

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	NRM1932253587
District RP	2RP-5700
Facility ID	
Application ID	pRM1932253694

Release Notification KQALD-191018-C-1410

Responsible Party

Responsible Party: WPX Energy Permian, LLC.	OGRID: 246289
Contact Name: Jim Raley	Contact Telephone: 575-689-7597
Contact email: james.ralej@wpxenergy.com	Incident # (assigned by OCD)
Contact mailing address: 5315 Buena Vista Dr., Carlsbad, NM 88220	

Location of Release Source

Latitude 32.0196704 Longitude -103.8904924
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: RDX FEDERAL COM 28 #009H	Site Type: Production Facility
Date Release Discovered: 10/17/2019	API# (if applicable): 30-015-43294

Unit Letter	Section	Township	Range	County
C	28	26S	30E	Eddy

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls)10	Volume Recovered (bbls)10
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" 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: Failure of automation system allowed tanks to overflow into fully lined secondary containment, fluids were recovered.

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" 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 checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" 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: Jim Raley Signature:  email: james.raley@wpenergy.com	Title: Environmental Specialist Date: 10/18/2019 Telephone: 575-689-7597
OCD Only Received by: <u>R a m o n a M a r c u s</u> Date: <u>11/18/2019</u>	

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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>>100</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☒ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☒ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☒ Laboratory data including chain of custody


If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

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Printed Name: Jim Raley Title: Environmental Specialist
Signature:  Date: 2/4/2021
email: james.raley@wpenergy.com Telephone: 575-689-7597

OCD Only

Received by: Cristina Eads Date: 02/04/2021

Incident ID	NRM1932253587
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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

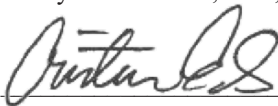
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public 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: Jim Raley Title: Environmental Specialist
Signature:  Date: 2/4/2021
email: james.raley@wpenergy.com Telephone: 575-689-7597

OCD Only

Received by: Critsina Eads Date: 02/04/2021

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:  Date: 04/23/2021
Printed Name: Cristina Eads Title: Environmental Specialist



WSP USA

3300 North "A" Street
Building 1, Unit 222
Midland, Texas 79705
432.704.5178

February 2, 2021

District II
New Mexico Oil Conservation Division
811 South First Street
Artesia, New Mexico 88210

**RE: Closure Request Addendum
WPX Energy Permian, LLC
RDX Federal Com 28 #009H
Incident Number NRM1932253587
Eddy County, New Mexico**

To Whom It May Concern:

WSP USA Inc. (WSP, formerly LT Environmental, Inc.), on behalf of WPX Energy Permian, LLC (WPX), is pleased to present the following Addendum to an original Closure Request submitted on May 29, 2020. This Addendum provides an update to the depth to groundwater determination activities at the RDX Federal Com 28 #009H (Site) in Unit C, Section 28, Township 26 South, Range 30 East, in Eddy County, New Mexico (Figure 1). The New Mexico Oil Conservation Division (NMOCD) denied the original Closure Request on August 6, 2020. In the denial, NMOCD expressed concern that the depth to groundwater assessment may not be sufficient. Based on the additional depth to groundwater determination activities described below, WPX is requesting no further action (NFA) for Incident Number NRM1932253587.

ADDITIONS

The revised report addresses the following updates:

- Depth to water was initially determined to be greater than 100 feet below ground surface (bgs) based on a water well approximately 1.6 miles away. WPX installed a soil boring approximately 0.41 miles northeast of the Site and confirmed depth to water is greater than 100 feet bgs. A completed well boring log is included in the report.
- This Closure Request Addendum only includes field summaries relevant to fulfilling the condition issued by the NMOCD in the August 6, 2020 denial. All previous data can be referenced in the original report.

BACKGROUND

On October 17, 2019, the automation system malfunctioned and allowed production tanks to overflow and release crude oil. A total of 10 barrels (bbls) of crude oil were released into the



lined secondary containment. All fluids were contained to the location. Vacuum trucks were dispatched and recovered approximately 10 bbls of crude oil from the impacted area. WPX reported the release to the New Mexico Oil Conservation Division (NMOCD) on a Release Notification and Corrective Action Form C-141 (Form C-141) on October 18, 2019, and the release event was subsequently assigned Remediation Permit (RP) Number 2RP-5700 and Incident Number NRM1932253587.

