

**HRL**  
**COMPLIANCE**  
**SOLUTIONS**P.O. Box 1708 • Artesia, NM 88211  
[www.hrlcomp.com](http://www.hrlcomp.com)

March 5, 2020

Ms. Amanda Davis  
Devon Energy Production Company  
6488 Seven Rivers Highway  
Artesia, New Mexico 88210  
Email: [Amanda.davis@dvn.com](mailto:Amanda.davis@dvn.com)

**Subject: Liner Inspection and Closure Report**  
**Cotton Draw Unit 172H**  
**Eddy County, New Mexico**

Dear Ms. Davis:

Devon Energy Production Company (Devon) (Client) retained HRL Compliance Solutions, Inc. (HRL) to conduct a liner inspection and prepare this closure report for the release at the Cotton Draw Unit 172H well pad (Site). The Site is located in Eddy County, New Mexico (Figure 1).

**Release Summary and Initial Response**

On August 13, 2019, a release of 10 barrels (bbls) of produced water was observed at the Site. The release occurred as a result of a pinhole leak on the two-inch flange on the water transfer pump. The produced water impacted the area within the poly-lined metal secondary containment. Initial response activities included stopping the source of the release, securing the impacted area, containing the released materials, and removing free liquids within the secondary containment.

The volume released was between five barrels and 25 barrels; therefore, this release is considered a minor release. On August 16, 2019 the C-141 (Attachment A) was submitted to the New Mexico Oil Conservation Division (NMOCD).

Item	Discussion
Site Name	Cotton Draw Unit 172H
Latitude	32.152620
Longitude	-103.726722
Township/Range/Section/Unit	Township 25 South/Range 31 East/Section 01/Unit P
Date Release Discovered	August 13, 2019
Cause of Release	Pinhole leak on the two-inch flange on the water transfer pump
Type of Material Released	Produced Water

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**INNOVATIVE SOLUTIONS DELIVERED**



Ms. Amanda Davis  
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Item	Discussion
Volume Released	10 barrels
Volume Recovered	10 barrels

### **Liner Inspection**

On February 21, 2020, after the released fluid was removed, HRL conducted an inspection to evaluate the integrity of the liner (Attachment B, Photographs). No tears or holes were observed in the liner and the liner was retaining precipitation. Based on this inspection, HRL has determined that the liner remains intact and had the ability to contain the release (Attachment C, Liner Inspection Field Form).

### **New Mexico Administrative Code (NMAC) Site Characterization Criteria**

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

#### *Site Map*

A scaled diagram depicting the Site and nearby significant features has been prepared (Figure 1).

#### *Depth to Groundwater*

Based on research from the New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS), depth to groundwater is estimated to be between 155 and 429 feet below ground surface (bgs) (Figure 2).

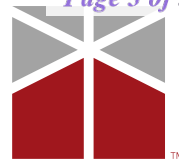
#### *Wellhead Protection Area*

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the Site.

#### *Distance to Nearest Significant Watercourse*

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary with a defined bed and bank" (19.15.17.7 NMAC). There are no significant watercourses within one-half mile of the extent of the release.

Cotton Draw Unit 172H  
March 5, 2020



Ms. Amanda Davis

Page 3

*Additional Site Characterization Criteria*

The following additional site characterization criteria were evaluated for the release.

<b>Additional Site Characterization Criteria</b>	<b>Response/Discussion</b>
Is the Site within 300 feet of a continuously flowing water or other significant watercourse?	No
Is the Site within 200 feet of a lakebed, sinkhole, or playa lake?	No
Is the Site within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Is the Site within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No
Is the Site within 1,000 feet of any fresh water well or spring?	No
Is the Site within 300 feet of a wetland?	No
Is the Site within the area overlying a subsurface mine?	No
Is the Site within an unstable area?	No
Is the Site within the 100-year floodplain?	No

**Conclusions and Recommendations**

The August 13, 2019 release of 10 barrels of produced water at the Site remained within the lined containment area. HRL has determined that the liner integrity remains intact and had the ability to contain the release; therefore, additional characterization of the soil and/or groundwater at the Site is not necessary. HRL recommends closure of this release.

**Scope and Limitations**

The scope of HRL's services consists of performing a liner integrity inspection and preparation of this closure report. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.

Cotton Draw Unit 172H

March 5, 2020



Ms. Amanda Davis  
Page 4

If you have any questions or concerns, please do not hesitate to contact Kris Graham at (575) 616-7398 Ext. 436 or via email at [kgraham@hrlcomp.com](mailto:kgraham@hrlcomp.com)

Sincerely,

**HRL Compliance Solutions, Inc.**

A handwritten signature in black ink, appearing to read 'Kris Graham', is written over a faint, larger version of the same signature.

