

Souder, Miller & Associates•201 S. Halagueno St.•Carlsbad, NM 88220 (575) 689-8801

April 9, 2020

#5E29133-BG4

NMOCD District 1 1625 N. French Drive Hobbs, New Mexico 88240

SUBJECT: Remediation Closure Report for the Boomslang 14 CTB 1 Release (1RP-4949), Lea County, New Mexico

To Whom It May Concern:

On behalf of Devon Energy Production Company, Souder, Miller & Associates (SMA) has prepared this Remediation Closure Report that describes the remediation of a release of liquids related to oil and gas production activities at the Boomslang 14 CTB 1 site. The site is in Unit D, Section 14, Township 24S, Range 33E, Lea County, New Mexico, on Federal land. Figure 1 illustrates the vicinity and site location on an USGS 7.5 minute quadrangle map.

Table 1 summarizes release information and closure criteria.

	Table 1: Release Inform	mation and Closure	Criteria
Name	ame Boomslang 14 CTB 1		Devon Energy Production Company
API Number	30-025-43032	Location	32.2243126 -103.5431322
Incident Number		1RP - 4949	
Estimated Date of Release	1/17/2018	Date Reported to NMOCD	1/31/2018
Land Owner	Federal Land	Reported To	NMOCD
Source of Release		Gun Barrel	·
Released Volume	9 BBLS	Released Material	Produced Water
Recovered Volume	9 BBLS	Net Release	9BBLS
NMOCD Closure Criteria	>	>100 feet to groundw	ater
SMA Response Dates	3/26/2020		

1.0 Background

On January 17, 2018, a release was discovered at the Boomslang 14 CTB 1 site due to an open valve on the gun barrel. The release occurred entirely within the metal containment structure, with no visual impacts to soil. Initial response activities were conducted by Devon Energy Production Company, and included source elimination, containment and vacuum activities, which recovered approximately 9 barrels of fluid which were hauled to and disposed of at R360 Environmental Solutions near Hobbs, NM.

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Figure 1 illustrates the vicinity and site location, Figure 2 illustrates the release location. The initial C-141 form is included in Appendix A.

2.0 Site Information and Closure Criteria

The Boomslang 14 CTB 1 is located approximately 22 miles northwest from Jal, New Mexico on Federal (BLM) land. As summarized in Table 2 and illustrated in Figure 1, depth to groundwater in the area is estimated to be 328 feet below grade surface (bgs). There are no known water sources within ½-mile of the location, according to the New Mexico Office of the State Engineer (NMOSE) online water well database (https://gis.ose.state.nm.us/gisapps/ose_pod_locations/; accessed 3/24/2020). The nearest surface water is an unnamed playa located approximately 3,890 feet to the northeast.

Based on the information presented herein, the applicable NMOCD Closure Criteria for this site is for a groundwater depth of greater than 100 feet bgs. Table 2 demonstrates the Closure Criteria applicable to this location. Pertinent well data is attached in Appendix B.

3.0 Release Characterization Activities and Findings

On March 25, 2020, SMA conducted a liner integrity inspection per requirements of 19.15.29.11.A(5)(a) NMAC. Notice was given to New Mexico Oil Conservation Division on March 23, 2020 that the inspection was to occur on the date mentioned above. After a thorough visual inspection of the containment structure, the liner appeared to be intact and had the ability to contain the leak. The containment did have standing water due to a recent rain event, supporting evidence of liner integrity. A Photo Log documenting the inspection is included in Appendix C.

On behalf of Devon Energy Production Company, SMA recommends no further action and requests closure for the release associated with 1RP-4949

4.0 Scope and Limitations

All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact either Ashely Maxwell at 505-320-8975 or Shawna Chubbuck at 505-325-7535.

