



P.O. Box 1708 • Artesia, NM 88211
www.hrlcomp.com

March 5, 2020

Ms. Amanda Davis
 Devon Energy Production Company
 6488 Seven Rivers Highway
 Artesia, New Mexico 88210
 Email: Amanda.davis@dvn.com

**Subject: Liner Inspection and Closure Report
 Cotton Draw Unit 172H
 Eddy County, New Mexico**

Dear Ms. Davis:

Devon Energy Production Company (Devon) (Client) retained HRL Compliance Solutions, Inc. (HRL) to conduct a liner inspection and prepare this closure report for the release at the Cotton Draw Unit 172H well pad (Site). The Site is located in Eddy County, New Mexico (Figure 1).

Release Summary and Initial Response

On August 13, 2019, a release of 10 barrels (bbls) of produced water was observed at the Site. The release occurred as a result of a pinhole leak on the two-inch flange on the water transfer pump. The produced water impacted the area within the poly-lined metal secondary containment. Initial response activities included stopping the source of the release, securing the impacted area, containing the released materials, and removing free liquids within the secondary containment.

The volume released was between five barrels and 25 barrels; therefore, this release is considered a minor release. On August 16, 2019 the C-141 (Attachment A) was submitted to the New Mexico Oil Conservation Division (NMOCD).

Item	Discussion
Site Name	Cotton Draw Unit 172H
Latitude	32.152620
Longitude	-103.726722
Township/Range/Section/Unit	Township 25 South/Range 31 East/Section 01/Unit P
Date Release Discovered	August 13, 2019
Cause of Release	Pinhole leak on the two-inch flange on the water transfer pump
Type of Material Released	Produced Water



Ms. Amanda Davis

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Item	Discussion
Volume Released	10 barrels
Volume Recovered	10 barrels

Liner Inspection

On February 21, 2020, after the released fluid was removed, HRL conducted an inspection to evaluate the integrity of the liner (Attachment B, Photographs). No tears or holes were observed in the liner and the liner was retaining precipitation. Based on this inspection, HRL has determined that the liner remains intact and had the ability to contain the release (Attachment C, Liner Inspection Field Form).

New Mexico Administrative Code (NMAC) Site Characterization Criteria

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

Site Map

A scaled diagram depicting the Site and nearby significant features has been prepared (Figure 1).

Depth to Groundwater

Based on research from the New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS), depth to groundwater is estimated to be between 155 and 429 feet below ground surface (bgs) (Figure 2).

Wellhead Protection Area

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the Site.

Distance to Nearest Significant Watercourse

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary with a defined bed and bank" (19.15.17.7 NMAC). There are no significant watercourses within one-half mile of the extent of the release.



Ms. Amanda Davis
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Additional Site Characterization Criteria

The following additional site characterization criteria were evaluated for the release.

Additional Site Characterization Criteria	Response/Discussion
Is the Site within 300 feet of a continuously flowing water or other significant watercourse?	No
Is the Site within 200 feet of a lakebed, sinkhole, or playa lake?	No
Is the Site within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Is the Site within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No
Is the Site within 1,000 feet of any fresh water well or spring?	No
Is the Site within 300 feet of a wetland?	No
Is the Site within the area overlying a subsurface mine?	No
Is the Site within an unstable area?	No
Is the Site within the 100-year floodplain?	No

Conclusions and Recommendations

The August 13, 2019 release of 10 barrels of produced water at the Site remained within the lined containment area. HRL has determined that the liner integrity remains intact and had the ability to contain the release; therefore, additional characterization of the soil and/or groundwater at the Site is not necessary. HRL recommends closure of this release.

Scope and Limitations

The scope of HRL's services consists of performing a liner integrity inspection and preparation of this closure report. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.



Ms. Amanda Davis
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If you have any questions or concerns, please do not hesitate to contact Kris Graham at (575) 616-7398 Ext. 436 or via email at kgraham@hrlcomp.com

Sincerely,

HRL Compliance Solutions, Inc.

A handwritten signature in black ink, appearing to read 'Kris Graham', is written over a faint, larger version of the same signature.