Kris Graham  
Environmental Scientist

Copy: Julie Linn, PG, RG, HRL Compliance Solutions, Inc.

**Figures:**

Figure 1: Site Location Map

Figure 2: Depth to Groundwater Map

**Attachments:**

Attachment A: NMOCD Form C-141

Attachment B: Photographs

Attachment C: Liner Inspection Field Form

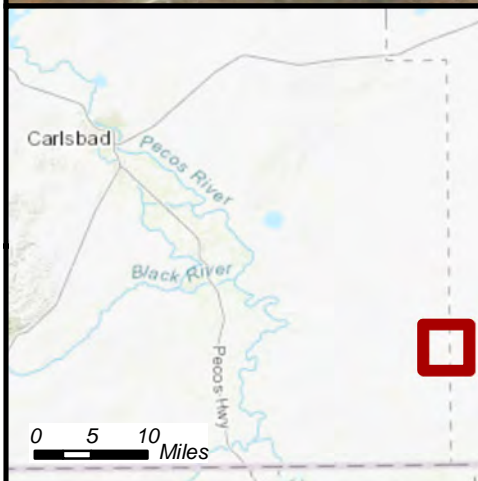
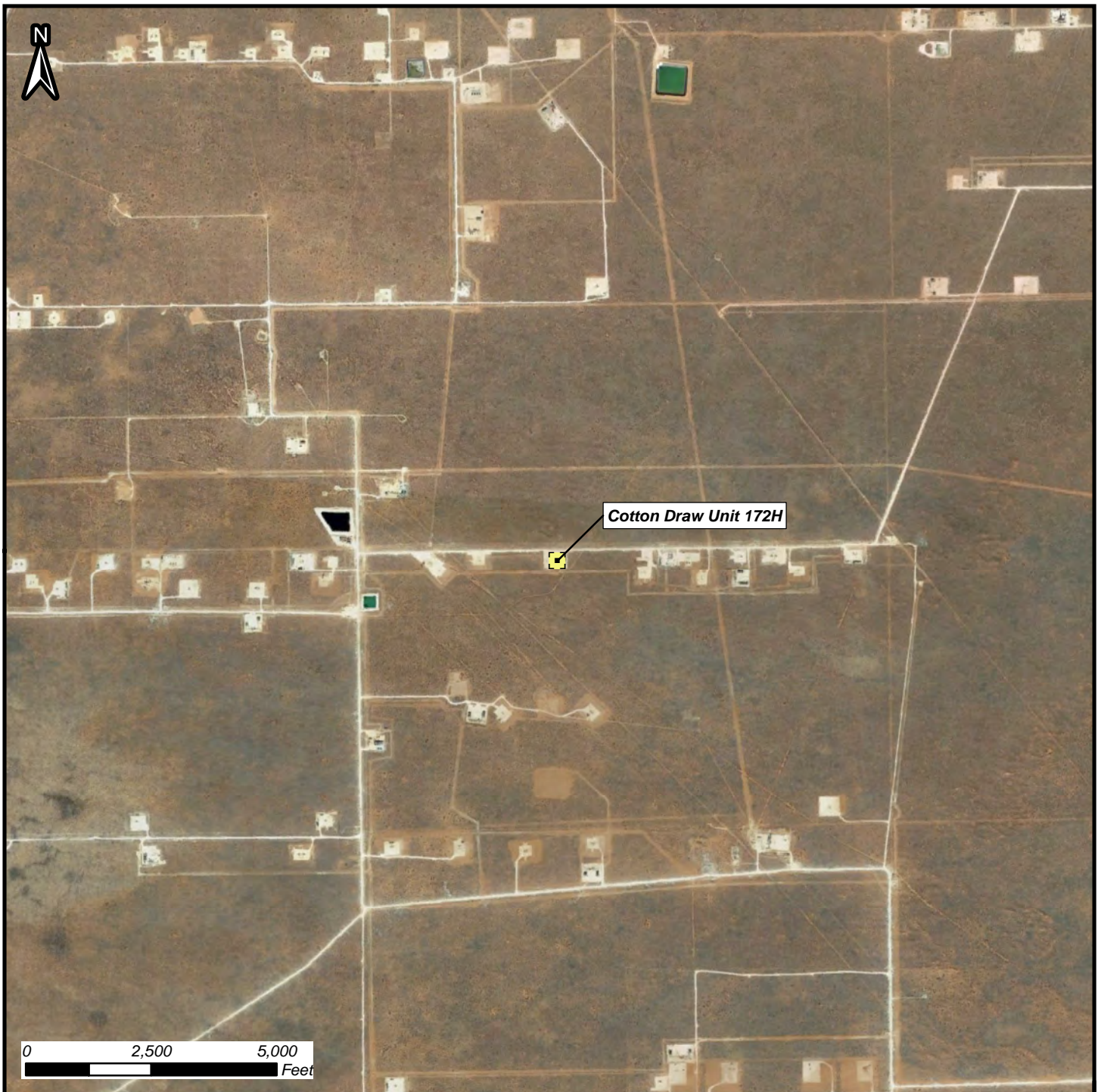
Cotton Draw Unit 172H  
March 5, 2020

