



October 13, 2025

New Mexico Oil Conservation Division

506 W. Texas Ave
Artesia, NM 88210

RE: **Horn 22-27-34 East Pad - Closure Request Report**

Incident Number: nAPP2518941837

GPS: 32.0379763°, -103.9663093°

Eddy County, New Mexico

ESRR Project No. VP-6757

To Whom It May Concern:

Earth Systems Response and Restoration (ESRR), presents the following Closure Request Report (CRR) to document the findings during a recent liner inspection conducted at Horn 22-27-34 East Pad (Site) following an inadvertent release of produced water within a lined secondary containment (LSC). Based on initial release response and liner inspection activities, WPX Energy Permian (WPX) is requesting No Further Action (NFA) at the Site.

Site Location

The Site is located in Unit P, Section 15, Township 26 South, Range 29 East, in Eddy County, New Mexico (32.0379763°, -103.9663093°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM) (**Figure 1**).

Incident Description & Background

On July 7, 2025, a pinhole leak developed on a water line, releasing approximately 26 barrels (bbls) of produced water within a LSC (**Figure 2**). The release was fully contained within the LSC with no fluids escaping to the production pad or adjacent native soils. A vacuum truck was immediately dispatched to the Site recovering the 26 bbls of produced water.

Notice was given to the New Mexico Oil Conservation Division (NMOCD) on July 7, 2025, by Notification of Release (NOR) and subsequently assigned Incident Number nAPP2518941837. A Corrective Action Form C-141 (Form C-141) was later submitted and approved by the NMOCD on July 15, 2025.

On July 9, 2025, WPX submitted a 48-hour Notification of Liner Inspection (Form C-141 L) for July 11, 2025.

On September 26, 2025, NMOCD rejected the previously submitted application for the following:

- 1) "Under the Site Characterization portion of the C-141 application, to the question, "What is the minimum distance, between the closest lateral extents of the release and the following surface areas: A continuously flowing watercourse or any other significant watercourse," was answered, "Between 1 and 5 (mi.)." According to 19.15.17 NMAC, a "significant watercourse" means a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5 minute quadrangle map or the next lower order tributary with a defined bed and bank of such watercourse. Brushy Draw, a significant watercourse, is located ~1,250 feet east of site. The minimum distance should be updated under the Site Characterization portion of the C-141 application upon resubmission and within the report itself.

Horn 22 27 34 Federal Com #411H - Closure Request Report
Incident Number: nAPP2510722871
32.037489°, -103.96695°



- 2) According to the NOR submitted on 7/8/2025, this incident occurred at FAPP2332566148 which was registered with OCD on 11/21/2023 and was called Horn 22-27-34 East Pad however referring to Photo 22, the location where the liner inspection occurred, was at Horn 22-27-24. Verify location."

ESRR has since updated this CRR to reflect the closest distance to a significant watercourse in the Site Characterization below and Devon has updated and replaced previously misprinted location signs referenced in photo 22. Updated **Photographic Documentation** is attached.

Site Characterization

ESRR characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). The following proximities were estimated:

- Between 1,000 feet and ½ miles of any continuously flowing watercourse or any other significant watercourse;
- Between 1 and 5 miles of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- Between 1 and 5 miles of any occupied permanent residence, school, hospital, institution or church;
- Between ½ and 1 mile of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between ½ and 1 mile of any other freshwater well or spring;
- Greater than 5 miles of any incorporated municipal boundary or a defined municipal fresh water well field covered under a municipal ordinance;
- Between 500 and 1,000 feet of any wetland;
- Greater than 5 miles of any subsurface mine;
- Overlying an unstable area (i.e. critical/ high/ medium karst potential); and
- Between 1,000 feet and ½ mile of a 100-year floodplain.

Receptor details used to determine the Site characterization are included in **Figure 3** and **Figure 4**. **Referenced Well Records** for the closest depth to water well are attached.

Based on the results from the desktop review, the Site is designated with medium karst potential with no depth to water well within 0.5 miles with data no greater than 25 years old. The following Closure Criteria was applied:

Constituents of Concern (COCs)	Closure Criteria [‡]
Chloride	600 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH)	100 mg/kg
Benzene	10 mg/kg
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX)	50 mg/kg

[‡]The reclamation concentration requirements of 600 mg/kg Chloride and 100 mg/kg TPH apply to the top 4 feet of areas to be immediately reclaimed following remediation pursuant to NMAC 19.15.17.13.

TPH= Gasoline Range Organics + Diesel Range Organics + Oil Range Organics

Laboratory Analytical Methods used: Environmental Protection Agency (EPA) 300.0, EPA 8015 NM, EPA 8021 B

Liner Inspection

On July 11, 2025, ESRR conducted a thorough visual inspection of the LSC and found no tears, cracks, cuts, breaks, or other signs of damage, confirming no evidence of a breach to the LSC. The liner appeared to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

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Closure Request

Based on initial release response and liner inspection activities, WPX believes the completed remedial actions meet the requirements set forth in NMAC 19.15.29.13 regulations in order to be protective of human health, the environment, and groundwater. WPX believes NFA is warranted at the Site and respectfully requests Closure for Incident Number nAPP2518941837. If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or gmoreno@earthsys.net. **NMOCD Documentation & Correspondence** is attached.

Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

A handwritten signature in black ink, appearing to read "Gilbert Moreno".

Gilbert Moreno
Carlsbad Operations Manager/ Project Geologist

A handwritten signature in black ink, appearing to read "Kris Williams".

Kris Williams, CHMM, REM
Principal

cc: Jim Raley, WPX Energy Permian
Bureau of Land Management

Attachments:

- Figure 1 - Site Map
- Figure 2 - Release Extent
- Figure 3 - Ground Water
- Figure 4 - Karst Potential
- Referenced Well Records
- Photographic Documentation
- NMOCD Documentation & Correspondence

