



December 1, 2020

Vertex Project #: 20E-00141-032

Spill Closure Report: Bilbrey 27 Fed #001
Unit L, Section 27, Township 21 South, Range 32 East
County: Lea
API: 30-025-30980
Tracking Number: NAB1915736499

Prepared For: Devon Energy Production Company
6488 Seven Rivers HWY
Artesia, New Mexico 88210

New Mexico Oil Conservation Division – District 1 – Hobbs

1625 North French Drive
Hobbs, New Mexico 88240

Devon Energy Production Company (Devon) retained Vertex Resource Services Inc. (Vertex) to conduct an assessment and remediation for a natural gas release that occurred at Bilbrey 27 Fed #001 (hereafter referred to as “Bilbrey 27”). Devon provided immediate notification of the release to New Mexico Oil Conservation Division (NM OCD) District 1, and the Bureau of Land Management (BLM), who own the land, on March 26, 2019. An initial C-141 Release Notification (Attachment 1) was submitted to NM OCD and the BLM on May 14, 2019. The NM OCD tracking number assigned to this incident is NAB1915736499.

This letter provides a description of the release assessment, and demonstrates that closure criteria established in 19.15.29.12 *New Mexico Administrative Code* (NMAC; New Mexico Oil Conservation Division, 2018) have been met and all applicable regulations are being followed. This document is intended to serve as a final report to obtain approval from NM OCD and the BLM for closure of this release.

Incident Description

On March 26, 2019, a release occurred at Devon’s Bilbrey 27 site when a back psi valve failed, causing the well to vent to atmosphere. This incident was not discovered immediately by operations and resulted in the release of approximately 18,540 million cubic feet (Mcf) of natural gas into the atmosphere, based on meter readings. No natural gas was recovered. The release was strictly natural gas, and occurred at the wellhead on a concrete pad, as shown on Figure 1 (Attachment 2). No oil or produced water was released as a result of this incident.

Actions Taken

Upon discovery of the release, the well was shut in and the back psi valve was replaced. On August 3, 2020, Vertex was at Bilbrey 27 to assess the release site. Photographs showing the concrete pad and surrounding soil are included in the Daily Field Report (DFR) associated with this site inspection (Attachment 3). Photos show no evidence of liquids having been released as a part of this incident and no chloride crusting or staining are visible. No vegetation is allowed to grow on the active wellpad; however, surrounding vegetation appears healthy.

vertex.ca

3101 Boyd Drive, Carlsbad, New Mexico 88220, USA | P 575.725.5001

Devon Energy Production Company
Bilbrey 27 Federal #001

2020 Spill Assessment and Closure
November 2020

Closure Request

Vertex recommends no remediation action necessary to address the natural gas release at Bilbrey 27. No liquids were released and there are no anticipated risks to human, ecological or hydrological receptors associated with the release.

Vertex requests that this incident (NAB195736499) be closed as all closure requirements set forth in Subsection E of 19.15.29.12 NMAC have been met. Devon certifies that all information in this report and the attachments is correct and that they have complied with all applicable closure requirements and conditions specified in Division rules and directives to meet NM OCD requirements to obtain closure on the March 26, 2019, release at Bilbrey 27.

Should you have any questions or concerns, please do not hesitate to contact the undersigned at 505.506.0040 or ngordon@vertex.ca.

Sincerely,



Natalie Gordon
PROJECT MANAGER

Attachments

- Attachment 1. NM OCD C-141 Report
- Attachment 2. Site Schematic
- Attachment 3. Daily Field Report(s) with Photographs

Devon Energy Production Company
Bilbrey 27 Federal #001

2020 Spill Assessment and Closure
November 2020

References

New Mexico Oil Conservation Division. (2019). *Natural Resources and Wildlife Oil and Gas Releases*. Santa Fe, New Mexico.

Devon Energy Production Company
Bilbrey 27 Federal #001

2020 Spill Assessment and Closure
November 2020

Limitations

This report has been prepared for the sole benefit of Devon Energy Production Company (Devon). This document may not be used by any other person or entity, with the exception of the New Mexico Oil Conservation Division, without the express written consent of Vertex Resource Services Inc. (Vertex) and Devon. Any use of this report by a third party, or any reliance on decisions made based on it, or damages suffered as a result of the use of this report are the sole responsibility of the user.