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## Figures





### Figure 1: Site Location Map

Cotton Draw Unit 172H

August 2019 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East

NOTES / COMMENTS:

#### Mapped Features

Facility Location

DISCLAIMER: This representation and the Geographic Information System (GIS) used to create it are designed as a source of reference and not intended to replace official records and/or legal surveys. HRL assumes no responsibility for any risks, dangers, or liabilities that may result from its use and makes no guarantees as to the quality or accuracy of the underlying data.



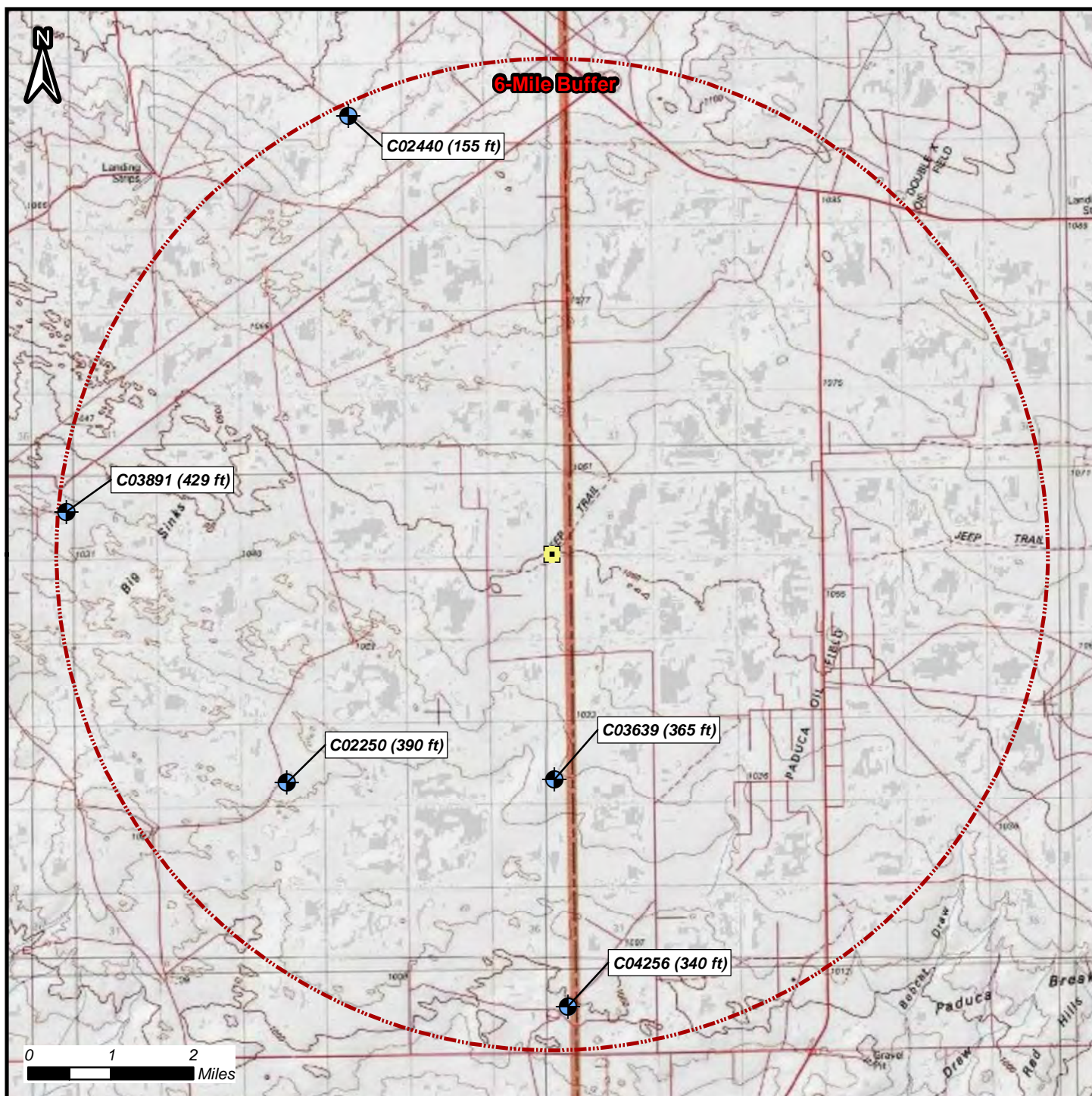
Author: A. Asay

Revision: 0

Date: 2/28/2020

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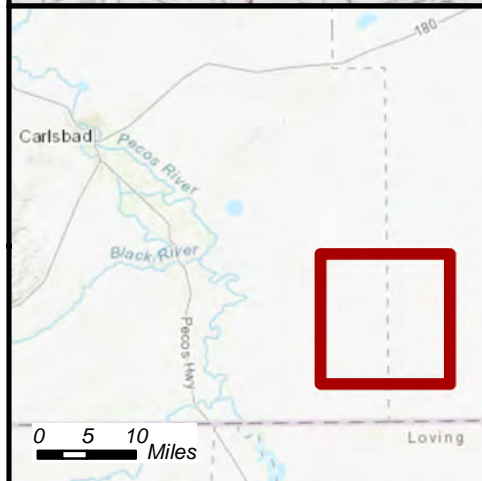
**Figure 2: Depth to Groundwater Map**

Cotton Draw Unit 172H




August 2019 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East



### Mapped Features

-  Point of Release
-  Groundwater Monitoring Well
-  6-Mile Buffer

Well Number	Water Level Below Ground Surface (ft)	Distance from Source (mi)
C02250	390	4.23
C03639	365	2.72
C04256	340	5.48
C02440	155	5.85
C03891	429	5.90



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Author: A. Asay

Revision: 0

Date: 2/28/2020

T:\CLIENTS\DEVON ENERGY\2020\Cotton Draw Unit 172H\Maps\Cotton Draw Unit 172H DTGW Map (August 2019 Spill) 022820.mxd



**Attachment A**  
**NMOCD Form C-141**



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		

## Oil Conservation Division

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: _____
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____



**Attachment B**  
**Photographs**



View of sediment buildup within lined secondary containment



View of sediment and minor pooling within lined secondary containment







**Attachment C**  
**Liner Inspection Field Form**


**HRL**  
**COMPLIANCE**  
**SOLUTIONS**

## Liner Inspection Form

Client

Devon Energy

Date of Inspection

2/21/2020

Site Name

Cotton Draw Unit #1724

Latitude

32.152681

