



December 2, 2025

New Mexico Oil Conservation Division

506 W. Texas Ave
Artesia, NM 88210

RE: **RDX Federal 17 #035H - Closure Request Report**

Incident Number: nAPP2524730686

GPS: 32.0492796°, -103.909725°

Eddy County, New Mexico
ESRR Project No. VP-7225

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 RDX Federal 17 #035H (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 D, Section 17, Township 26 South, Range 30 East, in Eddy County, New Mexico (32.0492796°, -103.909725°) 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 September 4, 2025, a hole developed on a tank, releasing approximately 60 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 60 bbls of produced water.

Notice was given to the New Mexico Oil Conservation Division (NMOCD) on September 4, 2025, by Notification of Release (NOR) and subsequently assigned Incident Number nAPP2524730686. A Corrective Action Form C-141 (Form C-141) was later submitted on September 10, 2025 and approved by the NMOCD on September 19, 2025.

On October 15, 2025, WPX submitted a 48-hour Notification of Liner Inspection (Form C-141 L) for October 17, 2025.

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:

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- Between 500 and 1,000 feet of any continuously flowing watercourse or any other significant watercourse;
- Between 500 and 1,000 feet 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 1 and 5 miles of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between 1 and 5 miles 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;
- Between 1 and 5 miles of an unstable area (non-karst); and
- Between 500 and 1,000 feet 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 as medium karst potential with depth to ground water estimated to be greater than 100 feet below ground surface (bgs). 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 October 17, 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 appears to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

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 nAPP2524730686. If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or gmoreno@earthsyst.net. **NMOCD Documentation & Correspondence** is attached.

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Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

A handwritten signature in black ink that appears to read "Gilbert Moreno".

Gilbert Moreno
Carlsbad Operations Manager/ Project Geologist

A handwritten signature in black ink that appears 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

