2135 S. Loop 250 W
Midland, Texas 79703
United States
ghd.com

Our ref.: 12676589 – NMOCD – 1

November 04, 2025

New Mexico Oil Conservation Division
1625 N. French Drive
Hobbs, New Mexico 88240

Closure Report
Devon Energy Production Company, LP
Todd Apache 6 CTB 1 Release
Unit Letter D, Section 06, T23S, R32E
GPS: 32.339248, -103.7203658
Lea County, New Mexico

1. Introduction

GHD Services Inc. (GHD), on behalf of Devon Energy Production Company, LP (Devon Energy), has prepared this *Closure Report* to document site assessment activities at Todd Apache 6 CTB 1 (Site). The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of produced water within a lined containment at the Site. Based on field observations, Devon Energy is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2520943541.

2. Site Description and Release Summary

The Site is in Unit D, Section 06, Township 23 South, Range 32 East, in Lea County, New Mexico (32.339248°N, 103.7203658°W) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM).

On July 25, 2025, a pump failure allowed produced water to leak into secondary containment. Approximately eleven (11) barrels (bbls) of produced water was released into the lined secondary containment. A vacuum truck was dispatched to the Site to recover free-standing fluids; all eleven (11) bbls of released produced water was recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on July 28, 2025, and was subsequently assigned Incident Number nAPP2520943541.

3. Site Characterization and Closure Criteria

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (NMAC 19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are summarized below and a Site Map is presented on **Figure 1**.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of Maljamar and Palomas fine sands, 0 to 3 percent slopes. The Site is located within an area of low karst potential.

Depth to groundwater at the Site is estimated to be greater than 110 feet below ground surface (ft bgs) based on the nearest groundwater well data. Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells. The nearest permitted groundwater well with depth to groundwater data is NMOSE well C 04936 located approximately 0.29 northwest of the Site. The well was completed to a depth of 55 ft bgs on February 25, 2025. No groundwater was recorded on March 3, 2025. Another NMOSE well C 04951 was drilled approximately 0.43 miles southeast of the Site, and it was completed to a depth of 110 ft bgs on April 24, 2025. No groundwater was encountered during drilling activities, and no groundwater was recorded on April 29, 2025. A copy of the well referenced records are included in **Attachment A**.

The Site is not within 300 feet of any continuously flowing watercourse or any other significant watercourse. There are no lakebeds, sinkholes or playa lakes within 200 feet of the Site. The closest playa is approximately 3.60 miles southwest of the Site, and a riverine wetland is located approximately 2.07 miles southwest. There are no permanent residences, schools, hospitals, institutions or churches within 300 feet of the Site. The closest residence is greater than 5 miles from the Site. The nearest fresh water well utilized for livestock watering is located approximately 3.29 miles southeast of the Site. There are no subsurface mines or 100-year floodplains within 300 feet of the Site. The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review, the following NMOCD Table I Closure Criteria (Closure Criteria) apply:

Table 3.1 Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	1,000	2,500	20,000

Notes:
--- = not defined.
mg/kg = milligrams per kilogram.
TPH = total petroleum hydrocarbons.
GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics.
BTEX = benzene, toluene, ethylbenzene, and xylene.

4. Site Assessment Activities

The liner inspection notice was provided on September 29, 2025. A liner integrity inspection was performed on October 2, 2025. The liner was visually inspected and no rips, tears, holes, or damages in the liner were observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

5. Closure Request

Based on the liner inspection and assessment activities at the Site, Devon Energy respectfully requests that no further actions be required, and requests closure for Incident Number nAPP2520943541 be granted.

Should you have any questions or require further information regarding this report, please do not hesitate to contact the undersigned.