Longitude

-103.726638

Observations	Yes	No	Comments
Is the liner present?	✓		
Is the liner torn?		✓	
Are there visible holes in the liner?		✓	
Is the liner retaining any liquids?	✓		Small amt of stormwater
Does it appear the liner had the ability to contain the leak?	✓		

Type of Liner:

Poly

Earthen

Metal

Other (describe below):

Other Concerns or Observations:

Spray poly liner

 No staining surrounding containment  
 indicative of seepage

Inspector Name

Kevin Smith

Inspector Signature

Kevin Smith

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**COMPLIANCE**  
**SOLUTIONS**P.O. Box 1708 • Artesia, NM 88211  
[www.hrlcomp.com](http://www.hrlcomp.com)

March 5, 2020

Ms. Amanda Davis  
Devon Energy Production Company  
6488 Seven Rivers Highway  
Artesia, New Mexico 88210  
Email: [Amanda.davis@dvn.com](mailto:Amanda.davis@dvn.com)

**Subject: Liner Inspection and Closure Report  
Cotton Draw Unit 172H  
Eddy County, New Mexico**

Dear Ms. Davis:

Devon Energy Production Company (Devon) (Client) retained HRL Compliance Solutions, Inc. (HRL) to conduct a liner inspection and prepare this closure report for the release at the Cotton Draw Unit 172H well pad (Site). The Site is located in Eddy County, New Mexico (Figure 1).

**Release Summary and Initial Response**

On January 7, 2016, a release of 15 barrels (bbls) of produced water, and 10 barrels of oil was observed at the Site. The release occurred when a two-inch drain line from the slop tank to the circulating pump froze and ruptured during freezing temperatures. The oil and produced water impacted the area within the poly-lined metal secondary containment. Initial response activities included stopping the source of the release, securing the impacted area, containing the released materials, and removing free liquids within the secondary containment.

The volume released was between five barrels and 25 barrels; therefore, this release is considered a minor release. On January 7, 2017 the C-141 (Attachment A) was submitted to the New Mexico Oil Conservation Division (NMOCD).