Kris Graham
Environmental Scientist

Copy: Julie Linn, PG, RG, HRL Compliance Solutions, Inc.

Figures:

Figure 1: Site Location Map
Figure 2: Depth to Groundwater Map

Attachments:

Attachment A: NMOCD Form C-141
Attachment B: Photographs
Attachment C: Liner Inspection Field Form



Figures

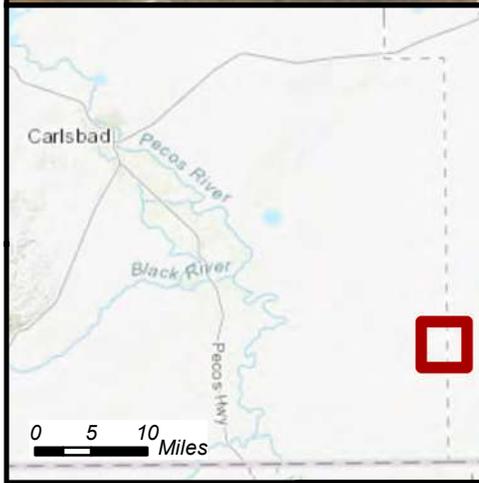
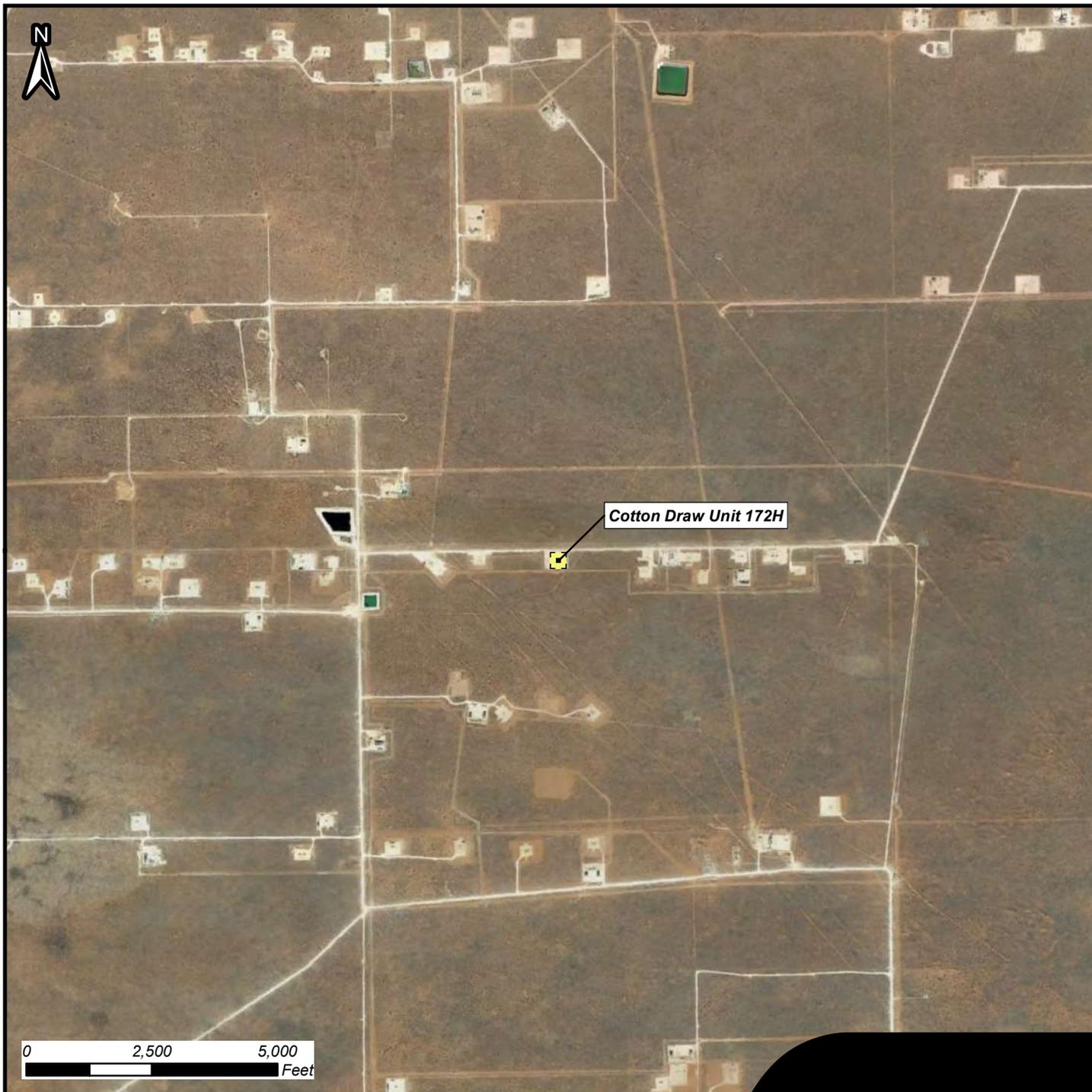



