

Incident ID	nAPP2122137759
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: Wes Mathews Title: EHS Professional

Signature: Wesley Mathews Date: 6/20/2022

email: wesley.mathews@dvn.com Telephone: 575-513-8068

### OCD Only

Received by: Jocelyn Harimon Date: 08/30/2022

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: 11/30/2022

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced



**Pima Environmental Services  
5614 N. Lovington Highway  
Hobbs, NM 88240  
575-964-7740**

June 20, 2022

NMOCD District 2  
811 S. First St  
Artesia, NM, 88210

**RE: Liner Inspection and Closure Report  
Cotton Draw Unit 182 CTB  
API No. N/A  
GPS: Latitude 32.179336 Longitude -103.737923  
UL- D, Section 36, Township 24S, Range 31E  
NMOCD Reference No. NAPP2122137759**

Devon Energy Production Company (Devon) has contracted Pima Environmental Services, LLC (Pima) to perform a liner inspection and prepare this closure report for a produced water release that happened at the Cotton Draw Unit 182 CTB (Cotton). An initial C-141 was submitted on August 13, 2021, and can be found in Appendix B. This incident was assigned Incident ID NAPP2122137759, by the New Mexico Oil Conservation Division (NMOCD).

#### **Site Information and Site Characterization**

The Cotton is located approximately twenty (20) miles East of Malaga, NM. This spill site is in Unit D, Section 36, Township 24S, Range 31E, Latitude 32.179336 Longitude -103.737923, Eddy County, NM. A Location Map can be found in Figure 1.

Based upon New Mexico Office of the State Engineer well water data, depth to the nearest groundwater in this area is 852 feet below grade surface (BGS). According to the United States Geological Survey well water data, depth to the nearest groundwater in this area is greater than 390 feet BGS. See Appendix A for referenced water surveys. The Cotton is in a low karst area (Figure 3). A Topographic Map can be found in Figure 2.

#### **Release Information**

**NAPP2122137759:** On August 3, 2021, A produced water tank ran over, causing fluid to be released into lined containment. Approximately 1300 barrels (bbls) of produce water was released. A vacuum truck was dispatched and recovered all 1300 bbls of fluid from the lined SPCC containment ring. 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 spilled fluids left containment.

A Site Map can be found in Figure 4.

#### **Site Assessment and Liner Inspection**

On June 12, 2022, after sending the 48-hour notification via email, Pima Environmental conducted a liner inspection at this location. We concluded that this liner and containment maintained its integrity and was able to retain the fluids. The liner inspection form and photographic documentation can be found in Appendix C.

#### **Closure Request**

After careful review, Pima requests that this incident NAPP2122137759 be closed. Devon has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Tom Bynum at 575-964-7740 or [tom@pimaoil.com](mailto:tom@pimaoil.com).

Respectfully,

*Tom Bynum*

Tom Bynum  
Project Manager  
Pima Environmental Services, LLC

**Attachments**

Figures:

- 1- Location Map
- 2- Topographic Map
- 3- Karst Map
- 4- Site Map

Appendices:

- Appendix A- Referenced Water Surveys
- Appendix B- C-141 Form & 48 Hour Notification
- Appendix C- Liner Inspection Form & Photographic Documentation