Item	Discussion
Site Name	Cotton Draw Unit 172H
Latitude	32.152620
Longitude	-103.726722
Township/Range/Section/Unit	Township 25 South/Range 31 East/Section 01/Unit O
Date Release Discovered	January 7, 2016
Cause of Release	The two-inch drain line from the slop tank to the circulating pump froze and ruptured during freezing temperatures

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**INNOVATIVE SOLUTIONS DELIVERED**



Ms. Amanda Davis

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Item	Discussion
Type of Material Released	Oil and Produced Water
Produced Water Volume Released	15 barrels
Oil Volume Released	10 barrels
Produced Water Volume Recovered	15 barrels
Oil Volume Recovered	10 barrels

### Liner Inspection

On February 21, 2020, after the released fluid was removed, HRL conducted an inspection to evaluate the integrity of the liner (Attachment B, Photographs). No tears or holes were observed in the liner and the liner was retaining precipitation. Based on this inspection, HRL has determined that the liner remains intact and had the ability to contain the release (Attachment C, Liner Inspection Field Form).

### New Mexico Administrative Code (NMAC) Site Characterization Criteria

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

#### *Site Map*

A scaled diagram depicting the Site and nearby significant features has been prepared (Figure 1).

#### *Depth to Groundwater*

Based on research from the New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS), depth to groundwater is estimated to be between 155 and 429 feet below ground surface (bgs) (Figure 2).

#### *Wellhead Protection Area*

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the Site.

#### *Distance to Nearest Significant Watercourse*

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary

Cotton Draw Unit 172H

March 5, 2020





Ms. Amanda Davis

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with a defined bed and bank" (19.15.17.7 NMAC). There are no significant watercourses within one-half mile of the extent of the release.

#### *Additional Site Characterization Criteria*

The following additional site characterization criteria were evaluated for the release.

<b>Additional Site Characterization Criteria</b>	<b>Response/Discussion</b>
Is the Site within 300 feet of a continuously flowing water or other significant watercourse?	No
Is the Site within 200 feet of a lakebed, sinkhole, or playa lake?	No
Is the Site within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Is the Site within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No
Is the Site within 1,000 feet of any fresh water well or spring?	No
Is the Site within 300 feet of a wetland?	No
Is the Site within the area overlying a subsurface mine?	No
Is the Site within an unstable area?	No
Is the Site within the 100-year floodplain?	No

#### **Conclusions and Recommendations**

The January 7, 2016 release of 15 barrels of produced water and 10 barrels of oil at the Site remained within the lined containment area. HRL has determined that the liner integrity remains intact and had the ability to contain the release; therefore, additional characterization of the soil and/or groundwater at the Site is not necessary. HRL recommends closure of this release.

#### **Scope and Limitations**

The scope of HRL's services consists of performing a liner integrity inspection and preparation of this closure report. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.

Cotton Draw Unit 172H

March 5, 2020



Ms. Amanda Davis  
Page 4

If you have any questions or concerns, please do not hesitate to contact Kris Graham at (575) 616-7398 Ext. 436 or via email at [kgraham@hrlcomp.com](mailto:kgraham@hrlcomp.com)

Sincerely,

**HRL Compliance Solutions, Inc.**

A handwritten signature in black ink, appearing to read 'Kris Graham', is written over a faint, larger version of the same signature.

Kris Graham  
Environmental Scientist

Copy: Julie Linn, PG, RG, HRL Compliance Solutions, Inc.

