R. T. HICKS CONSULTANTS, LTD.
901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 21, 2020
REVISED January 26, 2020

Susan Lucas Kamat, Environmental Scientist
OCD Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505
ONLINE SUBMISSION

RE: Temporary Pit Closure Report, Devon Energy
Bell Lake 19-18 State Com 017H (3002545455) and
Bell Lake 19-18 State Com 13Y (30025456210)

Dear Ms. Lucas Kamat,

On behalf of Devon Energy Production Co., R.T. Hicks Consultants submits this closure report for the above-referenced temporary pit in accordance with the approved C-144 closure plan and conditions of approval. This report includes the following information listed in Part 21 of the C-144 form:

Requirements	Location in this Submission
Proof of Closure Notice (to surface owner and Division)	Attachment 1 (Note that Closure Notice erroneously suggested that wells 007H, 009H and 010H were associated with this pit)
Proof of Deed Notice (on-site closure on private land only)	Not applicable; State Land (no deed)
Plot Plan, C-105 form (for on-site closures and temporary pits)	Attachment 2
Confirmation Sampling Analytical Results	Not applicable
Waste Material Sampling Analytical Results (required for on-site closure)	Attachment 3 (also submitted with closure notice)
Disposal Facility Name and Permit Number	Not applicable; on-site closure
Soil Backfilling and Cover Installation	Attachment 4
Re-vegetation Application Rates and Seeding Technique	Re-vegetation will be part of site reclamation after plugging and abandonment (interim reclamation approved with initial permit application).
Site Reclamation (photo documentation)	To follow after plugging and site reclamation
Updated C-144 form	Attachment 5

As stated in Attachment 4, the Closure Notice for this pit (Attachment 1) was incorrect. Wells that discharged cuttings to this pit were the two wells referenced above, 17H and 13Y. Well Bell Lake 19-18 13H was plugged and abandoned due to drilling problem as described in the attached Form C-103. The attached C-103 spud notice for Bell Lake 19-18 13Y is also attached. The updated C-144 form (Attachment 5) lists well 13Y rather than 13H.

Please contact me if you have any questions.

Sincerely,
R.T. Hicks Consultants

Randall Hicks
Principal

Copy: NM State Land Office, Devon Energy (*VIA EMAIL)*

Submit 1 Copy To Appropriate District Office
District I – (575) 393-6161
1625 N. French Dr., Hobbs, NM 88240
District II – (575) 748-1283
811 S. First St., Artesia, NM 88210
District III – (505) 334-6178
1000 Rio Brazos Rd., Aztec, NM 87410
District IV – (505) 476-3460
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources

OIL CONSERVATION DIVISION
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-103
Revised July 18, 2013

WELL API NO. 30-025-45454
5. Indicate Type of Lease STATE ☒ FEE ☐
6. State Oil & Gas Lease No.

SUNDRY NOTICES AND REPORTS ON WELLS
(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

1. Type of Well: Oil Well ☒ Gas Well ☐ Other
7. Lease Name or Unit Agreement Name: Bell Lake 19 18 State Com
8. Well Number: 3H
2. Name of Operator: Devon Energy Production Company, LP
9. OGRID Number: 6137
3. Address of Operator: 333 West Sheridan Avenue, Oklahoma City, OK 73102
10. Pool name or Wildcat: WC-025 G-06 S253201M; UBS
4. Well Location
Unit Letter N:538 feet from the North line and 1952 feet from the West line
Section 19 Township 24S Range 33E NMPM LEA County NM
11. Elevation *(Show whether DR, RKB, RT, GR, etc.)* 3551

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:				SUBSEQUENT REPORT OF:			
PERFORM REMEDIAL WORK	☐	PLUG AND ABANDON	☐	REMEDIAL WORK	☐	ALTERING CASING	☐
TEMPORARILY ABANDON	☐	CHANGE PLANS	☐	COMMENCE DRILLING OPNS.	☐	P AND A	☐
PULL OR ALTER CASING	☐	MULTIPLE COMPL	☐	CASING/CEMENT JOB	☐		
DOWNHOLE COMMINGLE	☐						
CLOSED-LOOP SYSTEM	☐						
OTHER:			☐	OTHER: Attempted SHL Operations			☒

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work). SEE RULE 19.15.7.14 NMAC. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

Devon Energy Production Co. respectfully reports while attempting to set conductor on the 13H location, Butches Rathole's auger got stuck. They attempted to get free with a crane, with no success. Requested to move SHL to accommodate setting a new conductor. A new APD will be filed for the new location.

Spud Date: Rig Release Date:

I hereby certify that the information above is true and complete to the best of my knowledge and belief.

SIGNATURE Rebecca Deal TITLE Regulatory Compliance Professional DATE 2/18/2019

Type or print name Rebecca Deal E-mail address: rebecca.deal@dvn.com PHONE: 405-228-8429

For State Use Only

APPROVED BY: TITLE Petroleum Engineer DATE 02/18/19
Conditions of Approval (if any):

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

Form C-103
August 1, 2011

Permit 265430

WELL API NUMBER: 30-025-45621

5. Indicate Type of Lease: S

6. State Oil & Gas Lease No.:

SUNDRY NOTICES AND REPORTS ON WELLS

(DO NOT USE THIS FORM FOR PROPOSALS TO DRILL OR TO DEEPEN OR PLUG BACK TO A DIFFERENT RESERVOIR. USE "APPLICATION FOR PERMIT" (FORM C-101) FOR SUCH PROPOSALS.)