Regards,

GHD

Kayla Taylor
Senior Project Manager

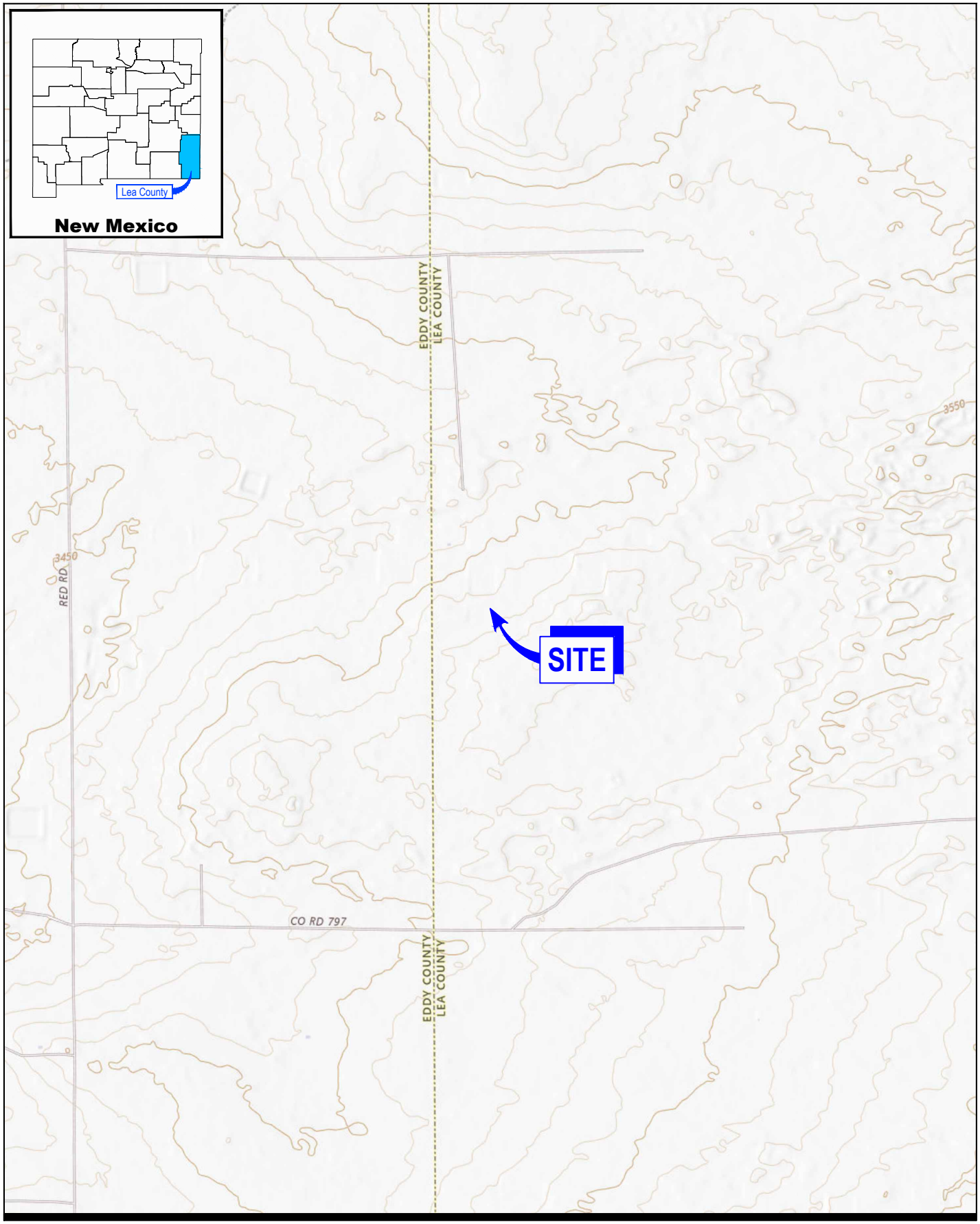
+1 432 210-5443
kayla.taylor@ghd.com

Jessica Wright
Project Director

+1 713 337-5419
jessica.wright@ghd.com

KT/lg/1

Encl.: Figure 1 - Site Location Map
Figure 2 - Site Details Map
Attachment A - Referenced Well Records
Attachment B - Site Characterization Documentation
Attachment C - Photographic Documentation



0 1000 2000 ft

1" = 2000 ft

Coordinate System:
NAD 1983 State Plane-
New Mexico East (US Feet)

N

GHD

DEVON ENERGY
LEA COUNTY, NEW MEXICO
TODD APACHE 6 CTB 1
INCIDENT No. nAPP2520943541

Project No. **12676589**
Date **October 2025**

SITE LOCATION MAP

FIGURE 1

Filename: N:\US\Dallas\Legacy\CAD\Files\Eight Digit Job Numbers\1267----\12676589\RPT001\12676589-GHD-00-00-RPT-EN-D101_DL-001.dwg

Data Source: USGS 7.5 Minute Quad "Bootleg Ridge and Los Medanos, New Mexico"
Lat/Long: 32.338172° North, 103.720078° West