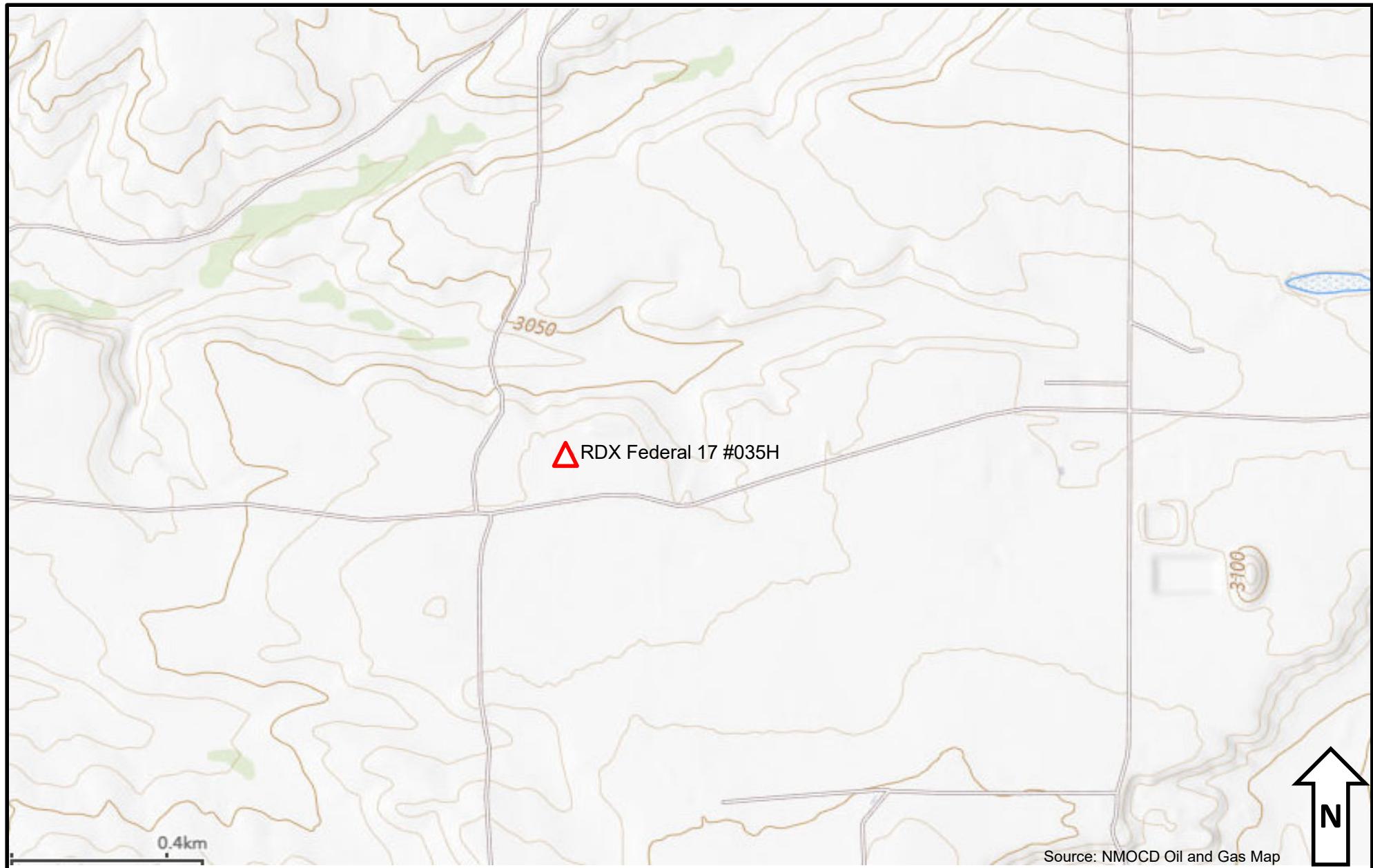


Figure 1 – Site Map

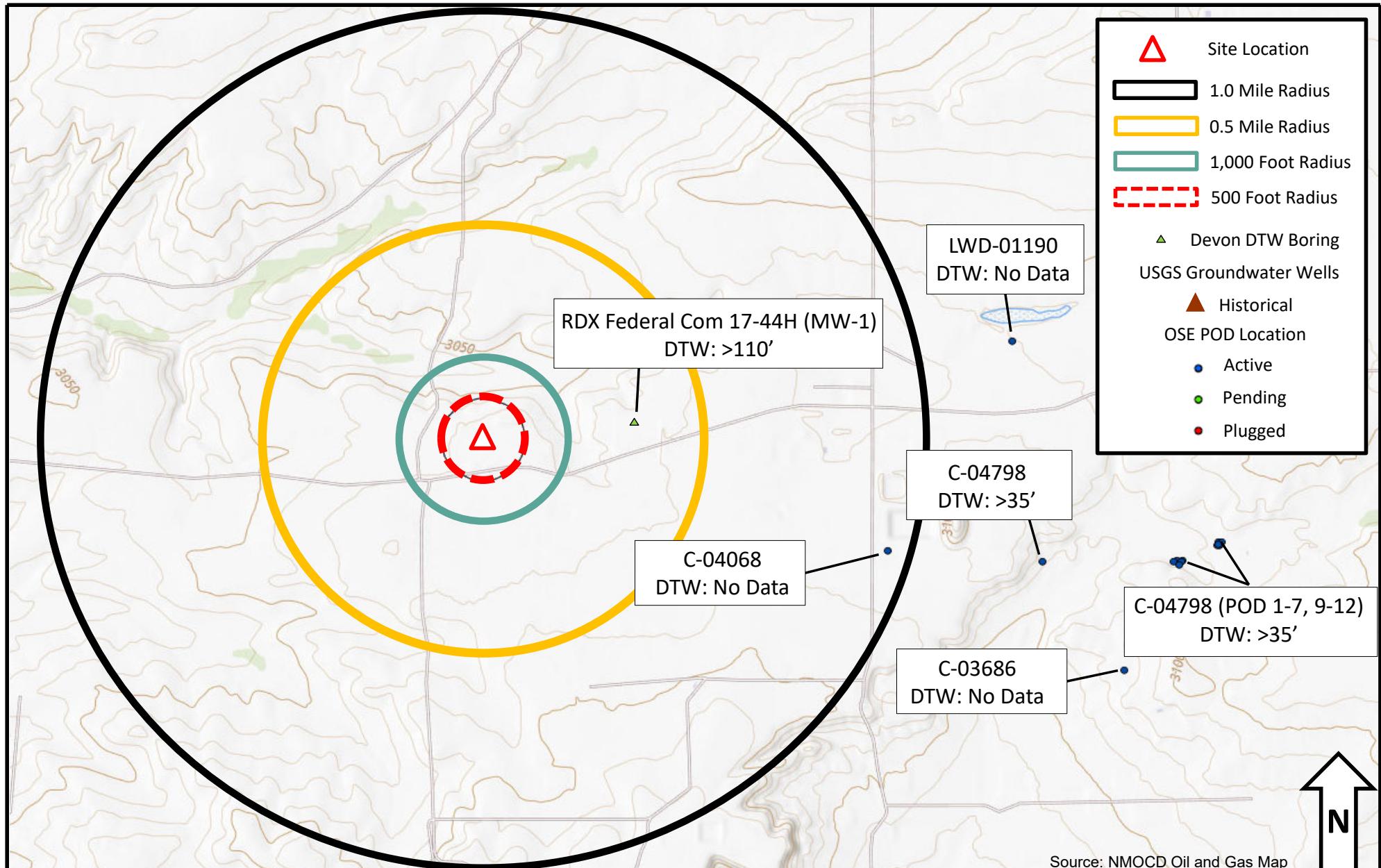
WPX Energy Permian – RDX Federal 17 #035H
GPS: 32.0492796°, -103.909725°
Eddy County, New Mexico