Figure 1: Site Location Map
 Cotton Draw Unit 172H
 August 2019 Spill
 32.152620, -103.726722
 Section 1, Township 25 South, Range 31 East

NOTES / COMMENTS:

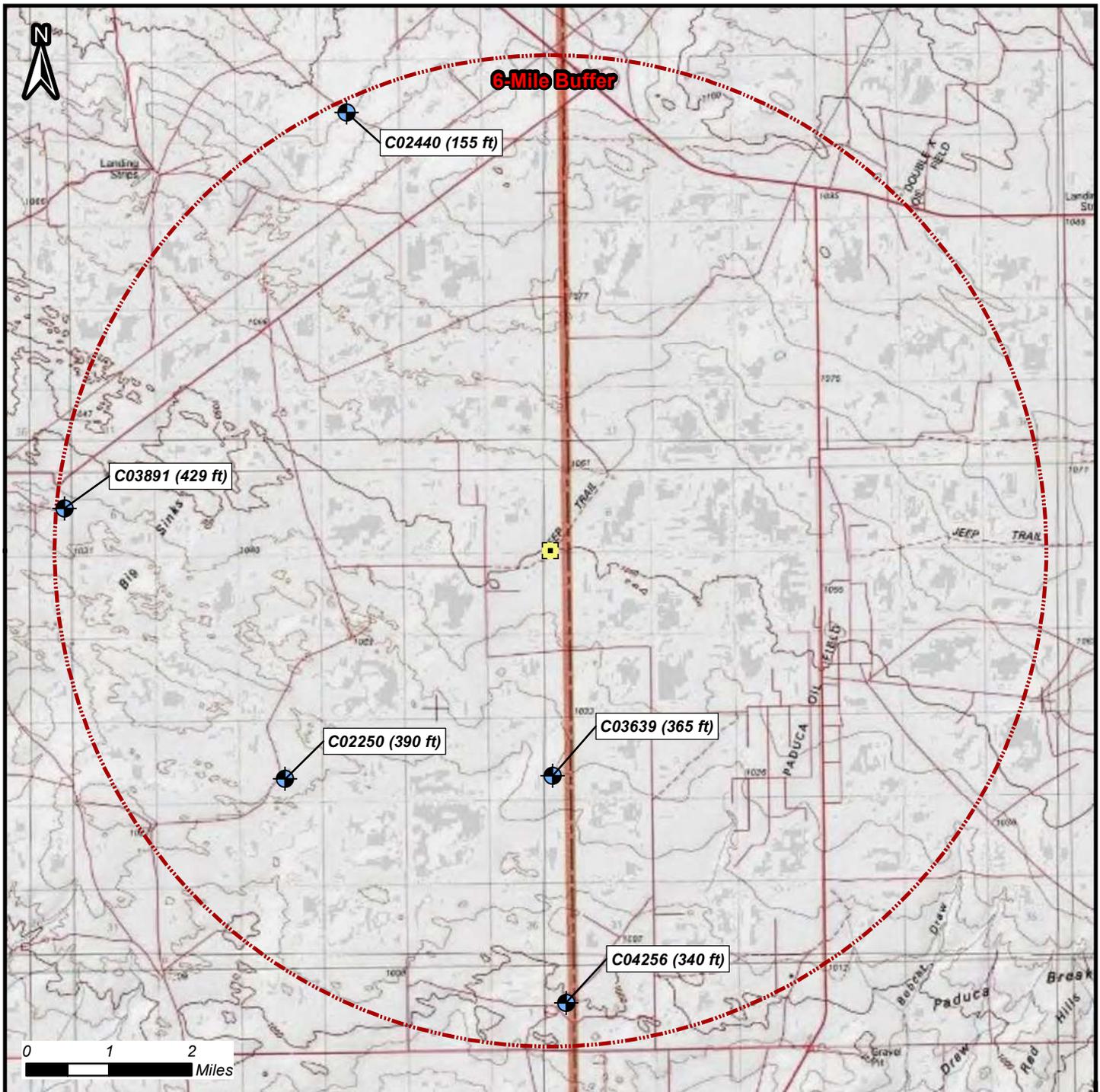
Mapped Features

-  Facility Location

DISCLAIMER: This representation and the Geographic Information System (GIS) used to create it are designed as a source of reference and not intended to replace official records and/or legal surveys. HRL assumes no responsibility for any risks, dangers, or liabilities that may result from its use and makes no guarantees as to the quality or accuracy of the underlying data.



Author: A. Asay
 Revision: 0
 Date: 2/28/2020



0 1 2 Miles

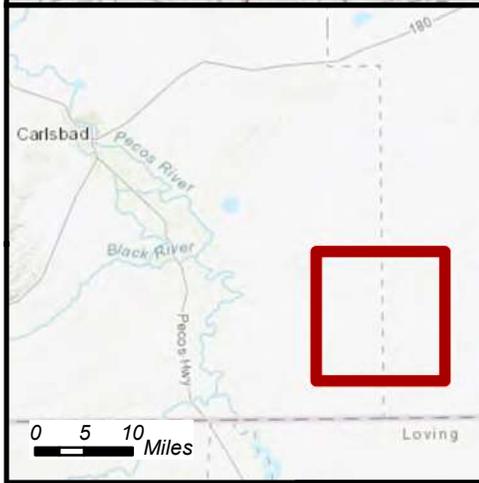


Figure 2: Depth to Groundwater Map

Cotton Draw Unit 172H
August 2019 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East

Mapped Features

-  Point of Release
-  Groundwater Monitoring Well
-  6-Mile Buffer

Well Number	Water Level Below Ground Surface (ft)	Distance from Source (mi)
C02250	390	4.23
C03639	365	2.72
C04256	340	5.48
C02440	155	5.85
C03891	429	5.90

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Author: A. Asay
Revision: 0
Date: 2/28/2020



Attachment A
NMOCD Form 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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Devon Energy Production Company	OGRID 6137
Contact Name Amanda T. Davis	Contact Telephone 575-748-0176
Contact email amanda.davis@dvn.com	Incident # (assigned by OCD)
Contact mailing address 6488 Seven Rivers HWY	

Location of Release Source

Latitude 32.152620 Longitude -103.726722
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Cotton Draw 172 Battery	Site Type Oil
Date Release Discovered 8/13/2019	API# (if applicable)

Unit Letter	Section	Township	Range	County
P	1	25S	31E	Eddy

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) 9.99	Volume Recovered (bbls) 9.99
	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 Pin hole leak on 2" flange on water transfer pump. Fluid stayed inside containment. Spill area 70'x60'x1/4".

