of New Mexico Incident ID page 1 of 28

Incident ID	nAPP2212228018
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	(ft bgs)
Did this release impact groundwater or surface water?	Yes X No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	Yes X 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)?	Yes X No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes 🛣 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?	Yes X No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	Yes X No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	Yes X No
Are the lateral extents of the release within 300 feet of a wetland?	Yes X No
Are the lateral extents of the release overlying a subsurface mine?	Yes No
Are the lateral extents of the release overlying an unstable area such as karst geology?	Yes X No
Are the lateral extents of the release within a 100-year floodplain?	Yes No
Did the release impact areas not on an exploration, development, production, or storage site?	Yes X No
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil
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 well 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	s.

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.

Received by OCD: 11/9/2022 1:11:49 PM Form C-141 State of New Mexico
Page 4 Oil Conservation Division

	Page 2 of	28
Incident ID	nAPP2212228018	
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. Title: Env. Professional Printed Name: Dale Woodall _____ Date: <u>11/9/2022</u> Signature: Dale Woodall email: dale.woodall@dvn.com Telephone: 575-748-1838 **OCD Only** Jocelyn Harimon Date: 11/09/2022 Received by:

1:49 PM State of New Mexico

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Incident ID	nAPP2212228018	
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 is	tems must be included in the closure report.							
A scaled site and sampling diagram as described in 19.15.29.1	1 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	C District office must be notified 2 days prior to final sampling)							
☐ Description of remediation activities								
and regulations all operators are required to report and/or file certain may endanger public health or the environment. The acceptance of	ntions. The responsible party acknowledges they must substantially nditions that existed prior to the release or their final land use in							
OCD Only								
Received by: Jocelyn Harimon	Date:11/09/2022							
	of liability should their operations have failed to adequately investigate and water, human health, or the environment nor does not relieve the responsible or regulations.							
Closure Approved by:	Date:							
Printed Name:	Title:							



5614 N. Lovington Highway
Hobbs, NM 88240
575-964-7740

July 21, 2022

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

RE: Liner Inspection and Closure Report

Bell Lake 24 CTB 3 API No. N/A

GPS: Latitude 32.2003159 Longitude -103.6269619

UL- K, Section 24, Township 24S, Range 32E NMOCD Reference No NAPP2212228018

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 Bell Lake 24 CTB 3 (Bell). An initial C-141 was submitted on May 17, 2022, and can be found in Appendix B. This incident was assigned Incident ID NAPP2212228018, by the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

The Bell is located approximately twenty-six (26) miles West of Jal, NM. This spill site is in Unit K, Section 24, Township 24S, Range 32E, Latitude 32.2003159 Longitude -103.6269619, Lea 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 415 feet below grade surface (BGS). According to the United States Geological Survey well water data, depth to the nearest groundwater in this area is 97 feet BGS. See Appendix A for referenced water surveys. The Bell is in a low karst area (Figure 3). A Topographic Map can be found in Figure 2.

Release Information

NAPP2212228018: On April 30, 2022, A Water tank ran over into lined containment. Approximately .29 barrels (bbl) of produced water was released. A vacuum truck was dispatched and recovered all .29 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 16, 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, NAPP2212228018 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.