Figure 2 – Release Extent

WPX Energy Permian – RDX Federal 17 #035H
GPS: 32.0492796°, -103.909725°
Eddy County, New Mexico





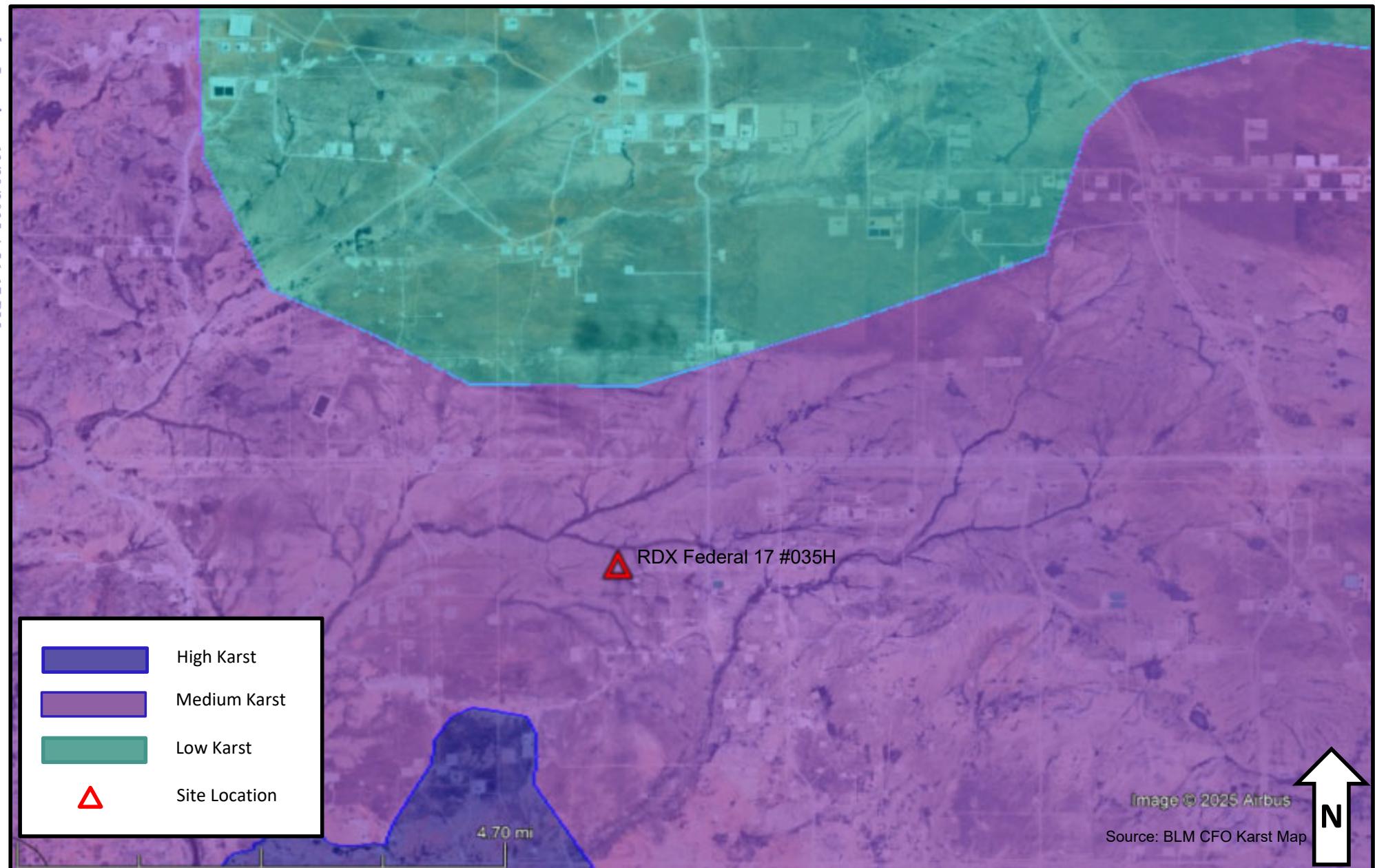


Figure 4 – Karst Potential

WPX Energy Permian – RDX Federal 17 #035H
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Eddy County, New Mexico



 HRL COMPLIANCE SOLUTIONS							BORING LOG/MONITORING WELL COMPLETION DIAGRAM					
							Boring/Well Number: MW-1		Location: RDX Federal Com 17-44H			
Drilling Method: Air Rotary		Sampling Method: None			Logged By: J. Linn, PG		Drilled By: Talon LPE					
Gravel Pack Type: 10/20 Sand		Gravel Pack Depth Interval: 3 Bags			Seal Type: None		Seal Depth Interval: None		Latitude: 32.049656			
Casing Type: PVC		Diameter: 2-inch			Depth Interval: 0-105 ft bgs		Boring Total Depth (ft. BGS): 110		Longitude: -103.904054			
Screen Type: PVC		Slot: 0.010-inch			Diameter: 2-inch		Depth Interval: 105 - 110 ft		Well Total Depth (ft. BGS): 110		Depth to Water (ft. BTOC): > 110	DTW Date: 12/16/2020
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks			Well Completion
0	NM	L	D	N	N	NM	CE	NS	Buff to pale pink colored caliche			
5												
10												
15												
20												
25												
30												
35												
40	NM	L	D	N	N	NM	CE	NS	Buff to pale pink colored caliche			
45												
50												
55												
60												
65	NM	L	D	N	N	NM	CE	NS	Buff to pale pink colored caliche			
70												
75												
80												
85	NM	L	D	N	N	NM	CE	NS	Pinky orange well graded sand with minor silt			
90												
95												
100	NM	L	D	N	N	NM	CE	NS	Pinky pale brown orange poorly graded fine sand with minor silt - TD: 110' bgs			
105												