7. Lease Name or Unit Agreement Name: BELL LAKE 19 18 STATE COM

1. Type of Well: O

8. Well Number: 013Y

2. Name of Operator: DEVON ENERGY PRODUCTION COMPANY, LP

9. OGRID Number: 6137

3. Address of Operator: 20 N Broadway, Oklahoma City, OK 73102

10. Pool name or Wildcat:

4. Well Location
Unit Letter N : 538 feet from the S line and feet 1967 from the W line
Section 19 Township 24S Range 33E NMPM _____ County Lea

11. Elevation (Show whether DR, KB, BT, GR, etc.)
3551 GR

Pit or Below-grade Tank Application ☐ or Closure ☐

Pit Type _____ Depth to Groundwater_____ Distance from nearest fresh water well_____ Distance from nearest surface water_____

Pit Liner Thickness:_____ mil Below-Grade Tank: Volume_____ bbls; Construction Material_____

12. Check Appropriate Box to Indicate Nature of Notice, Report or Other Data

NOTICE OF INTENTION TO:				SUBSEQUENT REPORT OF:			
PERFORM REMEDIAL WORK	☐	PLUG AND ABANDON	☐	REMEDIAL WORK	☐	ALTER CASING	☐
TEMPORARILY ABANDON	☐	CHANGE OF PLANS	☐	COMMENCE DRILLING OPNS.	☐	PLUG AND ABANDON	☐
PULL OR ALTER CASING	☐	MULTIPLE COMPL	☐	CASING/CEMENT JOB	☐		
Other:				Other: **Spud**			☒

13. Describe proposed or completed operations. (Clearly state all pertinent details, and give pertinent dates, including estimated date of starting any proposed work.) SEE RULE 1103. For Multiple Completions: Attach wellbore diagram of proposed completion or recompletion.

3/23/2019 Spudded well.

Spud well @ 13:30 on 3/23/19

I hereby certify that the information above is true and complete to the best of my knowledge and belief. I further certify that any pit or below-grade tank has been/will be constructed or closed according to NMOCD guidelines ☐, a general permit ☐ or an (attached) alternative OCD-approved plan ☐

SIGNATURE	Electronically Signed	TITLE		DATE	3/26/2019
Type or print name	Daniel Peach	E-mail address	danny.peach@dvn.com	Telephone No.	405-552-4660

For State Use Only:

APPROVED BY:	Paul F Kautz	TITLE	Geologist	DATE	3/26/2019

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

Comments

Permit 265430

NOTICESPUD COMMENTS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP 20 N Broadway Oklahoma City, OK 73102	6137
	Permit Number: 265430
	Permit Type: NoticeSpud

Comments

Created By	Comment	Comment Date

There are no Comments for this Permit

Attachment 1

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Since 1996
Artesia ▲ Carlsbad ▲ Durango ▲ Midland

November 18, 2019

Mr. Rick Rickman
Mr. Jim Griswold
NMOCD District 1
1625 French Drive
Hobbs, NM 88240
VIA EMAIL

RE: Devon Energy Temporary Pit Closure Notice Bell Lake 19-18 State Com 017H

Dear Mr. Rickman and Mr. Griswold:

On behalf of Devon Energy., R. T. Hicks Consultants provides this notice to NMOCD with a copy to the State Land Office (email return receipt in lieu of US Mail) that closure operations at the above-referenced pit will begin **Thursday, November 21, 2019**. The closure process should be complete about January 14, 2020.

The temporary pit that was permitted as being associated with the Bell Lake 19-18 State Com 017H well (See Figure 1) received solids from:

Bell Lake Unit 007H	30-025-45451	surface to TD (19545)
Bell Lake Unit 009H	30-025-45452	surface to TD (19430)
Bell Lake Unit 010H	30-025-45453	surface to TD (19478)
Bell Lake Unit 013H	30-025-45454	*no cuttings were added to temporary pit
Bell Lake Unit 017H	30-025-45455	surface to TD (19505)

*Per the Form C-103 for Unit 013H, while the conductor pipe was attempting to be set, the auger got stuck and crane removal was unsuccessful. A request to move SHL was to be filed in a new APD.

The C-144 that will be attached to the closure report will also provide this updated information. The "In-place Burial" closure plan for the pit was approved by NMOCD on February 21, 2019 and the permit application and approval are on the OCD website.

An excavator collected samples of cuttings from 5 locations and the composite shown on Figure 2. The laboratory reports of the cuttings samples are presented in Attachment A and Table 1 summarizes the results. Please note that the chain of custody was labeled only as Bell Lake.

Sampling Results Bell Lake Unit 17H in mg/kg (highlight blue = Practical Quantification Limit - aka ND)											
Name	Chloride	DRO	MRO	GRO	Benzene	Toluene	Ethylbenzene	Xylenes	GRO+DRO	TPH	BTEX
1	3,840	6060.0	131.0	240.0	0.1	1.2	1.3	6.9	6300.0	6431.0	9.5
2	236,000	13.9	10.0	10.0	0.1	0.1	0.1	0.2	23.9	33.9	0.3
3	312,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
4	1,520	793.0	23.5	335.0	10.0	30.0	15.6	62.0	100.0	123.5	117.6
5	800	528.0	10.0	78.3	0.5	7.7	4.8	19.0	195.0	205.0	32.0
6	5,440	2070.0	45.7	49.9	0.3	2.4	1.5	6.2	2119.9	2165.6	10.4
Average Cuttings	93,267	1579.2	38.4	120.5	1.8	6.9	3.9	15.7	1459.8	1498.2	28.3
7 (composite) Mixing Dirt	80.00	10.00	10.00	10.00	0.05	0.05	0.05	0.15	20.00	30.00	0.30
3 Parts Mixing + 1 Part Cuttings	23,377				0.49				380	397	7
Burial Standard	80,000				10				1,000	2,500	50

**MRO range (<C28-C35) - depicted as EXT DRO >C28-C36*
***When results were less than the reporting limit, the reporting limit was used.*

With the exception of GRO+DRO and chlorides, laboratory analysis of cuttings sample meets in-place closure target concentrations found in Table II of 19.15.17.13 NMAC without mixing with 3 parts clean fill. After mixing with 3 parts non-waste material, the GRO+DRO concentration is 380 mg/kg and the chloride is 23,377 mg/kg.

Closure activities require excavating the side slopes of the pit and using the underlying caliche for stabilization of the cuttings. The cuttings will also be mixed with dry material from beneath the pit liner as necessary. The closure process will follow the submitted plan.

Thank you for your consideration of this notice of in-place closure.