0 20 40 ft

1" = 40 ft
Coordinate System:
NAD 1983 State Plane-
New Mexico East (US Feet)

N

GHD

DEVON ENERGY
LEA COUNTY, NEW MEXICO
TODD APACHE 6 CTB 1
INCIDENT No. nAPP2520943541

SITE DETAILS MAP

Project No. **12676589**
Date **October 2025**

FIGURE 2

Filename: N:\US\Dallas\Legacy\CAD\Files\Eight Digit Job Numbers\1267----\12676589\RPT001\12676589-GHD-00-00-RPT-EN-D101_DL-001.dwg
Plot Date: 23 October 2025 11:53 AM

Data Source: Image © 2025 Google - Imagery Date: December 31, 2023
Lat/Long: 32.338172° North, 103.720078° West

Attachments

Attachment A

Referenced Well Records

WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION

OSE POD NO. (WELL NO.): Pod-1	WELL TAG ID NO.	OSE FILE NO(S.): C-04936
WELL OWNER NAME(S): Devon Energy		PHONE (OPTIONAL): 575-885-7541
WELL OWNER MAILING ADDRESS: 5315 Buena Vista Dr.		CITY: Carlsbad STATE: NM ZIP: 88220

WELL LOCATION (FROM GPS)	DEGREES	MINUTES	SECONDS	
LATITUDE	32	20	22.88	N
LONGITUDE	103	42	58.77	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: U/L C S-6 T-23S R-32E

2. DRILLING & CASING INFORMATION

LICENSE NO.	NAME OF LICENSED DRILLER	NAME OF WELL DRILLING COMPANY
WD-1862	James Hawley	H&R Enterprises, LLC

DRILLING STARTED	DRILLING ENDED	DEPTH OF COMPLETED WELL (FT)	BORE HOLE DEPTH (FT)	DEPTH WATER FIRST ENCOUNTERED (FT)
2/25/25	2/25/25	55'	55'	Dry

COMPLETED WELL IS: ☐ ARTESIAN *add Centralizer info below ☑ DRY HOLE ☐ SHALLOW (UNCONFINED)

STATIC WATER LEVEL IN COMPLETED WELL (FT): DRY

DATE STATIC MEASURED: 3/3/25

DRILLING FLUID: ☑ AIR ☐ MUD ADDITIVES – SPECIFY:

DRILLING METHOD: ☑ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ OTHER – SPECIFY:

CHECK HERE IF PITLESS ADAPTER IS INSTALLED ☐

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	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)
			No casing left in hole				

3. ANNULAR MATERIAL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL *(if using Centralizers for Artesian wells- indicate the spacing below)	AMOUNT (cubic feet)	METHOD OF PLACEMENT
			N/A		

FOR OSE INTERNAL USE — WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. C-04936	POD NO. 1	TRN NO. 778160	
LOCATION 23S.32E.06.221		WELL TAG ID NO. —	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	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)
0	5	5	loose sandy caliche	Y ✓ N	
5	10	5	caliche	Y ✓ N	
10	40	30	gray loose sandy clay	Y ✓ N	
40	45	5	reddish gray sandy clay	Y ✓ N	
45	50	5	pinkish gray clay	Y ✓ N	
50	55	5	red consolidated clay	Y ✓ N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				Y N	
				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

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: Well bore was drilled 2/25/25, gauged on 3/3/25, well bore was dry, casing was removed and bore was plugged in accordance with the approved PPOO on 3/3/25

OSE DII ROSWELL NM
6 MAR '25 PM 1:32

PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:

Nathan Smelcer

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:

James Hawley — 3/4/25

SIGNATURE OF DRILLER / PRINT SIGNEE NAME — DATE

FOR OSE INTERNAL USE — WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. C-04936	POD NO. 1	TRN NO. 778160	
LOCATION 23S.32E.06.221		WELL TAG ID NO. —	PAGE 2 OF 2

Elizabeth K. Anderson, P.E.
State Engineer

Roswell Office
1900 WEST SECOND STREET
ROSWELL, NM 88201

STATE OF NEW MEXICO
OFFICE OF THE STATE ENGINEER

Trn Nbr: 778160
File Nbr: C 04936
Well File Nbr: C 04936 POD1

Mar. 19, 2025

JAMES HAWLEY
H&R ENTERPRISES LLC
P.O. BOX 3641
HOBBS, NM 88241

Greetings:

The above numbered permit was issued in your name on 02/11/2025.