Pima Environmental Services

**Figures:**

1-Location Map

2-Topographic Map

3-Karst Map


4-Site Map

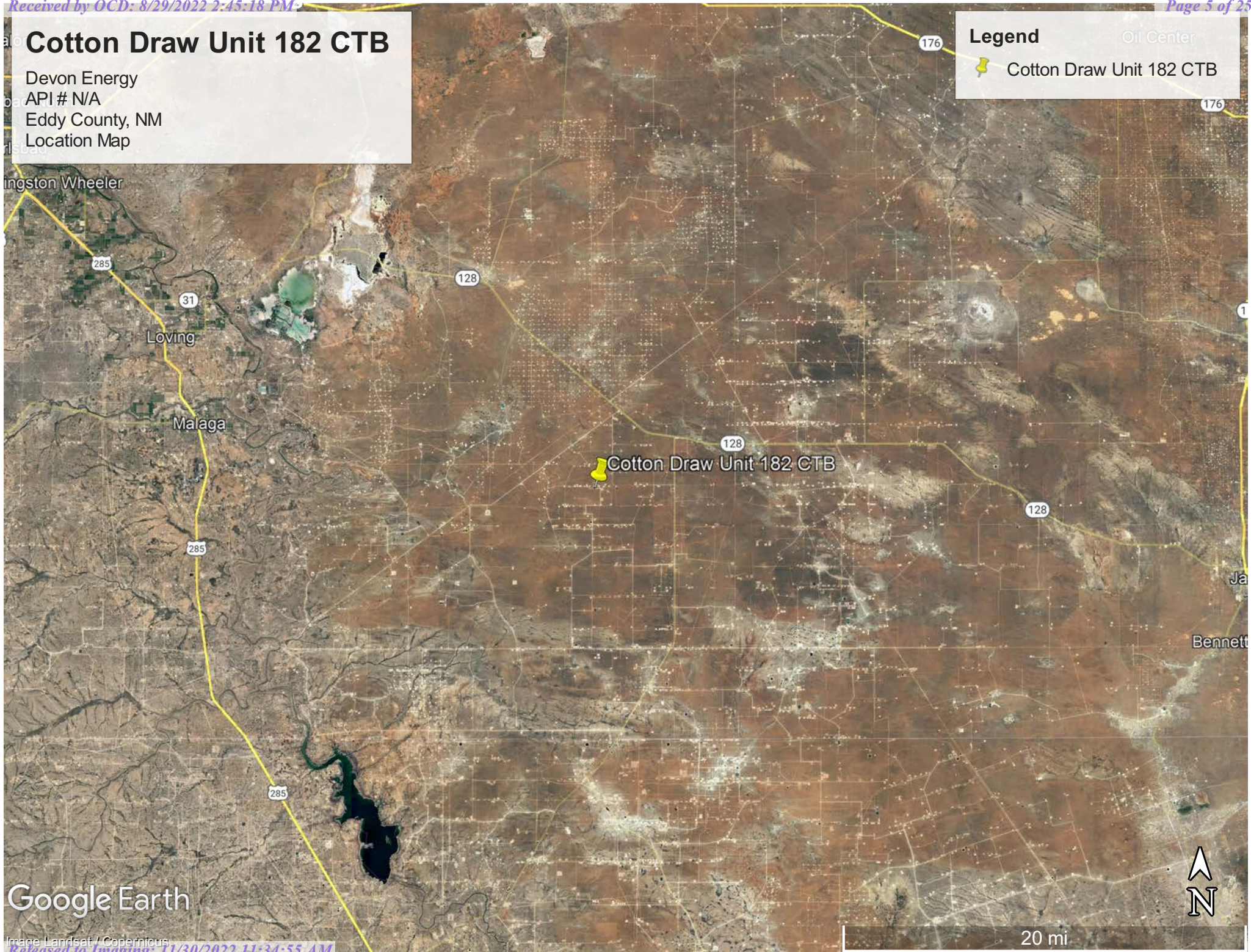


# Cotton Draw Unit 182 CTB

Devon Energy  
API # N/A  
Eddy County, NM  
Location Map

Legend

 Cotton Draw Unit 182 CTB




Google Earth

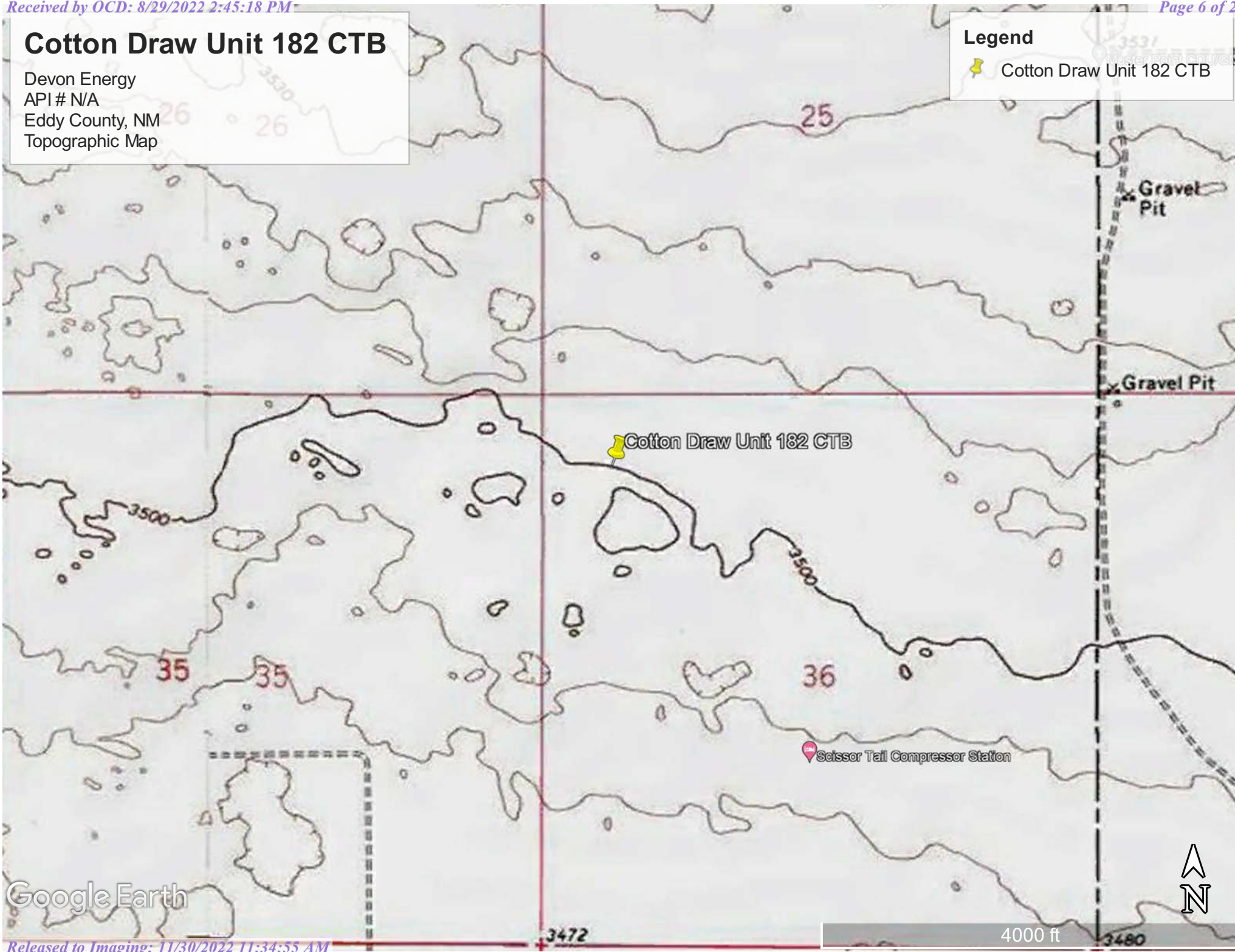


# Cotton Draw Unit 182 CTB

Devon Energy  
API # N/A  
Eddy County, NM  
Topographic Map

## Legend

 Cotton Draw Unit 182 CTB

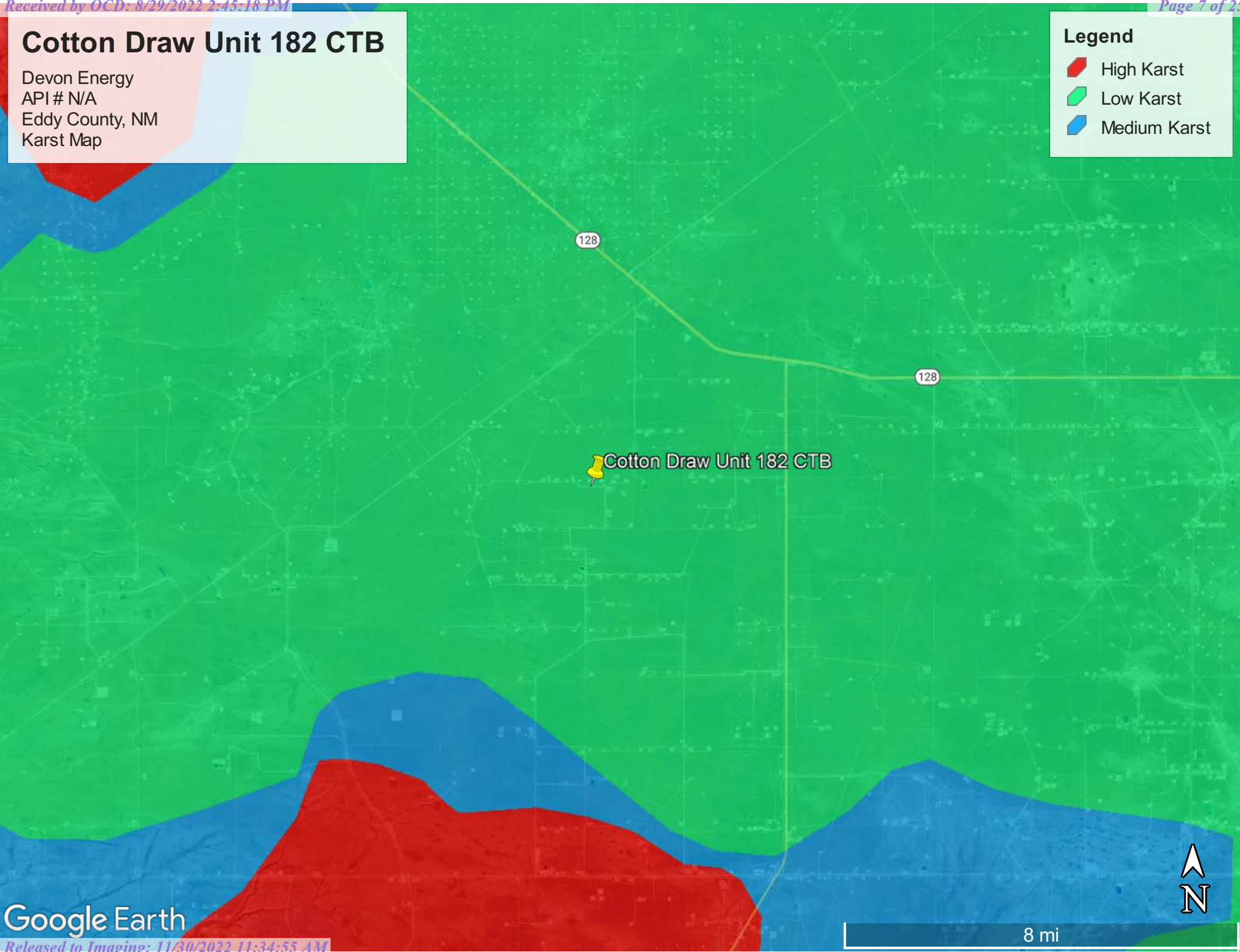


Google Earth

# Cotton Draw Unit 182 CTB

Devon Energy  
API # N/A  
Eddy County, NM  
Karst Map

- Legend**
- High Karst
  - Low Karst
  - Medium Karst