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



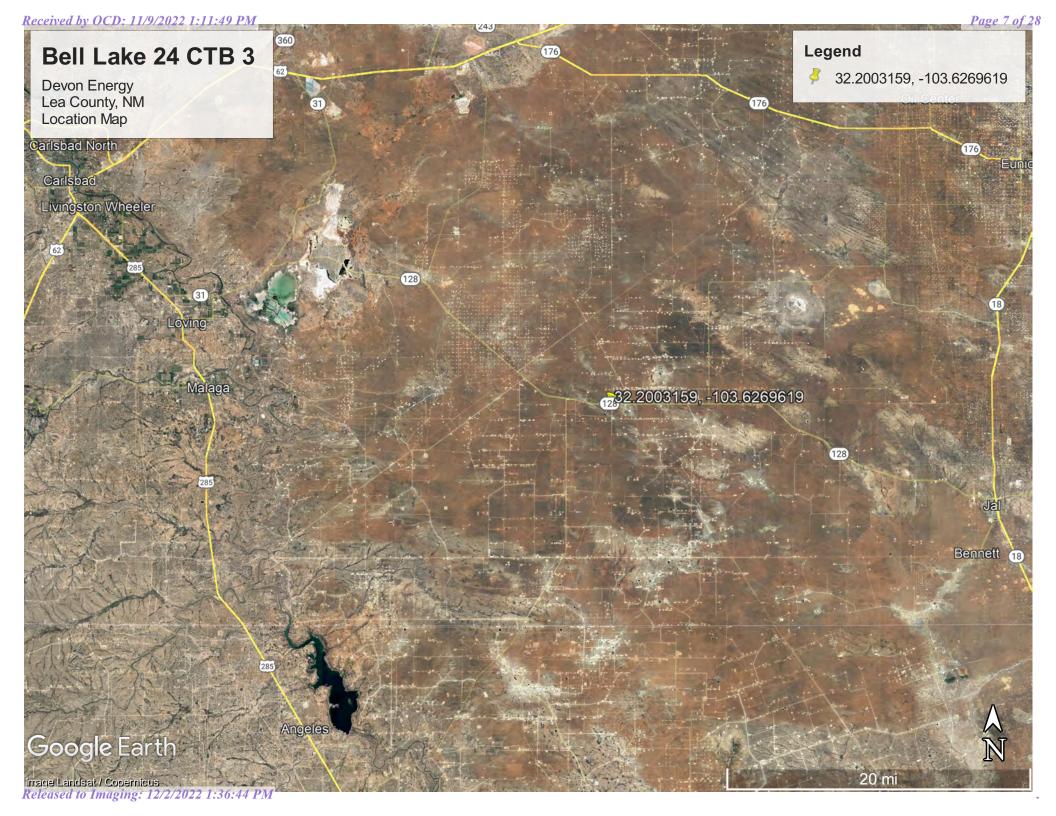
Figures:

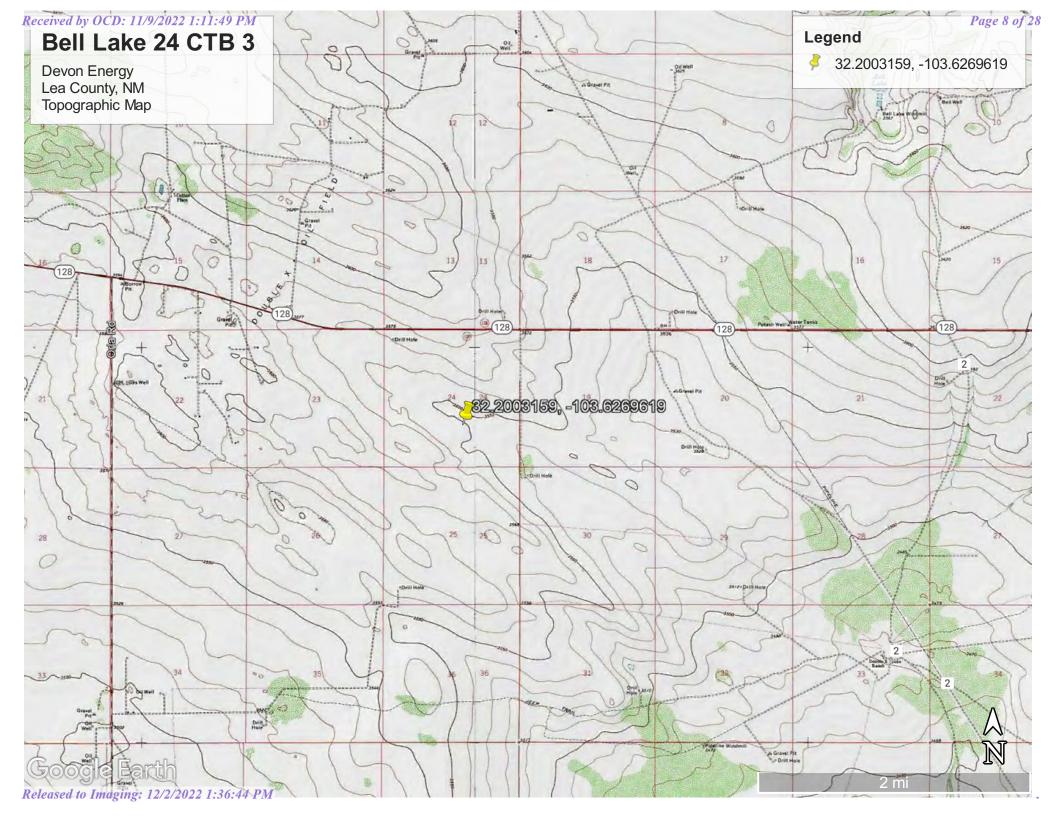
1-Location Map

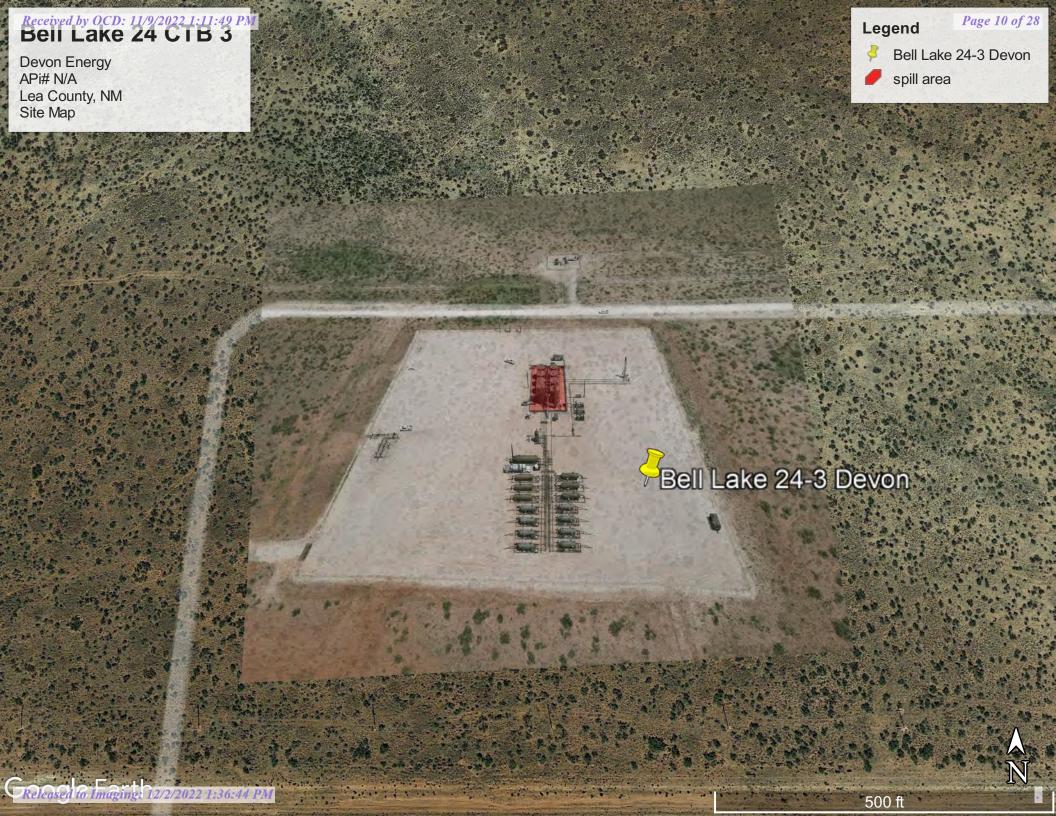
2-Topographic Map

3-Karst Map

4-Site Map









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													
DOD N. I	C 1	Sub-	0		Q		C	T	D	W.	X 7	D' 4 D	41 337 115		Water
POD Number	Code		County	64	16	4	Sec	IWS	Kng	X	Y	DistanceDe	eptn weii De	ptn water C	olumn
C 04622 POD1		CUB	LE	3	3	4	24	24S	32E	629436	3563006	459			
<u>C 01932</u>		С	ED		3	1	12	24S	32E	628633	3567188*	3803	492		
<u>C 02431</u>		CUB	LE	4	4	4	17	24S	33E	633175	3564728*	3967	525	415	110
<u>C 02432</u>		CUB	LE	4	4	4	17	24S	33E	633175	3564728*	3967	640	415	225
<u>C 02890</u>		С	LE		2	4	29	24S	33E	633114	3562012*	3974	500		
<u>C 02430</u>		CUB	LE	3	3	3	16	24S	33E	633377	3564732*	4160	643	415	228
<u>C 03528 POD1</u>		С	LE	1	1	2	15	24S	32E	626040	3566129	4298	541	133	408
C 03565 POD3		CUB	LE		3	4	08	24S	33E	632763	3566546	4551		1533	
<u>C 02350</u>		CUB	ED		4	3	10	24S	32E	625826	3566333*	4593	60		
<u>C 02312</u>		CUB	LE	1	2	1	05	25S	33E	632292	3559772	4681	150	90	60
<u>C 04536 POD1</u>		C	LE	1	2	2	33	24S	32E	625019	3561244	4924	500	314	186

Average Depth to Water:

473 feet 90 feet

1533 feet

Minimum Depth:

Maximum Depth:

Record Count: 11

UTMNAD83 Radius Search (in meters):

Easting (X): 629414.29 **Northing (Y):** 3563465.37 **Radius:** 5000

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

7/20/22 2:18 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER



USGS Home Contact USGS Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category:	Geographic Area:		
Groundwater ~	United States	•	GO

Click to hideNews Bulletins