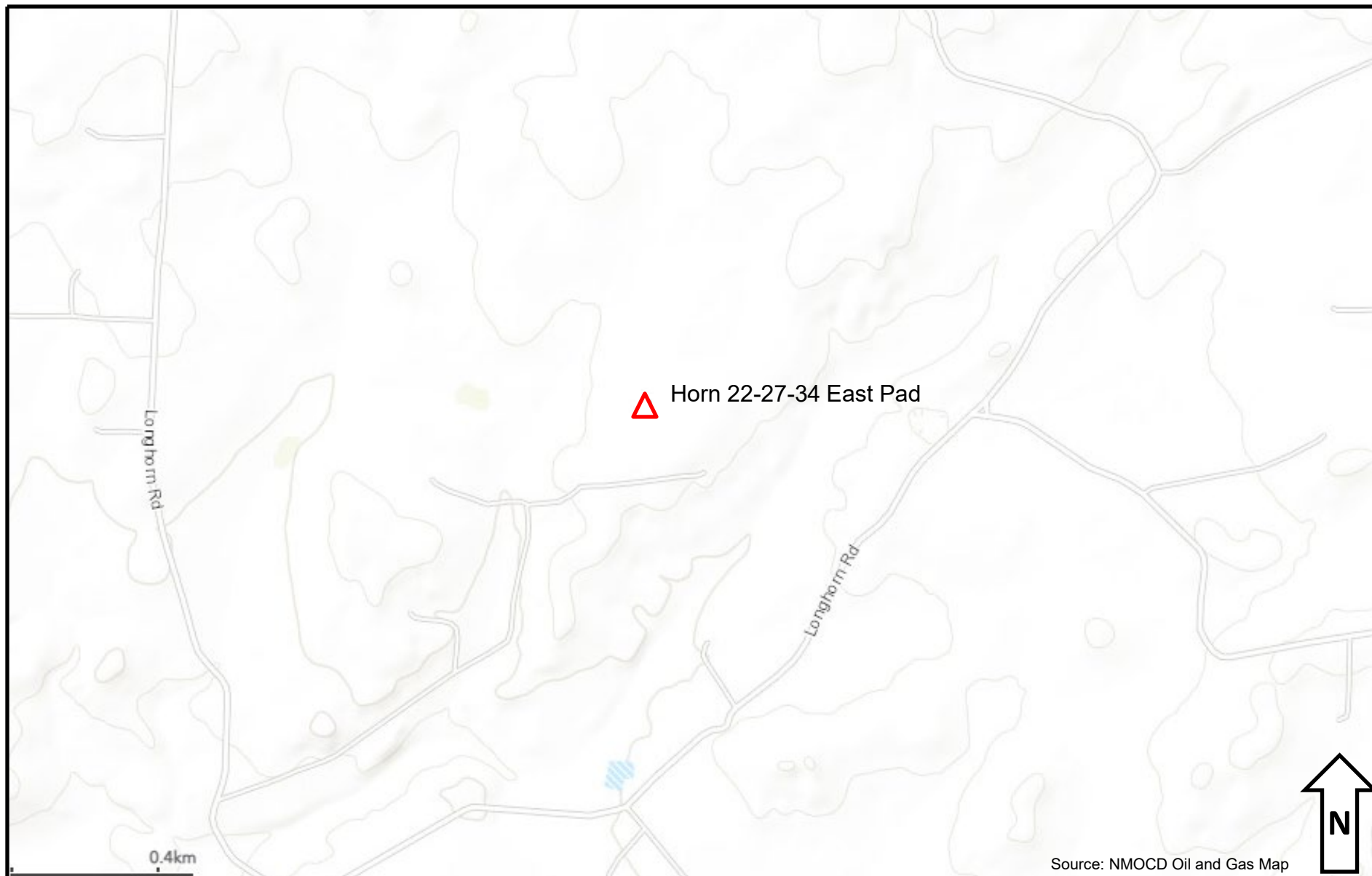
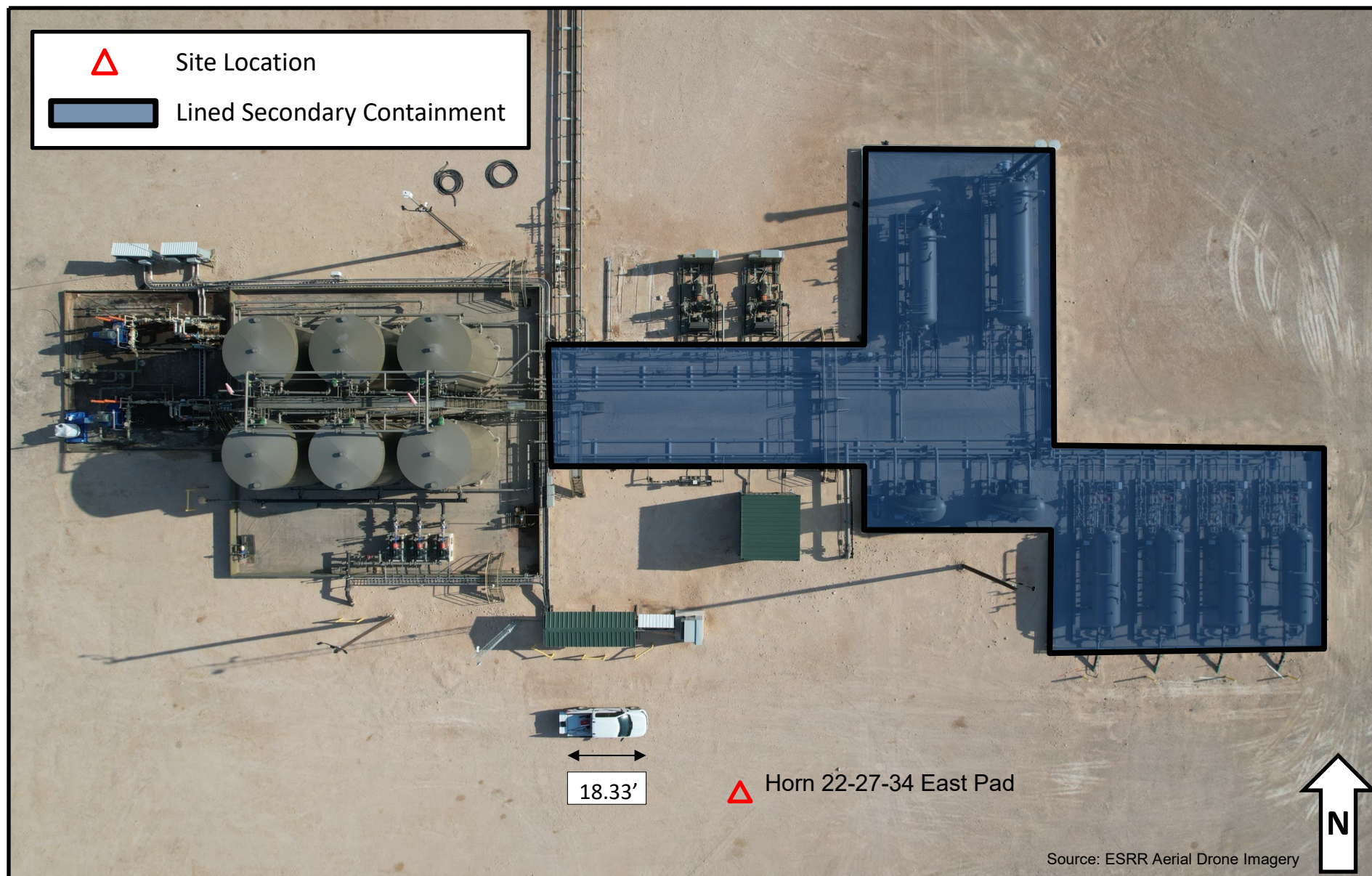


Figure 1 – Site Map

WPX Energy Permian – Horn 22-27-34 East Pad
GPS: 32.0379763°, -103.9663093°
Eddy County, New Mexico



**Figure 2 – Release Extent**

WPX Energy Permian – Horn 22-27-34 East Pad
GPS: 32.0379763°, -103.9663093°
Eddy County, New Mexico



