

Incident ID	NAB1822249538
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>51-100'</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 <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	NAB1822249538
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: Dale Woodall Title: Environmental Professional

Signature: *Dale Woodall* Date: 8/14/2023

email: dale.woodall@dvn.com Telephone: 575-748-1838

**OCD Only**

Received by: Shelly Wells Date: 8/14/2023

State of New Mexico  
Oil Conservation Division

Page 6

Incident ID	NAB1822249538
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: Dale Woodall Title: Environmental Professional

Signature: Dale Woodall Date: 8/14/2023

email: dale.woodall@dvn.com Telephone: 575-748-1838

**OCD Only**

Received by: Shelly Wells Date: 8/14/2023

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: 8/21/2023

Printed Name: Jocelyn Harimon Title: Environmental Specialist

**From:** [sebastian@pimaoil.com](mailto:sebastian@pimaoil.com)  
**To:** [ocdonline@state.nm.us](mailto:ocdonline@state.nm.us)  
**Cc:** [Polly@pimaoil.com](mailto:Polly@pimaoil.com); [tom@pimaoil.com](mailto:tom@pimaoil.com); "Gio PimaOil"  
**Subject:** Cotton Draw Unit 135H (NAB1822249538) - Liner Inspection 48-Hour Notification  
**Date:** Wednesday, July 19, 2023 2:02:58 PM  
**Attachments:** [image001.png](#)

---

Good afternoon,

Pima Environmental would like to notify you that we will be conducting a liner inspection at the Cotton Draw Unit 135H (NAB1822249538), on Sunday July 22<sup>nd</sup>, 2023. Pima personnel will be on location at 8 am. Thank you.

Respectfully,  
Sebastian Orozco  
Project Manager  
5614 N Lovington Hwy,  
Hobbs, NM 88240  
[Sebastian@pimaoil.com](mailto:Sebastian@pimaoil.com)  
619-721-4813 cell





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

August 10, 2023

Bureau of Land Management  
620 East Cotton Street  
Carlsbad, NM 88220

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

**RE: Liner Inspection and Closure Report**  
**Cotton Draw Unit 135H**  
**API No. 30-015-38533**  
**GPS: Latitude 32.1527023 Longitude -103.7520752**  
**UL- N, Section 2, Township 25S, Range 31E,**  
**Eddy County, NM**  
**NMOCD Reference No. NAB1822249538**

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 and crude oil release that happened on the Cotton Draw Unit 135H (Cotton). An initial C-141 was submitted on August 8, 2018, and can be found in Appendix B. This incident was assigned Incident ID NAB1822249538, by the New Mexico Oil Conservation Division (NMOCD).

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

The Cotton is located approximately twenty (20) miles southeast of Malaga, NM. This spill site is in Unit N, Section 2, Township 25S, Range 31E, Latitude 32.1527023 Longitude -103.7520752, Eddy County, NM.

Based upon New Mexico Office of the State Engineer well water data, depth to the nearest groundwater in this area is 135 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 406 feet BGS. See Appendix A for referenced water surveys. The Cotton is in a low karst area.

#### **Release Information**

**NAB1822249538:** On July 23, 2018. A hole was discovered on the bottom of the storage tank. Approximately 77.9 barrels (bbls) of produced water and 11.2 barrels (bbls) of crude oil were released from the tank. A vacuum truck was dispatched and recovered all 89.1 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.

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

On July 22, 2023, 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, NAB1822249538, be closed. Devon has complied with the applicable closure requirements.

