

**HRL**
COMPLIANCE
SOLUTIONSP.O. Box 1708 • Artesia, NM 88211
www.hrlcomp.com

September 24, 2020

Mr. Tom Bynum
Devon Energy Production Company
6488 Seven Rivers Highway
Artesia, New Mexico 88210
Email: tom.bynum@dvn.com

Subject: Liner Inspection and Closure Report
Rattlesnake 16 SWD#001 (August 2017)
nOY1724030412
Lea County, New Mexico

Dear Mr. Bynum:

Devon Energy Production Company (Devon) (Client) retained HRL Compliance Solutions, Inc. (HRL) to conduct a liner inspection and prepare this closure report for the August 7, 2017 release at the Rattlesnake 16 SWD #001 facility (Site). The Site is in Lea County, New Mexico (Figure 1).

Release Summary and Initial Response

On August 7, 2017, a release of 130 barrels of produced water was observed at the Site. The release occurred when the SCADA units misread the tanks and failed to send alarms, resulting in an overflow from the produced water tanks. Initial response activities included stopping the source of the release, securing the impacted area, and removing free liquids within the secondary containment. 130 barrels of produced water were recovered. On August 9, 2017, the C-141 (Attachment A) was submitted to the New Mexico Oil Conservation Division (NMOCD).

Item	Discussion
Site Name	Rattlesnake 16 SWD 1
Latitude	32.0441688
Longitude	-103.4826937
Unit/Section/Township/Range	Unit E/Section 16/Township 26 South/ Range 34 East
Release Number	nOY1724030412
Date Release Discovered	August 7, 2017
Cause of Release	Equipment failure resulting in overflow
Type of Material Released	Produced Water
Volume Release	130 barrels

INNOVATIVE SOLUTIONS DELIVERED



Mr. Tom Bynum

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Item	Discussion
Volume Recovered	130 barrels

Liner Inspection

On August 16, 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 a small amount of water and oil. Based on this inspection, HRL has determined that the liner remains intact and fully contained the release (Attachment C, Inspection 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

Depth to groundwater at the release was estimated by evaluating data from the New Mexico Office of the State Engineer (NMSE) and United States Geological Survey (USGS) (Figure 2). The nearest groundwater well was approximately 2.3 miles from the Site; the depth to water in this well was 123 feet below ground surface (bgs).

Wellhead Protection Area

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the release (Figure 2).

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 Site (Figure 2).

Additional Site Characterization Criteria

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

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September 24, 2020



Mr. Tom Bynum
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Site Characterization	Response/Discussion
What is the shallowest depth to groundwater beneath the area affected by the release?	Greater than 100 feet
Did the release impact groundwater or surface water?	No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or other significant watercourse?	No
Are the lateral extents of the release within 200 feet of a lakebed, sinkhole, or playa lake?	No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Are the lateral extents of the release 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
Are the lateral extents of the release within 1,000 feet of any fresh water well or spring?	No
Are the lateral extents of the release within any incorporated municipal boundaries?	No
Are the lateral extents of the release within a defined municipal fresh water well field?	No
Are the lateral extents of the release within 300 feet of a wetland?	No
Are the lateral extents of the release overlying a subsurface mine?	No
Are the lateral extents of the release overlying an unstable area such as karst geology?	The Site is in an area of low potential for karst topography
Are the lateral extents of the release within the 100-year floodplain?	No
Did the release impact areas not on an exploration, development, production, or storage site?	No

Conclusions and Recommendations

The August 7, 2017 release of 130 barrels of produced at the Site was completely contained within the lined containment structure. HRL has determined that the liner integrity was good and completely contained the release; therefore, additional characterization of the soil and/or groundwater at the Site is not necessary. HRL recommends closure of this release.

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September 24, 2020



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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.

If you have any questions or concerns, please do not hesitate to contact me at (970) 243-3271 or via email at jlinn@hrlcomp.com.

Sincerely,

HRL Compliance Solutions, Inc.