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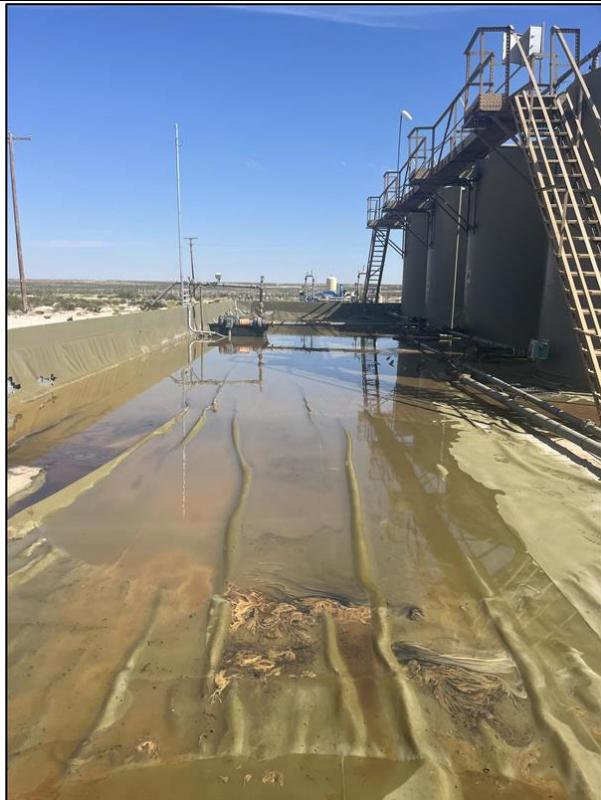


PHOTO 1: Southeastern view during initial site assessment by WPX. 9/04/2025



PHOTO 2: Northwestern view during initial site assessment by ESRR. 9/11/2025

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PHOTO 3: Northwestern view outside of containment during liner inspection activities. 10/17/2025



PHOTO 4: Northwestern view outside of containment during liner inspection activities. 10/17/2025

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PHOTO 5: Northeastern view outside of containment during liner inspection activities. 10/17/2025

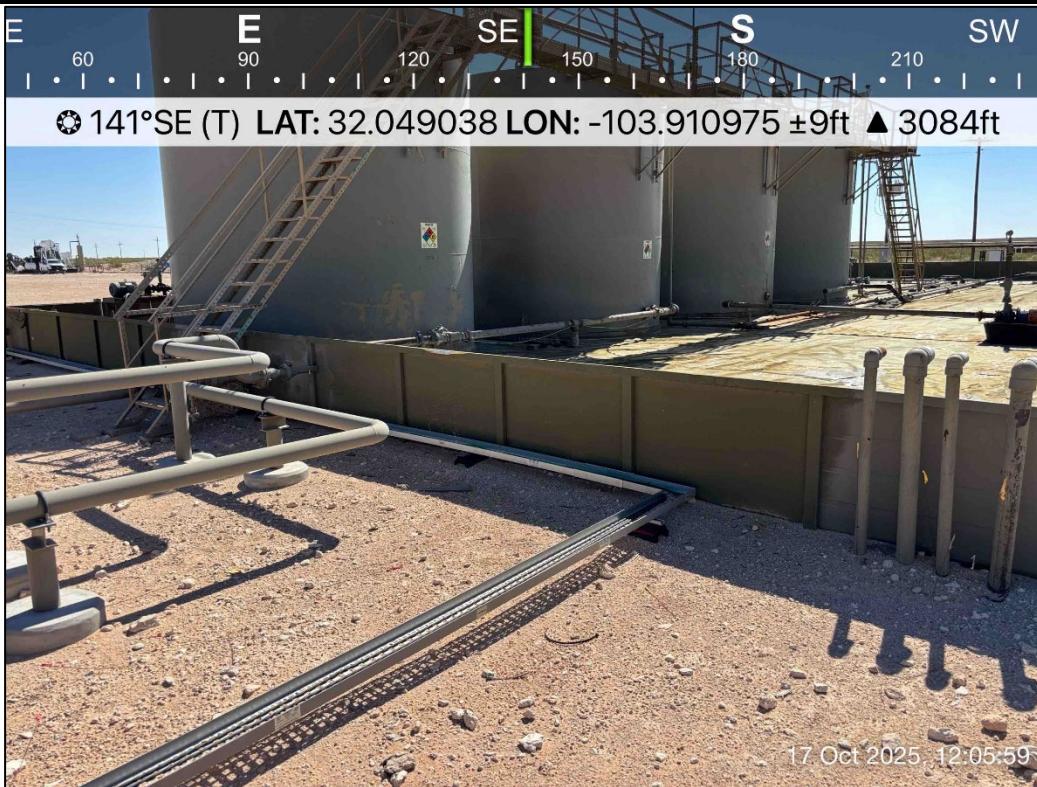


PHOTO 6: Southeastern view outside of containment during liner inspection activities. 10/17/2025