SITE CHARACTERIZATION

WSP characterized the Site according to Table 1, *Closure Criteria for Soils Impacted by a Release*, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are presented on Form C-141, Site Assessment/Characterization Form. Potential site receptors are identified on Figure 1.

In the original report, WSP referenced available data and determined depth to groundwater to be greater than 100 feet bgs. Additional data from the recently advanced soil boring, MW-1, located approximately 0.41 miles northeast of the Site, further supports the original depth to water assessment. The soil boring was drilled on December 9, 2020 to approximately 110 feet bgs, where no water was encountered during the drilling process or after the 72-hr waiting period. The referenced boring log is included as Attachment 1.

Based on these criteria, WPX has confirmed the following NMOCD Table 1 closure criteria apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

CLOSURE REQUEST

Due to the advancement of MW-1, WPX confirmed depth to groundwater is greater than 100 feet at the Site. Groundwater was not encountered at any point during the drilling or within 72 hours after drilling. As such, WPX has provided additional information for NMOCD to reconsider denial of the depth to water determination in the original Closure Request. Based on the confirmed depth to water greater than 100 feet bgs as presented in this Addendum, WPX respectfully requests no further action for Incident Number NRM1932253587.

If you have any questions or comments, please do not hesitate to contact Ms. Ashley Ager at (970) 385-1096.



District II
Page 3

Sincerely,

WSP USA Inc.

A handwritten signature in black ink, appearing to read 'Fatima Smith'.

Fatima Smith
Assistant Consultant, Geologist

A handwritten signature in black ink, appearing to read 'Ashley L. Ager'.

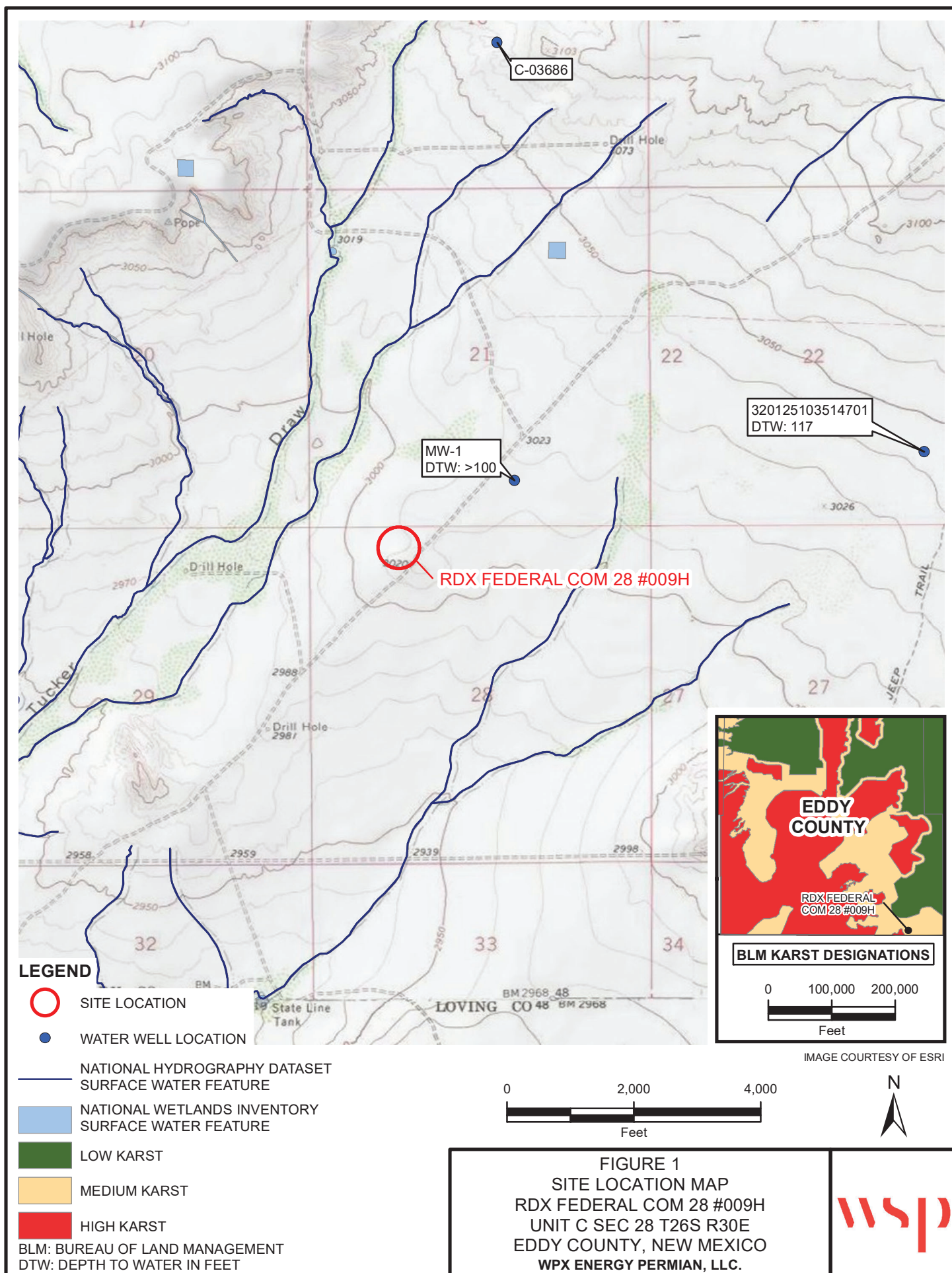
Ashley L. Ager, P.G.
Managing Director, Geologist