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

Respectfully,

*Gio Gomez*

Gio Gomez  
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

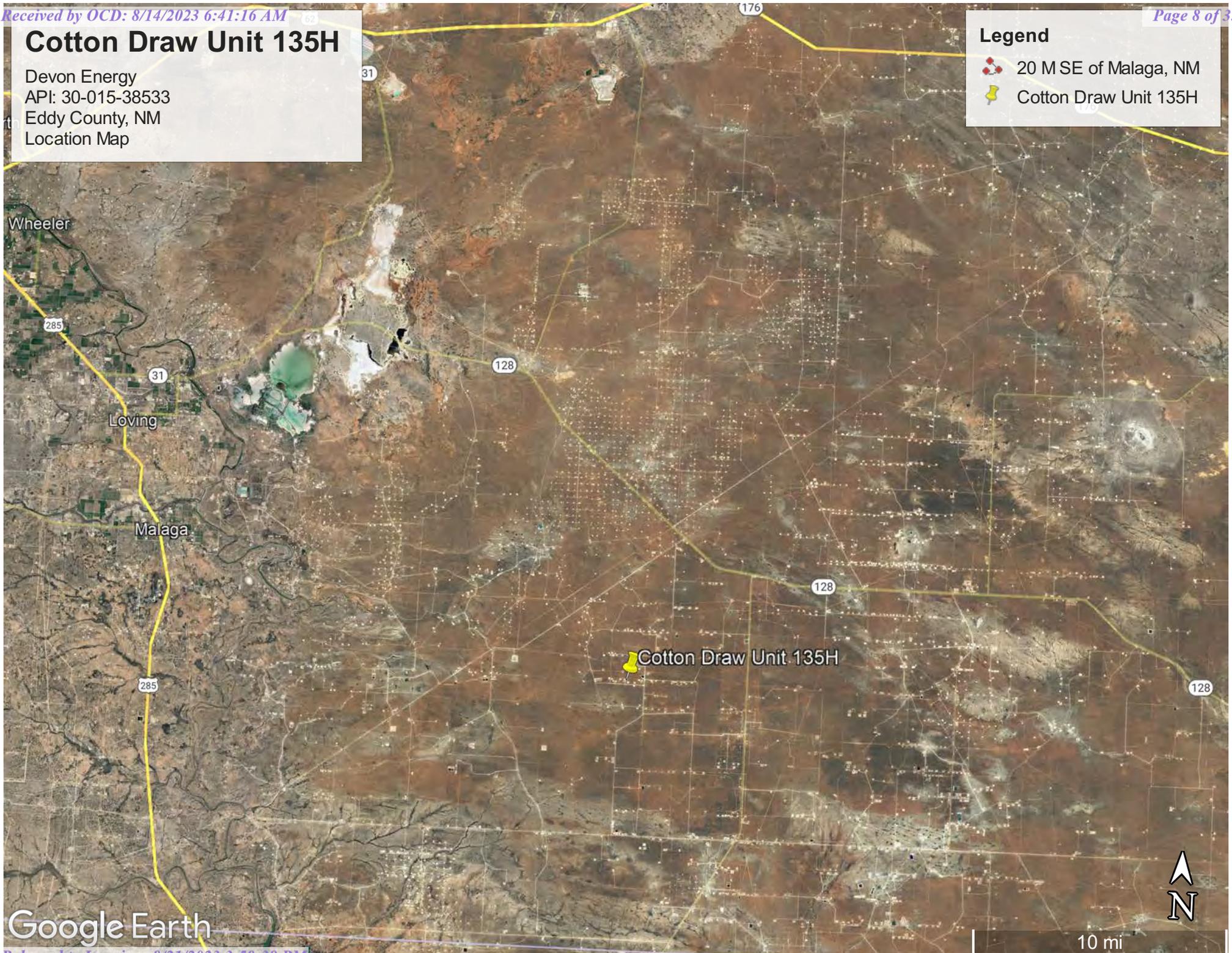
4-Site Map

# Cotton Draw Unit 135H

Devon Energy  
API: 30-015-38533  
Eddy County, NM  
Location Map

**Legend**

-  20 M SE of Malaga, NM
-  Cotton Draw Unit 135H



Google Earth

10 mi

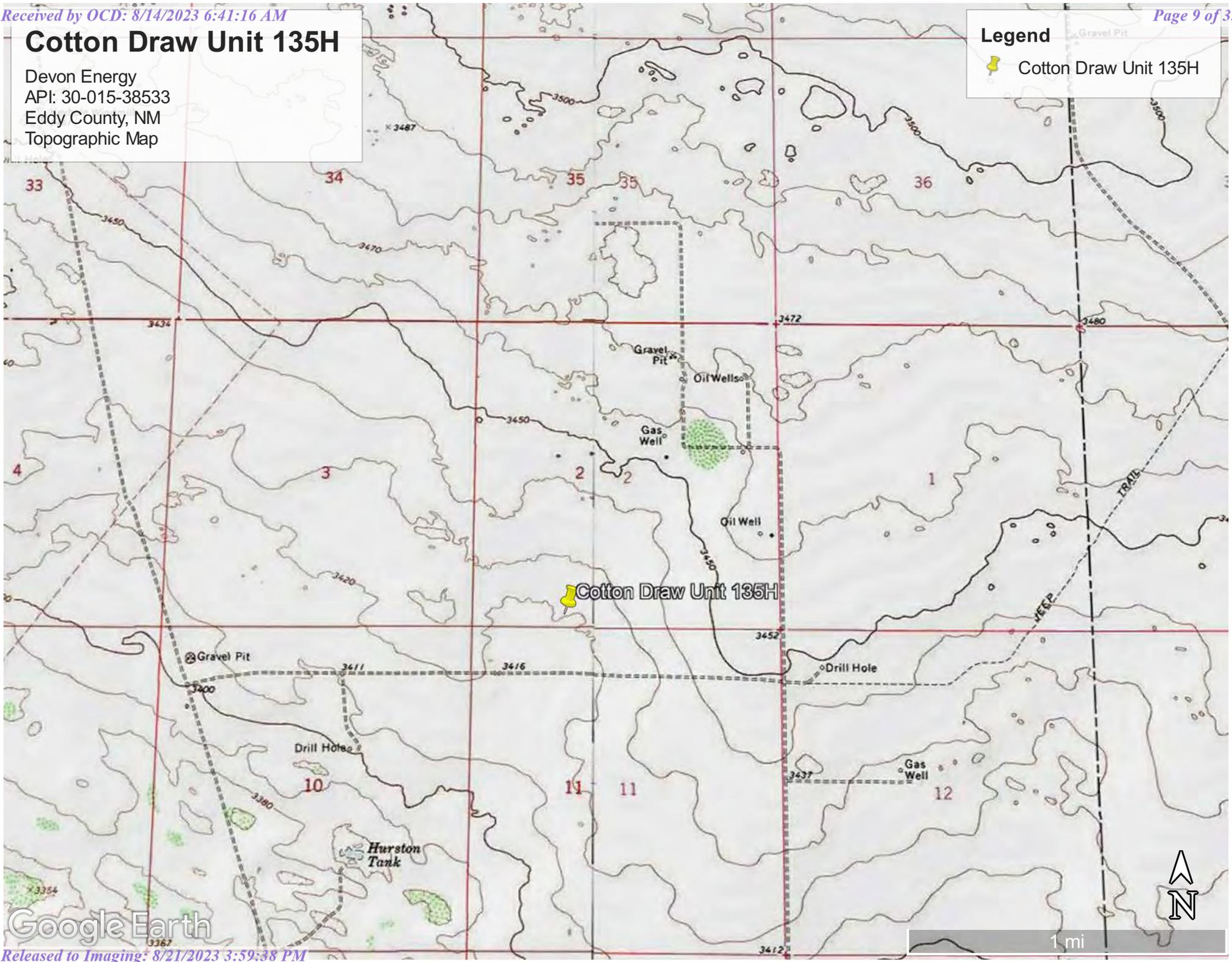


# Cotton Draw Unit 135H

Devon Energy  
API: 30-015-38533  
Eddy County, NM  
Topographic Map

**Legend**

-  Cotton Draw Unit 135H

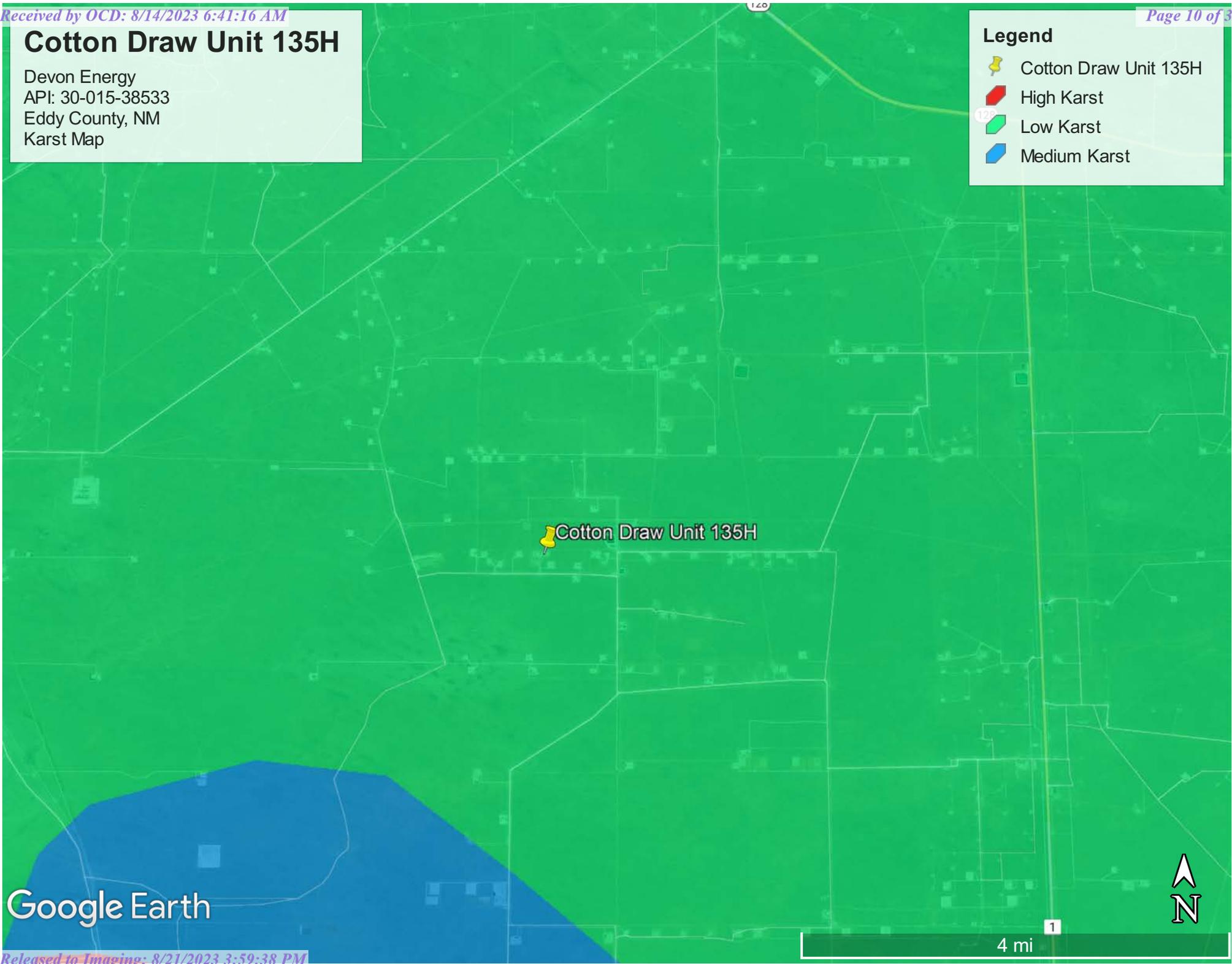


# Cotton Draw Unit 135H

Devon Energy  