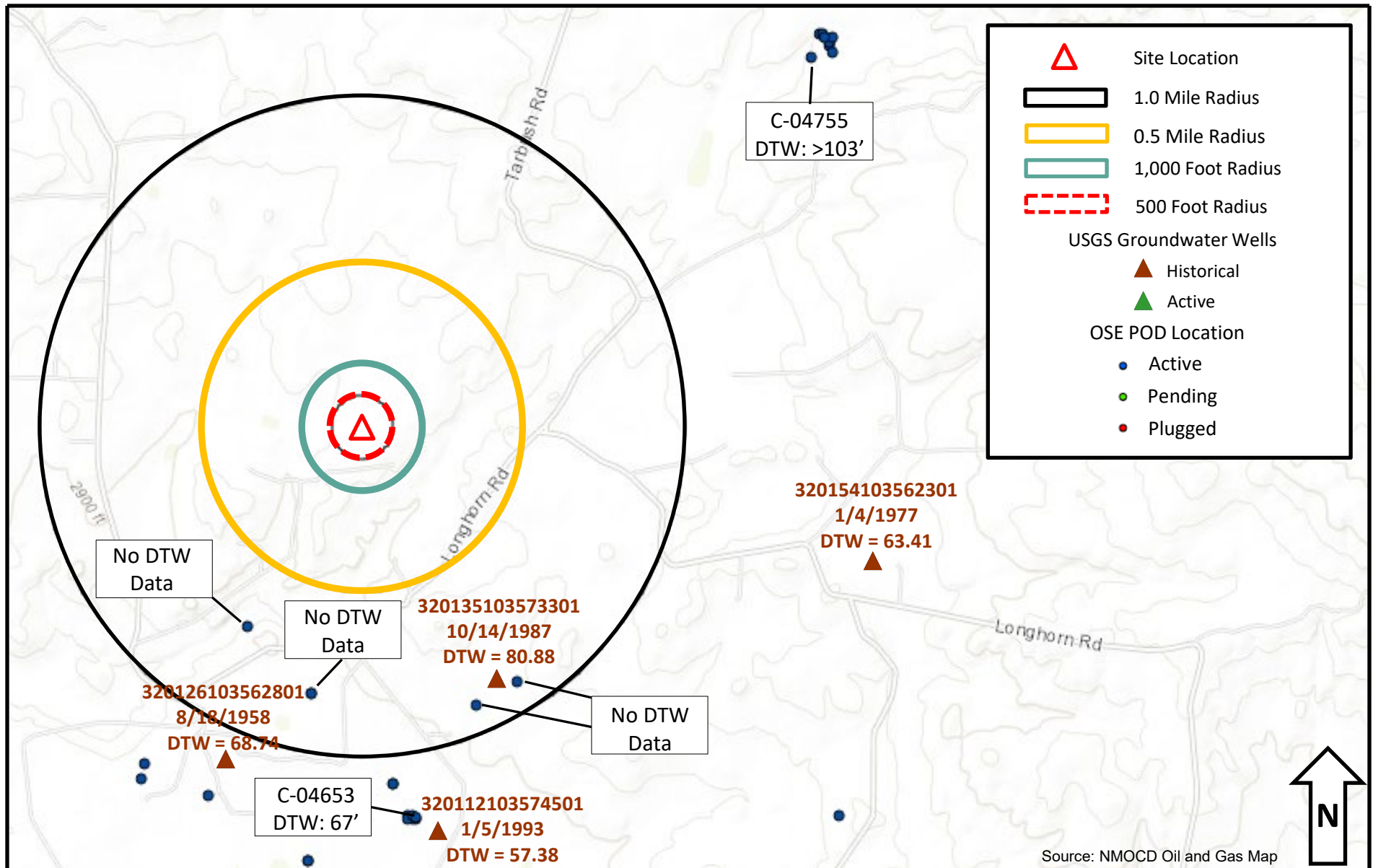
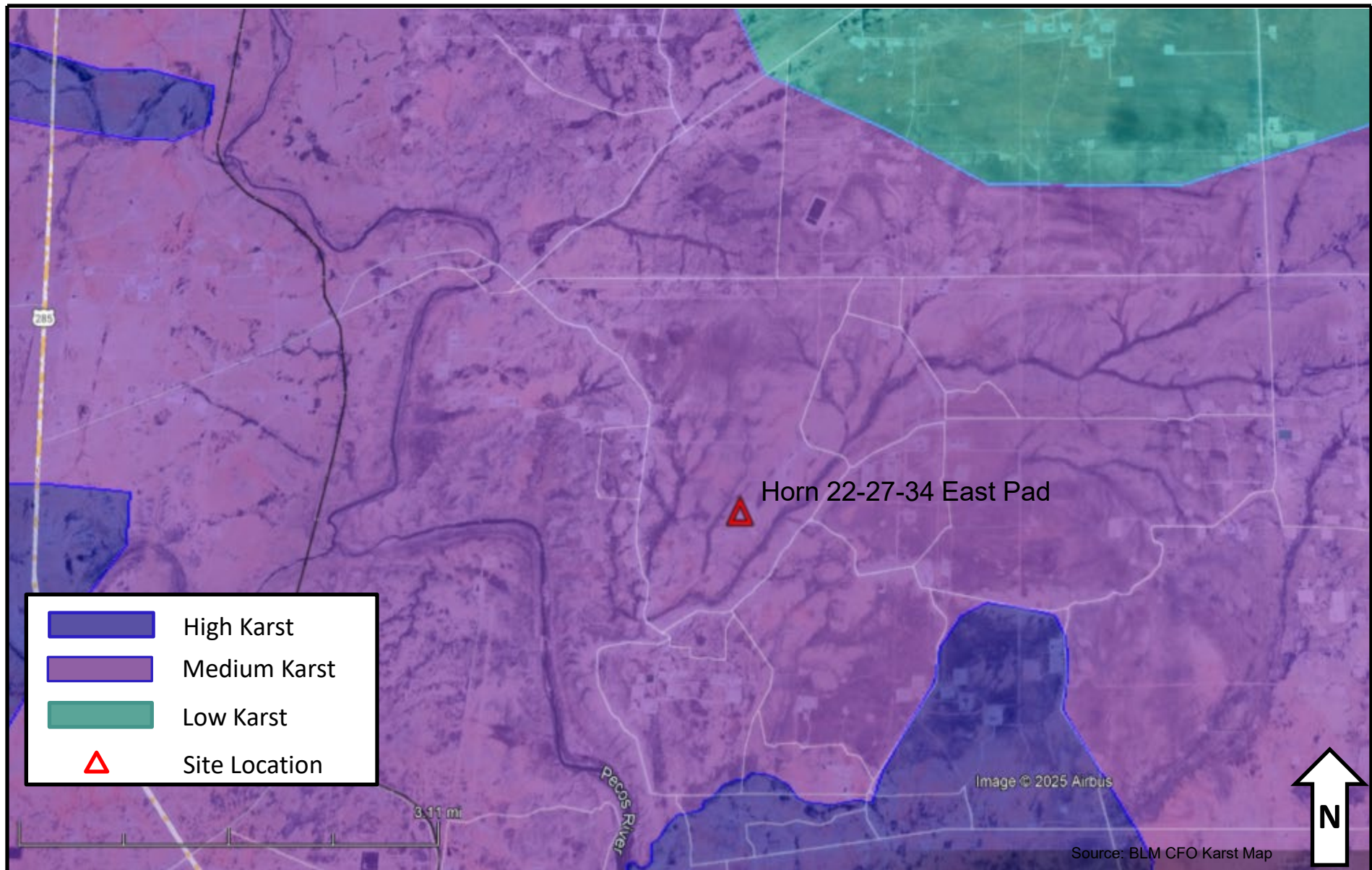