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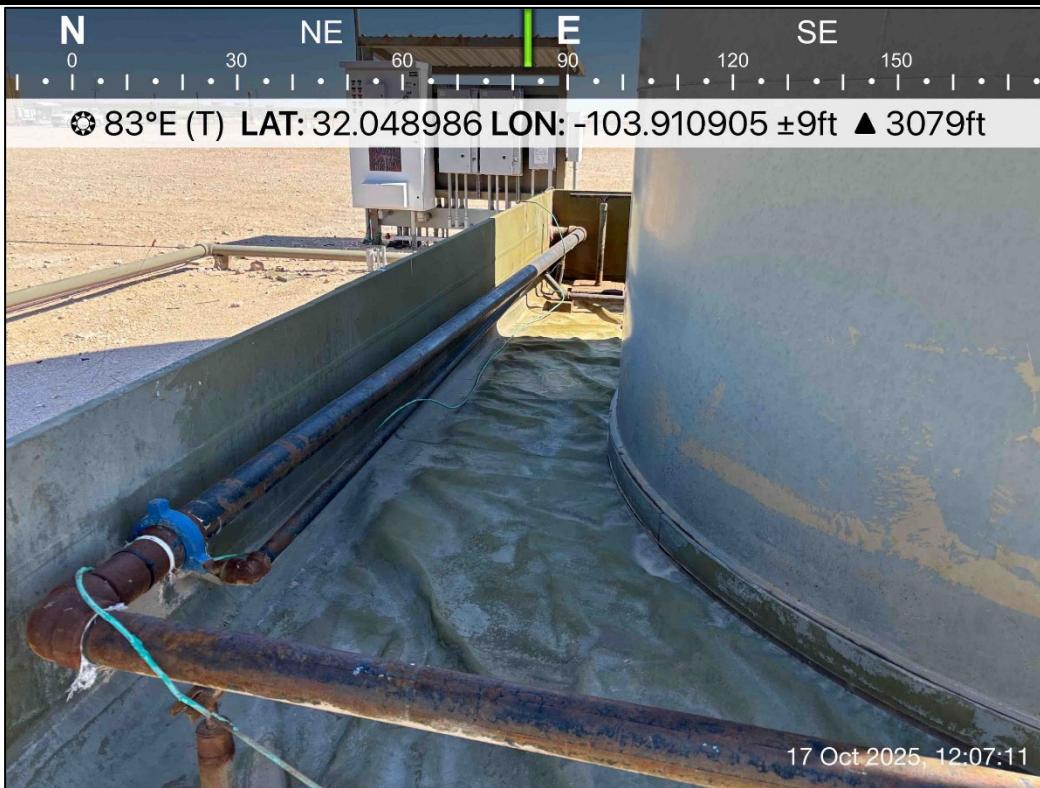


PHOTO 7: Eastern view outside of containment during liner inspection activities. 10/17/2025



PHOTO 8: Northeastern view outside of containment during liner inspection activities. 10/17/2025

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PHOTO 9: Southwestern view during liner inspection activities. 10/17/2025