API: 30-015-38533  
Eddy County, NM  
Karst Map

**Legend**

-  Cotton Draw Unit 135H
-  High Karst
-  Low Karst
-  Medium Karst



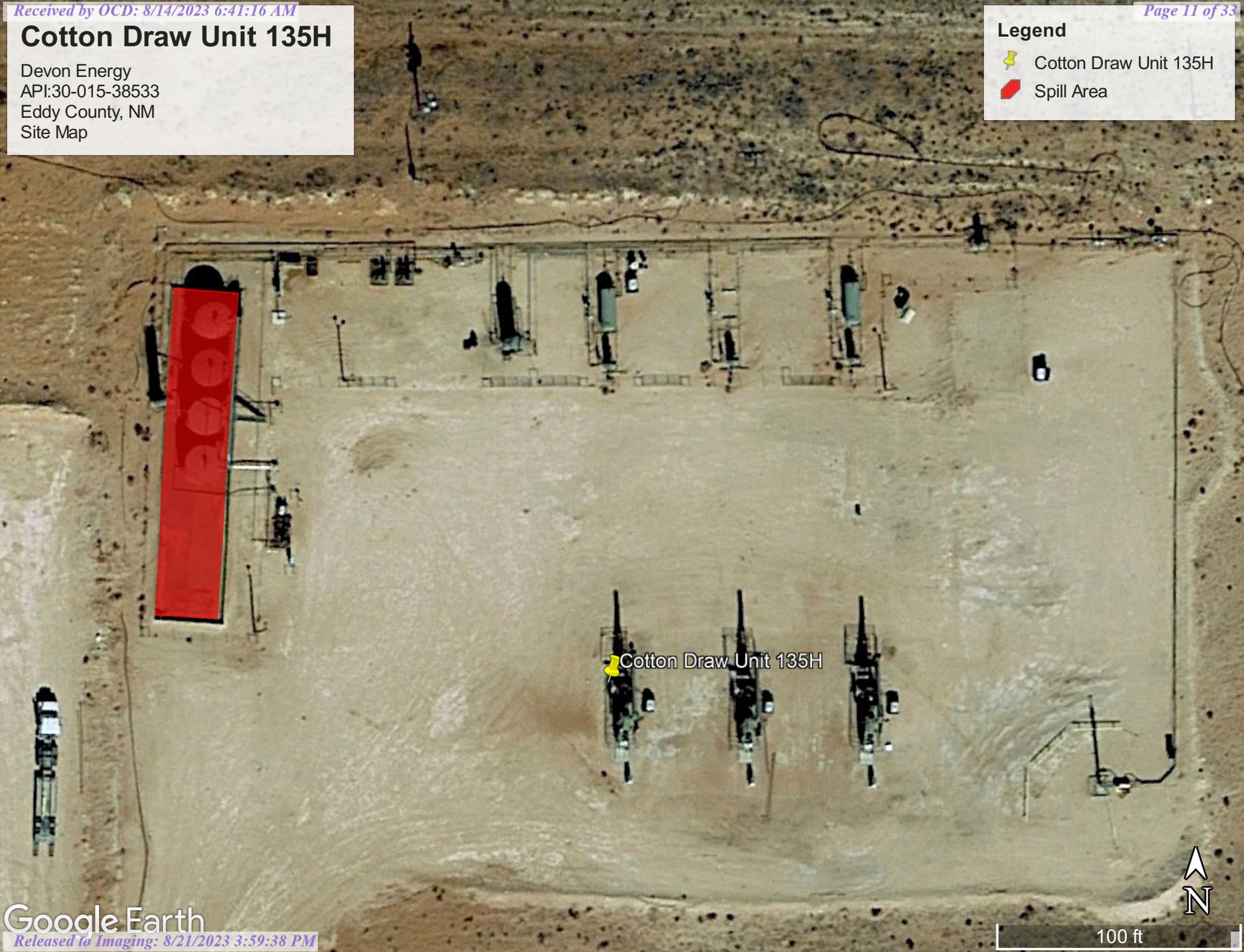
Google Earth

# Cotton Draw Unit 135H

Devon Energy  
API:30-015-38533  
Eddy County, NM  
Site Map

**Legend**

-  Cotton Draw Unit 135H
-  Spill Area



Cotton Draw Unit 135H





Pima Environmental Services

**Appendix A**

Water Surveys:

OSE

USGS

Surface Water Map

Wetlands Map



# New Mexico Office of the State Engineer

## Point of Diversion Summary

Well Tag	POD Number	(quarters are 1=NW 2=NE 3=SW 4=SE)				(quarters are smallest to largest)		(NAD83 UTM in meters)	
		Q64	Q16	Q4	Sec	Tws	Rng	X	Y
NA	C 04632 POD1	1	2	2	10	25S	31E	616802	3557964

---

<b>Driller License:</b> 1249	<b>Driller Company:</b> ATKINS ENGINEERING ASSOC. INC.	
<b>Driller Name:</b> JACKIE D ATKINS		
<b>Drill Start Date:</b> 06/08/2022	<b>Drill Finish Date:</b> 06/08/2022	<b>Plug Date:</b> 06/14/2022
<b>Log File Date:</b> 06/16/2022	<b>PCW Rev Date:</b>	<b>Source:</b>
<b>Pump Type:</b>	<b>Pipe Discharge Size:</b>	<b>Estimated Yield:</b>
<b>Casing Size:</b>	<b>Depth Well:</b> 55 feet	<b>Depth Water:</b>

---

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.