Julie Linn, PG, RG
Project Manager

Figures:

Figure 1: Site Location

Figure 2: Depth to Groundwater

Attachments:

Attachment A: NMOCD Form C-141

Attachment B: Photographs

Attachment C: Liner Inspection Field Form

Rattlesnake 16 SWD 1 (August 2017)
September 24, 2020



Figures

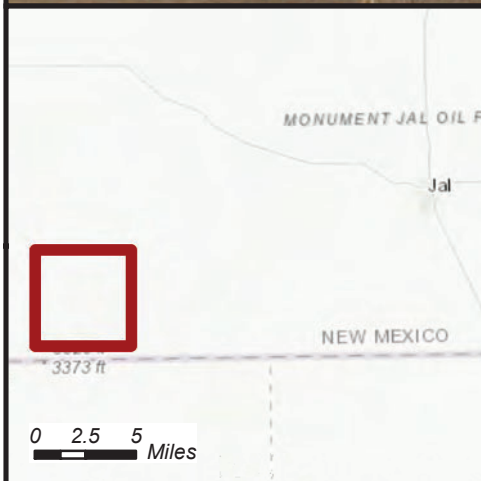
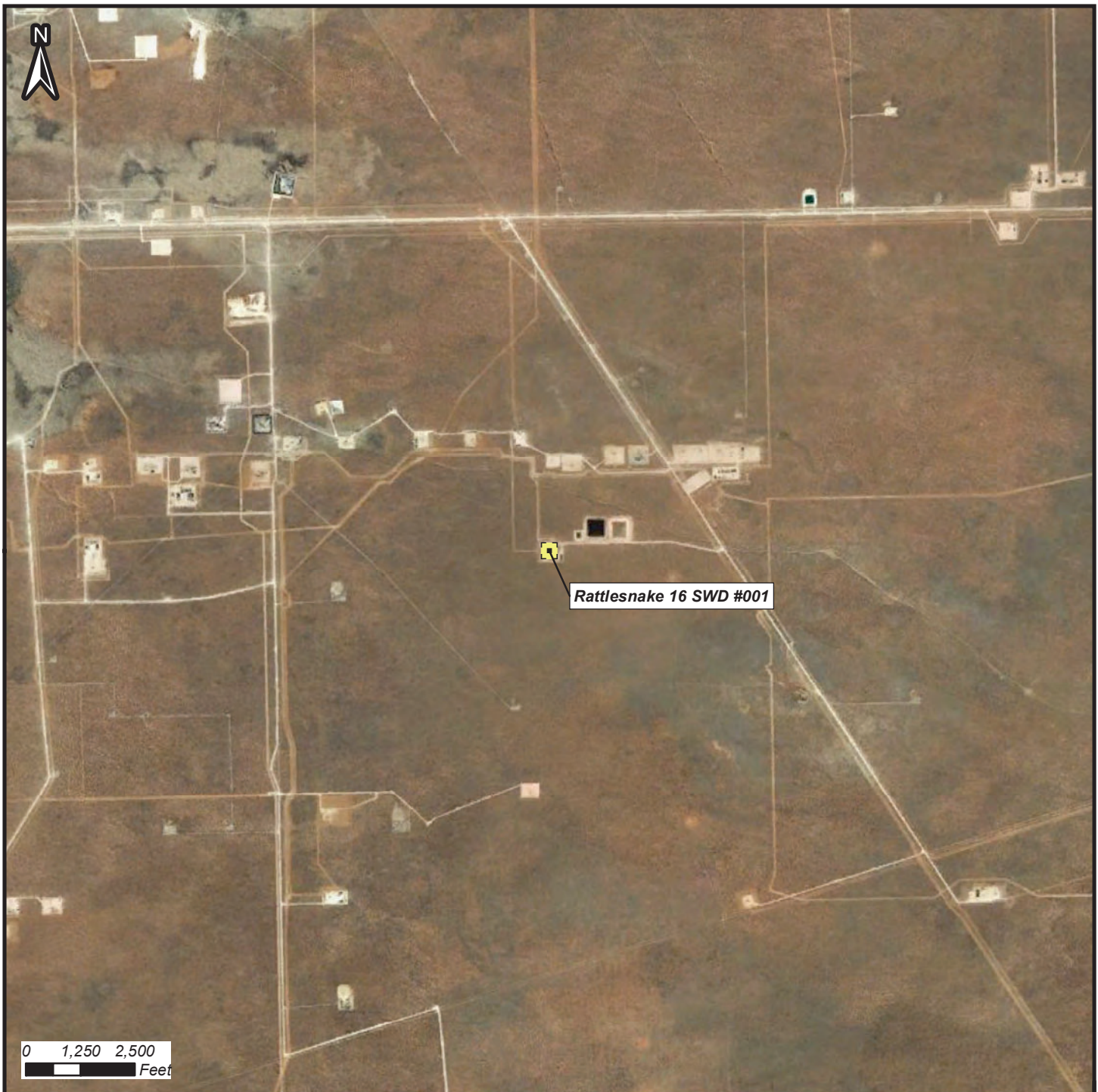