# Cotton Draw Unit 182 CTB

Devon Energy  
API # N/A  
Eddy County, NM  
Site Map

## Legend

 Lined Containments



Google Earth

200 ft





Pima Environmental Services

**Appendix A**

Water Surveys:

OSE

USGS



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced,  
O=orphaned,  
C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">C 04633 POD1</a>		CUB	ED	2	1	1	35	24S	31E	617394	3561170	1595			
<a href="#">C 02572</a>		CUB	ED	4	2	2	02	25S	31E	618695	3559294*	1741	852		
<a href="#">C 02574</a>		CUB	ED	1	1	2	02	25S	31E	618092	3559494*	1759			
<a href="#">C 02571</a>		CUB	ED	4	1	2	02	25S	31E	618292	3559294*	1850	860		
<a href="#">C 02573</a>		CUB	ED	1	4	2	02	25S	31E	618499	3559091*	1980			
<a href="#">C 02568</a>		CUB	ED	4	3	1	01	25S	31E	619103	3558892*	2122	1025		
<a href="#">C 02569</a>		CUB	ED	4	4	2	02	25S	31E	618699	3558891*	2139	1016		
<a href="#">C 04593 POD1</a>		CUB	ED	3	4	4	34	24S	31E	616903	3559674	2472	55		
<a href="#">C 02570</a>		CUB	ED	4	2	4	02	25S	31E	618704	3558489*	2537	895		
<a href="#">C 03830 POD1</a>		CUB	ED	4	2	4	02	25S	31E	618632	3558432	2602	450		
<a href="#">C 04388 POD1</a>		C	ED	3	2	1	23	24S	31E	617546	3564006	3321	910	868	42
<a href="#">C 04576 POD1</a>		CUB	ED	1	2	1	23	24S	31E	617700	3564324	3552	910	850	60
<a href="#">C 04508 POD1</a>		CUB	ED	4	4	3	15	24S	31E	616298	3564493	4396	110		