The information and conclusions contained in this report are based upon work undertaken by trained professional and technical staff in accordance with generally accepted scientific practices current at the time the work was performed. The conclusions and recommendations presented represent the best judgement of Vertex based on the data collected during the assessment. Due to the nature of the assessment and the data available, Vertex cannot warrant against undiscovered environmental liabilities. Conclusions and recommendations presented in this report should not be considered legal advice.

ATTACHMENT 1

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-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
Cause of Release		

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: _____ Title: _____ Signature: <u>Kendra DeHoyos</u> Date: _____ email: _____ Telephone: _____
<u>OCD Only</u> Received by: _____ Date: _____

Incident ID	NAB1915736499
District RP	1RP-5529
Facility ID	
Application ID	pAB1915735552

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☒ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Lupe Carrasco Title: Environmental Professional
Signature: Lupe Carrasco Date: 12/7/20
email: Lupe.Carrasco@dvn.com Telephone: 575-748-0176

OCD Only

Received by: _____ Date: _____

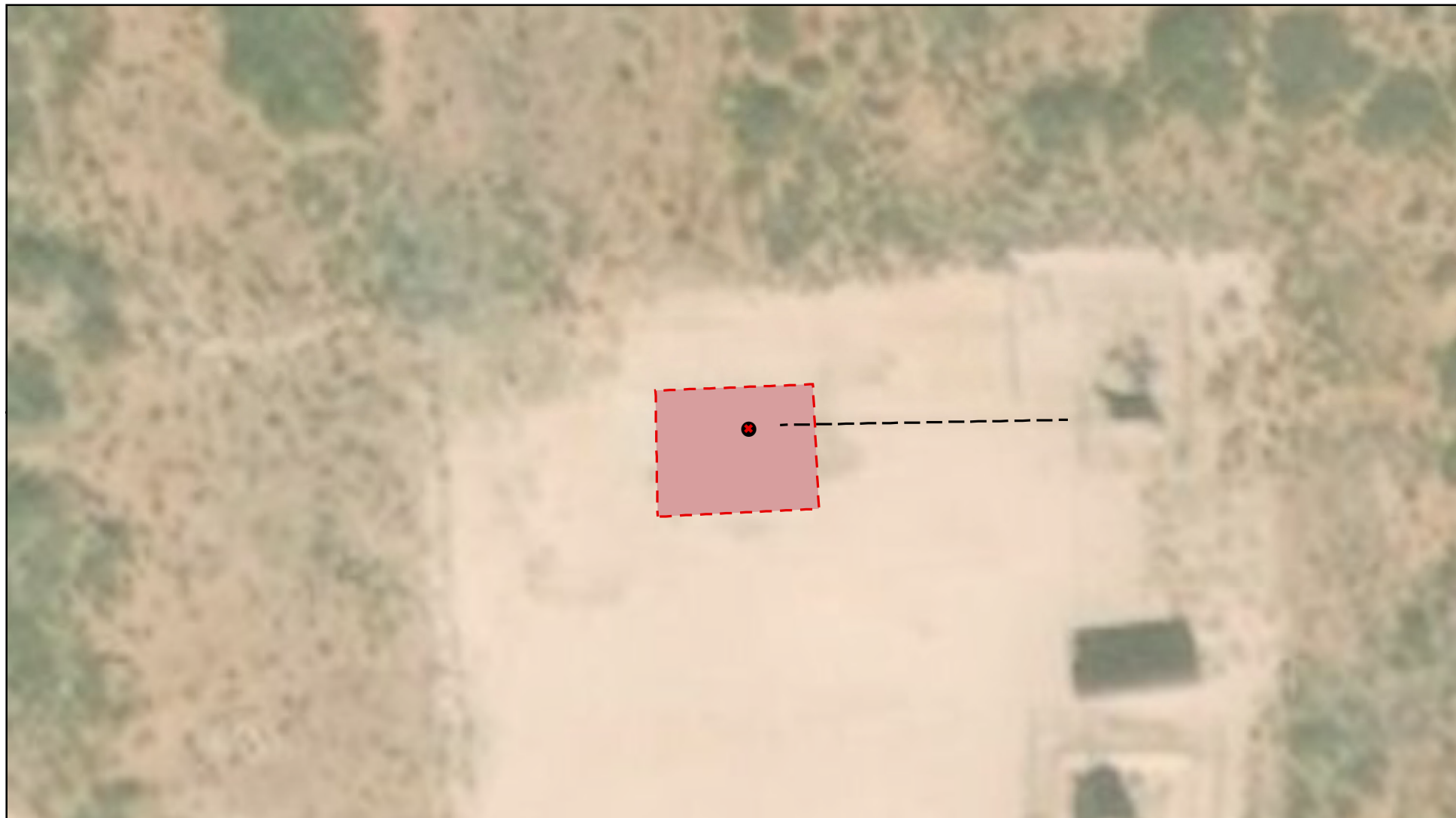
Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