Sincerely,
R.T. Hicks Consultants

Erica M. Hart, PG
Geologist

Copy: Devon Energy
Ryan Mann, SLO via email

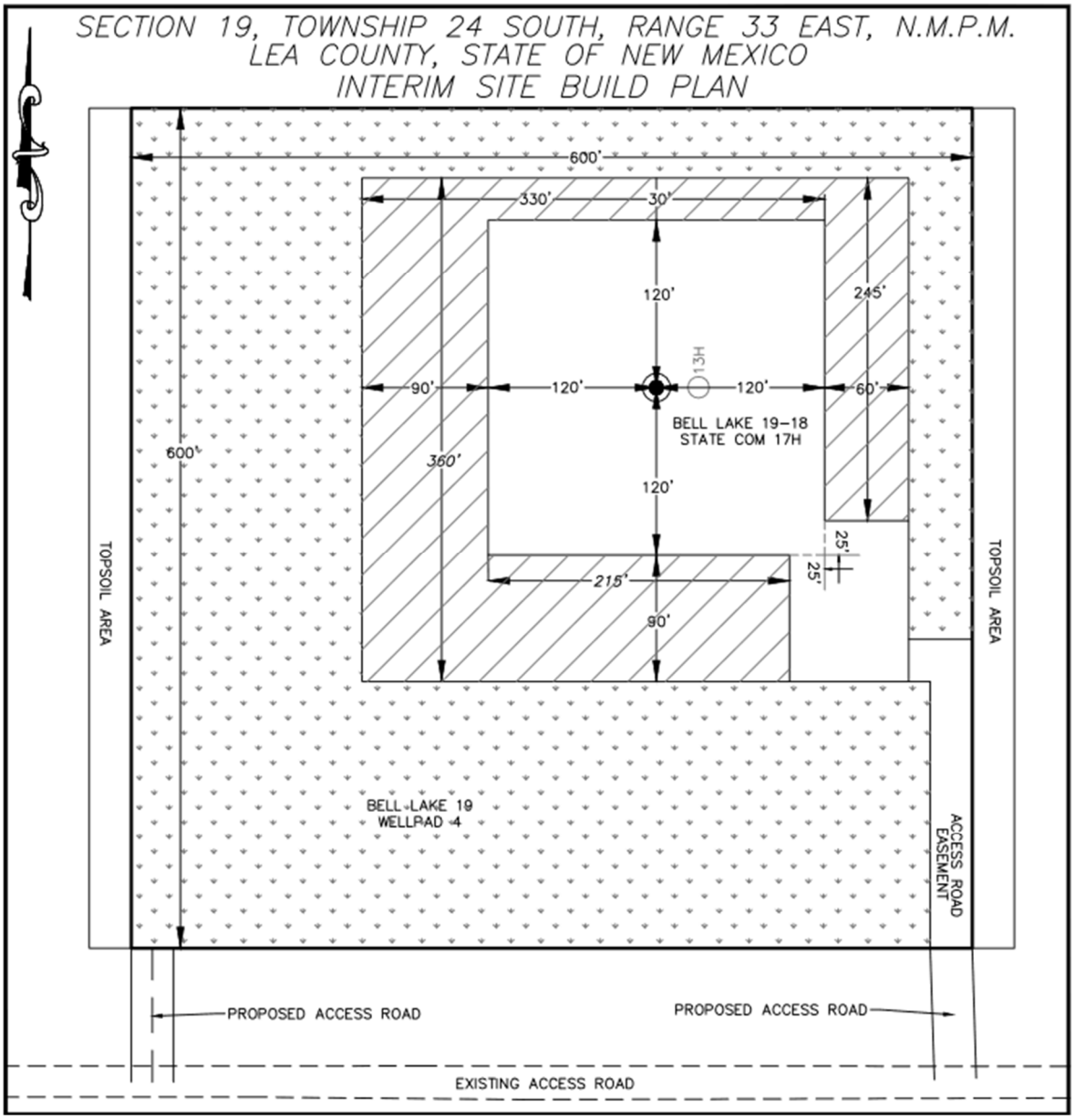


Figure 1 – Survey of Bell Lake 19-18 State Com 017H pit.

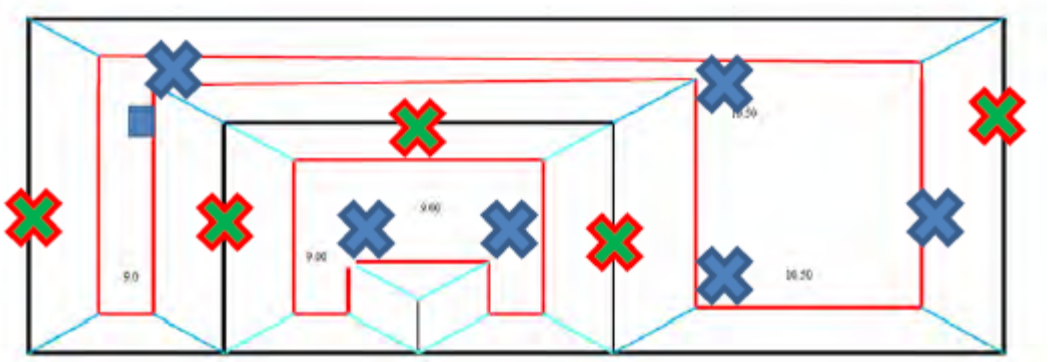


Image shows typical discrete pit sample locations (blue X) and the sub-sample locations for the "mixing dirt" (green X) composite sample to determine compliance with Table II.

Figure 2 – Sample locations for Bell Lake 19-18 State Com 017H pit. The wells associated with this pit are about 70 feet southeast of the pit.

Attachment 2

Submit To Appropriate District Office
Two Copies
District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Rd., Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy, Minerals and Natural Resources

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

Form C-105
Revised April 3, 2017

1. WELL API NO.
30-025-45455 (+45454)

2. Type of Lease
[x] STATE [ ] FEE [ ] FED/INDIAN

3. State Oil & Gas Lease No.

WELL COMPLETION OR RECOMPLETION REPORT AND LOG

4. Reason for filing:

[ ] **COMPLETION REPORT** (Fill in boxes #1 through #31 for State and Fee wells only)

[x] **C-144 CLOSURE ATTACHMENT** (Fill in boxes #1 through #9, #15 Date Rig Released and #32 and/or #33; attach this and the plat to the C-144 closure report in accordance with 19.15.17.13.K NMAC)

5. Lease Name or Unit Agreement Name
Bell Lake 19 18 State Com

6. Well Number:
017H

7. Type of Completion:
[x] NEW WELL [ ] WORKOVER [ ] DEEPENING [ ] PLUGBACK [ ] DIFFERENT RESERVOIR [ ] OTHER _____

8. Name of Operator
Devon Energy Production Company, LP

9. OGRID
6137

10. Address of Operator

11. Pool name or Wildcat

12. Location	Unit Ltr	Section	Township	Range	Lot	Feet from the	N/S Line	Feet from the	E/W Line	County
Surface:										
BH:										