**Figures:**

Figure 1: Site Location Map

Figure 2: Depth to Groundwater Map

**Attachments:**

Attachment A: NMOCD Form C-141

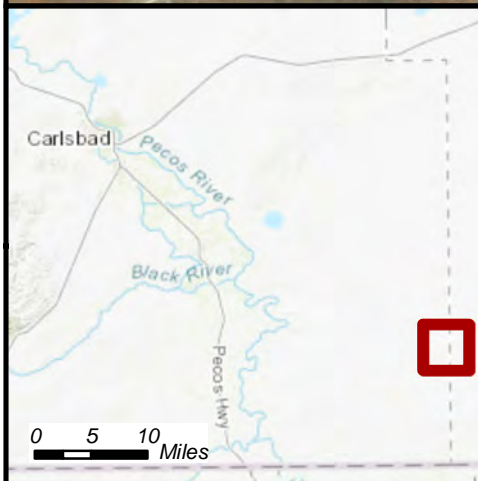
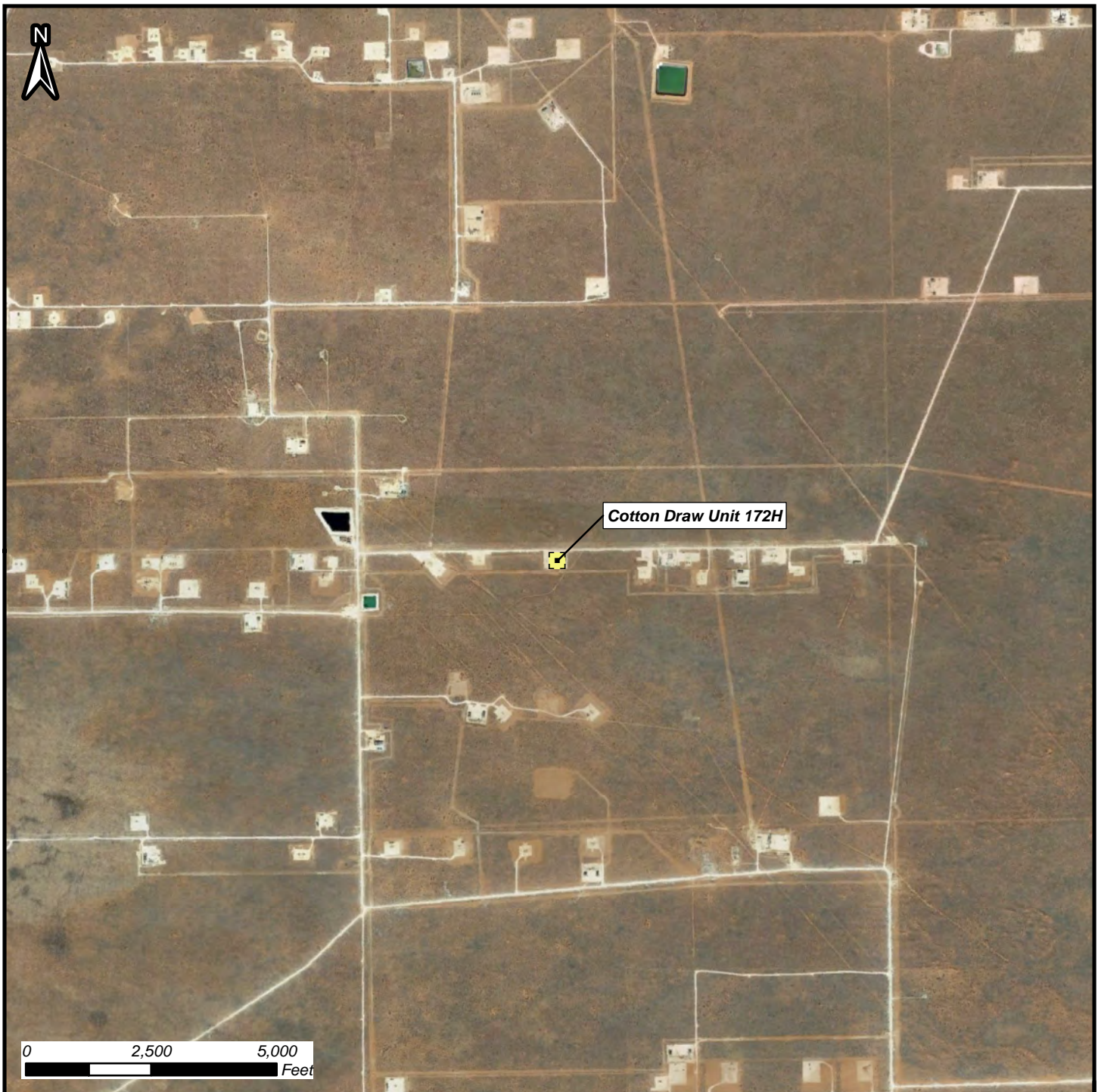
Attachment B: Photographs

Attachment C: Liner Inspection Field Form

Cotton Draw Unit 172H  
March 5, 2020



## Figures



### Figure 1: Site Location Map

Cotton Draw Unit 172H

January 2016 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East

NOTES / COMMENTS:

#### Mapped Features

 Facility Location

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Author: A. Asay

Revision: 0

Date: 2/28/2020

T:\CLIENTS\DEVON ENERGY\2020\Cotton Draw Unit 172H\Map\Cotton Draw Unit 172H Site Location Map (January 2016 Spill) 022820.mxd