The Well Record was received in this office on 03/06/2025, stating that it had been completed on 02/25/2025, and was a dry well. The well is to be plugged according to 19.27.4.30 NMAC.

Please note that another well can be drilled under this permit if the well is completed and the well log filed on or before 02/11/2026.

If you have any questions, please feel free to contact us.

Sincerely,

Rodolfo Chavez

Rodolfo Chavez
(575)622-6521

drywell

WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

1. GENERAL AND WELL LOCATION

OSE POD NO (WELL NO) POD1	WELL TAG ID NO N/A	OSE FILE NO(S) C-4951
WELL OWNER NAME(S) Devon Energy Production Company, LP		PHONE (OPTIONAL)
WELL OWNER MAILING ADDRESS 5315 Buena Vista Dr.		CITY Carlsbad STATE NM ZIP 88220

WELL LOCATION (FROM GPS)		DEGREES	MINUTES	SECONDS	
	LATITUDE	32	20	15.68	N
	LONGITUDE	103	42	47.17	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
Unit I, Section 06, T 23S, R 32E

2. DRILLING & CASING INFORMATION

LICENSE NO WD1188	NAME OF LICENSED DRILLER John Scarborough		NAME OF WELL DRILLING COMPANY John Scarborough Drilling, Inc
DRILLING STARTED 4/24/2025	DRILLING ENDED 4/24/2025	DEPTH OF COMPLETED WELL (FT) 110	BORE HOLE DEPTH (FT) ±110
DEPTH WATER FIRST ENCOUNTERED (FT) N/A			

COMPLETED WELL IS: ☐ ARTESIAN *add Centralizer info below ☑ DRY HOLE ☐ SHALLOW (UNCONFINED)
STATIC WATER LEVEL IN COMPLETED WELL (FT) N/A
DATE STATIC MEASURED 4/29/2025

DRILLING FLUID: ☑ AIR ☐ MUD ADDITIVES – SPECIFY:

DRILLING METHOD: ☑ ROTARY ☐ HAMMER ☐ CABLE TOOL ☐ OTHER – SPECIFY:
CHECK HERE IF PITLESS ADAPTER IS INSTALLED ☐

DEPTH (feet bgl) FROM	TO	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)
0	110	5.00	Soil Boring	--	--	--	--

OSE DII ROSWELL NM
2 JUN '25 AM9:22

3. ANNULAR MATERIAL

DEPTH (feet bgl) FROM	TO	BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL *(if using Centralizers for Artesian wells- indicate the spacing below)	AMOUNT (cubic feet)	METHOD OF PLACEMENT
			N/A		

FOR OSE INTERNAL USE WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO C-4951-POD 1	POD NO 1	TRN NO 781749	
LOCATION Mon 23.32.06.312		WELL TAG ID NO	PAGE 1 OF 2

4. HYDROGEOLOGIC LOG OF WELL

DEPTH (feet bgl) FROM	DEPTH (feet bgl) TO	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)
0	10	10	Sand, light to medium brown, fine to coarse grained	Y ✔ N	
10	20	10	Sand, light to medium brown, fine to coarse grained	Y ✔ N	
20	30	10	Sand, light to medium brown, fine to coarse grained	Y ✔ N	
30	40	10	Sand, light to medium brown, fine to medium grained	Y ✔ N	
40	50	10	Sand, light to medium brown, fine to medium grained	Y ✔ N	
50	60	10	Clay, red to medium brown, very fine grained	Y ✔ N	
60	70	10	Clay, red to medium brown, very fine grained	Y ✔ N	
70	80	10	Sandstone, red to medium brown, fine to coarse grained	Y ✔ N	
80	90	10	Sandstone, red to medium brown, fine to coarse grained	Y ✔ N	
90	100	10	Sandstone, red to medium brown, fine to coarse grained	Y ✔ N	
100	110	10	Sandstone, red to medium brown, fine to coarse grained	Y ✔ N	
110	110	0	Sandstone, red to medium brown, fine to coarse grained	Y ✔ N	
				Y N	
				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):

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: Temporary well material removed and soil boring backfilled using drill cuttings from total depth to ten feet below ground surface(bgs), then hydrated bentonite chips ten feet bgs to surface.

