



Souder, Miller & Associates ♦ 201 S. Halagueno St. ♦ Carlsbad, NM 88220  
(575) 689-7040

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February 24, 2021

SMA #5E29915, BG5

NMOCD District 1  
1625 N. French Dr.  
Hobbs, NM 88240

**RE: LINER INSPECTION REPORT  
BELL LAKE 19 CTB 3 (NAPP2104135238)**

To Whom it May Concern:

Souder, Miller & Associates (SMA) is pleased to submit this letter report on behalf of Devon Energy Production (Devon) summarizing the liner inspection that occurred due to the Bell Lake 19 CTB 3 release. The site is located in Unit Letter J, Section 19, T24S, R33E (N32.199668 /W-103.608866) Lea County, New Mexico, on Federal land.

**Site Characterization**

On January 26, 2021, a transfer pump developed a leak, causing fluid to release into the lined containment. Total fluids released amounted to 43.07 bbls of produced water inside the lined secondary containment of the tank battery. Initial response activities were conducted by the operator and included source elimination and site stabilization, which recovered approximately 43 bbls of produced water.

**Depth to Groundwater**

Based upon New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS) well data, depth to groundwater in the area is estimated to be 415 feet below grade surface (bgs).

**Wellhead Protection Area**

There are no water sources within ½-mile of the location, according to the NMOSE and USGS water well databases ([https://gis.ose.state.nm.us/gisapps/ose\\_pod\\_locations/](https://gis.ose.state.nm.us/gisapps/ose_pod_locations/); accessed March 5, 2021; Appendix C).

**Distance to Nearest Significant Watercourse**

The nearest significant watercourse is an unnamed spring, located approximately 1.7 miles to the south.

Due to a lack of supportable groundwater data, the applicable NMOCD Closure Criteria for this site is for a groundwater depth of <50 feet bgs.

**Liner Integrity**

At the request of Devon, SMA conducted a liner integrity inspection per the requirements of 19.15.29.11.A(5)(a) NMAC. NMOCD was notified on February 22, 2021 that the liner inspection was to occur, and the inspection was conducted on February 26, 2021. After a thorough visual inspection of the liner within the tank battery containment, the liner appeared to be intact and had the ability to contain the release in question. The location from which the release occurred was identified, and SMA verified



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that the release did not occur outside of the lined containment. A photo log and field notes of the inspection is included in Appendix A.

SMA recommends no further action for this release and requests the closure of NAPP2104135238.

Souder, Miller and Associates appreciates the opportunity to provide environmental services to you. If you have any questions or comments concerning this report, please contact Ashley Maxwell at (505) 325-7535.

Sincerely,  
Souder, Miller & Associates

Reviewed by:



Ashley Maxwell  
Project Scientist



Shawna Chubbuck  
Senior Scientist

## Attachments:

### Figures

Figure 1: Vicinity and Wellhead Protection Map

Figure 2: Surface Water Protection Map

Figure 3: Site and Photograph Location Map

### Appendices

Appendix A: Liner Inspection Form, Field Notes & Photo Log

Appendix B: C-141

Appendix C: NMOSE Water Well Data

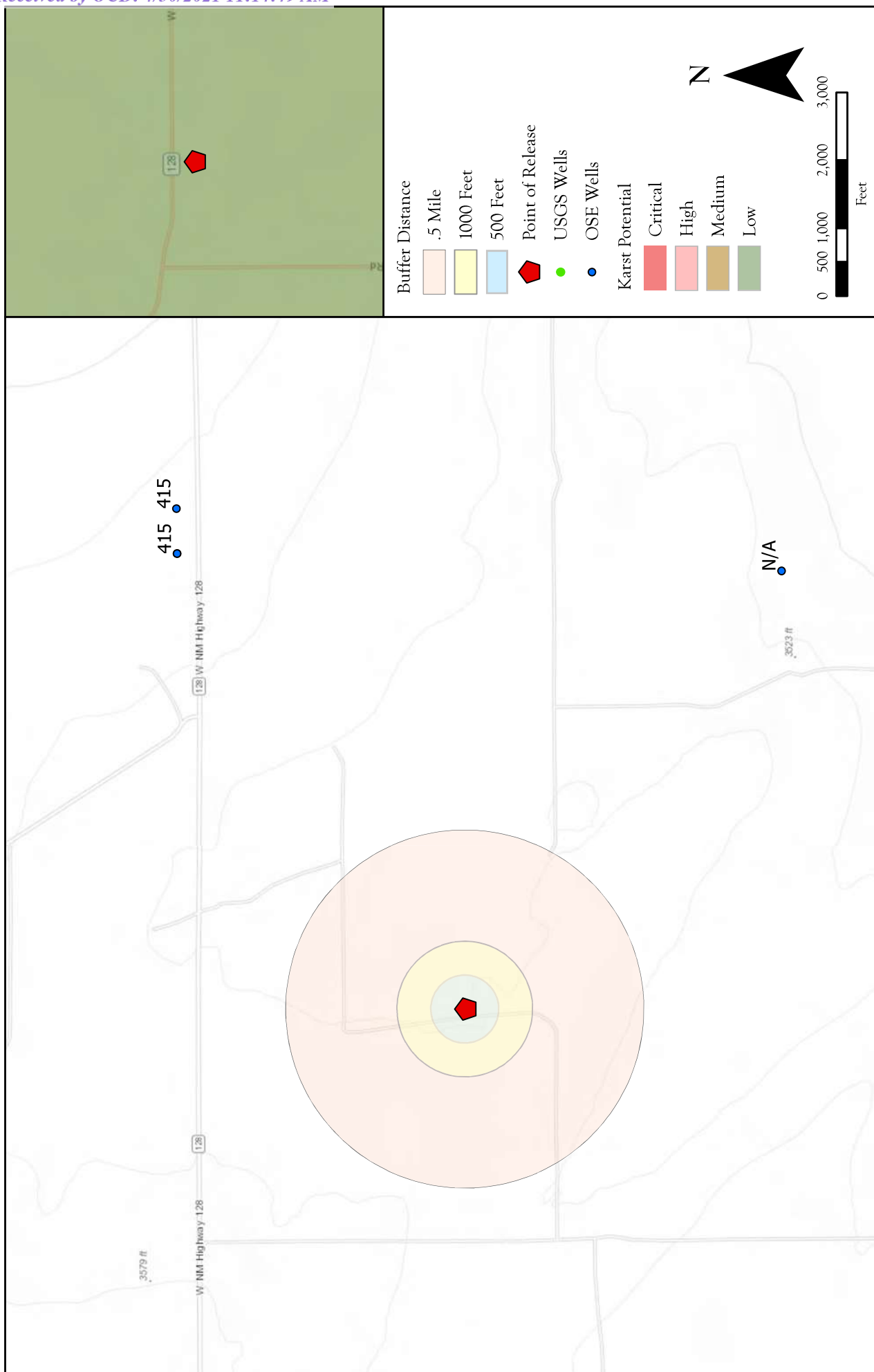


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## FIGURES

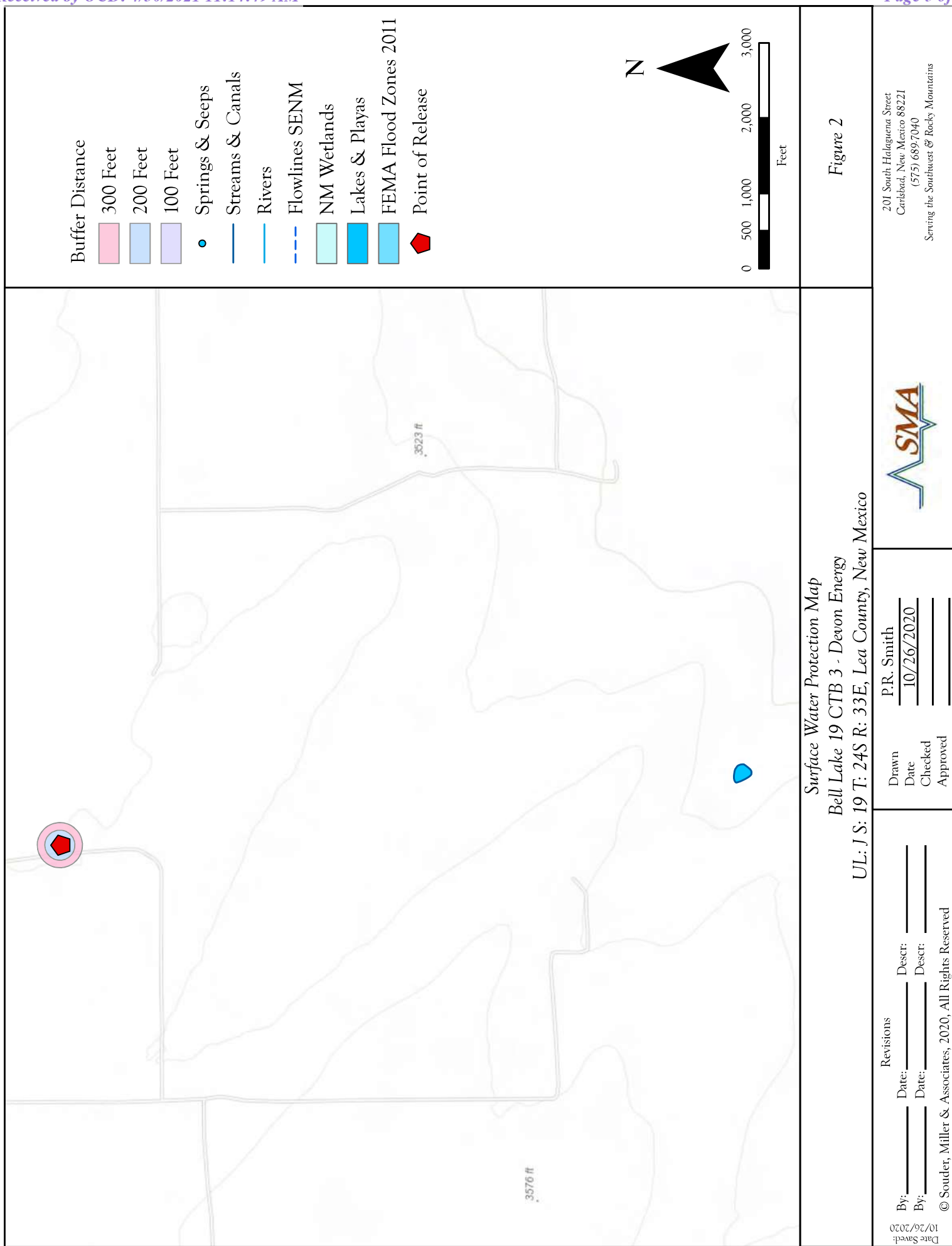




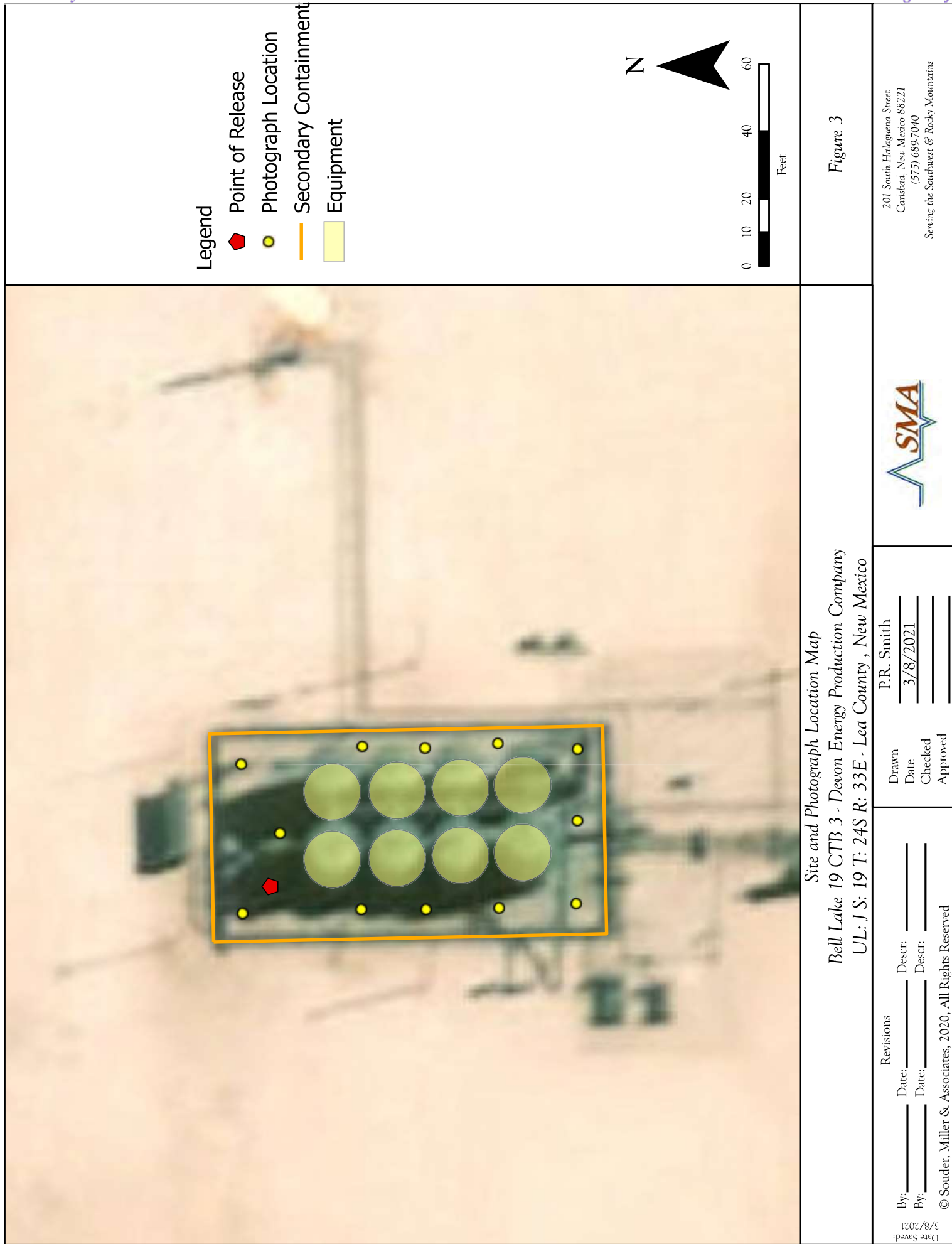
**Site Map**  
 Bell Lake 19 CTB 3 - Devon Energy  
 UL: J S: 19 T: 24S R: 33E, Lea County, New Mexico

	201 South Halaquena Street Carlsbad, New Mexico 88221 (575) 689-7040 Serving the Southwest & Rocky Mountains	