13. Date Spudded	14. Date T.D. Reached	15. Date Rig Released	16. Date Completed (Ready to Produce)	17. Elevations (DF and RKB, RT, GR, etc.)
		3/23/19	8/15/19	

18. Total Measured Depth of Well	19. Plug Back Measured Depth	20. Was Directional Survey Made?	21. Type Electric and Other Logs Run

22. Producing Interval(s), of this completion - Top, Bottom, Name

23. **CASING RECORD** (Report all strings set in well)

CASING SIZE	WEIGHT LB./FT.	DEPTH SET	HOLE SIZE	CEMENTING RECORD	AMOUNT PULLED

24. LINER RECORD

SIZE	TOP	BOTTOM	SACKS CEMENT	SCREEN

25. TUBING RECORD

SIZE	DEPTH SET	PACKER SET

26. Perforation record (interval, size, and number)

27. ACID, SHOT, FRACTURE, CEMENT, SQUEEZE, ETC.

DEPTH INTERVAL	AMOUNT AND KIND MATERIAL USED

28. **PRODUCTION**

Date First Production	Production Method *(Flowing, gas lift, pumping - Size and type pump)*	Well Status *(Prod. or Shut-in)*

Date of Test	Hours Tested	Choke Size	Prod'n For Test Period	Oil - Bbl	Gas - MCF	Water - Bbl.	Gas - Oil Ratio

Flow Tubing Press.	Casing Pressure	Calculated 24-Hour Rate	Oil - Bbl.	Gas - MCF	Water - Bbl.	Oil Gravity - API - *(Corr.)*

29. Disposition of Gas *(Sold, used for fuel, vented, etc.)*

30. Test Witnessed By

31. List Attachments

32. If a temporary pit was used at the well, attach a plat with the location of the temporary pit. see attached

33. Rig Release Date:

34. If an on-site burial was used at the well, report the exact location of the on-site burial:

Latitude 32.19765 Longitude -103.61392 NAD83

I hereby certify that the information shown on both sides of this form is true and complete to the best of my knowledge and belief

Signature Erica Hart Printed Name Erica Hart Title Project Geologist Agent for Devon Date 1/16/2020

E-mail Address erica@rthicksconsult.com

INSTRUCTIONS

This form is to be filed with the appropriate District Office of the Division not later than 20 days after the completion of any newly-drilled or deepened well and not later than 60 days after completion of closure. When submitted as a completion report, this shall be accompanied by one copy of all electrical and radio-activity logs run on the well and a summary of all special tests conducted, including drill stem tests. All depths reported shall be measured depths. In the case of directionally drilled wells, true vertical depths shall also be reported. For multiple completions, items 11, 12 and 26-31 shall be reported for each zone.

INDICATE FORMATION TOPS IN CONFORMANCE WITH GEOGRAPHICAL SECTION OF STATE

Southeastern New Mexico		Northwestern New Mexico	
T. Anhy_____	T. Canyon_____	T. Ojo Alamo_____	T. Penn A"_____
T. Salt_____	T. Strawn_____	T. Kirtland _____	T. Penn. "B"_____
B. Salt_____	T. Atoka_____	T. Fruitland_____	T. Penn. "C"_____
T. Yates_____	T. Miss_____	T. Pictured Cliffs_____	T. Penn. "D"_____
T. 7 Rivers_____	T. Devonian_____	T. Cliff House_____	T. Leadville_____
T. Queen_____	T. Silurian_____	T. Menefee_____	T. Madison_____
T. Grayburg_____	T. Montoya_____	T. Point Lookout_____	T. Elbert_____
T. San Andres_____	T. Simpson_____	T. Mancos_____	T. McCracken_____
T. Glorieta_____	T. McKee_____	T. Gallup_____	T. Ignacio Otzte_____
T. Paddock_____	T. Ellenburger_____	Base Greenhorn_____	T.Granite _____
T. Blinebry_____	T. Gr. Wash_____	T. Dakota_____	
T.Tubb_____	T. Delaware Sand_____	T. Morrison_____	
T. Drinkard_____	T. Bone Springs_____	T.Todilto_____	
T. Abo_____	T._____	T. Entrada_____	
T. Wolfcamp_____	T._____	T. Wingate_____	
T. Penn_____	T._____	T. Chinle_____	
T. Cisco (Bough C)_____	T._____	T. Permian_____	

OIL OR GAS SANDS OR ZONES

No. 1, from……..……..….to……. No. 3, from……to…….……

No. 2, from……to…… No. 4, from……to……..

IMPORTANT WATER SANDS

Include data on rate of water inflow and elevation to which water rose in hole.