Submitted by: SOUDER, MILLER & ASSOCIATES Reviewed by:

Ashley Maxwell Project Scientist

Jours hubbuck

Shawna Chubbuck Senior Scientist

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ATTACHMENTS:

Figures:

Figure 1: Site Map Figure 2: Surface Water Protection Map

Tables:

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Table 2: NMOCD Closure Criteria Justification

Appendices:

Appendix A: Form C-141 Initial Appendix B: NMOSE Wells Report Appendix C: Liner Inspection & Photo Log

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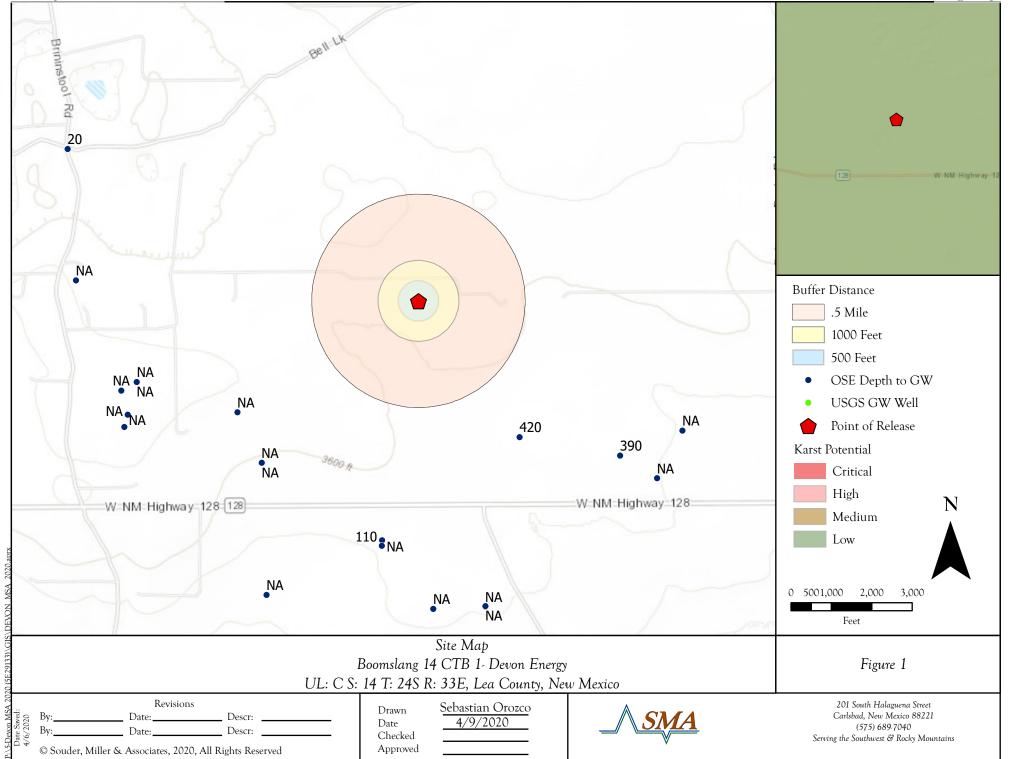
Page 3 of 3