Revisions By: _____ Date: _____ Descr: _____ By: _____ Date: _____ Descr: _____ © Souder, Miller & Associates, 2020, All Rights Reserved	Drawn Date: _____ Checked Approved	P.R. Smith 10/26/2020
Date Saved: 10/26/2020	Figure 1	











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# **Appendix A LINER INSPECTION FORM, FIELD NOTES & PHOTO LOG**



**Souder, Miller & Associates  
Liner Inspection Form**

Project Name: Bell Lake 19 CTB3 Inspection Date: 2/26/21  
Client Name: Dan Gargy  
Client Representative(s): Lisa Corasco  
SMA Inspector(s): FR Smith  
Project Location: Reel Lake County Latitude: 32.199668 Longitude: -103.608866

**Inspection Parameters as Outlined in 19.15.29.11.A(5) NMAC****PRIOR TO INSPECTION:**

Two (2) Business Day Notification of Inspection to Appropriate Division Office (Y/N): Y  
Date of Notice: 2/22/21

Material Covering Liner Removed by Client (Y/N): Y

Affected Areas Exposed by Client (Y/N): Y

**INSPECTION:**

Liner Thoroughly Inspected for Damage (Y/N): Y

All Damaged Areas Observed Marked in **White Paint** on Liner  
Photos and Field Notes Detailing Failures Attached to This Form

**To Be Completed by Client Representative:**

Can Responsible Party Demonstrate:  
Liner Integrity Was Maintained (per SMA Inspection) (Y/N): Y  
Release Was Contained to Lined Containment Area (Y/N): Y  
Liner Was Able to Contain the Leak (Y/N): Y

**If YES:**

Certify on Form C-141 That Liner Remains Intact

**If NO to Any of Above:**

Responsible Party Must Delineate Horizontal & Vertical Extent

Depending on Release:

See Table 1 19.15.29.12 NMAC

See Subparagraph (e) Paragraph (5) of Subsection A 19.15.29.11 NMAC

**Additional Comments:****SMA INSPECTOR SIGNATURE**

FR Smith  
Date: 2/26/21

**CLIENT REPRESENTATIVE**

Date: \_\_\_\_\_



SUBJECT Liner InspectionPROJECT Bull Lake 19 PAGECLIENT Dan EngerDATE 2/26/21 BY

CHECKED

BY

- o Walked to POR and examined it release was fully contained
- o Release did stay in Containment
- o Searched for tears and other potential compromises throughout containment
  - No failures
  - Liner remained intact
  - Verified that outside of containment was not compromised.
- o Took photographs of Containment with GPS coordinates + date/time.
- o Mapped Containment + Photograph location sites.
- o Left Site.



















































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## **APPENDIX B C-141**



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-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

Incident ID	NAPP2104135238
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party Devon Energy Production Company	OGRID 6137
Contact Name Lupe Carrasco	Contact Telephone
Contact email Lupe.Carrasco@dvn.com	Incident # (assigned by OCD)
Contact mailing address 6488 Seven Rivers Hwy	

### Location of Release Source

Latitude 32.199668 Longitude -103.608866  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Bell Lake 19 CTB 3	Site Type Oil
Date Release Discovered 1/26/2021	API# (if applicable)

Unit Letter	Section	Township	Range	County
J	19	24S	33E	Lea

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 43.07 BBLS	Volume Recovered (bbls) 43.07 BBLS
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release Transfer pump developed a leak causing fluid release into lined containment.



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Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? <b>This is considered a major release because it is over 25 BBLs.</b>
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? <b>Immediate notice was given by Lupe Carrasco on 2/10/2021 to the OCD and BLM.</b>	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:          	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <b>Kendra DeHoyos</b>	Title: <b>EHS Associate</b>
Signature: <u>Kendra DeHoyos</u>	Date: <u>2/9/2021</u>
email: <b>Kendra.DeHoyos@dvn.com</b>	Telephone: <b>575-748-0167</b>
<b><u>OCD Only</u></b>	
Received by: <u>Ramona Marcus</u>	Date: <u>2/16/2021</u>



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Spills In Lined Containment	
Measurements Of Standing Fluid	
Length(Ft)	140
Width(Ft)	70
Depth(in.)	0.35
Total Capacity without tank displacements (bbls)	50.91
No. of 500 bbl Tanks In Standing Fluid	8
No. of Other Tanks In Standing Fluid	
OD Of Other Tanks In Standing Fluid(feet)	
Total Volume of standing fluid accounting for tank displacement.	43.07



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## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	415 (Estimate) (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

### **Characterization Report Checklist:** *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☒ Field data
- ☐ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☒ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.



State of New Mexico  
Oil Conservation Division

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Facility ID	
Application ID	

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

Printed Name: Wes Mathews Title: EHS Professional

Signature: *Wesley Mathews* Date: 4/27/2021

email: wesley.mathews@dm.com Telephone: 575-513-8608

**OCD Only**

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



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Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Wes Mathews Title: EHS Professional  
Signature: Wesley Mathews Date: 4/27/2021  
email: wesley.mathews@dvn.com Telephone: 575-513-8608

**OCD Only**

Received by: Chad Hensley Date: 06/24/2021

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: Chad Hensley Date: 06/24/2021  
Printed Name: Chad Hensley Title: Environmental Specialist Advanced



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Bell Lake 19 CTB 3 (NAPP2104135238)

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## **APPENDIX C NMOSE WATER WELL DATA**





# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	POD Sub-Code	basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">C 02890</a>	C		LE	2	4	29	24S	33E		633114	3562012*	2425	500		
<a href="#">C 02431</a>	CUB		LE	4	4	4	17	24S	33E	633175	3564728*	2426	525	415	110
<a href="#">C 02432</a>	CUB		LE	4	4	4	17	24S	33E	633175	3564728*	2426	640	415	225

Average Depth to Water: **415 feet**

Minimum Depth: **415 feet**

Maximum Depth: **415 feet**

Record Count: 3

### UTMNAD83 Radius Search (in meters):

**Easting (X):** 631135

**Northing (Y):** 3563414.806

**Radius:** 2500

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

10/26/20 12:44 PM

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WATER COLUMN/ AVERAGE  
DEPTH TO WATER



**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 26455

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 26455
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
chensley	None	6/24/2021