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

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: <u>Kendra DeHoyos</u> Title: <u>EHS Associate</u> Signature: <u>Kendra DeHoyos</u> Date: <u>8/16/2019</u> email: <u>kendra.dehoyos@dvn.com</u> Telephone: <u>575-748-3371</u>
<u>OCD Only</u> Received by: _____ Date: _____



Attachment B
Photographs



View of sediment buildup within lined secondary containment



View of sediment and minor pooling within lined secondary containment





Attachment C
Liner Inspection Field Form



HRL
COMPLIANCE
SOLUTIONS

Liner Inspection Form

Client Devon Energy
 Date of Inspection 2/21/2020
 Site Name Cotton Draw Unit #1724
 Latitude 32.152681
 Longitude -103.726638

Observations	Yes	No	Comments
Is the liner present?	✓		
Is the liner torn?		✓	
Are there visible holes in the liner?		✓	
Is the liner retaining any liquids?	✓		Small amt of stormwater
Does it appear the liner had the ability to contain the leak?	✓		

Type of Liner: Poly Earthen Metal Other (describe below):

Other Concerns or Observations: Spray poly liner
No staining surrounding containment
indicative of seepage

Inspector Name Kevin Smith
 Inspector Signature Kevin Smith



P.O. Box 1708 • Artesia, NM 88211
www.hrlcomp.com

March 5, 2020

Ms. Amanda Davis
 Devon Energy Production Company
 6488 Seven Rivers Highway
 Artesia, New Mexico 88210
 Email: Amanda.davis@dvn.com

**Subject: Liner Inspection and Closure Report
 Cotton Draw Unit 172H
 Eddy County, New Mexico**

Dear Ms. Davis:

Devon Energy Production Company (Devon) (Client) retained HRL Compliance Solutions, Inc. (HRL) to conduct a liner inspection and prepare this closure report for the release at the Cotton Draw Unit 172H well pad (Site). The Site is located in Eddy County, New Mexico (Figure 1).

Release Summary and Initial Response

On January 7, 2016, a release of 15 barrels (bbls) of produced water, and 10 barrels of oil was observed at the Site. The release occurred when a two-inch drain line from the slop tank to the circulating pump froze and ruptured during freezing temperatures. The oil and produced water impacted the area within the poly-lined metal secondary containment. Initial response activities included stopping the source of the release, securing the impacted area, containing the released materials, and removing free liquids within the secondary containment.

The volume released was between five barrels and 25 barrels; therefore, this release is considered a minor release. On January 7, 2017 the C-141 (Attachment A) was submitted to the New Mexico Oil Conservation Division (NMOCD).

Item	Discussion
Site Name	Cotton Draw Unit 172H
Latitude	32.152620
Longitude	-103.726722
Township/Range/Section/Unit	Township 25 South/Range 31 East/Section 01/Unit O
Date Release Discovered	January 7, 2016
Cause of Release	The two-inch drain line from the slop tank to the circulating pump froze and ruptured during freezing temperatures



Ms. Amanda Davis
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Item	Discussion
Type of Material Released	Oil and Produced Water
Produced Water Volume Released	15 barrels
Oil Volume Released	10 barrels
Produced Water Volume Recovered	15 barrels
Oil Volume Recovered	10 barrels

Liner Inspection

On February 21, 2020, after the released fluid was removed, HRL conducted an inspection to evaluate the integrity of the liner (Attachment B, Photographs). No tears or holes were observed in the liner and the liner was retaining precipitation. Based on this inspection, HRL has determined that the liner remains intact and had the ability to contain the release (Attachment C, Liner Inspection Field Form).

New Mexico Administrative Code (NMAC) Site Characterization Criteria

Title 19, Chapter 15, Part 29, Section 11 of the New Mexico Administrative Code (NMAC) provides requirements for release characterization once the free liquids and recoverable materials have been removed from the Site.

Site Map

A scaled diagram depicting the Site and nearby significant features has been prepared (Figure 1).

Depth to Groundwater

Based on research from the New Mexico Office of the State Engineer (NMOSE) and United States Geological Survey (USGS), depth to groundwater is estimated to be between 155 and 429 feet below ground surface (bgs) (Figure 2).

Wellhead Protection Area

There are no sources of water, including springs, wells, or other sources of fresh water, within one-half mile of the Site.

Distance to Nearest Significant Watercourse

A significant watercourse is defined as "...a watercourse with a defined bed and bank either named or identified by a dashed blue line on a USGS 7.5-minute quadrangle map or the next lower order tributary



Ms. Amanda Davis
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with a defined bed and bank” (19.15.17.7 NMAC). There are no significant watercourses within one-half mile of the extent of the release.

