.0						
	5/4/2018	1.0						
	5/11/2018	1.0						
	5/18/2018	1.0						
	5/25/2018	1.0						
	6/1/2018	1.0						
	6/8/2018	1.0						
	6/15/2018	1.0						
	6/22/2018	1.0						
	6/29/2018	1.0						
	7/6/2018	1.0						
	7/13/2018	1.0						
	7/20/2018	1.0						
	7/27/2018	9.0						
	8/3/2018	9.0						
	8/10/2018	9.0						
	8/17/2018	9.0						
	8/24/2017	9.0						
	8/31/2018	9.0						

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OCD Registration Number 2RF-103

	DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
	9/7/2018	4.5						
	11/19/2018	1.5						
	11/28/2018	1.5					X	2-3 washouts, not bad
	12/5/2018	2.5						
	12/10/2018	2.5						
	12/18/2018	2.5						
	12/28/2018	2.5						
	1/1/2019	2.5						
	1/7/2019	2.5						
	1/14/2019	2.5						
	1/21/2019	2.5						
	1/28/2019	2.5						stinger needs to be pulled up berm
	2/4/2019	2.5						
	2/11/2019	7.0						
	2/18/2019	8.0						
	2/25/2018	9.0						
	3/4/2019	9.0						
	3/11/2019	7.0						
	3/18/2019	4.0		X				need to replace safety light on bird deterrent
	3/25/2019	2.5						
	4/1/2019	2.8						
	4/8/2019	3.0						
	4/15/2019	3.0						
	4/22/2019	4.0						
	4/29/2019	2.0					X	washout needs repair
	5/6/2019	2.0					X	washout needs repair
	5/13/2019	3.0						
	5/20/2019	3.0						
	5/27/2019	3.0						
	6/3/2019	1.5						
	6/10/2019	1.5						
	6/17/2019	1.5						
	6/24/2019	1.5					X	small holes on top of liner, crew set up to patch
	7/1/2019	1.0					X	small holes on top of liner, crew set up to patch
	7/8/2019	7.0						liner holes repaired
	8/2/2019	2.0						
	8/15/2019	2.0						
	8/23/2019	2.0						
	9/6/2019	2.0						
	9/13/2019	2.0						
	9/20/2019	2.0						
	10/3/2019	0.0						
	10/11/2019	6.0						
	10/25/2019	1.0						
	11/8/2019	1.0						

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	DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
	12/13/2019	1.0						
	12/27/2019	1.0						
	1/7/2020	1.0						
	1/14/2020	1.0						
	1/31/2020	0.0						
	2/7/2020	0.0						
	2/14/2020	0.0						
	2/21/2020	0.0						
	2/28/2020	0.0						
	3/6/2020	0.0						
	3/13/2020	0.0						
	3/20/2020	0.0						
	3/27/2020	0.0						
	4/3/2020	0.0						
	4/10/2020	0.0						
	4/17/2020	0.0						
	4/24/2020	0.0						
	5/1/2020	0.0						
	5/8/2020	0.0						
	5/15/2020	0.0						
	5/22/2020	0.0						