

November 17, 2025

New Mexico Oil Conservation Division

506 W. Texas Ave Artesia, NM 88210

RE: Right Meow 30 CTB 1 - Closure Request Report

Incident Number: nAPP2520422832 GPS: 32.2797774°, -103.7206055° Lea County, New Mexico ESRR Project No. VP-6972

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 Right Meow 30 CTB 1 (Site) following an inadvertent release of produced water within a lined secondary containment (LSC). Based on initial release response and liner inspection activities, Devon Energy (Devon) is requesting No Further Action (NFA) at the Site.

Site Location

The Site is located in Unit L, Section 30, Township 23 South, Range 32 East, in Lea County, New Mexico (32.2797774°, -103.7206055°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM) (**Figure 1**).

Incident Description & Background

On July 22, 2025, a transfer pump malfunctioned, allowing the release of approximately 347 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 347 bbls of produced water.

Notice was given to the New Mexico Oil Conservation Division (NMOCD) on July 23, 2025, by Notification of Release (NOR) and subsequently assigned Incident Number nAPP2520422832. A Corrective Action Form C-141 (Form C-141) was later submitted and approved by the NMOCD on July 29, 2025.

On September 4, 2025, Devon submitted a 48-hour Notification of Liner Inspection (Form C-141 L) for September 8, 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:



- Between 1 and 5 miles of any continuously flowing watercourse or any other significant watercourse;
- Between 1 and 5 miles of any lakebed, sinkhole or playa lake (measured from the ordinary highwater mark);
- Greater than 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 1 and 5 miles of any wetland;
- Greater than 5 miles of any subsurface mine;
- o Greater than 5 miles of an unstable area (non-karst); and
- Greater than 5 miles 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, depth to groundwater is estimated to be greater than 100 feet below ground surface (bgs). The following Closure Criteria was applied:

Constituents of Concern (COCs)	Closure Criteria [‡]
Chloride	20,000 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH)	2,500 mg/kg
TPH (GRO) +TPH (DRO).	1,000 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 September 8, 2025, ESRR conducted a thorough visual inspection of the LSC and found no tears, cracks, cuts, breaks, or other signs of damage, confirming no evidence of a breach to the LSC. The liner appeared to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

Closure Request

Based on initial release response and liner inspection activities, Devon 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. Devon believes NFA is warranted at the Site and respectfully requests Closure for Incident Number nAPP2520422832.

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



Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

Gilbert Moreno

Carlsbad Operations Manager/ Project Geologist

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

Kris Williams

Kris Williams, CHMM, REM Principal



Figure 1 - Site Map

Devon Energy Permian – Right Meow 30 CTB 1 GPS: 32.2797774°, -103.7206055° Lea County, New Mexico







Figure 2 – Release Extent

Devon Energy Permian – Right Meow 30 CTB 1 GPS: 32.2797774°, -103.7206055° Lea County, New Mexico