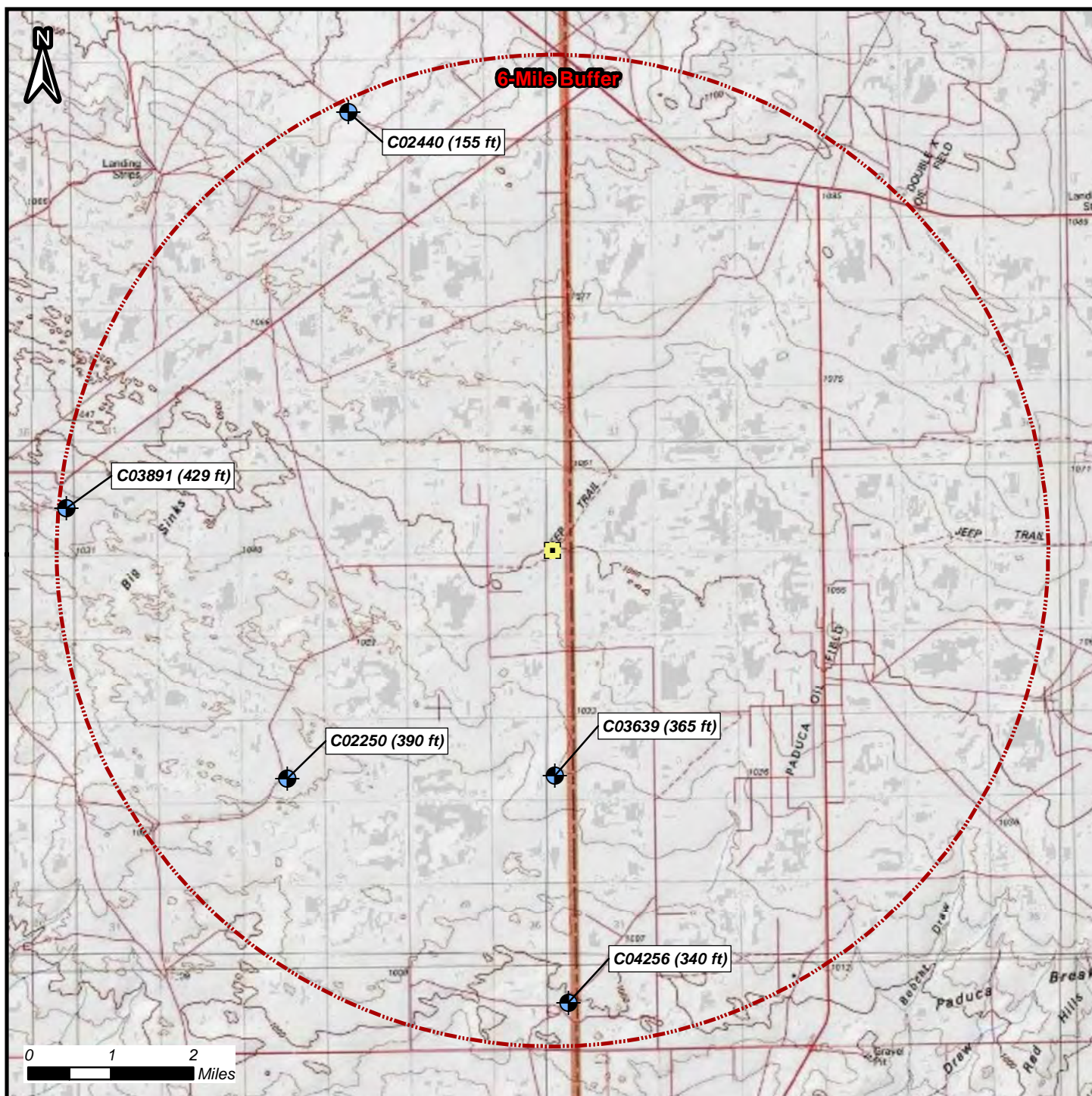


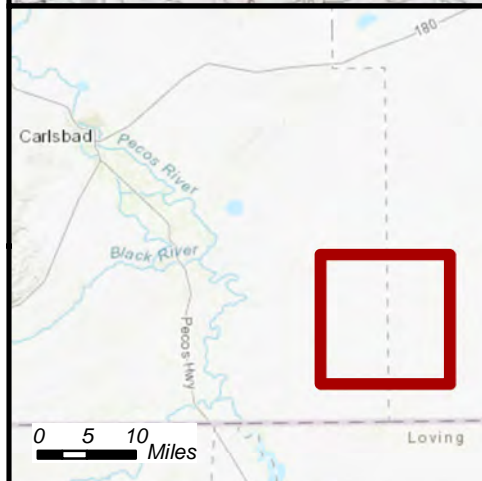
Figure 2: Depth to Groundwater Map

Cotton Draw Unit 172H

January 2016 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East



## Mapped Features

- Point of Release
- Groundwater Monitoring Well
- 6-Mile Buffer

Well Number	Water Level Below Ground Surface (ft)	Distance from Source (mi)
C02250	390	4.23
C03639	365	2.72
C04256	340	5.47
C02440	155	5.85
C03891	429	5.90

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SOLUTIONS

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Author: A. Asay

Revision: 0

Date: 2/28/2020

T:\CLIENTS\DEVON ENERGY\2020\Cotton Draw Unit 172H\Map\Cotton Draw Unit 172H DTGW Map (January 2016 Spill) 022820.mxd



**Attachment A**  
**NMOCD Form C-141**

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

Form C-141  
Revised August 8, 2011  
Submit 1 Copy to appropriate District Office in  
accordance with 19.15.29 NMAC.