Figure 1: Site Location Map

Rattlesnake 16 SWD #001

August 2017 Release

32.0441688, -103.4826937

Section 16, Township 26 South, Range 34 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: 8/31/2020

T:\CLIENTS\DEVON ENERGY\2020\Rattlesnake 16 SWD #001\Maps\Rattlesnake 16 SWD #001 Site Location Map (August 2017 Split) 083120.mxd

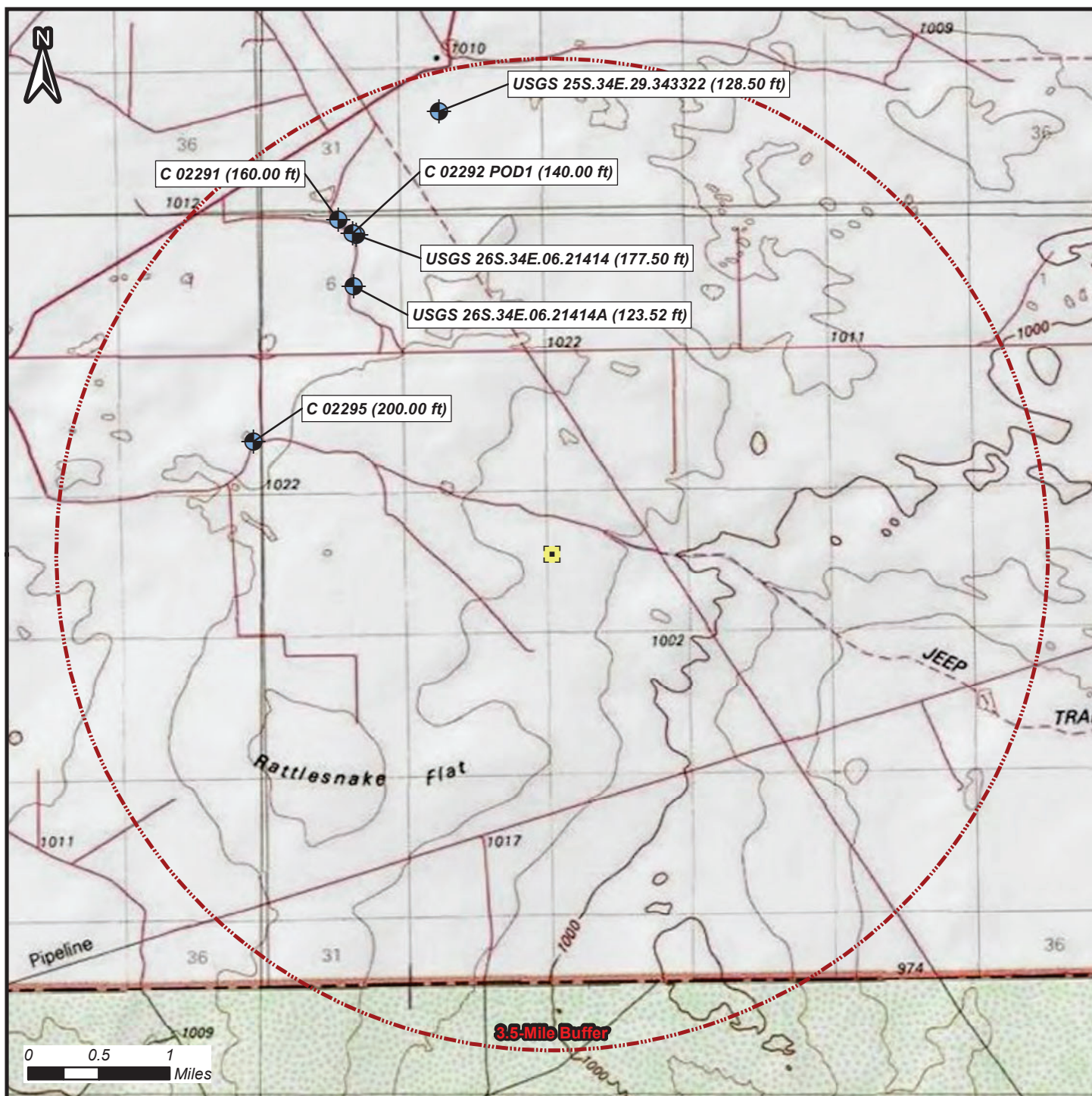


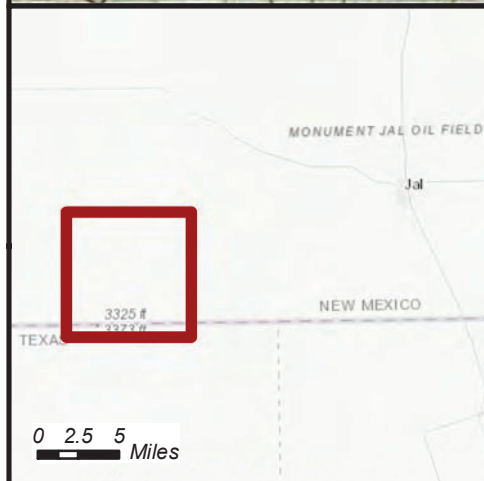
Figure 2: Depth to Groundwater Map

Rattlesnake 16 SWD #001

August 2017 Release

32.0441688, -103.4826937

Section 16, Township 26 South, Range 34 East



Mapped Features

- Point of Release
- Groundwater Well
- 3.5-Mile Buffer

Well Number	Water Level Below Ground Surface (ft)	Distance from Source (mi)
USGS 26S.34E.06.21414A	123.52	2.36
USGS 26S.34E.06.21414	177.50	2.65
C 02295	200.00	2.25
C 02292 POD1	140.00	2.67
C 02291	160.00	2.80
USGS 25S.34E.29.343322	128.50	3.23

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Author: A. Asay

Revision: 0

Date: 8/31/2020



Attachment A
NMOCD Form C-141

4441 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

Name of Company Devon Energy Production Company	Contact Rebecca Jamison, Production Foreman
Address 6488 Seven Rivers Hwy Artesia, NM 88210	Telephone No. 575-513-5538
Facility Name Rattlesnake 16 SWD 1	Facility Type Salt Water Disposal
Surface Owner State	Mineral Owner State
API No 30-025-42355	

LOCATION OF RELEASE

Unit Letter E	Section 16	Township 26S	Range 34E	Feet from the 2375	North/South Line North	Feet from the 210	East/West Line West	County Lea
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Latitude: 32.0441688

Longitude: -103.4826937

NATURE OF RELEASE

Type of Release Produced Water (PW)	Volume of Release 130BBLS	Volume Recovered 130BBLS
Source of Release Storage tank	Date and Hour of Occurrence 8/17/2017 @ 9:40 PM	Date and Hour of Discovery 8/17/2017 @ 9:40 PM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? OCD-Olivia Yu BLM-Shelly Tucker	
By Whom? Rebecca Jamison, Production Foreman	Date and Hour OCD- 8/08/2017 @ 4:40 PM BLM- 8/10/2017 @ 4:42 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse	