cc: Jim Raley, WPX
Robert Hamlet, NMOCD
Victoria Venegas, NMOCD
Bureau of Land Management


Attachments:

Figure 1 Site Location Map
Attachment 1 Drilling Well Record

FIGURES



ATTACHMENT 1: REFERENCED BORE LOG

 HRL COMPLIANCE SOLUTIONS							BORING LOG/MONITORING WELL COMPLETION DIAGRAM								
Drilling Method: Air Rotary							Sampling Method: None			Boring/Well Number: MW-1			Location: RDX Federal Com 21-43		
Gravel Pack Type: 10/20 Sand							Gravel Pack Depth Interval: 3 Bags			Date: 12/9/2020			Client: WPX Energy		
Casing Type: PVC							Diameter: 2-inch			Depth Interval: 0-100 feet bgs			Logged By: J. Linn, P.G.		
Screen Type: PVC							Slot: 0.010-inch			Diameter: 2-inch			Depth Interval: 100 - 105 ft		
Seal Type: None							Seal Depth Interval: None			Boring Total Depth (ft. BGS): 110			Latitude: 32.022571		
Well Total Depth (ft. BGS): 105							Depth to Water (ft. BTOC): > 105			DTW Date: 12/16/2020			Longitude: -103.884371		
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks			Well Completion			
0	NM	L	D	N	N	NM	SP	NS	Pale orange to tan poorly graded fine sand						
5															
10															
15															
20	NM	H	D	N	N	NM	CL	NS	Pale orange/tan/pale red clay, dry, with silt, fine sand, and minor caliche						
25															
30															
35															
40	NM	L	D	N	N	NM	SP	NS	Pale orange to pale red poorly graded fine sand						
45															
50															
55															
60	NM	L	D	N	N	NM	SP	NS	Golden yellow poorly graded fine sand with minor silt and clay						
65															
70															
75															
80	NM	L	D	N	N	NM	SP	NS	Pale orange to pale red poorly graded fine sand with minor silt/clay						
85															
90															
95															
100	NM	H	D	N	N	NM	CL	NS	Brown orange clay with silt and fine sand						
105															
105	NM	H	D	N	N	NM	SC	NS	Golden yellow and buff colored clay with fine sand - TD Boring: 110' BGS; Sand 110' - 105' BGS						
105															

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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 16945

CONDITIONS OF APPROVAL

Operator: WPX ENERGY PERMIAN, LLC Devon Energy - Regulatory 333West Sheridan Ave. Oklahoma City, OK73102	OGRID: 246289	Action Number: 16945	Action Type: C-141
OCD Reviewer ceads	Condition None		