No. 1, from…….to……feet……

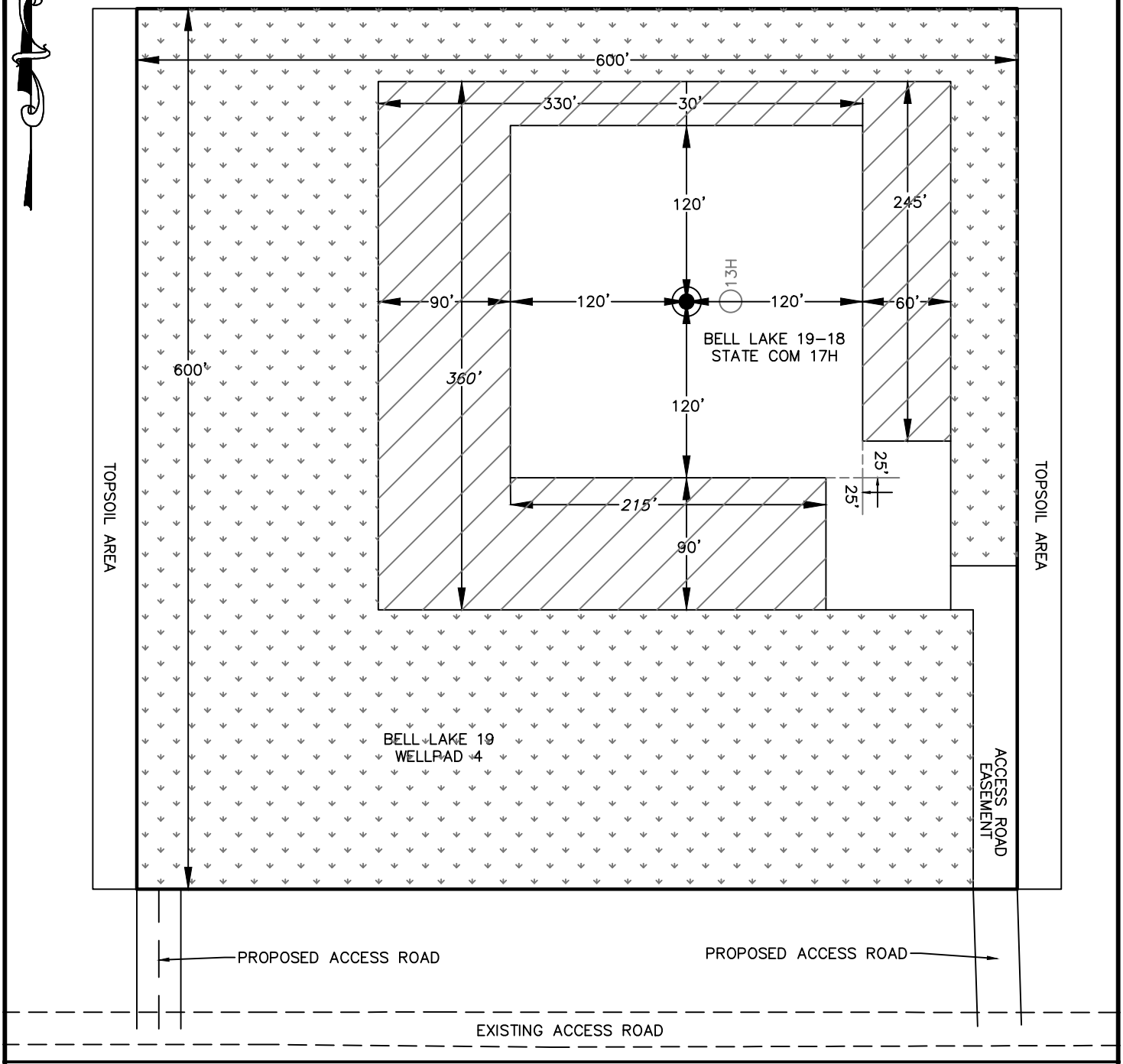
No. 2, from…….to……feet……

No. 3, from…….to……feet……

LITHOLOGY RECORD (Attach additional sheet if necessary)

From	To	Thickness In Feet	Lithology		From	To	Thickness In Feet	Lithology

SECTION 19, TOWNSHIP 24 SOUTH, RANGE 33 EAST, N.M.P.M.
LEA COUNTY, STATE OF NEW MEXICO
INTERIM SITE BUILD PLAN



DENOTES INTERIM PAD RECLAMATION AREA

DENOTES GRADING SITE RECLAMATION AREA

1.690± ACRES INTERIM PAD RECLAMATION AREA
4.879± ACRES GRADING SITE RECLAMATION AREA
1.695± ACRES NON-RECLAIMED AREA
8.264± ACRES GRADING SITE RECLAMATION AREA

0 100 200

DEVON ENERGY PRODUCTION COMPANY, L.P.
BELL LAKE 19-18 STATE COM 17H
LOCATED 538 FT. FROM THE SOUTH LINE
AND 1922 FT. FROM THE WEST LINE OF
SECTION 19, TOWNSHIP 24 SOUTH,
RANGE 33 EAST, N.M.P.M.
LEA COUNTY, STATE OF NEW MEXICO