## Release Notification and Corrective Action

### OPERATOR

☒ Initial Report ☒ Final Report

<b>Name of Company</b> Devon Energy Production Company	<b>Contact</b> Jake Harrington, Production Foreman
<b>Address</b> 6488 Seven Rivers Hwy Artesia, NM 88210	<b>Telephone No.</b> 432-214-5175
<b>Facility Name</b> Cotton Draw Unit 172H	<b>Facility Type</b> Oil
<b>Surface Owner</b> Federal	<b>Mineral Owner</b> Federal
<b>API No</b> 30-015-42426	

### LOCATION OF RELEASE

Unit Letter O	Section 01	Township 25S	Range 31E	Feet from the 195	North/South Line South	Feet from the 1345	East/West Line East	County Eddy
------------------	---------------	-----------------	--------------	----------------------	---------------------------	-----------------------	------------------------	----------------

**Latitude:** 32.1525726

**Longitude:** -103.7273788

### NATURE OF RELEASE

<b>Type of Release</b> Produced Water and Oil	<b>Volume of Release</b> 15bbls produced water & 10bbls oil	<b>Volume Recovered</b> 15bbls produced water & 10bbls oil
<b>Source of Release</b> 2" drain line from slop tank to the circulating pump	<b>Date and Hour of Occurrence</b> January 7, 2016 @ 6:15 AM	<b>Date and Hour of Discovery</b> January 7, 2016 @ 6:15 AM
<b>Was Immediate Notice Given?</b> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	<b>If YES, To Whom?</b> Shelly Tucker, BLM Mike Bratcher, OCD	
<b>By Whom?</b> Ray Carter, Asst. Production Foreman	<b>Date and Hour</b> Shelly Tucker, BLM January 7, 2017 @ 1:30 PM Mike Bratcher, OCD January 7, 2017 @ 1:35 PM	
<b>Was a Watercourse Reached?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>If YES, Volume Impacting the Watercourse</b> N/A	
<b>If a Watercourse was Impacted, Describe Fully.*</b> N/A		
<b>Describe Cause of Problem and Remedial Action Taken.*</b> The 2" drain line from the slop tank to the circulating pump froze and ruptured due to freezing temperatures. The drain was isolated and isolated so that the line could be replaced. Repairs are complete and the line is back in service.		
<b>Describe Area Affected and Cleanup Action Taken.*</b> Approximately 15bbls produced water and 10bbls oil were released into lined containment. A vacuum truck was called and recovered all 15bbls produced water and all 10bbls oil from lined containment. The containment was checked for holes and none were found. No further action is necessary.		
Requesting closure of this incident. 2RP-4070		

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

<b>Signature:</b> <i>Sheila Fisher</i>	<b>OIL CONSERVATION DIVISION</b>	
<b>Printed Name:</b> Sheila Fisher	<b>Approved by Environmental Specialist:</b> Jocelyn Harimon	
<b>Title:</b> Field Admin Support	<b>Approval Date:</b> 06/27/2022	<b>Expiration Date:</b>
<b>E-mail Address:</b> Sheila.fisher@dmn.com	<b>Conditions of Approval:</b>	<b>Attached</b> <input type="checkbox"/>
<b>Date:</b> 1/10/17 <b>Phone:</b> 575.748.1829		

\* Attach Additional Sheets If Necessary



**Attachment B**  
**Photographs**





View of sediment buildup within lined secondary containment



View of sediment and minor pooling within lined secondary containment





**Attachment C**  
**Liner Inspection Field Form**


**HRL**  
**COMPLIANCE**  
**SOLUTIONS**

### Liner Inspection Form

Client Devon Energy

Date of Inspection 2/21/2020

Site Name Cotton Draw Unit #1724

Latitude 32.152681

Longitude -103.726638

Observations	Yes	No	Comments
Is the liner present?	✓		
Is the liner torn?		✓	
Are there visible holes in the liner?		✓	
Is the liner retaining any liquids?	✓		Small amt of stormwater
Does it appear the liner had the ability to contain the leak?	✓		

Type of Liner: Poly Earthen Metal Other (describe below):

Other Concerns or Observations:

Spray poly liner

No staining surrounding containment

indicative of seepage

Inspector Name Kevin Smith

Inspector Signature Kevin Smith

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	NAB1929428497
District RP	2RP-5677
Facility ID	
Application ID	pAB1929428231

## 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>155</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 <b>not</b> 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

State of New Mexico  
Oil Conservation Division

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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.

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: Tom Bynum Title: EHS Consultant

Signature: Tom Bynum Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_



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## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled sitemap with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: Tom Bynum Title: EHS Consultant

Signature: Tom Bynum Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	NAB1929428497
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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: Tom Bynum Title: EHS Consultant

Signature: Tom Bynum Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

**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: \_\_\_\_\_

**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 8328

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 8328
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	6/27/2022