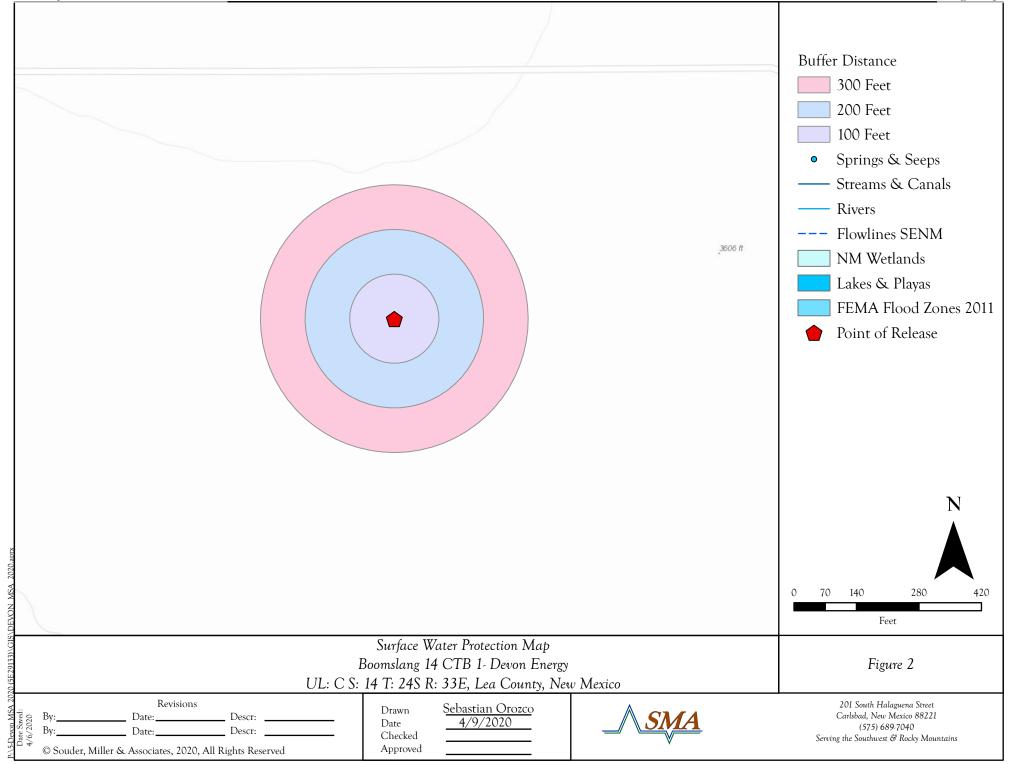
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FIGURES

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TABLES

Table 2: NMOCD Closure Criteria

Site Information (19.15.29.11.A(2, 3, and 4) NMAC)	Source/Notes	
Depth to Groundwater (feet bgs)	306	New Mexico Office of the State Engineer
Hortizontal Distance From All Water Sources Within 1/2 Mile (ft)	NA	United States Geological Survery Topo Map
Hortizontal Distance to Nearest Significant Watercourse (ft)	3,890	Unnamed Playa

Closure Criteria (19.15.2	29.12.B(4) and	d Table 1 NMAC)						
		Closure Criteria (units in mg/kg)						
Depth to Groundwater		Chloride *numerical limit or background, whichever is greater	ТРН	GRO + DRO	BTEX	Benzene		
< 50' BGS		600	100		50	10		
51' to 100'		10000	2500	1000	50	10		
>100'	Х	20000	2500	1000	50	10		
Surface Water	yes or no		if ye	s, then				
<300' from continuously flowing watercourse or other significant watercourse? <200' from lakebed, sinkhole or playa lake? Water Well or Water Source	No No							
<500 feet from spring or a private, domestic fresh water well used by less than 5 households for domestic or stock watering purposes? <1000' from fresh water well or spring?	No No							
Human and Other Areas		600	100		50	10		
<300' from an occupied permanent residence, school, hospital, institution or church? within incorporated municipal boundaries or within a defined municipal fresh water well field? <100' from wetland? within area overlying a subsurface mine	No No No							
within area overlying a subsurface mine within an unstable area?	No No	-						
within a 100-year floodplain?	No							

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APPENDIX A FORM C141 FINAL

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State of New Mexico Energy Minerals and Natural Resources