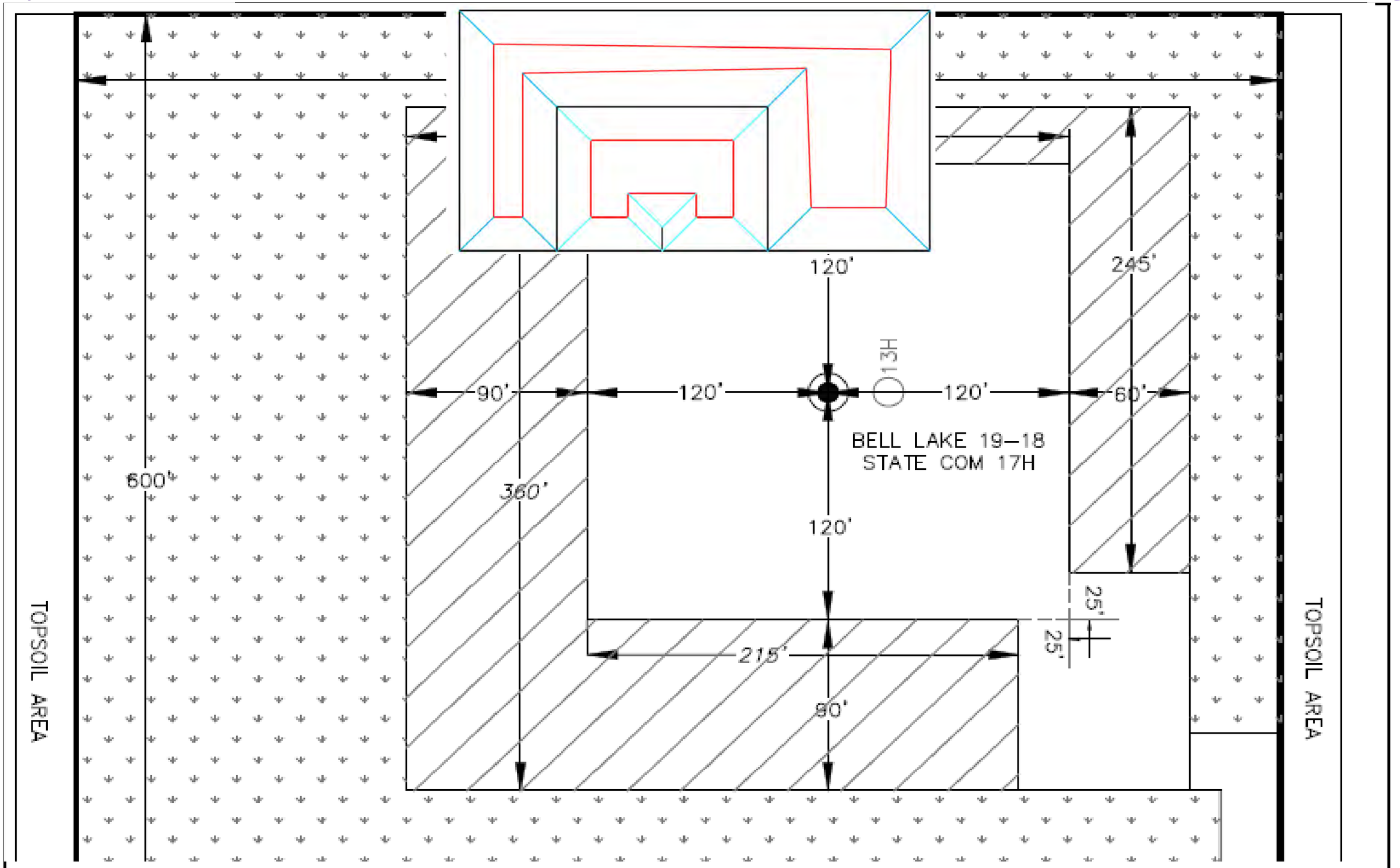
HORIZON ROW LLC

DEVON ENERGY PRODUCTION CO., L.P.

Drawn by: CHRIS MAAS

Date: 11/17/2018

Drawn for: devon



R.T. Hicks Consultants 901 Rio Grande Blvd. NW Suite F-142 Albuquerque, N. M. 87104	**Drawing of Temporary Pit and Well in Relation to Pad Boundary**	**Plate 2**
	Bell Lake 19 State 17H (+13H)	**January 2019**

Attachment 3

Sampling Results Bell Lake 19-18 State Com 017H in mg/kg											
Name	**Chloride**	**DRO**	**MRO**	**GRO**	**Benzene**	**Toluene**	**Ethylbenzene**	**Xylenes**	**GRO+DRO**	**TPH**	**BTEX**
1	3,840	6060.0	131.0	240.0	0.1	1.2	1.3	6.9	6300.0	6431.0	9.5
2	236,000	13.9	13.9	10.0	0.1	0.1	0.1	0.2	23.9	37.8	0.3
3	312,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
4	1,520	793.0	23.5	335.0	10.0	30.0	15.6	62.0	100.0	123.5	117.6
5	800	528.0	10.0	78.3	0.5	7.7	4.8	19.0	195.0	205.0	32.0
6	5,440	2070.0	45.7	49.9	0.3	2.4	1.5	6.2	2119.9	2165.6	10.4
Average Cuttings	93,267	1579.2	39.0	120.5	1.8	6.9	3.9	15.7	1459.8	1498.8	28.3
7 (composite) Mixing Dirt	80.00	10.00	10.00	10.00	0.05	0.05	0.05	0.15	20.00	30.00	0.30
3 Parts Mixing + 1 Part Cuttings	**23,377**				**0.49**				**380**	**397**	**7**
Burial Standard	80,000				10				1,000	2,500	50

**MRO range (<C28-C35) - depicted as EXT DRO >C28-C36*

***When results were less than the reporting limit, the reporting limit was used.*

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

October 21, 2019

ERICA HART

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: BELL LAKE

Enclosed are the results of analyses for samples received by the laboratory on 10/16/19 14:10.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 1 (H903523-01)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	**0.051**	0.050	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	**1.16**	0.050	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	**1.34**	0.050	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	**6.90**	0.150	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	**9.45**	0.300	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *117 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**3840**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS S-04

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	**240**	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	**6060**	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	**131**	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *236 %* *41-142*

Surrogate: 1-Chlorooctadecane *204 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 2 (H903523-02)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	<0.050	0.050	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	<0.050	0.050	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	<0.150	0.150	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	<0.300	0.300	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *98.4 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**236000**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	**13.9**	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	<10.0	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *88.4 %* *41-142*

Surrogate: 1-Chlorooctadecane *96.2 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 3 (H903523-03)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	<0.050	0.050	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	<0.050	0.050	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	<0.150	0.150	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	<0.300	0.300	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *97.8 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**312000**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	<10.0	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	<10.0	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *86.4 %* *41-142*

Surrogate: 1-Chlorooctadecane *99.7 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 4 (H903523-04)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	**10.0**	0.500	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	**30.0**	0.500	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	**15.6**	0.500	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	**62.0**	1.50	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	**118**	3.00	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *101 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**1520**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	**335**	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	**793**	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	**23.5**	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *127 %* *41-142*

Surrogate: 1-Chlorooctadecane *124 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 5 (H903523-05)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	**0.503**	0.500	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	**7.72**	0.500	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	**4.79**	0.500	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	**19.0**	1.50	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	**32.0**	3.00	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *104 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**800**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	**78.3**	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	**528**	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	<10.0	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *103 %* *41-142*

Surrogate: 1-Chlorooctadecane *117 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 6 (H903523-06)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	**0.324**	0.050	10/18/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	**2.38**	0.050	10/18/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	**1.52**	0.050	10/18/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	**6.15**	0.150	10/18/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	**10.4**	0.300	10/18/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *115 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**5440**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS S-04

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	**49.9**	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	**2070**	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	**45.7**	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *105 %* *41-142*

Surrogate: 1-Chlorooctadecane *150 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
ERICA HART
901 RIO GRANDE BLVD SUITE F-142
ALBUQUERQUE NM, 87104
Fax To: NONE

Received:	10/16/2019	Sampling Date:	10/16/2019
Reported:	10/21/2019	Sampling Type:	Soil
Project Name:	BELL LAKE	Sampling Condition:	Cool & Intact
Project Number:	BELL LAKE 19-18 STATE COM 17H	Sample Received By:	Tamara Oldaker
Project Location:	NOT GIVEN		

Sample ID: 17 H - 7 (H903523-07)

BTEX 8021B mg/kg Analyzed By: BF

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	10/17/2019	ND	1.63	81.3	2.00	4.43	
Toluene*	<0.050	0.050	10/17/2019	ND	1.67	83.3	2.00	3.54	
Ethylbenzene*	<0.050	0.050	10/17/2019	ND	1.61	80.7	2.00	3.07	
Total Xylenes*	<0.150	0.150	10/17/2019	ND	4.89	81.5	6.00	2.55	
Total BTEX	<0.300	0.300	10/17/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID *98.5 %* *73.3-129*

