

1R - 433

APPROVALS

YEAR(S):

State of New Mexico
Energy, Minerals and Natural Resources Department

Susana Martinez
Governor

John Bemis
Cabinet Secretary

Brett F. Woods, Ph.D.
Deputy Cabinet Secretary

Jami Bailey
Division Director
Oil Conservation Division



August 6, 2012

Chris Biagi
Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, Oklahoma 73102-5010

RE: Patsy Tank Battery (1R-66, -399, and -433) in Unit Letter B of Section 18, Township 20 South, Range 37 East NMPM in Lea County, New Mexico

Chris,

I have received your letter of June 28, 2012 concerning the former Patsy Battery southwest of Monument, New Mexico. Proceed with the proper plugging and abandonment of the five remaining groundwater monitoring wells. Once this is accomplished, please forward a comprehensive report of the plugging activities to my attention.

Respectfully,

A handwritten signature in black ink, appearing to read "J. Griswold".

Jim Griswold
Senior Hydrologist

cc: Geoff Leking, OCD District I Office, Hobbs
Mike Griffin, Whole Earth Environmental
Wayne Price



Devon Energy Corporation
333 West Sheridan Avenue
Oklahoma City, OK 73102-5010

405 228 8327 Phone
www.devonenergy.com

June 28, 2012

Jim Griswold-Hydrologist
New Mexico Oil Conservation Division
1220 S. St. Francis Dr.
Santa Fe, NM 87505

Reference: Devon Energy Corporation
Patsy Tank Battery
Monument NM Area
UL B Section 18-Ts. 20s-Rg. 37e

Subject: Request for Final Closure of 1R-066, 1R-399, and 1R-433

Dear Mr. Griswold:

Devon Energy Corporation hereby request from OCD, approval to properly plug and abandon all on-site monitor wells at the historic Patsy Tank Battery site and obtain a final closure approval.

Devon Energy will be conducting a meeting with OCD on June 28, 2012 at 11am next Thursday morning to provide OCD the required information, so OCD may make a final determination.

This site has been remediated and groundwater abated for hydrocarbon contamination with greater than eight quarters of "ND" in all of the monitor wells. The presentation will show that the site is situated in one of the largest "Salt Impacted" groundwater contamination cases in the history of New Mexico.

The evidence presented will show emphatically that groundwater has been and is continually being impacted from up-gradient sources out of Devon's control. Also, the Patsy Site had virtually "no salt" that impacted the groundwater.

However, Devon did conduct source removal from the groundwater to aid in the regional problem. OCD has allowed other companies to close their sites once they removed a certain amount of salt.

Therefore, Devon Energy feels it has met the states' obligations and goals for this area, and hereby request final closure of the site.

Sincerely,



Mr. Chris Biagi
EHS Remediation Advisor

cc: file
Darren Smith, Devon EHS Manager

Price, Wayne, EMNRD

From: Price, Wayne, EMNRD
Sent: Friday, February 29, 2008 10:28 AM
To: Mike Griffin; Biagi, Chris
Cc: Williams, Chris, EMNRD; Johnson, Larry, EMNRD
Subject: Devon Sites

Devon 1R0432 Dickinson: OCD is in receipt of the closure report dated November 02, 2005 and hereby approves of the closure with the following conditions:

1. Monitors wells will be sampled quarterly with the results submitted with an annual report. The annual report shall include conclusions and recommendations for groundwater remediation, sample analysis with summary charts, photos of the surface restoration and any other pertinent information.
2. Devon shall be required to install additional monitoring or recovery wells if outer perimeter well shows migration of contaminants. OCD shall be notified within 30 days.
3. The first annual report shall be due on November 15, 2008.

Devon 1R0433 Patsy: OCD is in receipt of the closure report dated June 23, 2005 and hereby approves of the closure with the following conditions:

1. Monitors wells will be sampled annually with the results submitted with an annual report. The annual report shall include conclusions and recommendations for groundwater remediation, sample analysis with summary charts, photos of the surface restoration and any other pertinent information.
2. Devon shall be required to install additional monitoring or recovery wells if outer perimeter well shows migration of contaminants. OCD shall be notified within 30 days.
3. The first annual report shall be due on June 23, 2008.

Wayne Price-Environmental Bureau Chief
Oil Conservation Division
1220 S. Saint Francis
Santa Fe, NM 87505
E-mail wayne.price@state.nm.us
Tele: 505-476-3490
Fax: 505-476-3462

Price, Wayne

From: Biagi, Chris [Chris.Biagi@dvn.com]
Sent: Thursday, February 10, 2005 4:02 PM
To: Price, Wayne
Cc: Mike Griffin
Subject: RE: Devon Contact

Mr. Price – Thank you for the plan approvals. Devon is looking forward to working with you on these projects and will take the necessary steps to ensure compliance with the listed conditions. Please feel free to contact me or Mr. Griffin at anytime if you wish to discuss this project.