1/25/23 2:16 PM

POINT OF DIVERSION SUMMARY



# 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	Q 2	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">C_04632 POD1</a>		CUB	ED	1	2	2	10	25S	31E	616802	3557964		886	55		
<a href="#">C_03830 POD1</a>		CUB	ED	4	2	4	02	25S	31E	618632	3558432		1022	450		
<a href="#">C_02570</a>		CUB	ED	4	2	4	02	25S	31E	618704	3558489*		1109	895		
<a href="#">C_02569</a>		CUB	ED	4	4	2	02	25S	31E	618699	3558891*		1317	1016		
<a href="#">C_02573</a>		CUB	ED	1	4	2	02	25S	31E	618499	3559091*		1321			
<a href="#">C_02571</a>		CUB	ED	4	1	2	02	25S	31E	618292	3559294*		1383	860		
<a href="#">C_02574</a>		CUB	ED	1	1	2	02	25S	31E	618092	3559494*		1499			
<a href="#">C_02572</a>		CUB	ED	4	2	2	02	25S	31E	618695	3559294*		1602	852		
<a href="#">C_02568</a>		CUB	ED	4	3	1	01	25S	31E	619103	3558892*		1649	1025		
<a href="#">C_04593 POD1</a>		CUB	ED	3	4	4	34	24S	31E	616903	3559674		1802	55		
<a href="#">C_04635 POD1</a>		CUB	ED	4	3	4	01	25S	31E	619958	3558078		2273	55		
<a href="#">C_04633 POD1</a>		CUB	ED	2	1	1	35	24S	31E	617394	3561170		3132			
<a href="#">C_04722 POD2</a>		CUB	LE	2	1	1	06	25S	32E	620808	3559499		3443	55		
<a href="#">C_04636 POD1</a>		CUB	ED	3	4	3	25	24S	31E	619200	3561279		3566			
<a href="#">C_04643 POD1</a>		C	ED	4	2	2	05	23S	27E	619200	3561279		3566	305	135	170
<a href="#">C_04479 POD1</a>		CUB	ED	2	1	1	04	25S	31E	614182	3559400		3753	0	0	0
<a href="#">C_04620 POD1</a>		CUB	LE	4	3	4	06	25S	32E	621445	3558018		3760	55		
<a href="#">C_04654 POD1</a>		CUB	ED	3	3	4	25	24S	31E	619764	3561226		3796	55		
<a href="#">C_04618 POD1</a>		CUB	LE	3	4	3	18	25S	32E	621041	3554886		4612	55		

Average Depth to Water: **67 feet**  
 Minimum Depth: **0 feet**  
 Maximum Depth: **135 feet**

**Record Count:** 19

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

**Easting (X):** 617684.72      **Northing (Y):** 3558050.5      **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.

6/26/23 3:29 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:

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 = 

- 320952103444401

Minimum number of levels = 1

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

### USGS 320952103444401 25S.31E.02.214411

Available data for this site

Eddy County, New Mexico

Hydrologic Unit Code 13070001

Latitude 32°09'50.0", Longitude 103°44'41.2" NAD83

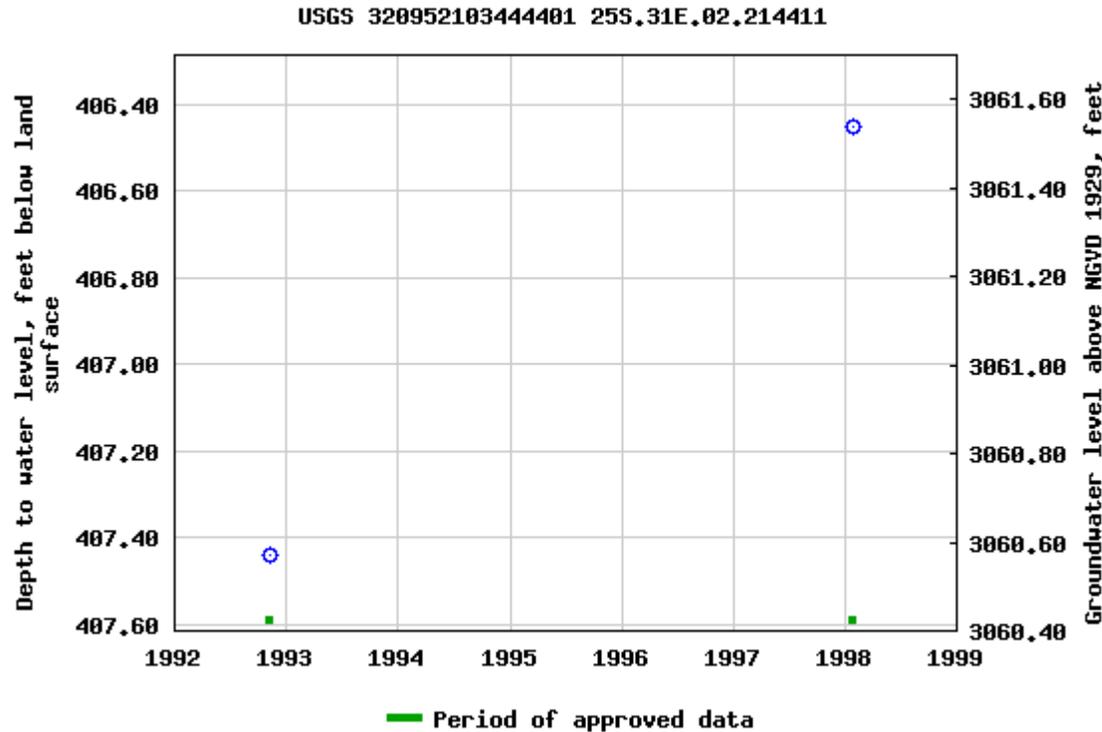
Land-surface elevation 3,468.0 feet above NGVD29

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

This well is completed in the Azotea Tongue of Seven Rivers Formation (313AZOT) local aquifer.