Chloride, SM4500Cl-B mg/kg Analyzed By: AC

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**80.0**	16.0	10/18/2019	ND	432	108	400	0.00	

TPH 8015M mg/kg Analyzed By: MS

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	10/17/2019	ND	213	107	200	0.0685	
DRO >C10-C28*	<10.0	10.0	10/17/2019	ND	217	109	200	4.96	
EXT DRO >C28-C36	<10.0	10.0	10/17/2019	ND					

Surrogate: 1-Chlorooctane *84.2 %* *41-142*

Surrogate: 1-Chlorooctadecane *98.7 %* *37.6-147*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name:	RT Hicks Consultants
Project Manager:	E Hart
Address:	on file
City:	State: Zip:
Phone #:	575-704-2526 Fax #:
Project #:	Project Owner:
Project Name:	
Project Location:	Bell Lake 19-18 State Com 17H
Sampler Name:	Erica Hart

BILL TO

P.O. #:	
Company:	RT Hicks
Attn:	Randy Hicks
Address:	on file
City:	
State: Zip:	
Phone #:	
Fax #:	

FOR LAB USE ONLY				MATRIX						PRESERV.			SAMPLING		ANALYSIS REQUEST										
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME	Chlorides	BTex	MRO	GRO	DRO						
H903523																									
1	17H-1		1			✓							10/16	10:05	✓	✓	✓	✓	✓						
2	17H-2		1			✓							10/16	10:15	↓	↓	↓	↓	↓						
3	17H-3		1			✓								10:25											
4	17H-4		1			✓								10:35											
5	17H-5		1			✓								10:45											
6	17H-6		1			✓								10:56											
7	17H-7		1			✓								11:00	↓	↓	↓	↓	↓						

Relinquished By: Erica Hart	Date: 10/16/19 Time: 14:10	Received By: Tamara Oldaker	Phone Result: ☐ Yes ☐ No Add'l Phone #:
Relinquished By:	Date: Time:	Received By:	Fax Result: ☐ Yes ☐ No Add'l Fax #:
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	4.7°C #97 Corrected 5.1°C	Sample Condition Cool: ☑ Yes ☐ No Intact: ☑ Yes ☐ No	CHECKED BY: (Initials) T.O.

REMARKS:

+ Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326

Attachment 4

Closure Letter Attachment 4

Devon – Bell Lake 19-18 State Com 017H Cuttings Pit

SOIL BACKFILLING & COVER INSTALLATION

In accordance with the requirements listed in paragraph D of 19.15.17.13 NMAC and the conditions of approval, the operator employed the following steps for in-place burial of the waste material from the temporary pit:

1. The 017H temporary pit C-144 application was approved by NMOCD to accept cuttings from the drilling of wells (017H and 13H).

2. The Notice of Closure (Attachment 1) was incorrect with respect to the wells that discharged cuttings to this pit. Bell Lake 19-18 13H was plugged and abandoned due to drilling problem as described in the Form C-103 attached to the transmittal letter. Bell Lake 19-18 17H and Bell Lake 19-18 13Y discharged cuttings to the temporary pit. The updated C-144 form (Attachment 5) lists well 13Y rather than 13H.

3. Samples from the contents of the pit were recovered on October 16, 2019. The samples were analyzed for Chloride, TPH, GRO+DRO, Benzene, and BTEX at Cardinal Laboratories in Hobbs, New Mexico. As noted in the subsequent closure notice and Attachment 3 of this report, the cuttings/mixing dirt ratio meet the concentration limits of the parameters listed in Table II of the Pit Rule.

4. A closure notice was submitted to the NMOCD and to the State Land Office (via email) on November 18, 2019.

5. On November 21, 2019, closure activities commenced with the mixing of the cuttings and sloping of the material so that the overlying liner will shed infiltrating fluids.

6. On December 16, 2019, Hicks Consultants confirmed that the mixed cuttings passed a paint filter test and were located at least 4 feet below surrounding grade.

7. Following inspection, having achieved all applicable requirements associated with in-place burial, a geomembrane liner was installed to completely cover the stabilized cuttings on December 16, 2019.

8. Clean backfill material was placed on the geomembrane liner to hold it in place.

9. Equipment operators completed the placing of backfill on December 17, 2019. The soil cover consists of at least four feet of compacted, non-waste containing, earthen material. The topsoil is reserved on location for final pit reclamation to occur at the time of abandonment of the drilling/production pad.

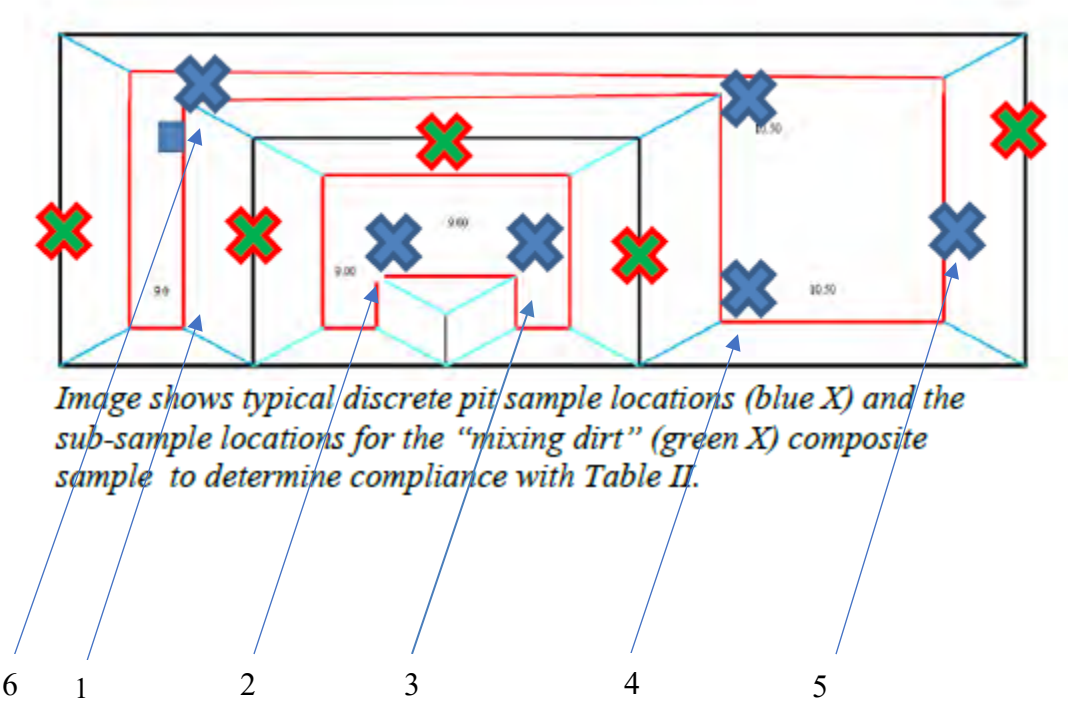


Image shows typical discrete pit sample locations (blue X) and the sub-sample locations for the "mixing dirt" (green X) composite sample to determine compliance with Table II.