RECEIVED

By Olivia Yu at 8:22 am, Aug 28, 2017

If a Watercourse was Impacted, Describe Fully.* N/A
Describe Cause of Problem and Remedial Action Taken.* Scada issues misread the tanks and no alarms were sent resulting in the produced water tanks running over. The pumps were shut down into the SWD and proper personnel were contacted.

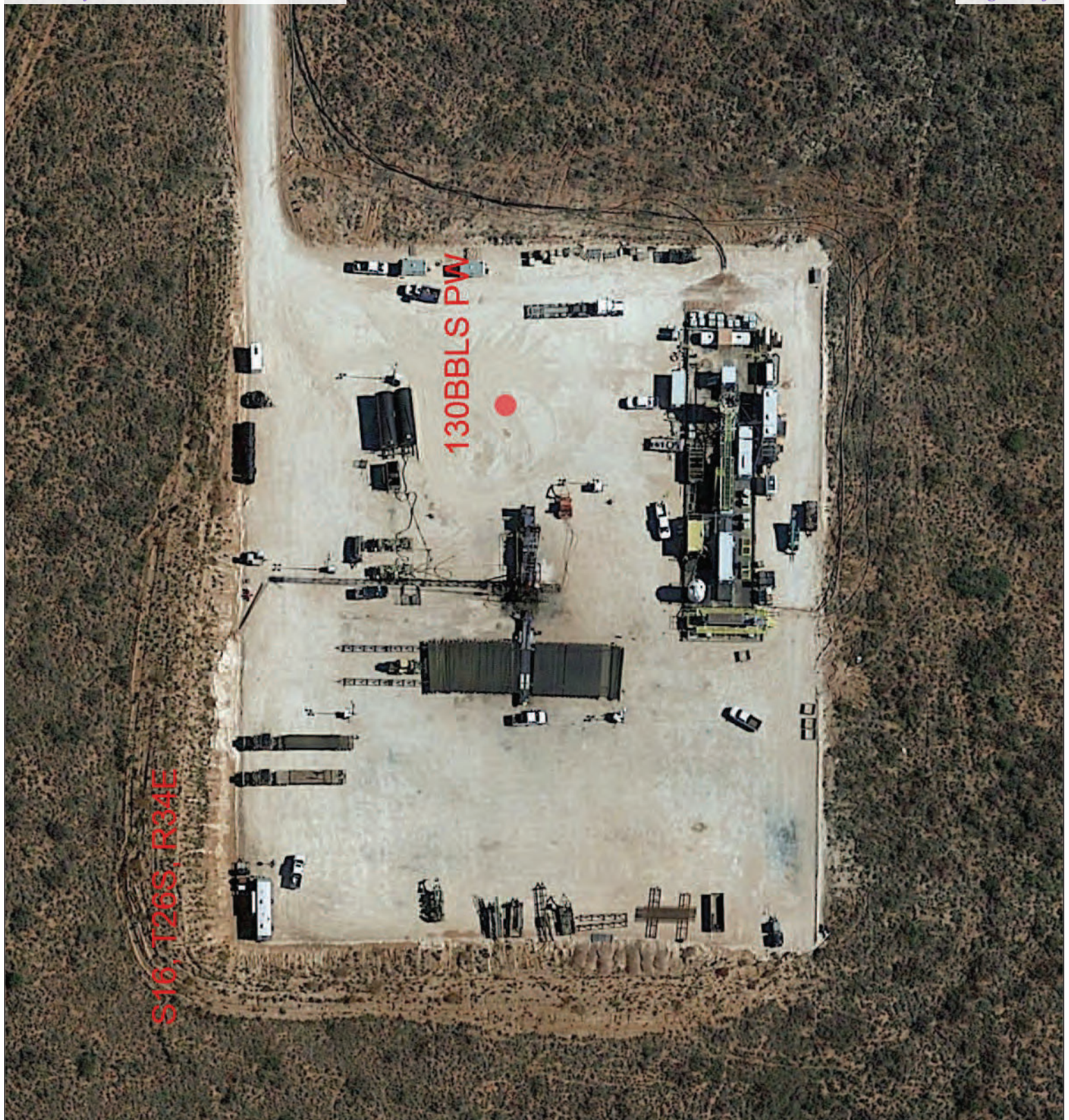
Describe Area Affected and Cleanup Action Taken.* Approximately 130BBLS of PW was released as a result of tanks overflowing. Approximately 130BBLS of PW was recovered via the dispatched vacuum truck. All fluid stayed inside the lined SPCC containment. Once fluids were removed the liner was visually inspected by Devon field staff for any pinholes or punctures and none were found. Based on this inspection there is no evidence that the spill fluids left containment.