*Chris Biagi, REM
Senior Remediation Specialist
Devon Energy Corporation
405.228.8327 - office
405.850.2649 - cell
405.552.7839 - fax*

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From: Price, Wayne [mailto:WPrice@state.nm.us]
Sent: Thursday, February 10, 2005 4:45 PM
To: 'Mike Griffin'; Price, Wayne
Cc: Biagi, Chris; Sheeley, Paul; Johnson, Larry
Subject: RE: Devon Contact

Dear Mr. Biagi:

OCD is in receipt of the two work plans for the Devon Energy sites, Dickinson (Nw/4Sw/4 Sec 1-Ts15s-R37e) and Patsy (Nw/4 Sec 18-Ts20s-R37e), submitted by Whole Earth Environmental on behalf of Devon Energy. OCD understands the landowner has been contacted for both sites. **The OCD hereby approves of the plans with the following conditions:**

1. All remediate soils shall have samples collected and preserved in the field with a minimum of five samples collected for each site and submittal to a third party laboratory. The Lab shall composite these samples and run the EPA method 1312 SPLP for BTEX, TPH, and Chlorides.
2. Bottom hole and sidewall samples shall be collected and analyzed for BTEX, TPH and Chlorides.
3. Devon shall submit the results of the remediation efforts to the OCD Santa Fe Office by July 15, 2005 with a copy provided to the OCD Hobbs District Office and shall include the following information:
 - a. A description of all investigation, remediation and monitoring activities which have occurred including conclusions and recommendations.
 - b. A geologic/lithologic log and well completion diagram for each monitor well and a vertical and horizontal profile log of any remaining contamination.
 - c. A water table potentiometric map showing the location of excavated areas, monitor wells, and any other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
 - d. Isopleth maps for contaminants of concern which were observed during the investigations.

2/10/2005

- e. Summary tables of all ground water quality sampling results and copies of all laboratory analytical data sheets and associated QA/QC data taken within the past year.
- f. The quantity and disposition of all recovered product and/or wastes generated.
- g. Photo documentation of the project should include beginning activities, bottom hole, and surface completion. The surface shall be prepared properly to support native vegetation and photos provided in future reports of surface restoration.

4. Annual groundwater reports shall be submitted by July 15 of each year until OCD issues closure of site. If deemed necessary, OCD may request an abatement plan pursuant to Rule 19. The annual reports shall include items listed in item #3 above. It shall be Devon's responsibility to report future contamination found beyond the most down gradient monitor well that exceeds the Water Quality Control Commission Regulation (WQCC) groundwater standards, or report any amount that exceeds the previous reading by 10% of any monitoring point. Failure to report within 30 days shall be deemed a violation of this approved plan.

5. Devon Energy will notify the OCD Santa Fe office and the OCD District office at least 72 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and/or split samples during OCD's normal business hours.

6. OCD has assigned the following case numbers to these sites. Dickinson 1R0432, Patsy 1R0433. Please include these case numbers on all future submittals.

Please be advised that NMOCD approval of this plan does not relieve Devon Energy of liability should their operations fail to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD approval does not relieve Devon Energy of responsibility for compliance with any other federal, state, or local laws and/or regulations.

-----Original Message-----

From: Mike Griffin [mailto:whearth@msn.com]
Sent: Thursday, February 10, 2005 12:41 PM
To: wprice@state.nm.us
Cc: chris.biagi@dvn.com
Subject: Devon Contact

Good afternoon, Wayne:

My contact at Devon Energy is Chris Biagi. His direct phone no. is 405.228.8327; his e-mail address is chris.biagi@dvn.com.

Thank you again for your early response.

Mike Griffin

Whole Earth Environmental, Inc.
Phone: 281.394.2050
FAX: 281.394.2051

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Price, Wayne

To: Mike Griffin; Price, Wayne
Cc: chris.biagi@dvn.com
Subject: RE: Devon Contact

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-----Original Message-----

From: Mike Griffin [mailto:whearth@msn.com]
Sent: Thursday, February 10, 2005 12:41 PM
To: wprice@state.nm.us
Cc: chris.biagi@dvn.com

2/10/2005

Subject: Devon Contact

Good afternoon, Wayne:

My contact at Devon Energy is Chris Biagi. His direct phone no. is 405.228.8327; his e-mail address is chris.biagi@dvn.com.

Thank you again for your early response.

Mike Griffin

Whole Earth Environmental, Inc.
Phone: 281.394.2050
FAX: 281.394.2051

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