The composite sample of "mixing dirt" (7) is comprised of materials from the green "X" locations.

Sample Location 1: 7 feet below surface

Sample Location 2: 7 feet below surface

Sample Location 3: 6 feet below surface

Sample Location 4: 8 feet below surface

Sample Location 5: 7 feet below surface

Sample Location 6: 7 feet below surface

Figure 1 - Well Site (10/16/19)

Figure 2 – Drilling Pit (10/16/19)

Figure 3 - Paint Filter Test (12-16-19)

Figure 4 – View of well pad and drilling pit from the south (12/16/19)

Figure 5 - Reclaimed surface is a minimum of 4 feet below natural ground.

Figure 6 - Liner placement (12/16/19)

Attachment 5

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action:
- ☐ Below grade tank registration
- ☐ Permit of a pit or proposed alternative method
- ☒ Closure of a pit, below-grade tank, or proposed alternative method
- ☐ Modification to an existing permit/or registration
- ☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.
Operator: Devon Energy Production Company, LP. OGRID #: 6137
Address: 333 W. Sheridan, Oklahoma City, OK 73102-8260
Facility or well name: Bell Lake 19-18 State Com 17H
API Number: 3002545621 (13Y) 3002545455 (17H) OCD Permit Number:
U/L or Qtr/Qtr N Section 19 Township 24S Range 33E County: Lea
Center of Proposed Design is about 65 feet north of: Latitude 32.1973915 Longitude -103.6136122 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☒ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☒ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☒ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☒ no
☒ Lined ☐ Unlined Liner type: Thickness 20 mil ☒ LLDPE ☐ HDPE ☐ PVC ☐ Other
☒ String-Reinforced
Liner Seams: ☒ Welded ☐ Factory ☐ Other Volume: See Plate 1 and 2 Dimensions: See Plate 1 and 2

3.
☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: bbl Type of fluid:
Tank Construction material:
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other
Liner type: Thickness mil ☐ HDPE ☐ PVC ☐ Other

4.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.
Fencing: Subsection D of 19.15.17.11 NMAC *(Applies to permanent pits, temporary pits, and below-grade tanks)*
☐ Chain link, six feet in height, two strands of barbed wire at top *(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)*
☒ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify

6.
Netting: Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

7.
Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☒ Signed in compliance with 19.15.16.8 NMAC

8.
Variances and Exceptions:
Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval

All proposed variances have been previously-approved by OCD.

9.
Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. **Siting criteria does not apply to drying pads or above-grade tanks.**

General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells	☐ Yes ☐ No ☒ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit . NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells **See Figures 1 & 2**	☐ Yes ☒ No ☐ NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks) See Figure 3** - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within the area overlying a subsurface mine. **(Does not apply to below grade tanks) See Figure 4** - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No
Within an unstable area. **(Does not apply to below grade tanks) See Figure 5** - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☒ No
Within a 100-year floodplain. **(Does not apply to below grade tanks) See Figure 6** - FEMA map	☐ Yes ☒ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). **See Figure 7** - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image. **See Figure 8**	☐ Yes ☒ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site **See Figures 1 & 2 and 7 (springs)**	☐ Yes ☒ No
Within 300 feet of a wetland. **See Figure 9** - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☒ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☒ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☒ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☒ Previously Approved Design (attach copy of design) API Number: 30 025 45070 or Permit Number: _____

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ A List of wells with approved application for permit to drill associated with the pit.
☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H_2S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.
Proposed Closure: 19.15.17.13 NMAC
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☒ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit ☐ Alternative

Proposed Closure Method:
- ☐ Waste Excavation and Removal
- ☐ Waste Removal (Closed-loop systems only)
- ☒ On-site Closure Method (Only for temporary pits and closed-loop systems)
  - ☒ In-place Burial ☐ On-site Trench Burial
- ☐ Alternative Closure Method

14.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- ☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☒ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☒ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☒ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☒ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☒ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☒ No

16.
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

- ☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☒ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- ☒ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- ☒ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- ☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.
Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

18.
OCD Approval: ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: _____ **Approval Date:** _____

Title: _____ **OCD Permit Number:** _____

19.
Closure Report (required within 60 days of closure completion): 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☐ **Closure Completion Date: 12/17/19**

20.
Closure Method:

☐ Waste Excavation and Removal ☒ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

21.
Closure Report Attachment Checklist: ***Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.***

- ☒ Proof of Closure Notice (surface owner and division)
- ☐ Proof of Deed Notice (required for on-site closure for private land only)
- ☒ Plot Plan (for on-site closures and temporary pits)
- ☐ Confirmation Sampling Analytical Results (if applicable)
- ☒ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number
- ☒ Soil Backfilling and Cover Installation
- ☐ Re-vegetation Application Rates and Seeding Technique **(Will Provide after P&A/Site Reclamation)**
- ☐ Site Reclamation (Photo Documentation) **(Will Provide after P&A/Site Reclamation)**

On-site Closure Location: Latitude 32.19765 Longitude -103.61392 NAD: ☐ 1927 ☒ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): ____Randall Hicks_____ Title: _____Consultant for Devon Energy_____

Signature:_____ _____ _____ Date: ____January 21,2020_____

e-mail address:___R@rthicksconsult.com_____ Telephone: ____505 238 9515_____

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 3619

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 3619
	Action Type: [C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	NMOCD has reviewed the Closure Report for the Temporary Pit associated with the 30-025-45455 BELL LAKE 19 18 STATE COM #017H received from R.T. Hicks Consultants on behalf of DEVON ENERGY PRODUCTION COMPANY, LP [6137] on 01/29/2020. The Closure Report is approved.	10/19/2021