Figure 3 – Ground Water

WPX Energy Permian – Horn 22-27-34 East Pad
 GPS: 32.0379763°, -103.9663093°
 Eddy County, New Mexico

**Figure 4 – Karst Potential**

WPX Energy Permian – Horn 22-27-34 East Pad
GPS: 32.0379763°, -103.9663093°
Eddy County, New Mexico





WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) POD-6 (TW-1)		WELL TAG ID NO. n/a		OSE FILE NO(S). C-4653			
	WELL OWNER NAME(S) Stephens & Johnson Operating Co.				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS PO BOX 2249				CITY Wichita Falls	STATE TX	ZIP 7307-2249	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE 32		MINUTES 1	SECONDS 13.71	N		
		LONGITUDE 103		57	52.14	W		
* ACCURACY REQUIRED: ONE TENTH OF A SECOND * DATUM REQUIRED: WGS 84								
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE SE SE SE Sec. 22 T26S R29E, NMPM								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1249		NAME OF LICENSED DRILLER Jackie D. Atkins			NAME OF WELL DRILLING COMPANY Atkins Engineering Associates, Inc.		
	DRILLING STARTED 7/25/2022		DRILLING ENDED 7/25/2022		DEPTH OF COMPLETED WELL (FT) Soil Boring	BORE HOLE DEPTH (FT) ±74	DEPTH WATER FIRST ENCOUNTERED (FT) ±67	
	COMPLETED WELL IS: ☐ ARTESIAN ☐ DRY HOLE ☒ SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) 67.1	DATE STATIC MEASURED 7/26/2022	
	DRILLING FLUID: ☐ AIR ☐ MUD ADDITIVES - SPECIFY:							
	DRILLING METHOD: ☐ ROTARY ☐ HAMMER ☐ CABLE TOOL ☒ OTHER - SPECIFY: Hollow Stem Auger					CHECK HERE IF FITLESS ADAPTER IS INSTALLED ☐		
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	74	±6.5	Soil Boring	--	--	--	--
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						

FOR OSE INTERNAL USE

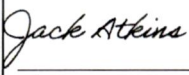
WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO.	C-4653	POD NO.	6	TRN NO.	729202
LOCATION	26S.29E.22 444	WELL TAG ID NO.		PAGE 1 OF 2	

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4. HYDROGEOLOGIC LOG OF WELL	DEPTH (feet bgl)		THICKNESS (feet)	COLOR AND TYPE OF MATERIAL ENCOUNTERED - INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES (attach supplemental sheets to fully describe all units)	WATER BEARING? (YES / NO)	ESTIMATED YIELD FOR WATER- BEARING ZONES (gpm)
	FROM	TO				
	0	14	14	Clay, Medium Plastic, with sand and caliche, Brown	Y ✓ N	
	14	30	16	Sand, medium/fine grained, poorly graded, increasing clay, Tan	Y ✓ N	
	30	44	14	Clay, Medium Plastic, with sand and caliche, gypsum Reddish Brown	Y ✓ N	
	44	54	10	Sand, medium/fine grained, poorly graded, with clay, Tan	Y ✓ N	
	54	60	6	Clay, Stiff, Medium Plastic, with brown sand Reddish Brown	Y ✓ N	
	60	64	4	Clay, Stiff, Medium Plastic, with cemented sand, Reddish Brown	Y ✓ N	
	64	74	10	Clay, Low Plastic, with sand and caliche, gypsum Reddish Brown, wet	✓ Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
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					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
					Y N	
METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA: ☐ PUMP ☐ AIR LIFT ☐ BAILER ☐ OTHER - SPECIFY:					TOTAL ESTIMATED WELL YIELD (gpm): 0.00	

5. TEST; RIG SUPERVISION	WELL TEST	TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD.
MISCELLANEOUS INFORMATION: Grouted from total depth to surface using augers as tremie Plugged using Type I/II neat cement (5.2 gallons per 94 lb. sack)		
PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE: Shane Eldridge, Cameron Pruitt, Lucas Middleton		

6. SIGNATURE	THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:	
	Jackie D. Atkins	8/18/2022
SIGNATURE OF DRILLER / PRINT SIGNEE NAME		DATE

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

FILE NO. <u>C-4653</u>	POD NO. <u>6</u>	TRN NO. <u>729202</u>
LOCATION <u>265.29E.22 444</u>	WELL TAG ID NO.	PAGE 2 OF 2

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Horn 22-27-34 East Pad - Closure Request Report
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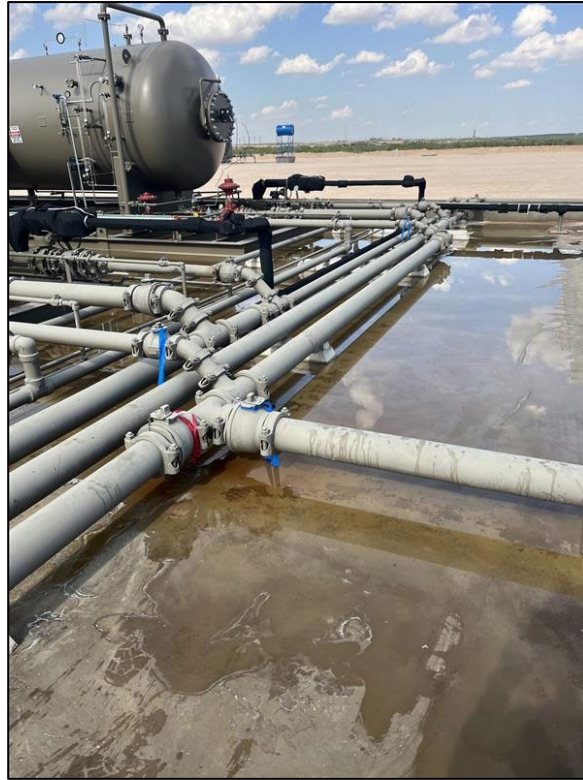


PHOTO 1: Northeastern view during initial site assessment by WPX. 7/7/2025



PHOTO 2: Northeastern view during initial site assessment by WPX. 7/7/2025

Horn 22-27-34 East Pad - Closure Request Report
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PHOTO 3: Western view outside of containment during liner inspection activities. 7/11/2025



PHOTO 4: Southwestern view outside of containment during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
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PHOTO 5: Southwestern view outside of containment during liner inspection activities. 7/11/2025