- Explore the NEW <u>USGS National Water Dashboard</u> interactive map to access realtime water data from over 13,500 stations nationwide.
- Full News

Groundwater levels for the Nation

Important: <u>Next Generation Monitoring Location Page</u>

Search Results -- 1 sites found

site_no list =

321236103350101

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

USGS 321236103350101 24S.33E.17.444414

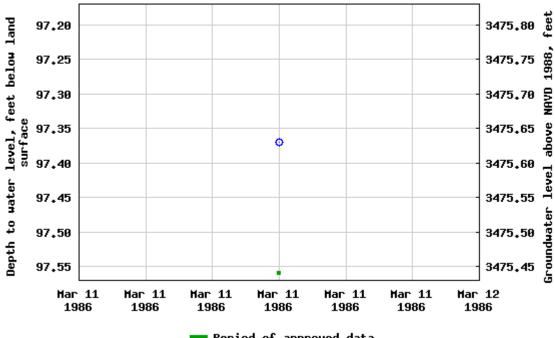
Available data for this site Groundwater: Field measurements

GO

Lea County, New Mexico
Hydrologic Unit Code 13070007
Latitude 32°12'36", Longitude 103°35'01" NAD27
Land-surface elevation 3,573 feet above NAVD88
This well is completed in the Other aquifers (N99990THER) national aquifer.
This well is completed in the Ogallala Formation (1210GLL) local aquifer.

Table of data Tab-separated data Graph of data Reselect period

USGS 321236103350101 245.33E.17.444414



- Period of approved data

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** <u>Help</u> **Data Tips Explanation of terms** Subscribe for system changes **News**

Accessibility

FOIA

Privacy

Policies and Notices

U.S. Department of the Interior | U.S. Geological Survey

Title: Groundwater for USA: Water Levels

URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

Page Contact Information: <u>USGS Water Data Support Team</u>

Page Last Modified: 2022-07-20 16:20:00 EDT

0.56 0.47 nadww02





USGS Home Contact USGS Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category:	Geographic Area:		
Groundwater >	✓ United States	~ [G	OE

∨ GO

Click to hideNews Bulletins

- Explore the NEW <u>USGS National Water Dashboard</u> interactive map to access realtime water <u>data</u> from over 13,500 stations nationwide.
- Full News