### Output formats

<a href="#">Table of data</a>
<a href="#">Tab-separated data</a>
<a href="#">Graph of data</a>
<a href="#">Reselect period</a>



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

[Download a presentation-quality graph](#)

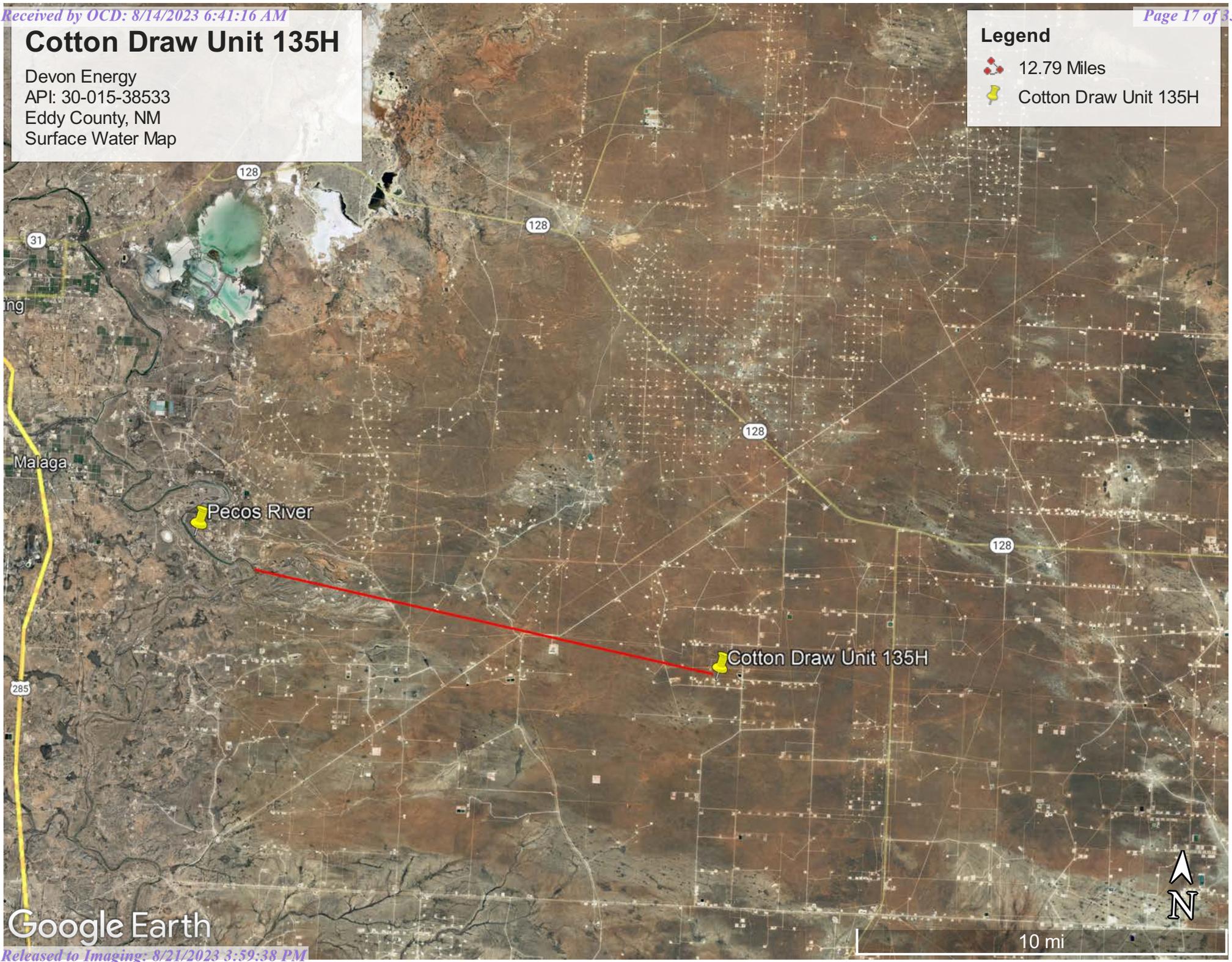
- [Questions or Comments](#)
- [Automated retrievals](#)
- [Help](#)
- [Data Tips](#)
- [Explanation of terms](#)
- [Subscribe for system changes](#)
- [News](#)

# Cotton Draw Unit 135H

Devon Energy  
API: 30-015-38533  
Eddy County, NM  
Surface Water Map

**Legend**

-  12.79 Miles
-  Cotton Draw Unit 135H



Google Earth



10 mi



# Wetlands Map



June 26, 2023

### Wetlands\_Alaska

- Estuarine and Marine Deepwater
- Freshwater Emergent Wetland
- Lake
- Estuarine and Marine Wetland
- Freshwater Forested/Shrub Wetland
- Other
- Freshwater Pond
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



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

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

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Form C-141  
Revised April 3, 2017

**Release Notification and Corrective Action**

**NAB1822249538**

**OPERATOR**

Initial Report  Final Report

Name of Company <b>Devon Energy Production Company</b> <i>1137</i>	Contact <b>Wesley Ryan, Production Foreman</b>
Address <b>6488 Seven Rivers Hwy Artesia, NM 88210</b>	Telephone No. <b>575-748-0177</b>
Facility Name <b>Cotton Draw Unit 135</b>	Facility Type <b>Oil</b>

Surface Owner <b>Federal</b>	Mineral Owner <b>Federal</b>	API No. <b>30-015-38533</b>
------------------------------	------------------------------	-----------------------------