ATTACHMENT 2

Document Path: G:\1-Projects\US PROJECTS\Devon Energy Corporation\20E-0014\032 - Bilbrey 27 Federal #001\Figure 1 Confirmatory Sampling Bilbrey 27 Federal #001.mxd



- Point of Release
- Flowline
- Concrete Pad



0 20 40 Feet
Map Center:
Lat/Long: 32.447993, -103.667978

NAD 1983 UTM Zone 13N
Date: Apr 07/20



Site Schematic
Bilbrey 27 Federal #001

FIGURE:

1



Geospatial data presented in this figure may be derived from external sources and Vertex does not assume any liability for inaccuracies. This figure is intended for reference use only and is not certified for legal, survey, or engineering purposes.

Note: Imagery from ESRI, 2018.

VERSATILITY. EXPERTISE.

ATTACHMENT 3



Daily Site Visit Report

Client:	Devon Energy Corporation	Inspection Date:	8/3/2020
Site Location Name:	Bilbrey 27 Fed #001	Report Run Date:	8/3/2020 8:48 PM
Client Contact Name:	Amanda Davis	API #:	30-025-30980
Client Contact Phone #:	(575) 748-0176		
Unique Project ID	-Bilbrey 27 Fed #001	Project Owner:	Amanda Davis
Project Reference #	03/26/2019 Gas Release	Project Manager:	Natalie Gordon

Summary of Times

Arrived at Site	8/3/2020 10:02 AM
Departed Site	8/3/2020 11:53 AM

Field Notes

10:15 - Safety Paperwork

10:30 - Site assessment - no staining visible.

Next Steps & Recommendations

1 Draft closure report.

Daily Site Visit Report



Site Photos

Viewing Direction: North



Viewing Direction: Northwest



Viewing Direction: East



Viewing Direction: East



Daily Site Visit Report



Daily Site Visit Signature

Inspector: Kevin Smith

Signature:

A handwritten signature in black ink, appearing to read 'Kevin Smith', written over a horizontal line. Below the line, the word 'Signature' is printed in a small font.

Incident ID	NAB1915736499
District RP	1RP-5529
Facility ID	
Application ID	pAB1915735552

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

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Printed Name: Lupe Carrasco Title: Environmental Professional
Signature: Lupe Carrasco Date: 12/7/20
email: Lupe.Carrasco@dvn.com Telephone: 575-748-0176

OCD Only

Received by: Robert Hamlet Date: 2/1/2021

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Robert Hamlet Date: 2/1/2021

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced

From: [Hamlet, Robert, EMNRD](#)
To: [Carrasco, Lupe](#)
Cc: [Bratcher, Mike, EMNRD](#); [Eads, Cristina, EMNRD](#); blm_nm_cfo_spill@blm.gov
Subject: Closure Approval - Devon - Bilbrey 27 Fed #1 - (Incident #NAB1915736499)
Date: Monday, February 1, 2021 11:57:00 AM
Attachments: [Closure Approval - Devon - Bilbrey 27 Fed #1 - \(NAB1915736499\).pdf](#)

Lupe,

We have received your closure report and final C-141 for **Incident #NAB1915736499 Bilbrey 27 Fed #1**, thank you. This closure is approved.

Please let me know if you have any further questions.

Regards,

Robert Hamlet • Environmental Specialist - Advanced
Environmental Bureau
EMNRD - Oil Conservation Division
811 S. First Street | Artesia, NM 88210
505.748.1283 | robert.hamlet@state.nm.us
<http://www.emnrd.state.nm.us/OCD/>



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

CONDITIONS

Action 11448

CONDITIONS OF APPROVAL

Operator: DEVON ENERGY PRODUCTION COMPAN			333 West Sheridan Ave.	Oklahoma City, OK73102	OGRID: 6137	Action Number: 11448	Action Type: C-141
OCD Reviewer	Condition						
rhamlet	We have received your closure report and final C-141 for Incident #NAB1915736499 Bilbrey 27 Fed #1, thank you. This closure is approved.						