Groundwater levels for the Nation

Important: <u>Next Generation Monitoring Location Page</u>

Search Results -- 1 sites found

site_no list =

• 321312103395601

Minimum number of levels = 1

Save file of selected sites to local disk for future upload

Available data for this site Groundwater: Field measurements

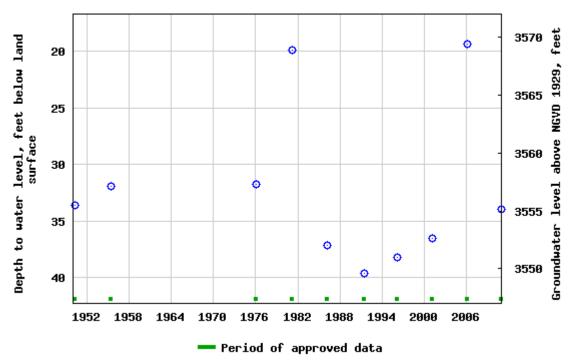
USGS 321312103395601 24S.32E.10.344333

Lea County, New Mexico	
Hydrologic Unit Code 13070007	
Latitude 32°13'30.4", Longitude 103°39'52.7" NAD83	
Land-surface elevation 3,589.00 feet above NGVD29	
The depth of the well is 60 feet below land surface.	
This well is completed in the Other aquifers (N9999OTHER	R) national aquifer.
This well is completed in the Alluvium, Bolson Deposits ar	nd Other Surface Deposits
(110AVMB) local aquifer.	·

Output formats

Table of data	
<u>Tab-separated data</u>	
Graph of data	
Reselect period	

USGS 321312103395601 245.32E.10.344333



Breaks in the plot represent a gap of at least one year between field measurements. <u>Download a presentation-quality graph</u>

Questions about sites/data?
Feedback on this web site
Automated retrievals
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U.S. Department of the Interior | U.S. Geological Survey

Title: Groundwater for USA: Water Levels

URL: https://nwis.waterdata.usgs.gov/nwis/gwlevels?

Page Contact Information: <u>USGS Water Data Support Team</u>

Page Last Modified: 2022-07-20 16:20:35 EDT

0.58 0.48 nadww02





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	OGRID				
Contact Nam	ne			Contact Te	Contact Telephone				
Contact ema	il			Incident #	(assigned by OCD)				
Contact mail	ing address			1					
			T	an i					
			Location	of Release So	ource				
Latitude				Longitude _					
			(NAD 83 in de	cimal degrees to 5 decim	nal places)				
Site Name				Site Type					
Date Release	Discovered			API# (if app	licable)				
Unit Letter	Section	Township	Range	Coun	ntv	7			
Cint Ection	Section	10 whomp	range		,	1			
						_			
Surface Owner	r: State	☐ Federal ☐ Tr	ribal Private (A	Name:)			
			Notare on	d Walssmaac f I	Dalaasa				
			Nature and	d Volume of I	Keiease				
				calculations or specific		e volumes provided below)			
Crude Oi		Volume Release			Volume Recovered (bbls)				
Produced	Water	Volume Release	• •		Volume Recovered (bbls)				
			tion of total dissol water >10,000 mg		S) Yes No				
Condensa	ite	Volume Release		2/1:	Volume Recovered (bbls)				
Natural G	ias	Volume Release	ed (Mcf)		Volume Recovered (Mcf)				
Other (de	scribe)	Volume/Weight	Released (provide	e units)	Volume/Weight Recovered (provide units)				
,	,		· ·	,		.			
Cause of Rel	ease	l							

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	Pag	e 19 of 2
nt ID		

cident ID
istrict RP
cility ID
pplication ID

Was this a major	If YES, for what reason(s) does the respon	sible party consider this a major release?
release as defined by 19.15.29.7(A) NMAC?		
19.13.29.7(A) WIAC:		
☐ Yes ☐ No		
If YES, was immediate no	otice given to the OCD? By whom? To wh	om? When and by what means (phone, email, etc)?
	Initial Ro	esponse
m u i		•
The responsible p	party must undertake the following actions immediatel	y unless they could create a safety hazard that would result in injury
The	h h4d	
	ease has been stopped.	
	is been secured to protect human health and	
		ikes, absorbent pads, or other containment devices.
-	ecoverable materials have been removed and	
If all the actions described	d above have <u>not</u> been undertaken, explain	why:
		emediation immediately after discovery of a release. If remediation
		efforts have been successfully completed or if the release occurred lease attach all information needed for closure evaluation.
		post of my knowledge and understand that pursuant to OCD rules and fications and perform corrective actions for releases which may endanger
public health or the environr	ment. The acceptance of a C-141 report by the C	CD does not relieve the operator of liability should their operations have
		at to groundwater, surface water, human health or the environment. In responsibility for compliance with any other federal, state, or local laws
and/or regulations.		
Printed Name:		Title:
Signatura: Kendra	Ruiz	Date:
Signature.		Date
email:		Telephone:
OCD Only	Harimon	
Jocelyn ł Received by:	Harimon	Date:

of New Mexico Incident ID PARTICIPATION APPROXIMATION OF A PROGRAMMENT OF THE PROGRAMMENT