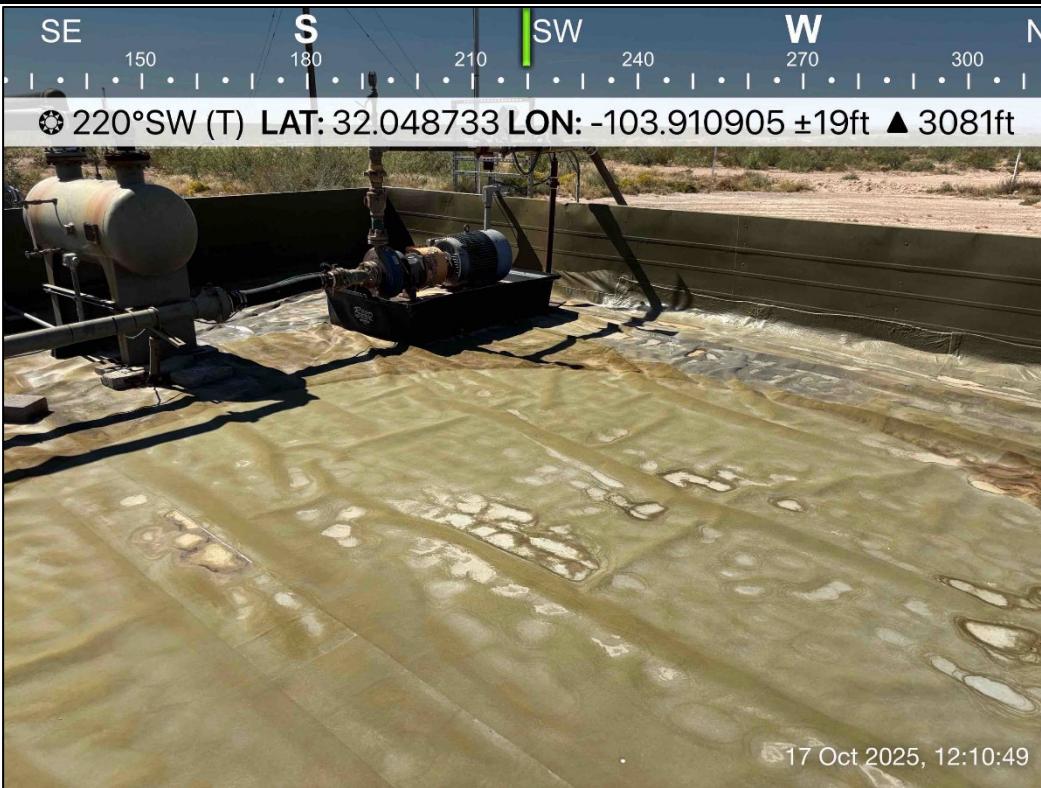


PHOTO 10: Southwestern view during liner inspection activities. 10/17/2025

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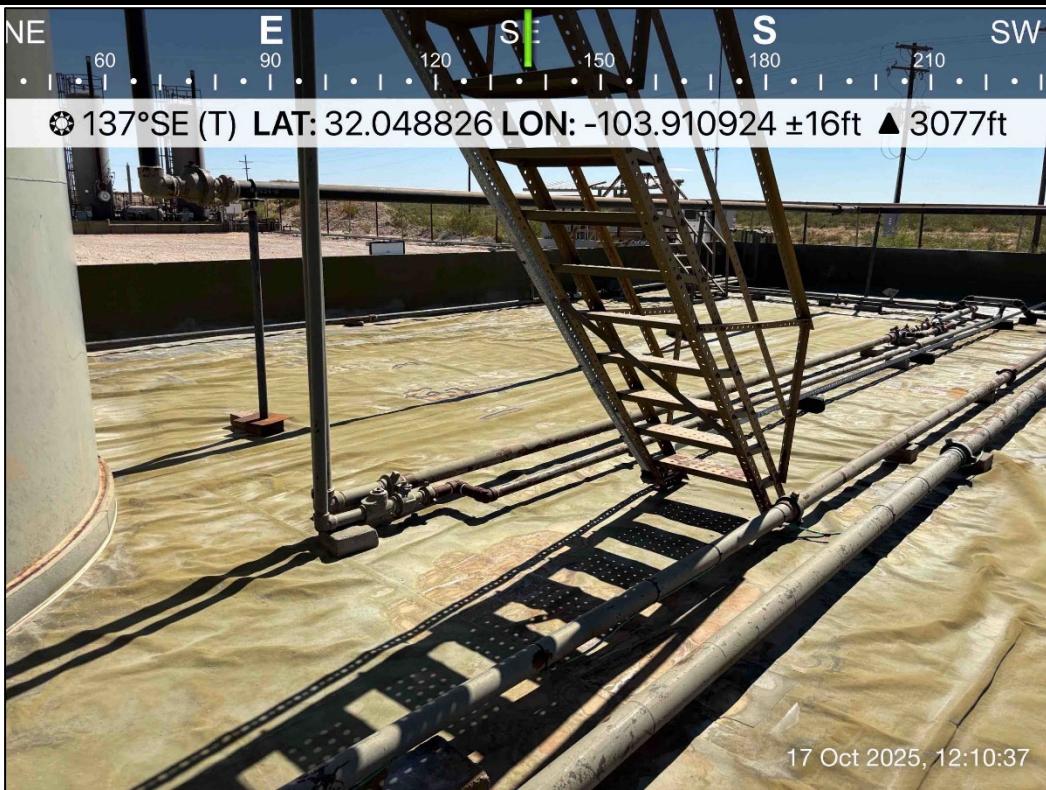