Average Depth to Water: **859 feet**

Minimum Depth: **850 feet**

Maximum Depth: **868 feet**

Record Count: 13

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 618982.37

**Northing (Y):** 3561011.4

**Radius:** 5000





[USGS Home](#)  
[Contact USGS](#)  
[Search USGS](#)

## National Water Information System: Web Interface

USGS Water Resources

Data Category:


Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.
- [Full News](#) 

Groundwater levels for the Nation



Important: [Next Generation Monitoring Location Page](#)

## Search Results -- 1 sites found

site\_no list =

- 320932103443801

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

## USGS 320932103443801 25S.31E.02.23441

Available data for this site

Groundwater: Field measurements



GO

Eddy County, New Mexico

Hydrologic Unit Code 13070001

Latitude 32°09'37.4", Longitude 103°44'29.6" NAD83

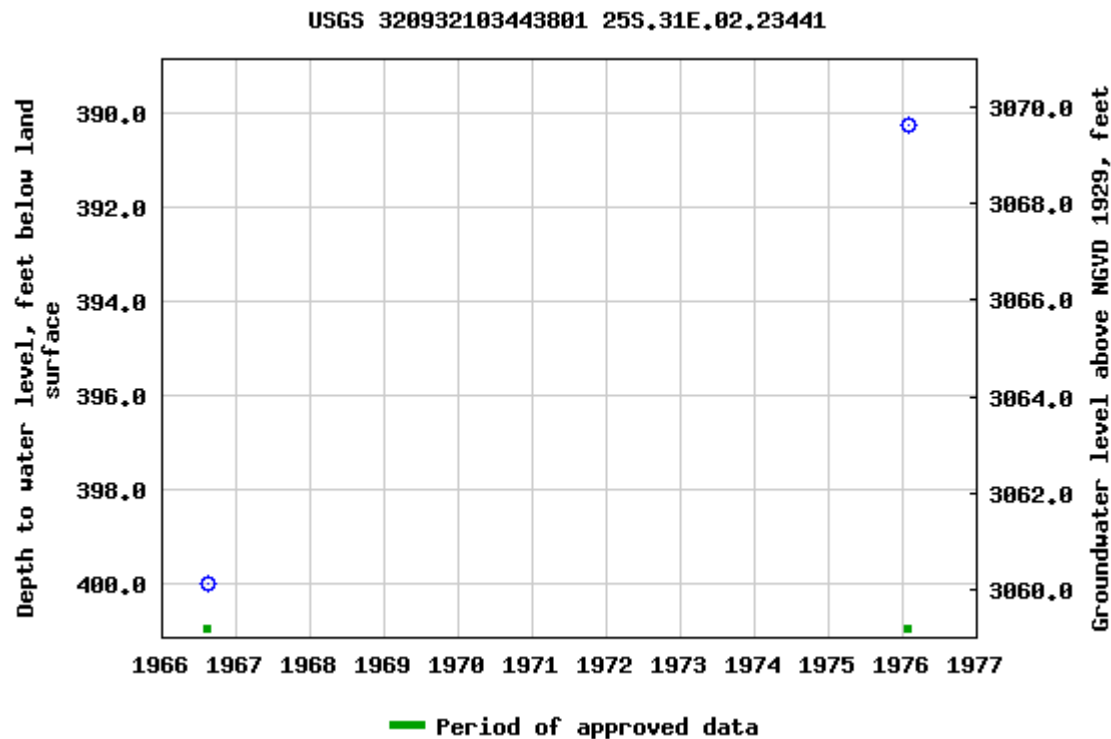
Land-surface elevation 3,460.00 feet above NGVD29

The depth of the well is 1,016 feet below land surface.

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Rustler Formation (312RSLR) local aquifer.

### Output formats

[Table of data](#)
[Tab-separated data](#)
[Graph of data](#)
[Reselect period](#)


Breaks in the plot represent a gap of at least one year between field measurements.

[Download a presentation-quality graph](#)

[Questions about sites/data?](#)

[Feedback on this web site](#)

[Automated retrievals](#)

[Help](#)

[Data Tips](#)

[Explanation of terms](#)





Pima Environmental Services

**Appendix B**

C-141 Form

48-Hour Notification

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: _____
<b><u>OCD Only</u></b>	
Received by: <u>Ramona Marcus</u>	Date: <u>10/05/2021</u>

NAPP2122137759

Spills In Lined Containment	
Measurements Of Standing Fluid	
Length(Ft)	140
Width(Ft)	30
Depth(in.)	28.546
Total Capacity without tank displacements (bbls)	1779.49
No. of 500 bbl Tanks In Standing Fluid	6
No. of Other Tanks In Standing Fluid	
OD Of Other Tanks In Standing Fluid(feet)	16
Total Volume of standing fluid accounting for tank displacement.	1300.05



Incident ID	NAPP2122137759
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>390</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

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.