**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
N	2	25S	31E	200	FSL	1600	FWL	Eddy

Latitude 32.1527023 Longitude 103.7520752 NAD83

**NATURE OF RELEASE**

Type of Release <b>Produced Water (PW) &amp; Oil</b>	Volume of Release <b>77.9BBLS PW &amp; 11.2BBLS Oil</b>	Volume Recovered <b>77.9BBLS PW &amp; 11.2BBLS Oil</b>
Source of Release <b>Hole in tank</b>	Date and Hour of Occurrence <b>July 23, 2018 @ 1:00 PM MST</b>	Date and Hour of Discovery <b>July 23, 2018 @ 1:00 PM MST</b>
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? <b>BLM-Shelly Tucker NMOCD - Mike Bratcher : NMOCD Maria Pruett</b>	
By Whom? <b>Brett Fulks, EHS Professional</b>	Date and Hour <b>July 24, 2018 @ 3:28 PM MST</b>	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse. <b>N/A</b>	

If a Watercourse was Impacted, Describe Fully.\*  
N/A

Describe Cause of Problem and Remedial Action Taken.\*  
A hole was discovered in the bottom of the storage tank. The tank was isolated to prevent any further release. Repairs made.

Describe Area Affected and Cleanup Action Taken.\*  
Approximately 77.9 bbls of pw and 11.2bls oil was released into lined containment. All fluid was recovered.

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>OIL CONSERVATION DIVISION</b>	
Signature: <i>Dana DeLaRosa</i>	Approved by Environmental Specialist: <i>Maria Pruett</i>
Printed Name: Dana DeLaRosa	Approval Date: <i>8/8/18</i> Expiration Date: <i>N/A</i>
Title: Field Admin Support	Conditions of Approval: <i>See attached</i> Attached: <i>APP-4907</i>
E-mail Address: <i>dana.delarosa@dvn.com</i>	
Date: Phone: <i>575.748.3371</i>	

\* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 08/06/18 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2824907 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

*The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]*

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in Artesia on or before 09/06/18. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C<sub>6</sub> thru C<sub>36</sub>), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

**Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.**

**Jim Griswold**  
OCD Environmental Bureau Chief  
1220 South St. Francis Drive  
Santa Fe, New Mexico 87505  
505-476-3465  
jim.griswold@state.nm.us

**Pruett, Maria, EMNRD**

---

**From:** Fulks, Brett <Brett.Fulks@dvn.com>  
**Sent:** Monday, August 6, 2018 9:36 PM  
**To:** Shoemaker, Mike; Bratcher, Mike, EMNRD; Pruett, Maria, EMNRD  
**Cc:** Fisher, Sheila; DeLaRosa, Dana; Ryan, Wesley; Kidd, Aaron; Mann, Ryan; Tucker, Shelly; Linam, Harry  
**Subject:** RE: Spill notification for Cotton Draw Unit 135 CTB (API# 30-015-38533)  
**Attachments:** Cotton Draw Unit 135\_77.9bbls pw & 11.21bbls oil\_7.23.2018\_Initial C141.doc; Cotton Draw Unit 135\_77.9bbls pw & 11.21bbls oil\_7.23.2018\_GIS Image.pdf

Good evening,

Attached please find the initial C-141 for the below release.

Thanks,

**Brett Fulks**  
EHS Representative

**Devon Energy Corporation**  
6488 Seven Rivers Highway  
Artesia, New Mexico 88210  
575 748 1844 Direct  
432 301 3223 Mobile



---

**From:** Fulks, Brett  
**Sent:** Tuesday, July 24, 2018 3:28 PM  
**To:** Shoemaker, Mike <Mike.Shoemaker@dvn.com>; 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; 'Pruett, Maria, EMNRD' <Maria.Pruett@state.nm.us>  
**Cc:** Fisher, Sheila <Sheila.Fisher@dvn.com>; DeLaRosa, Dana <Dana.DeLaRosa@dvn.com>; Ryan, Wesley <Wesley.Ryan@dvn.com>; Kidd, Aaron <Aaron.Kidd@dvn.com>; Mann, Ryan <rmann@slo.state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>; Linam, Harry <Harry.Linam@dvn.com>  
**Subject:** Spill notification for Cotton Draw Unit 135 CTB (API# 30-015-38533)

Good afternoon,

Devon had the following release occur at 4:00 PM MST on 7/23/18. The incident is described below.

- a. Cotton Draw Unit 135 CTB (API# 30-015-38533) At the Cotton Draw Unit 135 CTB, a hole developed in the bottom of oil tank 3, releasing approximately 77.9 bbls of produced water and 11.21 bbls of oil into lined secondary containment. All fluid was recovered, the secondary containment is intact with no leaks.

I have copied both BLM and SLO, I did so because our in house GIS system indicates that this is State surface and State minerals, but the NMOCD GIS system indicates that it is BLM surface and state minerals. Shelly, could you help double check if this is Fed surface or not?

A C-141 will be prepared and submitted with GPS coordinates of the areas affected.