PHOTO 6: Southeastern view outside of containment during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
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PHOTO 7: Southeastern view outside of containment during liner inspection activities. 7/11/2025

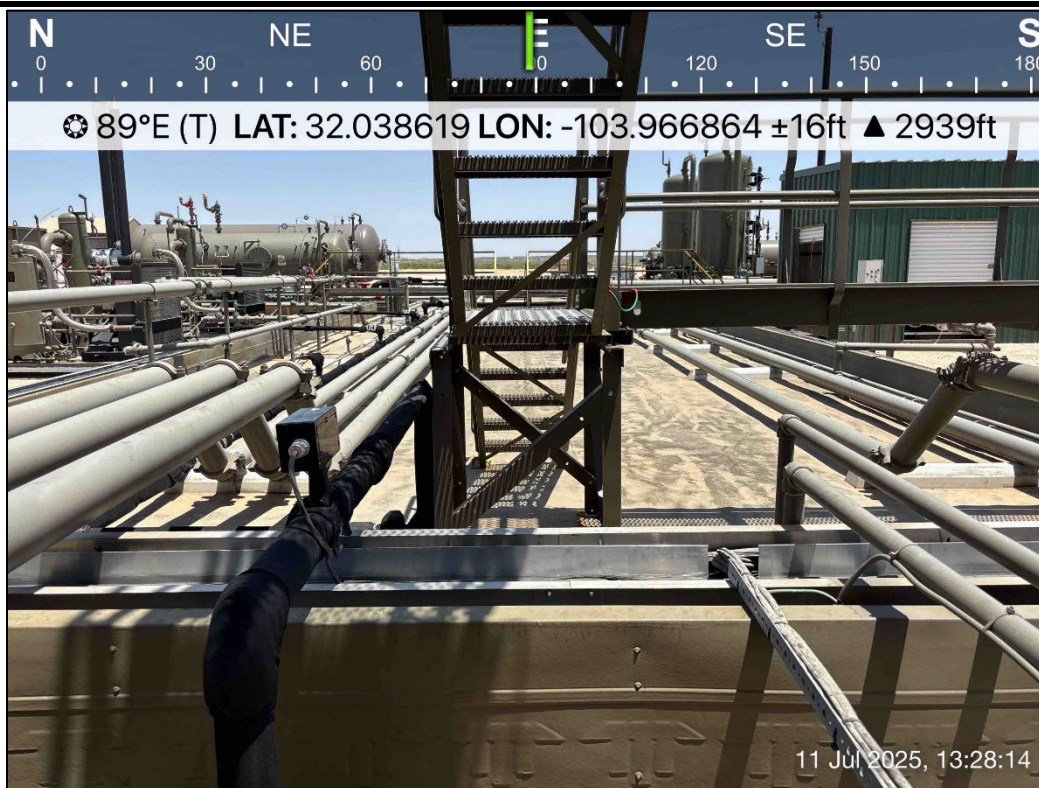


PHOTO 8: Eastern view outside of containment during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
GPS: 32.0379763°, -103.9663093°

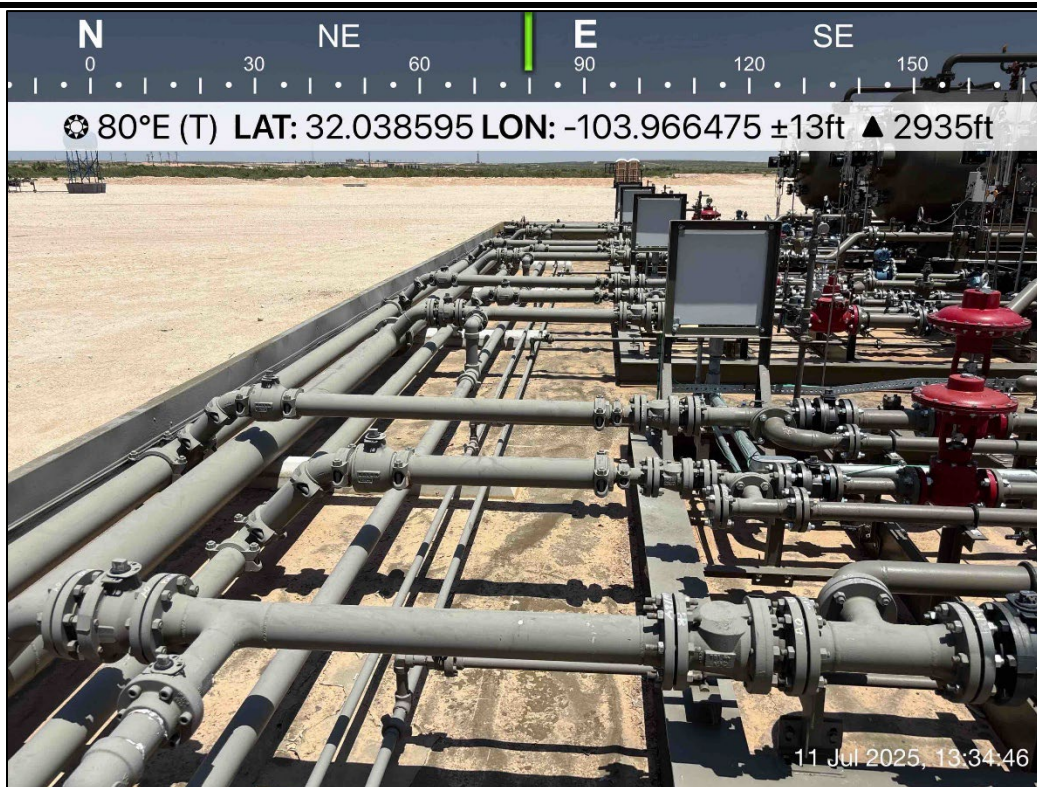


PHOTO 9: Northeastern view during liner inspection activities. 7/11/2025



PHOTO 10: Northern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
GPS: 32.0379763°, -103.9663093°