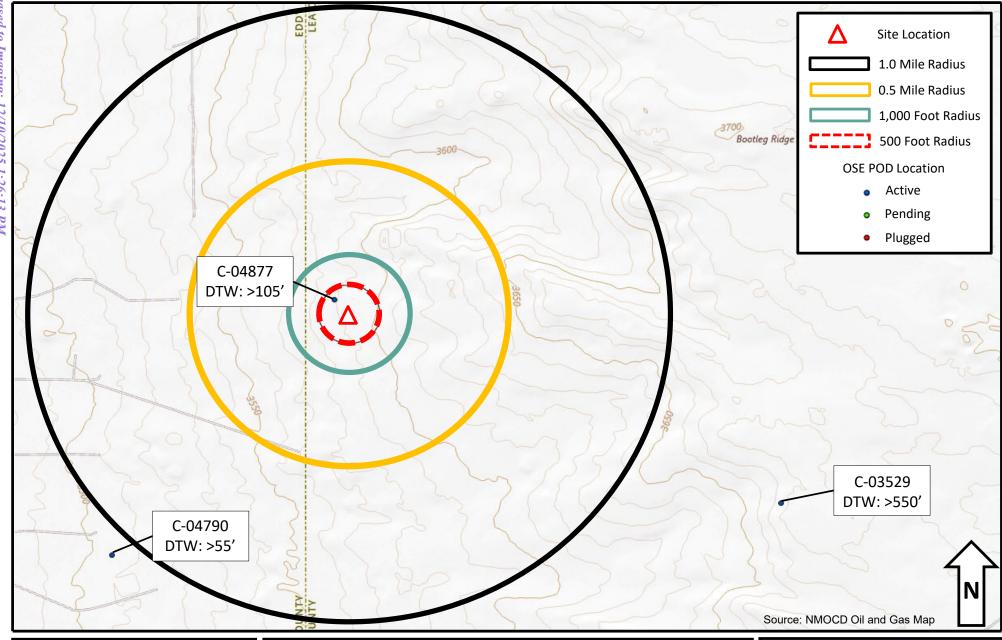




Figure 3 – Ground Water

Devon Energy Permian – Right Meow 30 CTB 1 GPS: 32.2797774°, -103.7206055° Lea County, New Mexico





Low Karst

Site Location

Figure 4 - Karst Potential

Devon Energy Permian – Right Meow 30 CTB 1 GPS: 32.2797774°, -103.7206055° Lea County, New Mexico



Source: BLM CFO Karst Map



WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

www.ose.state.nm.us

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PHOTO 1: Northwestern view during initial site assessment activities. 5/27/2025



PHOTO 2: Northeastern view during initial site assessment activities. 5/27/2025





PHOTO 3: Northwestern view outside of containment during liner inspection activities. 9/8/2025



PHOTO 4: Southern view outside of containment during liner inspection activities. 9/8/2025



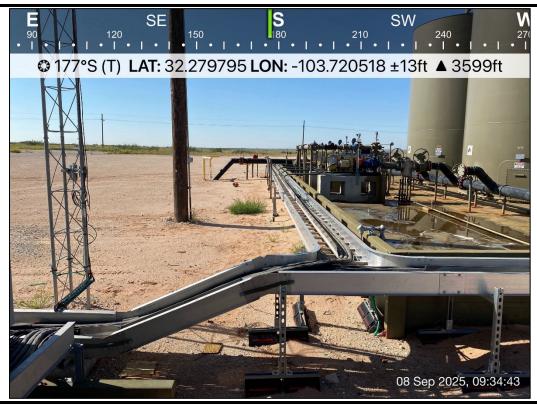


PHOTO 5: Southern view outside of containment during liner inspection activities. 9/8/2025



PHOTO 6: Southeastern view outside of containment during liner inspection activities. 9/8/2025