Thanks,

**Brett Fulks**  
EHS Representative

**Devon Energy Corporation**  
6488 Seven Rivers Highway  
Artesia, New Mexico 88210  
575 748 1844 Direct  
432 301 3223 Mobile



**Confidentiality Warning:** This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.

Incident ID	NAB1822249538
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?	_51-100'_ (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.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NAB1822249538
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: Dale Woodall Title: Environmental Professional

Signature: *Dale Woodall* Date: 8/14/2023

email: dale.woodall@dvn.com Telephone: 575-748-1838

**OCD Only**

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

Incident ID	NAB1822249538
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: Dale Woodall Title: Environmental Professional

Signature: Dale Woodall Date: 8/14/2023

email: dale.woodall@dvn.com Telephone: 575-748-1838

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

**From:** [sebastian@pimaoil.com](mailto:sebastian@pimaoil.com)  
**To:** [ocdonline@state.nm.us](mailto:ocdonline@state.nm.us)  
**Cc:** [Polly@pimaoil.com](mailto:Polly@pimaoil.com); [tom@pimaoil.com](mailto:tom@pimaoil.com); "Gio PimaOil"  
**Subject:** Cotton Draw Unit 135H (NAB1822249538) - Liner Inspection 48-Hour Notification  
**Date:** Wednesday, July 19, 2023 2:02:58 PM  
**Attachments:** [image001.png](#)

---

Good afternoon,

Pima Environmental would like to notify you that we will be conducting a liner inspection at the Cotton Draw Unit 135H (NAB1822249538), on Sunday July 22<sup>nd</sup>, 2023. Pima personnel will be on location at 8 am. Thank you.

Respectfully,  
Sebastian Orozco  
Project Manager  
5614 N Lovington Hwy,  
Hobbs, NM 88240  
[Sebastian@pimaoil.com](mailto:Sebastian@pimaoil.com)  
619-721-4813 cell





Pima Environmental Services

**Appendix C**

Liner Inspection Form

Photographic Documentation



Pima Environmental Services, LLC

**Liner Inspection Form**

Company Name: Devon Energy

Site: Cotton Draw Unit 135H

Lat/Long: 32.1527023, -103.7520752

NMOCD Incident ID & Incident Date: NAB1822249538 7/23/2018

2-Day Notification Sent: via Email by Sebastian Orozco 7/19/2023

Inspection Date: 7/22/2023

Liner Type:      Earthen w/liner                      Earthen no liner                      Polystar  
                          **Steel w/poly liner**                      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		

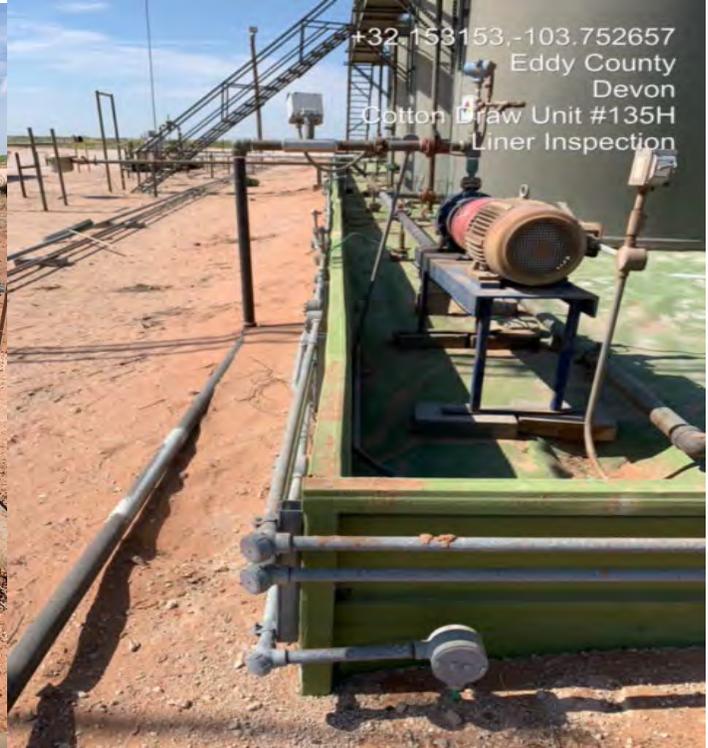
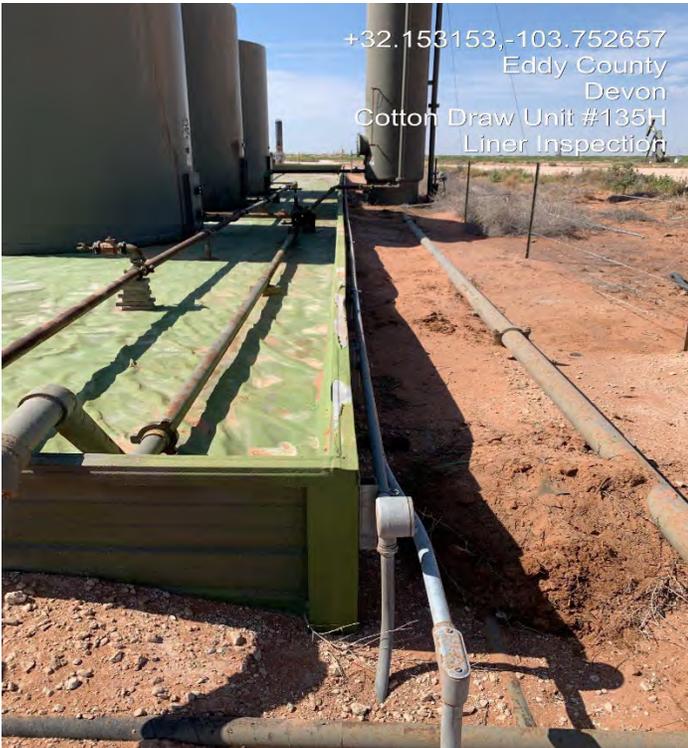
Comments: \_\_\_\_\_

Inspector Name: Andrew Franco      Inspector Signature: Andrew Franco



**SITE PHOTOGRAPHS  
DEVON ENERGY  
COTTON DRAW UNIT 135H  
LINER INSPECTION**





**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 251513

**CONDITIONS**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 251513
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
jharimon	None	8/21/2023