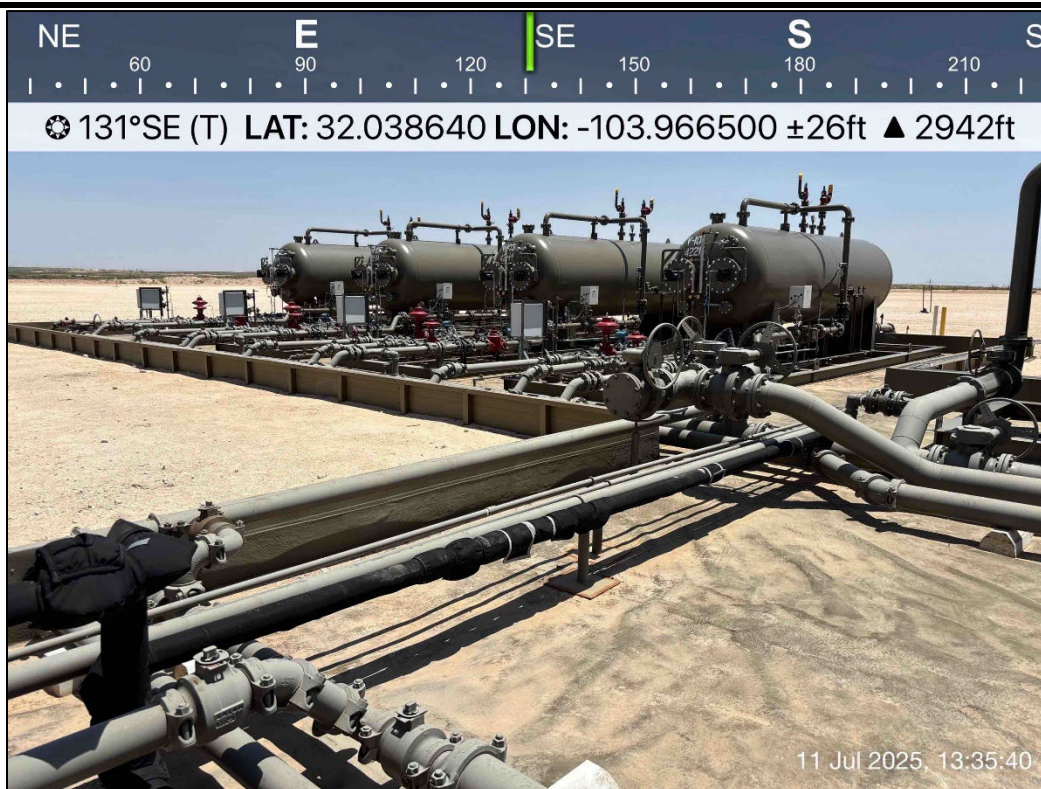


PHOTO 11: Southeastern view during liner inspection activities. 7/11/2025



PHOTO 12: Southwestern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
GPS: 32.0379763°, -103.9663093°

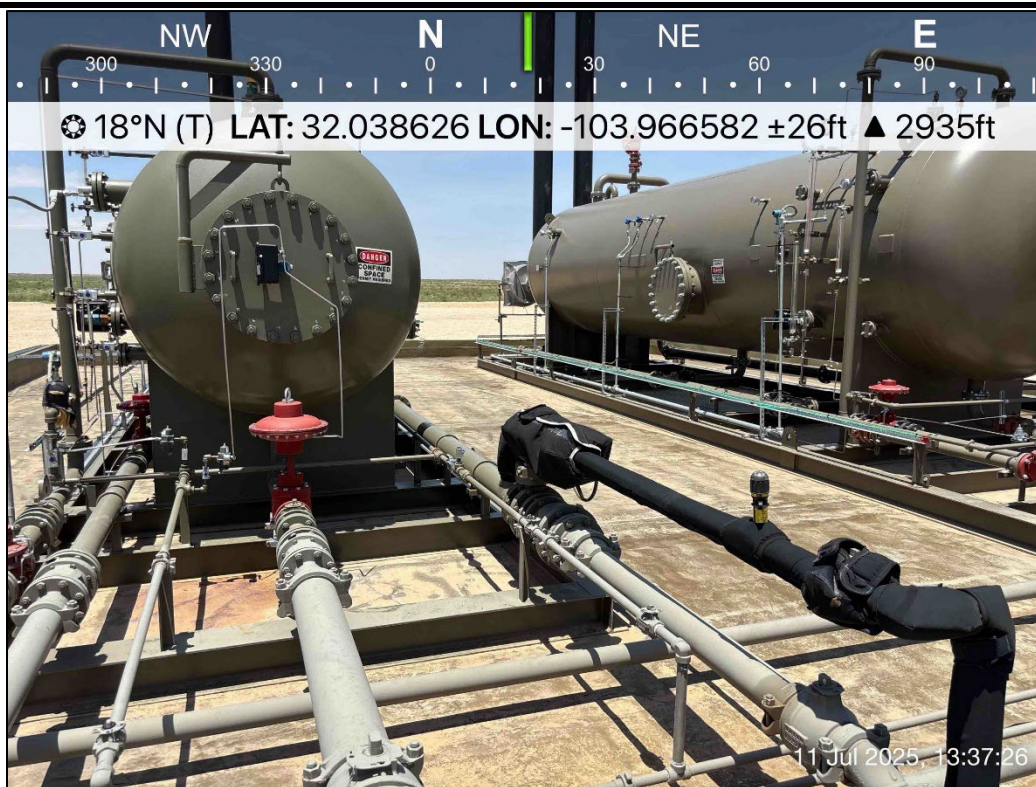


PHOTO 13: Northeastern view during liner inspection activities. 7/11/2025



PHOTO 14: Northwestern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
GPS: 32.0379763°, -103.9663093°



PHOTO 15: Southeastern view during liner inspection activities. 7/11/2025



PHOTO 16: Southwestern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
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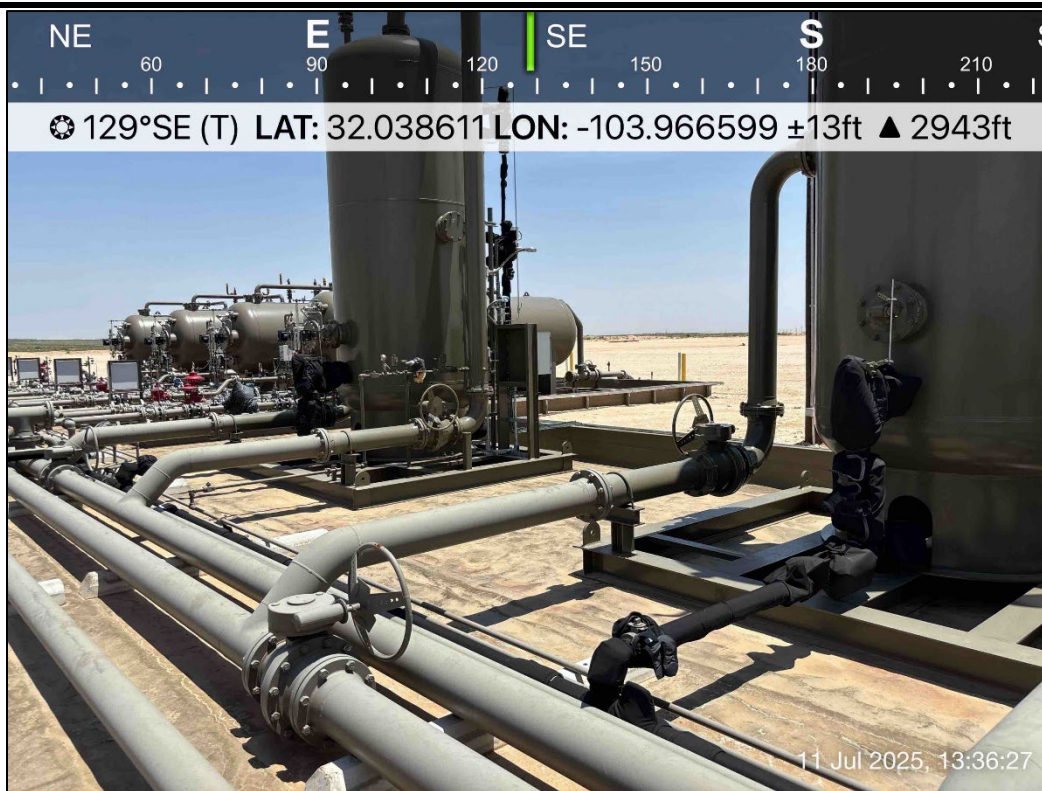