OSE DII ROSWELL NM
2 JUN '25 AM9:22

PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:

Scott Scarborough

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:

Lane Scarborough — 5-28-2025

SIGNATURE OF DRILLER / PRINT SIGNEE NAME — DATE

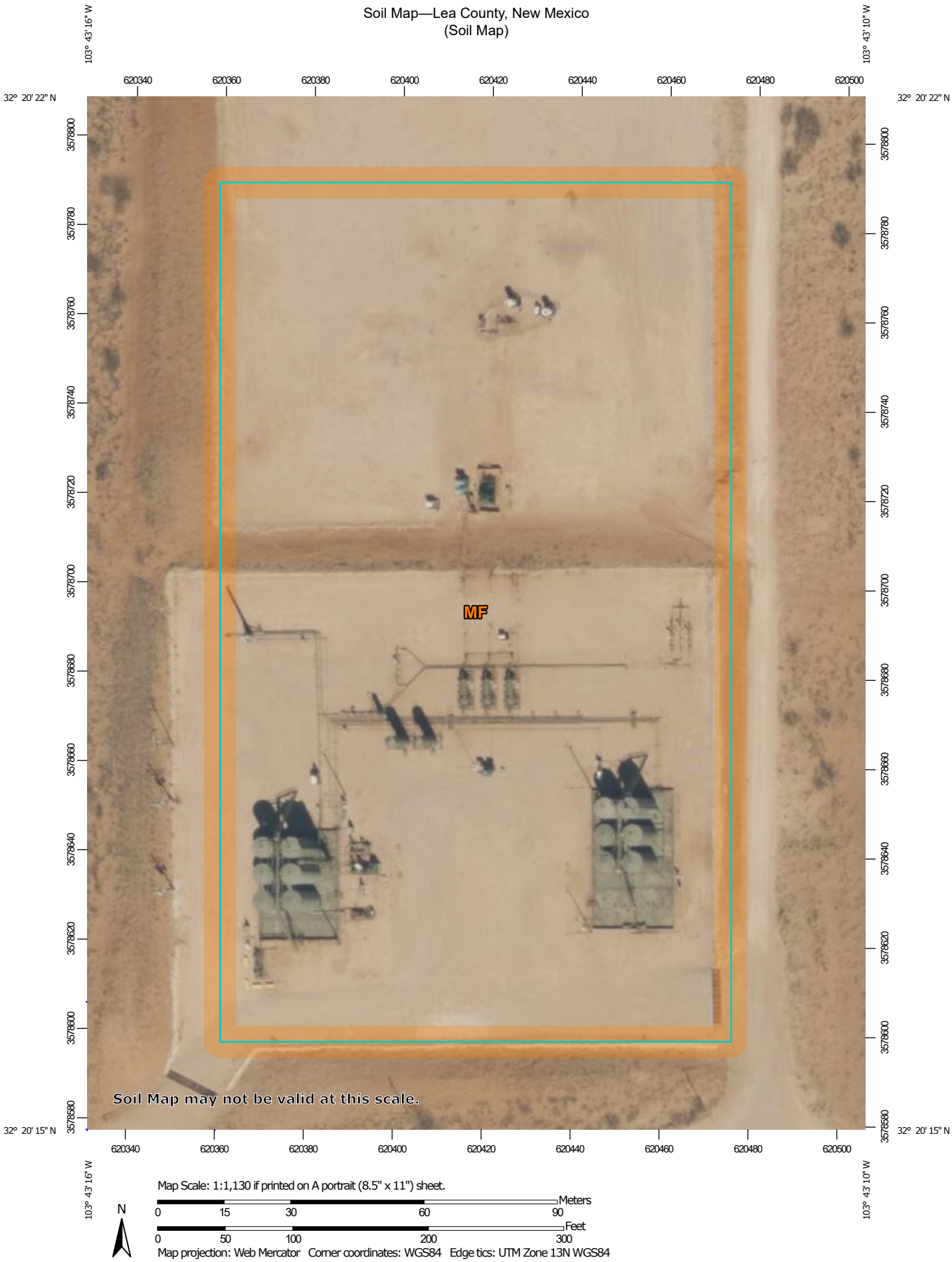
FOR OSE INTERNAL USE — WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. C-4951-POD 1	POD NO. 1	TRN NO. 781749	
LOCATION Roswell 23.32.06.312		WELL TAG ID NO.	PAGE 2 OF 2

Attachment B

Site Characterization Documentation

Soil Map—Lea County, New Mexico
(Soil Map)



Map Scale: 1:1,130 if printed on A portrait (8.5" x 11") sheet.