Additional Site Characterization Criteria

The following additional site characterization criteria were evaluated for the release.

Additional Site Characterization Criteria	Response/Discussion
Is the Site within 300 feet of a continuously flowing water or other significant watercourse?	No
Is the Site within 200 feet of a lakebed, sinkhole, or playa lake?	No
Is the Site within 300 feet of an occupied permanent residence, school, hospital institution, or church?	No
Is the Site within 500 feet of a spring or private, domestic fresh water well used by less than five households for domestic or stock watering purposes?	No
Is the Site within 1,000 feet of any fresh water well or spring?	No
Is the Site within 300 feet of a wetland?	No
Is the Site within the area overlying a subsurface mine?	No
Is the Site within an unstable area?	No
Is the Site within the 100-year floodplain?	No

Conclusions and Recommendations

The January 7, 2016 release of 15 barrels of produced water and 10 barrels of oil at the Site remained within the lined containment area. HRL has determined that the liner integrity remains intact and had the ability to contain the release; therefore, additional characterization of the soil and/or groundwater at the Site is not necessary. HRL recommends closure of this release.

Scope and Limitations

The scope of HRL’s services consists of performing a liner integrity inspection and preparation of this closure report. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin.



Ms. Amanda Davis
Page 4

If you have any questions or concerns, please do not hesitate to contact Kris Graham at (575) 616-7398 Ext. 436 or via email at kgraham@hrlcomp.com

Sincerely,

HRL Compliance Solutions, Inc.

Kris Graham
Environmental Scientist

Copy: Julie Linn, PG, RG, HRL Compliance Solutions, Inc.

Figures:

Figure 1: Site Location Map
Figure 2: Depth to Groundwater Map

Attachments:

Attachment A: NMOCD Form C-141
Attachment B: Photographs
Attachment C: Liner Inspection Field Form