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.

Signature: Dana DeLaRosa	OIL CONSERVATION DIVISION	
Printed Name: Dana DeLaRosa	Approved by Environmental Specialist: 	
Title: Field Admin Support	Approval Date: 8/28/2017	Expiration Date:
E-mail Address: dana.delarosa@dvnm.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 8/9/2017 Phone: 575.746.5594	Please inspect liner in question. Provide NMOCD with a concise report of the inspection with affirmation the liner has and will continue to contain liquids.	

* Attach Additional Sheets If Necessary

nOY1724030412



Rattlesnake 16 SWD 1
130BBL PW_8.9.2017



This map is for illustrative purposes only and is neither a legally recorded map nor survey and is not intended to be used as one. The user makes no warranty, representation or statement of any kind regarding this map.

WGS_1984_Web_Mercator_Auxiliary_Sphere
Prepared by: Dana DeLaRosa
Map is current as of: 24-Aug-2017



Miles
0 0.00 0.01 0.02 1:889

Devon_Google_Maps_L
imagery

Incident ID	NOY1724030412
District RP	
Facility ID	
Application ID	

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

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Incident ID	NOY1724030412
District RP	
Facility ID	
Application ID	

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: 9/25/2020
email: tom.bynum@dvn.com Telephone: 575-748-2663

OCD Only

Received by: _____ Date: _____

Incident ID	NOY1724030412
District RP	
Facility ID	
Application ID	

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: 9/25/2020
email: tom.bynum@dvn.com Telephone: 575-748-2663

OCD Only

Received by: OCD Date: 10/20/2020

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: Ashley Maxwell Date: 9/20/2022
Printed Name: Ashley Maxwell Title: Environmental Specialist



Attachment B

Photographs



Interior of the
secondary
containment



Interior of the
secondary
containment





Interior of the
secondary
containment



Exterior of the
secondary
containment





Interior of the
secondary
containment



Exterior of the
secondary
containment





Interior of the
secondary
containment





Attachment C

Liner Inspection Field Form



Liner Inspection Form

Client Devon Energy
 Site Name Rattlesnake 16 SWD #001
 Latitude 32.0441688
 Longitude -103.4826937
 Date of Release 8-7-2017
 NMOCD Incident Number NOY1724030412
 2-Day Notification sent to NMOCD 8-4-2020 and 8-12-2020
 Date of Inspection 8-16-2020

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?	✓		MIX rainwater + minor oil
Does it appear the liner had the ability to contain the leak?	✓		

Type of Liner: PolyStar Earthen with liner Earthen no liner
 Metal with Poly Lining Metal with Spray Epoxy Lining

Other (describe here): _____

Other Concerns or Observations:

Inspector Name Julie Linn
 Inspector Signature Julie Linn

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 10757

CONDITIONS

Operator: Pima Environmental Services, LLC 5614 N Lovington Hwy Hobbs, NM 88240	OGRID: 329999
	Action Number: 10757
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
amaxwell	None	9/20/2022