> Oil Conservation Division 1220 South St. Francis Dr. Santa Fe. NM 87505

Form C-141 Revised April 3, 2017

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

1220 S. St. Fran	cis Dr., Sant	a Fe, NM 87505	i	Sa	inta F	e, NM 875	05							
			Rele	ease Notific	atio	n and Co	orrec	tive A	ction	Initia	al only			
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		evon Energy				Contact Hu	ibert P				1		1	
		Rivers Hwy				Telephone N		5-513-96	37					
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Type of Rele Produced W						Volume of 9BBLS P		e		Volume I 9BBLS F	Recovered W			
Source of Re	. ,					Date and Hour of Occurrence D				Date and	Date and Hour of Discovery			
Gun Barrel Was Immedi	ate Notice (Given?				1/17/2018 If YES, To				1/1//201	8 @ 5:36 pn	1 MS I		
			Yes 🗵	No 🗌 Not Ro	equired									
By Whom? N/A						Date and Hour								
Was a Water	course Read		Yes 🗵	No		If YES, Vo N/A	olume Ir	npacting t	he Wate	ercourse.				
	ırse was Im	pacted, Descr	ibe Fully. ³	*	(DECEN								
N/A						RECEI	VEL)						
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		and Cleanup A produced wate		ased. A vacuum	truck w	as called and a	approxi	mately 9B	BLS of	produced	water was re	covered	1. Repairs	
were made.														
				e is true and comp nd/or file certain r										
public health	or the envi	ronment. The	acceptan	ce of a C-141 repo	ort by th	he NMOCD m	arked as	s "Final R	eport" d	oes not rel	ieve the ope	rator of	liability	
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federal, state,	, or local la	ws and/or regu	lations.		_						DIVICIO			
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Signature: Da	ana DeLaR	osa				A 11	г ·	(10		T	T			
Printed Name	e: Dana De	LaRosa				Approved by	Enviroi	nmental S	pecialisi		U			
Title: Field	Admin Supj	port				Approval Dat	e: 2/2	2/2018		Expiration	Date:	_/		
E-mail Addre	ess: dana.d	elarosa@dvn.	com			Conditions of	Appro	val:			Attached			
Date: 1.31.20)18	Phone: 5	75-746-5	594		see attac	hed o	directiv	е		2 stracheu			
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Operator/Responsible Party,

The OCD has received the form C-141 you provided on _1/31/2018_ regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number _1RP-4949_ has been assigned. Please refer to this case number in all future correspondence.

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete <u>division-approved corrective action</u> for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District _1_ office in __Hobbs____ on or before _3/2/2018_. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

• Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.

• Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.

• Nominal detection limits for field and laboratory analyses must be provided.

• Composite sampling is not generally allowed.

• Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

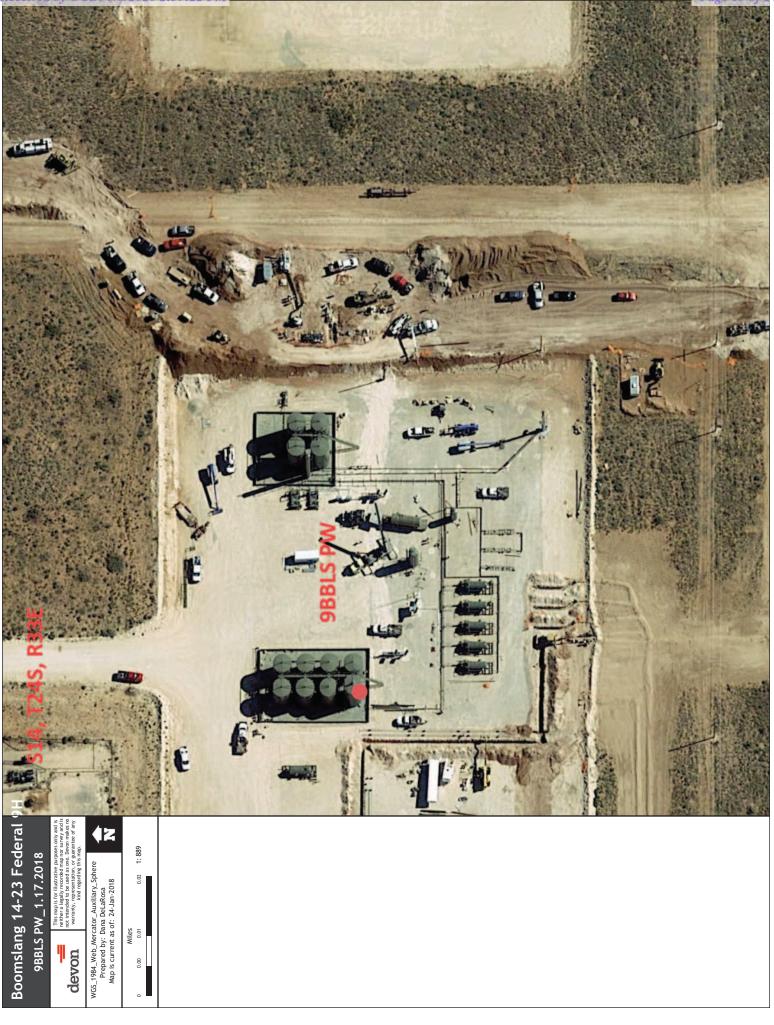
•Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