Incident ID	NAPP2122137759
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Printed Name: Wes Mathews Title: EHS Professional

Signature: *Wesley Mathews* Date: 6/20/2022

email: wesley.mathews@dvn.com Telephone: 575-513-8068

**OCD Only**

Received by: Jocelyn Harimon Date: 08/29/2022



Incident ID	nAPP2122137759
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: Wes Mathews Title: EHS Professional

Signature: Wesley Mathews Date: 6/20/2022

email: wesley.mathews@dvn.com Telephone: 575-513-8068

### OCD Only

Received by: Jocelyn Harimon Date: 08/30/2022

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: \_\_\_\_\_



Gio PimaOil <gio@pimaoil.com>

---

## Cotton Liner Inspection

1 message

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Gio PimaOil <gio@pimaoil.com>

Thu, Jun 9, 2022 at 10:03 AM

To: ocdonline@state.nm.us, Tom Pima Oil <tom@pimaoil.com>

*Good Morning,*

*Pima Environmental would like to notify you that we will be conducting a liner Inspection at the Cotton Draw Unit 182 CTB for incident NAPP2122137759. Pima personnel are scheduled to be on site for this Inspection event at approximately 11:00 a.m. On Sunday, June 12, 2022. If you have any questions or concerns, please let me know. Thank you.*

--

Gio Gomez  
Environmental Project Manager  
cell-806-782-1151  
Office- 575-964-7740  
**Pima Environmental Services, LLC.**



Pima Environmental Services

## **Appendix C**

Liner Inspection Form

Photographic Documentation





## Pima Environmental Services, LLC

**Liner Inspection Form**Company Name: Devon EnergySite: Cotton Draw Unit 182 CTBLat/Long: 32.179336, -103.737923NMOCD Incident ID  
& Incident Date: NAPP21221367759 8/03/20212-Day Notification  
Sent: via Email by Gio Gomez 6/9/2022Inspection Date: 6/12/2022

Liner Type:	Earthen w/liner	Earthen no liner	Polystar
	<b>Steel w/poly liner</b>	Steel w/spray epoxy	No Liner

Other: \_\_\_\_\_

Visualization	Yes	No	Comments
Is there a tear in the liner?		X	
Are there holes in the liner?		X	
Is the liner retaining any fluids?		X	
Does the liner have integrity to contain a leak?	X		

Comments: \_\_\_\_\_

Inspector Name: Ned Rogers Inspector Signature: Ned Rogers

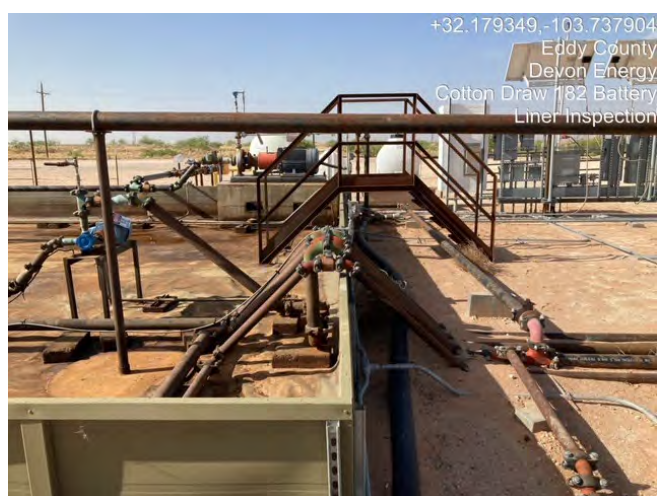


**SITE PHOTOGRAPHS  
DEVON ENERGY – LINER INSPECTION**

**COTTON DRAW 182 CTB**









**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 139032

**CONDITIONS**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 139032
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	We have received your closure report and final C-141 for Incident #NAPP2122137759 COTTON DRAW UNIT 182 CTB, thank you. This closure is approved.	11/30/2022