Incident ID	nAPP2212228018
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?	(ft bgs)			
Did this release impact groundwater or surface water?	Yes X No			
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	Yes X 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)?	Yes X No			
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	Yes 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?	Yes No			
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	Yes X No			
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	Yes X No			
Are the lateral extents of the release within 300 feet of a wetland?	Yes No			
Are the lateral extents of the release overlying a subsurface mine?	Yes No			
Are the lateral extents of the release overlying an unstable area such as karst geology?	Yes X No			
Are the lateral extents of the release within a 100-year floodplain?	Yes No			
Did the release impact areas not on an exploration, development, production, or storage site?	Yes No			
Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and ver contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.	tical extents of soil			
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.

Received by OCD: 11/9/2022 1:11:49 PM Form C-141 State of New Mexico Page 4 Oil Conservation Division

Received by:

	Page	<i>21</i>	of	28	
2212	22001	0		1	

Incident ID	nAPP2212228018
District RP	
Facility ID	
Application ID	

Date: _____

Page 22 of 28

Incident ID	nAPP2212228018
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.

A scaled site and sampling diagram as described in 19.15.29.	.11 NMAC
Photographs of the remediated site prior to backfill or photomust be notified 2 days prior to liner inspection)	s of the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate OD	OC District office must be notified 2 days prior to final sampling)
Description of remediation activities	
and regulations all operators are required to report and/or file certa may endanger public health or the environment. The acceptance of should their operations have failed to adequately investigate and rehuman health or the environment. In addition, OCD acceptance of compliance with any other federal, state, or local laws and/or regularestore, reclaim, and re-vegetate the impacted surface area to the caccordance with 19.15.29.13 NMAC including notification to the Orinted Name: Dale Woodall	lations. The responsible party acknowledges they must substantially onditions that existed prior to the release or their final land use in OCD when reclamation and re-vegetation are complete. Title:Env. Professional
Signature: Dale Woodall	Date: 11/9/2022
email: <u>dale.woodall@dvn.com</u>	Telephone: <u>575-748-1838</u>
OCD OI.	
OCD Only	
Received by:	Date:
	y of liability should their operations have failed to adequately investigate and e water, human health, or the environment nor does not relieve the responsible d/or regulations.
Closure Approved by:	Date: 12/02/2022
Printed Name: Jennifer Nobui	Title: Environmental Specialist A



Gio PimaOil <gio@pimaoil.com>

Bell Lake 24 CTB 3 Liner Inspection

1 message

Gio PimaOil <gio@pimaoil.com>

Thu, Jul 14, 2022 at 8:17 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 Bell Lake 24 CTB 3 for incident NAPP2212228018. Pima personnel are scheduled to be on site for this Inspection event at approximately 9:00 a.m. On Saturday, July 16, 2022. If you have any questions or concerns, please let me know. Thank you.

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

Relitions from the second of t



Appendix C

Liner Inspection Form

Photographic Documentation



Liner Inspection Form

Company Name:	Devon I	Energy	<u>, </u>		
Site:	Bell	Lake 2	24 CTB 3		
Lat/Long:	32.2	00315	9, -103.62696	19	
NMOCD Incident ID & Incident Date:	NA	.PP221	12228018	4/30/2022	
2-Day Notification Sent:	via E	mail b	y Gio Gomez	7/14/2022	
Inspection Date:	7/16	/2022			
Liner Type:	Earthen	w/line	er	Earthen no liner	Polystar
	Steel w/	poly li	ner	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?	2	X			
Is the liner retaining any fluids?	X		Rain Water		
Does the liner have integrity to contain a leak?	X				
		1	1		



SITE PHOTOGRAPHS BELL LAKE 24 CTB 3







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 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 157390

CONDITIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	157390
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Report Approved.	12/2/2022