N

Meters
0 15 30 60 90

Feet
0 50 100 200 300

Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 13N WGS84

Soil Map—Lea County, New Mexico
(Soil Map)

MAP LEGEND

Area of Interest (AOI)
- Area of Interest (AOI)

Soils
- Soil Map Unit Polygons
- Soil Map Unit Lines
- Soil Map Unit Points

Special Point Features
- Blowout
- Borrow Pit
- Clay Spot
- Closed Depression
- Gravel Pit
- Gravelly Spot
- Landfill
- Lava Flow
- Marsh or swamp
- Mine or Quarry
- Miscellaneous Water
- Perennial Water
- Rock Outcrop
- Saline Spot
- Sandy Spot
- Severely Eroded Spot
- Sinkhole
- Slide or Slip
- Sodic Spot
- Spoil Area
- Stony Spot
- Very Stony Spot
- Wet Spot
- Other
- Special Line Features

Water Features
- Streams and Canals

Transportation
- Rails
- Interstate Highways
- US Routes
- Major Roads
- Local Roads

Background
- Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Lea County, New Mexico
Survey Area Data: Version 21, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
MF	Maljamar and Palomas fine sands, 0 to 3 percent slopes	5.5	100.0%
Totals for Area of Interest		**5.5**	**100.0%**

Lea County, New Mexico

MF—Maljamar and Palomas fine sands, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: dmqb
Elevation: 3,000 to 3,900 feet
Mean annual precipitation: 10 to 15 inches
Mean annual air temperature: 60 to 62 degrees F
Frost-free period: 190 to 205 days
Farmland classification: Farmland of statewide importance

Map Unit Composition

Maljamar and similar soils: 46 percent
Palomas and similar soils: 44 percent
Minor components: 10 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Maljamar

Setting

Landform: Plains
Landform position (three-dimensional): Rise
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Sandy eolian deposits derived from sedimentary rock

Typical profile

A - 0 to 24 inches: fine sand
Bt - 24 to 50 inches: sandy clay loam
Bkm - 50 to 60 inches: cemented material

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: 40 to 60 inches to petrocalcic
Drainage class: Well drained
Runoff class: Very low
Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 5 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 2.0
Available water supply, 0 to 60 inches: Low (about 5.6 inches)

Interpretive groups

Land capability classification (irrigated): 7e

Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B
Ecological site: R070BD003NM - Loamy Sand
Hydric soil rating: No

Description of Palomas

Setting

Landform: Plains
Landform position (three-dimensional): Rise
Down-slope shape: Linear
Across-slope shape: Linear
Parent material: Alluvium derived from sandstone

Typical profile

A - 0 to 16 inches: fine sand
Bt - 16 to 60 inches: sandy clay loam
Bk - 60 to 66 inches: sandy loam

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.60 to 2.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 45 percent
Gypsum, maximum content: 1 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Sodium adsorption ratio, maximum: 2.0
Available water supply, 0 to 60 inches: Moderate (about 7.5 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B
Ecological site: R070BD003NM - Loamy Sand
Hydric soil rating: No

Minor Components

Kermit

Percent of map unit: 5 percent
Ecological site: R070BC022NM - Sandhills
Hydric soil rating: No