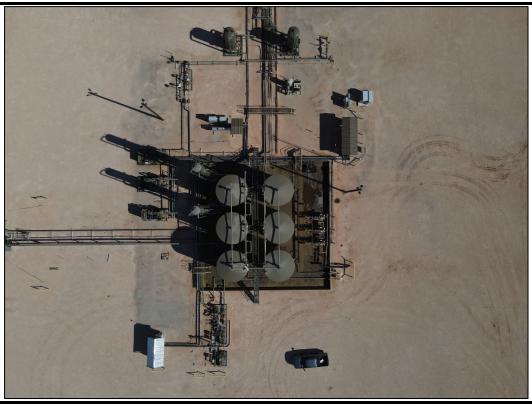


PHOTO 7: Aerial view of containment during liner inspection activities. 9/8/2025



PHOTO 8: Southeastern view during liner inspection activities. 9/8/2025





PHOTO 9: Eastern view during liner inspection activities. 9/8/2025



PHOTO 10: Western view during liner inspection activities. 9/8/2025





PHOTO 11: Eastern view during liner inspection activities. 9/8/2025



PHOTO 12: Western view during liner inspection activities. 9/8/2025





PHOTO 13: Southwestern view during liner inspection activities. 9/8/2025



PHOTO 14: Western view during liner inspection activities. 9/8/2025



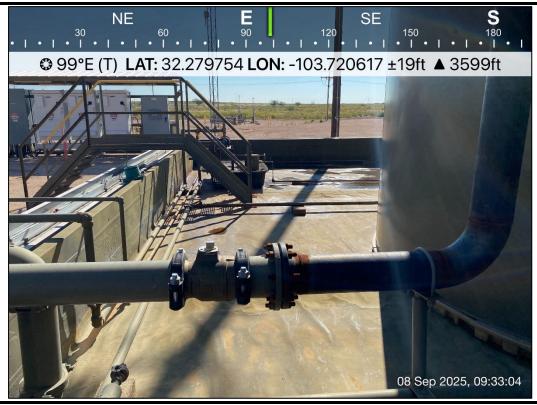


PHOTO 15: Eastern view during liner inspection activities. 9/8/2025

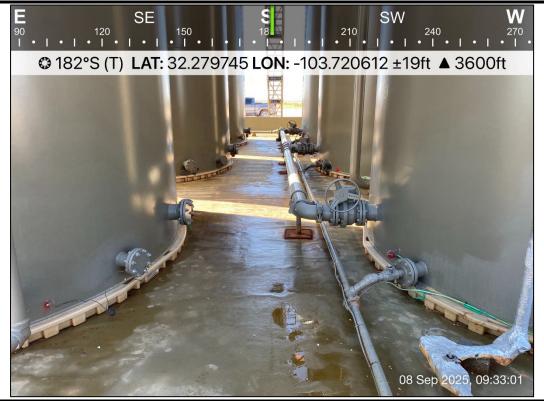


PHOTO 16: Southern view during liner inspection activities. 9/8/2025





PHOTO 17: Eastern view during liner inspection activities. 9/8/2025



PHOTO 18: Northern view during liner inspection activities. 9/8/2025





PHOTO 19: Southwestern view during liner inspection activities. 9/8/2025



PHOTO 20: Southwestern view of location sign. 9/8/2025

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

Phone: (505) 629-6116
Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Action 502748

QUESTIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	502748
	Action Type:
	[NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites			
Incident ID (n#)	nAPP2520422832		
Incident Name	NAPP2520422832 RIGHT MEOW 30 CTB 1 @ 0		
Incident Type	Produced Water Release		
Incident Status	Initial C-141 Approved		
Incident Facility	[fAPP2214429367] RIGHT MEOW 30 CTB 1		

Location of Release Source		
Site Name	Right Meow 30 CTB 1	
Date Release Discovered	07/22/2025	
Surface Owner	Federal	

Liner Inspection Event Information				
Please answer all the questions in this group.				
What is the liner inspection surface area in square feet	5,350			
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	09/08/2025			
Time liner inspection will commence	09:00 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	32.2797774, -103.7206055			

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

CONDITIONS

Action 502748

CONDITIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	502748
	Action Type:
	[NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Create By	Condition	Condition Date
jraley	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.	9/4/2025

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Phone: (505) 629-6116
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State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 S. St Francis Dr. Santa Fe, NM 87505

QUESTIONS

Action 527279

QUESTIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	527279
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites			
Incident ID (n#)	nAPP2520422832		
Incident Name	NAPP2520422832 RIGHT MEOW 30 CTB 1 @ FAPP2214429367		
Incident Type	Produced Water Release		
Incident Status	Remediation Closure Report Received		
Incident Facility	[fAPP2214429367] RIGHT MEOW 30 CTB 1		

Location of Release Source			
Please answer all the questions in this group.			
Site Name	RIGHT MEOW 30 CTB 1		
Date Release Discovered	07/22/2025		
Surface Owner	Federal		

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

Nature and Volume of Release		
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.		
Crude Oil Released (bbls) Details	Not answered.	
Produced Water Released (bbls) Details	Cause: Equipment Failure Pump Produced Water Released: 347 BBL Recovered: 347 BBL Lost: 0 BBL.	
Is the concentration of chloride in the produced water >10,000 mg/l	Yes	
Condensate Released (bbls) Details	Not answered.	
Natural Gas Vented (Mcf) Details	Not answered.	
Natural Gas Flared (Mcf) Details	Not answered.	
Other Released Details	Not answered.	
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Transfer pump issue allowed release to lined secondary containment. Fluids fully recovered.	