PHOTO 11: Southeastern view during liner inspection activities. 10/17/2025



PHOTO 12: Northwestern view during liner inspection activities. 10/17/2025

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PHOTO 13: Southeastern view during liner inspection activities. 10/17/2025



PHOTO 14: Northwestern view during liner inspection activities. 10/17/2025

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

General Information
Phone: (505) 629-6116

Online Phone Directory
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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 515287

QUESTIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289 Action Number: 515287 Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)
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QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2524730686
Incident Name	NAPP2524730686 RDX FEDERAL 17 #035H @ 30-015-43884
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-015-43884] RDX FEDERAL 17 #035H

Location of Release Source	
Site Name	RDX FEDERAL 17 #035H
Date Release Discovered	09/04/2025
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	6,200
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	10/17/2025
Time liner inspection will commence	10:00 AM
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	32.0492796, -103.909725

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CONDITIONS

Action 515287

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Operator:	WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
		Action Number: 515287
		Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Created By	Condition	Condition Date
jraleyley	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.	10/15/2025

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QUESTIONS

Action 534253

QUESTIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2524730686
Incident Name	NAPP2524730686 RDX FEDERAL 17 #035H @ 30-015-43884
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-43884] RDX FEDERAL 17 #035H

Location of Release Source*Please answer all the questions in this group.*

Site Name	RDX FEDERAL 17 #035H
Date Release Discovered	09/04/2025
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	<i>Not answered.</i>
Produced Water Released (bbls) Details	<i>Cause: Equipment Failure Production Tank Produced Water Released: 60 BBL Recovered: 60 BBL Lost: 0 BBL.</i>
Is the concentration of chloride in the produced water >10,000 mg/l	<i>Yes</i>
Condensate Released (bbls) Details	<i>Not answered.</i>
Natural Gas Vented (Mcf) Details	<i>Not answered.</i>
Natural Gas Flared (Mcf) Details	<i>Not answered.</i>
Other Released Details	<i>Not answered.</i>
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	<i>Tank developed hole, allowing for fluids to be released to lined secondary containment. Fluids fully contained and recovered. NM</i>

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QUESTIONS, Page 2

Action 534253

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	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.

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	
<i>The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.</i>	
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	<i>Not answered.</i>

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: 12/12/2025
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QUESTIONS, Page 3

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Santa Fe, NM 87505

Action 534253

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	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 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 500 and 1000 (ft.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 500 and 1000 (ft.)
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 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 500 and 1000 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 500 and 1000 (ft.)
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	10/17/2025
On what date will (or did) the final sampling or liner inspection occur	10/17/2025
On what date will (or was) the remediation complete(d)	10/17/2025
What is the estimated surface area (in square feet) that will be remediated	6200
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 534253

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	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.raleyn@dvn.com Date: 12/12/2025
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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, Page 6

Action 534253

QUESTIONS (continued)

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	515287
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	10/17/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	6200

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
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	6200
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@dvn.com Date: 12/12/2025

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

CONDITIONS

Action 534253

CONDITIONS

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 534253
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	12/29/2025