Wink

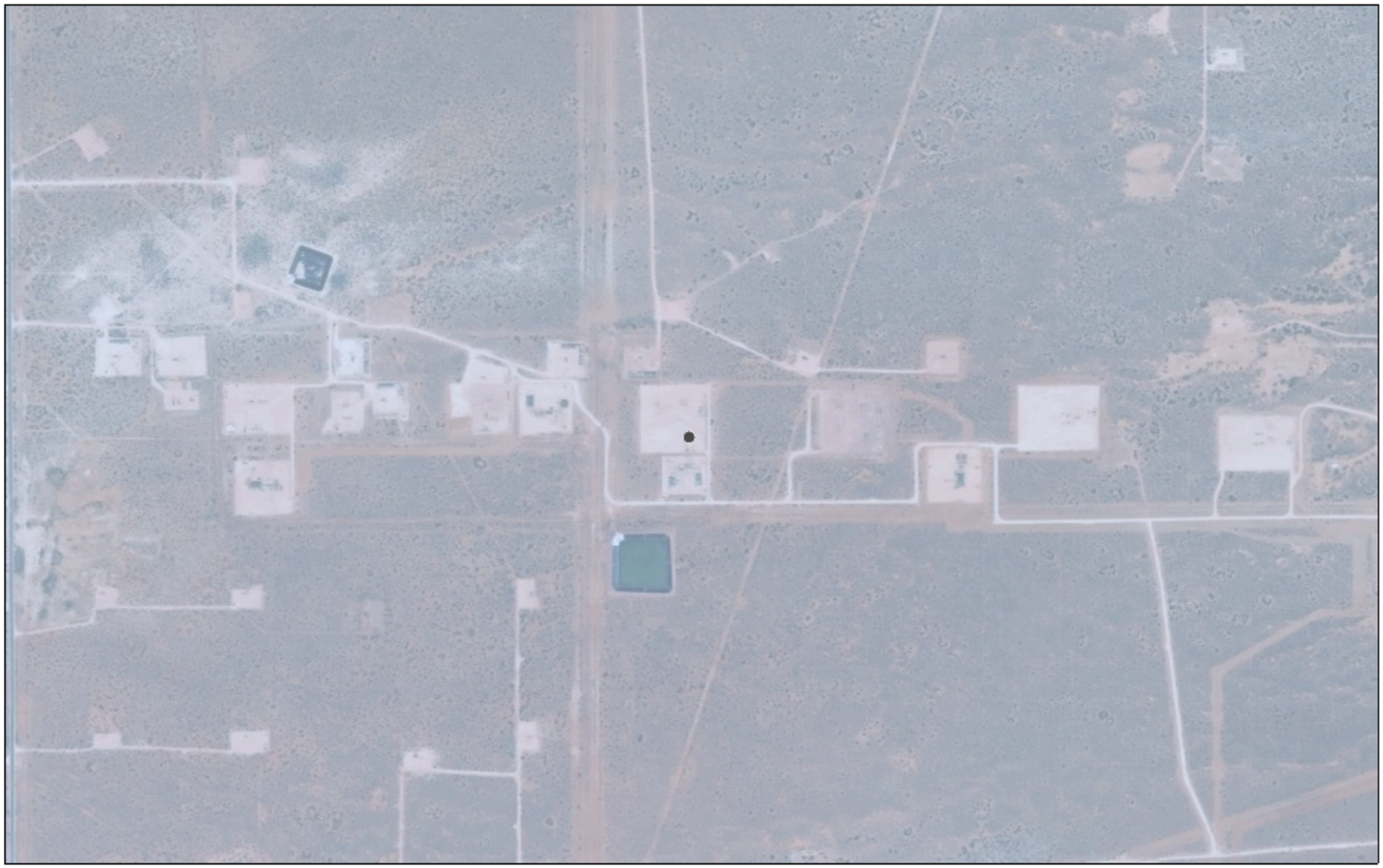
Percent of map unit: 5 percent
Ecological site: R070BD003NM - Loamy Sand

Hydric soil rating: No

Data Source Information

Soil Survey Area: Lea County, New Mexico
Survey Area Data: Version 21, Sep 3, 2024

Karst Potential



9/29/2025, 5:13:56 PM

Karst Occurrence Potential

Low

1:18,056

0 0.13 0.25 0.5 mi

0 0.2 0.4 0.8 km

BLM, OCD, New Mexico Tech, Maxar

New Mexico Oil Conservation Division

NM OCD Oil and Gas Map. http://nm-emnrd.maps.arcgis.com/apps/webappviewer/index.html?id=4d017f2306164de29fd2fb9f8f35ca75: New Mexico Oil Conservation Division

U.S. Fish and Wildlife Service
National Wetlands Inventory

Todd Apache 6 CTB 1

October 8, 2025

Wetlands

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

National Wetlands Inventory (NWI)
This page was produced by the NWI mapper

National Flood Hazard Layer FIRMette

FEMA

103°43'32"W 32°20'36"N

0 250 500 1,000 1,500 2,000 Feet

1:6,000

103°42'55"W 32°20'6"N

Basemap Imagery Source: USGS National Map 2023

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS
- Without Base Flood Elevation (BFE) *Zone A, V, A99*
- With BFE or Depth *Zone AE, AO, AH, VE, AR*
- Regulatory Floodway