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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, Page 2

Action 527279

Santa	Fe, NM 8/505
QUESTI	ONS (continued)
Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137 Action Number: 527279 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.	e. gas only) are to be submitted on the C-129 form.
Initial Response The responsible party must undertake the following actions immediately unless they could create a s	safety hazard that would result in injury.
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
	ation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releathe OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are require ases which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dvn.com

General Information Phone: (505) 629-6116

QUESTIONS

A subsurface mine

A 100-year floodplain

storage site

An (non-karst) unstable area

Categorize the risk of this well / site being in a karst geology

Did the release impact areas not on an exploration, development, production, or

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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, Page 3

Action 527279

QUESTIONS (continued)

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	527279
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

Site Characterization Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the What is the shallowest depth to groundwater beneath the area affected by the Between 100 and 500 (ft.) release in feet below ground surface (ft bgs) What method was used to determine the depth to ground water NM OSE iWaters Database Search Did this release impact groundwater or surface water What is the minimum distance, between the closest lateral extents of the release and the following surface areas: A continuously flowing watercourse or any other significant watercourse Between 1 and 5 (mi.) Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) Between 1 and 5 (mi.) An occupied permanent residence, school, hospital, institution, or church Greater than 5 (mi.) A spring or a private domestic fresh water well used by less than five households Between 1 and 5 (mi.) for domestic or stock watering purposes 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.)

Between 1 and 5 (mi.)

Greater than 5 (mi.)

Greater than 5 (mi.)

Greater than 5 (mi.)

Remediation Plan		
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.		
Requesting a remediation plan approval with this submission	Yes	
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.		
Have the lateral and vertical extents of contamination been fully delineated	Yes	
Was this release entirely contained within a lined containment area	Yes	
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.		
On what estimated date will the remediation commence	09/07/2025	
On what date will (or did) the final sampling or liner inspection occur	09/08/2025	
On what date will (or was) the remediation complete(d)	09/08/2025	
What is the estimated surface area (in square feet) that will be remediated	5350	
What is the estimated volume (in cubic yards) that will be remediated	0	
These estimated dates and measurements are recognized to be the best guess or calculation at the	he time of submission and may (be) change(d) over time as more remediation efforts are completed.	

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to

No

General Information Phone: (505) 629-6116

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

QUESTIONS, Page 4

Action 527279

QUESTIONS (continued)

ı	Operator:	OGRID:
ı	DEVON ENERGY PRODUCTION COMPANY, LP	6137
ı	333 West Sheridan Ave.	Action Number:
ı	Oklahoma City, OK 73102	527279
ı		Action Type:
ı		[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,		

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC which includes the anticipated timelines for beginning and completing the remediation.

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

I hereby agree and sign off to the above statement

Name: James Raley Title: EHS Professional Email: jim.raley@dvn.com Date: 11/17/2025

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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

Phone: (505) 629-6116

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

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

QUESTIONS, Page 6

Action 527279

QUESTI	ONS (continued)
Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137 Action Number: 527279 Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)
QUESTIONS	
Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	502748
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	09/08/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5350
Remediation Closure Request Only answer the questions in this group if seeking remediation closure for this release because all re	omediation stens have been completed
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	5350
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspected
	losure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of

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

I hereby agree and sign off to the above statement

Email: jim.raley@dvn.com

Date: 11/17/2025

General Information Phone: (505) 629-6116

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CONDITIONS

Action 527279

CONDITIONS

Operator:	OGRID:
DEVON ENERGY PRODUCTION COMPANY, LP	6137
333 West Sheridan Ave.	Action Number:
Oklahoma City, OK 73102	527279
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2520422832 RIGHT MEOW 30 CTB 1, thank you. This Remediation Closure Report is approved.	12/10/2025