• If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

• Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold OCD Environmental Bureau Chief 1220 South St. Francis Drive Santa Fe, New Mexico 87505 505-476-3465 jim.griswold@state.nm.us



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APPENDIX B NMOSE WELLS REPORT

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(A CLW##### in the POD suffix indicates the POD has been replaced & no longer	(R=POD been rep O=orpha	placed,		(aua	rtore		o 1-N	W 2-N	E 3=SW 4	-SE)				
serves a water right file.)	C=the fil closed)			Ì		rters			Illest to		=SE) AD83 UTM in r	neters)	(In fe	et)	
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C 03662 POD1		С	LE	3	1	2 2	23	24S	33E	637342	3564428 🌍	1838	550	110	44
C 04339 POD6		CUB	LE	3	1	2 2	23	24S	33E	637340	3564386 🌍	1879	60		
C 03666 POD1		С	LE	2	3	4 1	13	24S	33E	639132	3565078 🌍	1938	650	390	26
											Aver	age Depth to V	Vater:	306 fe	et
												Minimum D	epth:	110 fe	et
												Maximum De	epth:	420 fe	et
Record Count:4															
UTMNAD83 Radiu	us Search ((in mete	ers):												
Easting (X): 63	37588		North	hing	3 (Y)	: 3	566	250			Radius: 2000				

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WATER COLUMN/ AVERAGE DEPTH TO WATER

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APPENDIX C LINER INSPECTION & PHOTO LOG

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Souder, Miller & A Liner Inspection H				∧ SMA
Project Name:	Boomslang 14 CTB	Inspection Date	: 3/26/2020	
Client Name:	Devon			
Client Representative	(s):			
SMA Inspector(s):	Sebastian Orozco			
Project Location:		Latitude: 32.22	13144 Longitud	le: <u>-103 5 39675</u>
Inspection Paramete	rs as Outlined in 19.15.29.1	11.A(5) NMAC		
PRIOR TO INSPEC Two (2) Business Day Date of Notice	Notification of Inspection to	o Appropriate Divisi	ion Office	(Y/N): <u> </u>
Material Covering Lin	er Removed by Client			(Y/N): <u> </u>
Affected Areas Expos	ed by Client			(Y/N): 🖊
INSPECTION: Liner Thoroughly Insp	pected for Damage			(Y/N): Y
-	bserved Marked in White P ailures A		m	
Can Responsible Party Liner Integrity Release Was C Liner Was Abl	Client Representative: Demonstrate: Was Maintained (per SMA contained to Lined Containm e to Contain the Leak	· · ·		(Y/N): (Y/N): (Y/N):
If YES: Certify	on Form C-141 That Liner I	Remains Intadt		
If NO to Any o Respon		Iorizontal & Vertica		IAC
Additional Comment	s:			
SMA INSPECTOR S	SIGNATURE		CLIENT RE Lupe Carra Date: 4/14/	



Liner Inspection Photos Taken March 26, 2020