Figures

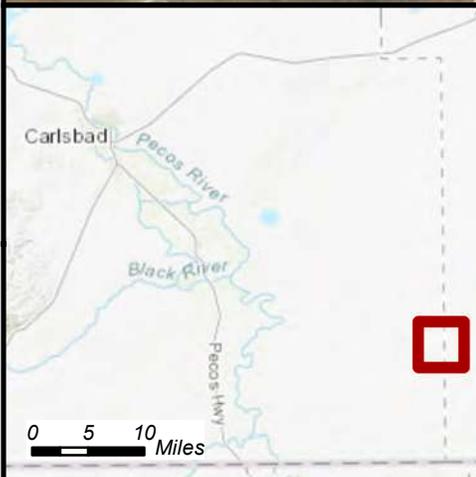
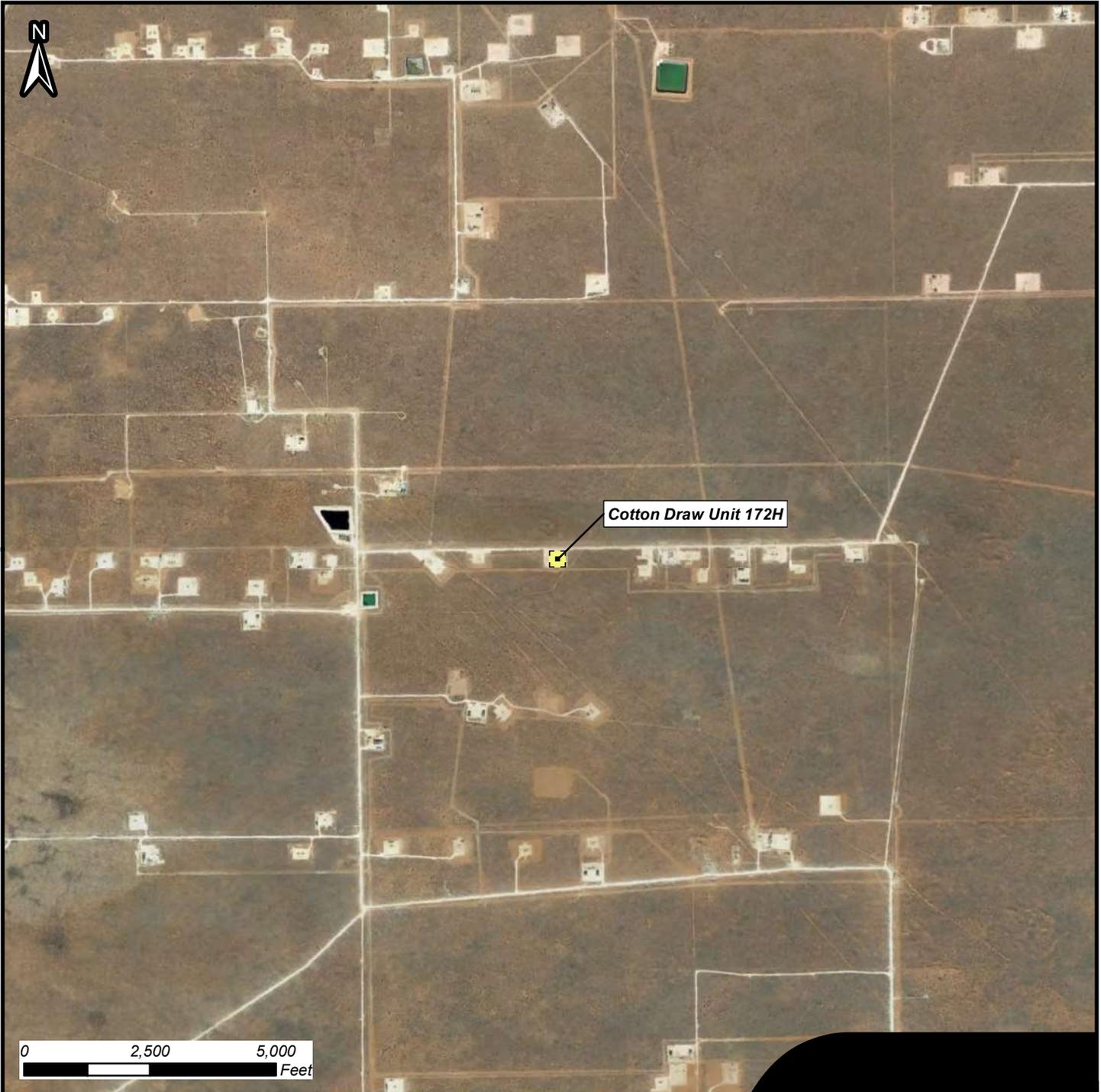


Figure 1: Site Location Map
 Cotton Draw Unit 172H
 January 2016 Spill
 32.152620, -103.726722
 Section 1, Township 25 South, Range 31 East