OTHER AREAS OF FLOOD HAZARD
- 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile *Zone X*
- Future Conditions 1% Annual Chance Flood Hazard *Zone X*
- Area with Reduced Flood Risk due to Levee. See Notes. *Zone X*
- Area with Flood Risk due to Levee *Zone D*

OTHER AREAS
- NO SCREEN Area of Minimal Flood Hazard *Zone X*
- Effective LOMRs
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- 513 Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 9/29/2025 at 11:27 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Attachment C

Photographic Documentation

Devon Energy Production Company, LP
Todd Apache 6 CTB 1
Incident No. nAPP2520943541
Lea County, New Mexico

Photo 1 *View of Site signage.*

Photo 2 *View of southern portion of containment facing west.*

Photo 3 *View of eastern portion of containment facing north.*

Photo 4 *View of southern portion of containment facing east.*

Devon Energy Production Company, LP
Todd Apache 6 CTB 1
Incident No. nAPP2520943541
Lea County, New Mexico

Photo 5 *View of northern portion of containment facing west.*

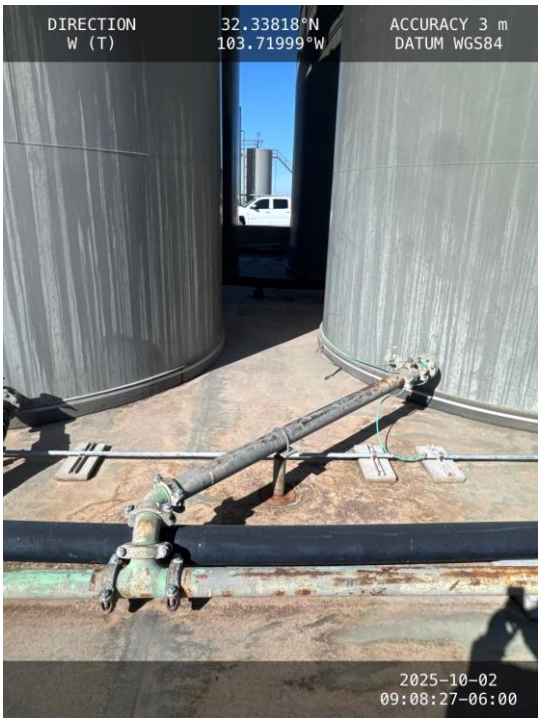


Photo 6 *View of central portion of containment facing west.*

Photo 7 *View of central portion of containment facing east.*

Photo 8 *View of western portion of containment facing south.*

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Oil Conservation Division
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Santa Fe, NM 87505

QUESTIONS

Action 523178

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 523178
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	**nAPP2520943541**
Incident Name	**NAPP2520943541 TODD APACHE 6 CTB 1 @ FAB1914933068**
Incident Type	**Produced Water Release**
Incident Status	**Remediation Closure Report Received**
Incident Facility	**[fAB1914933068] TODD APACHE 6 CTB 1**

Location of Release Source	
Please answer all the questions in this group.	
Site Name	TODD APACHE 6 CTB 1
Date Release Discovered	07/25/2025
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: Equipment Failure | Pump | Produced Water | Released: 11 BBL | Recovered: 11 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)	Recycle pump developed leak. Allowing fluids to be released to lined secondary containment.

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QUESTIONS (continued)

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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	**No**
Reasons why this would be considered a submission for a notification of a major release	*Unavailable.*
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.	

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@dvn.com Date: 11/05/2025

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QUESTIONS (continued)

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QUESTIONS

Site Characterization	
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.	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (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 1 and 5 (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	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
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.	
Requesting a remediation plan approval with this submission	Yes
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
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.	
On what estimated date will the remediation commence	10/01/2025
On what date will (or did) the final sampling or liner inspection occur	10/02/2025
On what date will (or was) the remediation complete(d)	10/02/2025
What is the estimated surface area (in square feet) that will be remediated	4000
What is the estimated volume (in cubic yards) that will be remediated	0
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.	
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.	

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QUESTIONS (continued)

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	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
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.	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	*Not answered.*
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 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@dvn.com Date: 11/05/2025
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.	

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QUESTIONS (continued)

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QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	**509992**
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	**10/02/2025**
Was all the impacted materials removed from the liner	**Yes**
What was the liner inspection surface area in square feet	**4000**

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	4000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspection

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@dvn.com Date: 11/05/2025

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CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 523178 Liner Inspection approved	12/1/2025