PHOTO 17: Southeastern view during liner inspection activities. 7/11/2025

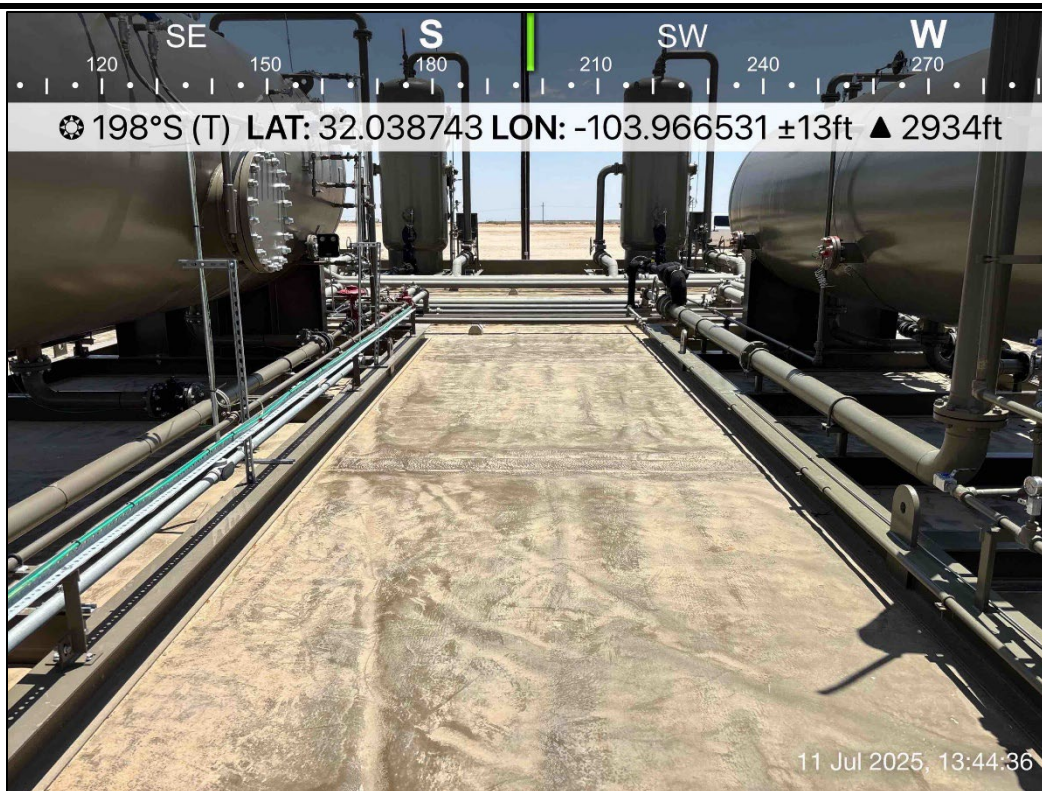


PHOTO 18: Southwestern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
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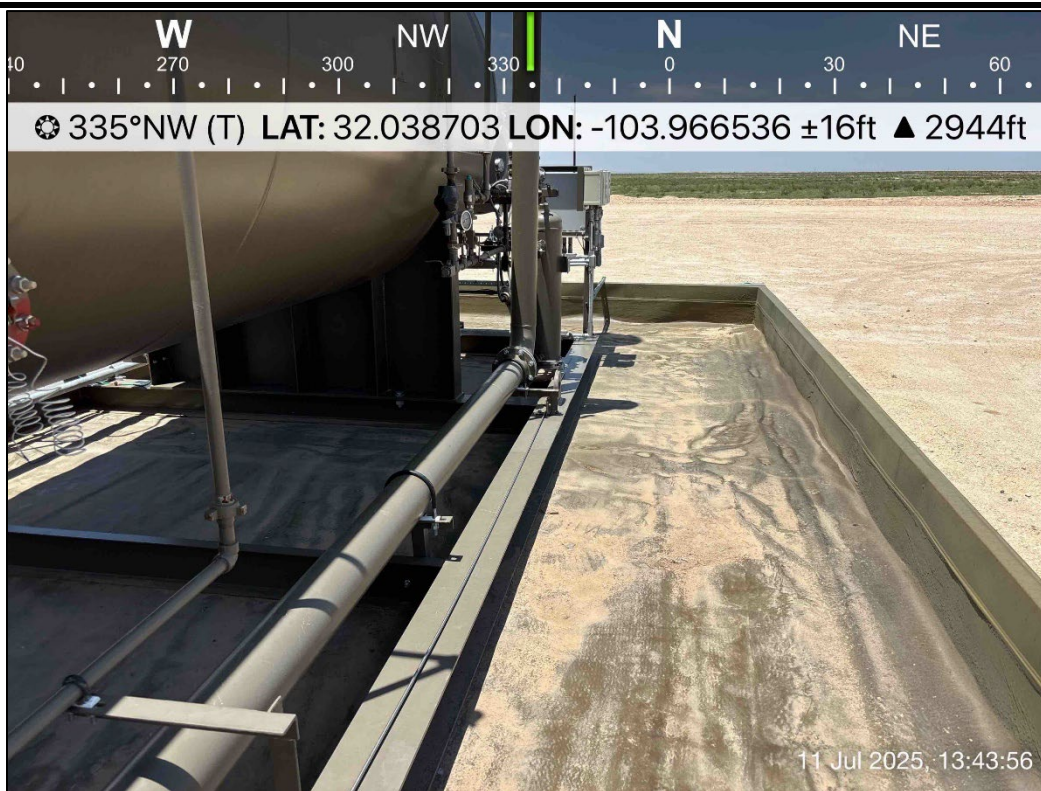


PHOTO 19: Northwestern view during liner inspection activities. 7/11/2025



PHOTO 20: Southern view during liner inspection activities. 7/11/2025

Horn 22-27-34 East Pad - Closure Request Report
Incident Number: nAPP2518941837
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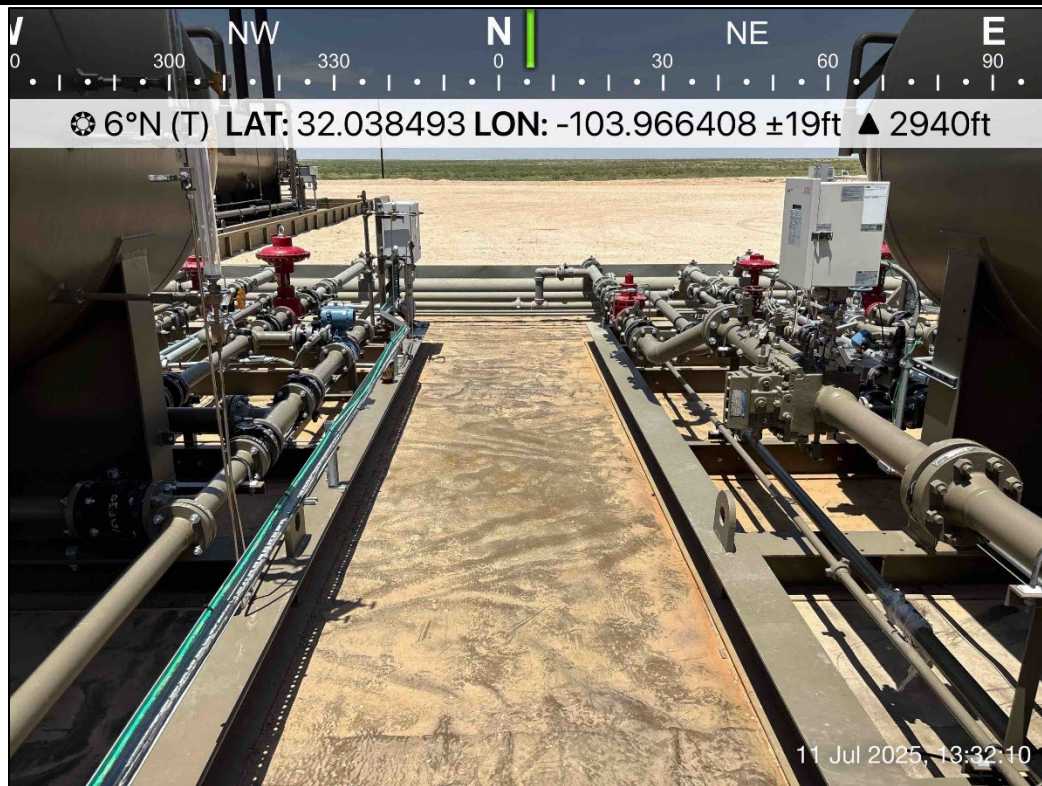


PHOTO 21: Northern view during liner inspection activities. 7/11/2025

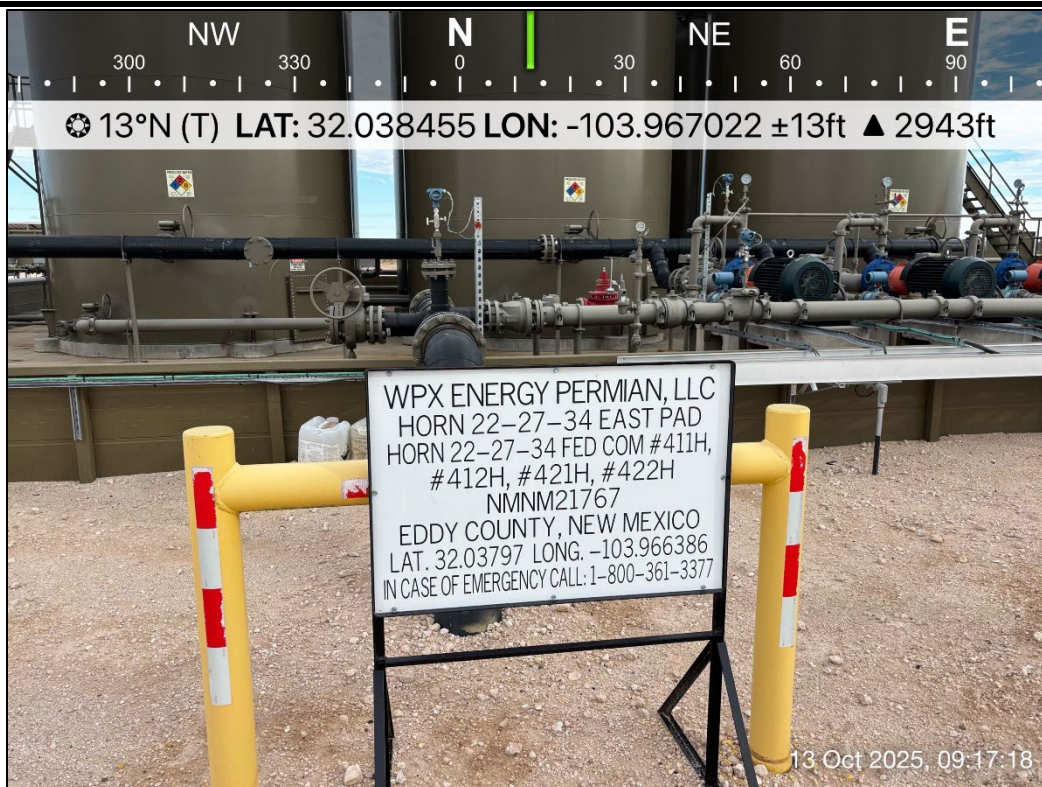


PHOTO 22: Northeastern view of location sign. 10/13/2025

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 483202

QUESTIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 483202
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2518941837
Incident Name	NAPP2518941837 HORN 22-27-34 EAST PAD @ 0
Incident Type	Produced Water Release
Incident Status	Notification Accepted
Incident Facility	[fAPP2332566148] HORN 22-27-34 EAST PAD

Location of Release Source	
Site Name	HORN 22-27-34 EAST PAD
Date Release Discovered	07/07/2025
Surface Owner	Federal

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	9,358
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/11/2025
Time liner inspection will commence	01:00 PM
Please provide any information necessary for observers to liner inspection	Gilbert Moreno (832) 541-7719
Please provide any information necessary for navigation to liner inspection site	32.038625°,-103.966947°

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

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

CONDITIONS

Action 483202

CONDITIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 483202
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
jralej	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	7/9/2025

Sante Fe Main Office
Phone: (505) 476-3441

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Phone: (505) 629-6116

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

QUESTIONS

Action 515126

QUESTIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2518941837
Incident Name	NAPP2518941837 HORN 22-27-34 EAST PAD @ FAPP2332566148
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2332566148] HORN 22-27-34 EAST PAD

Location of Release Source

Please answer all the questions in this group.

Site Name	HORN 22-27-34 EAST PAD
Date Release Discovered	07/07/2025
Surface Owner	Federal

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Dump Line Produced Water Released: 26 BBL Recovered: 26 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Pinhole leak developed on water line allowing fluids to be released to lined secondary containment.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 2

Action 515126

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dvsn.com Date: 10/15/2025
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Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 3

Action 515126

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 500 and 1000 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 100 (ft.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	07/11/2025
On what date will (or did) the final sampling or liner inspection occur	07/11/2025
On what date will (or was) the remediation complete(d)	07/11/2025
What is the estimated surface area (in square feet) that will be remediated	9358
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 515126

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	No
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dv.com Date: 10/15/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 515126

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	483202
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/11/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	9358

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	9358
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	The release was contained laterally by the lined containment and the liner was performing as designed

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 (in .pdf format) 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.

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.

I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dv.com Date: 10/15/2025
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CONDITIONS

Action 515126

CONDITIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 515126
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	10/16/2025