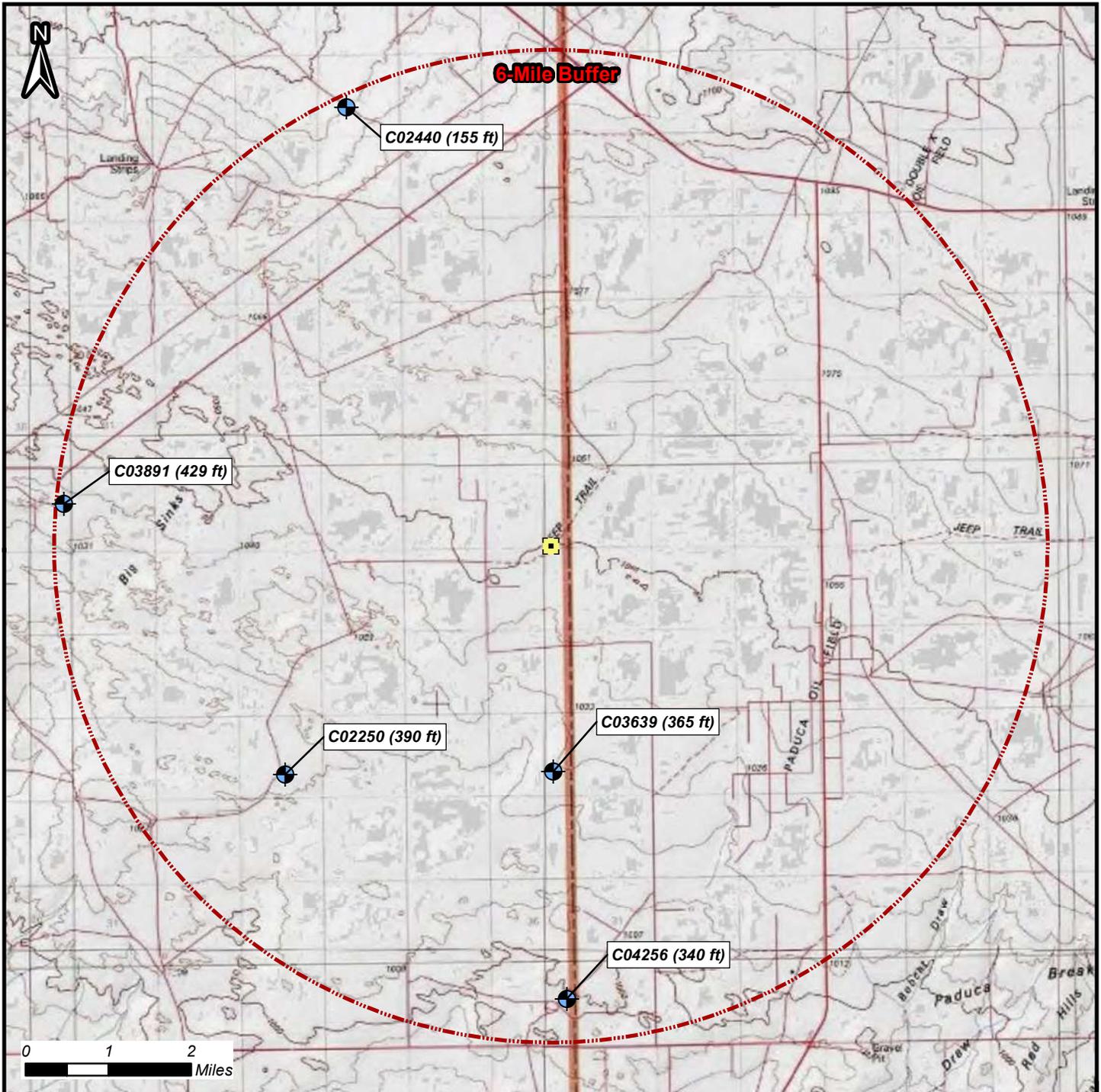
NOTES / COMMENTS:

Mapped Features

- Facility Location

DISCLAIMER: This representation and the Geographic Information System (GIS) used to create it are designed as a source of reference and not intended to replace official records and/or legal surveys. HRL assumes no responsibility for any risks, dangers, or liabilities that may result from its use and makes no guarantees as to the quality or accuracy of the underlying data.

Author: A. Asay
 Revision: 0
 Date: 2/28/2020



0 1 2 Miles

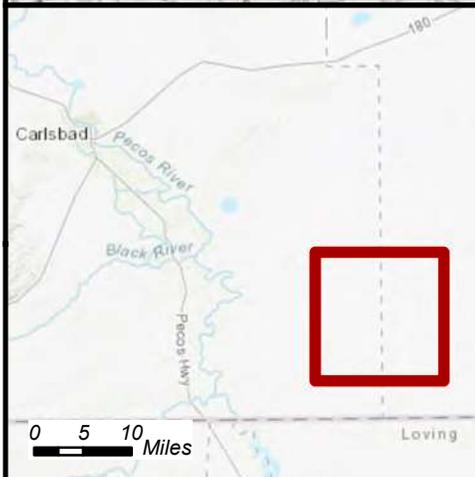


Figure 2: Depth to Groundwater Map

Cotton Draw Unit 172H
January 2016 Spill

32.152620, -103.726722

Section 1, Township 25 South, Range 31 East

Mapped Features

-  Point of Release
-  Groundwater Monitoring Well
-  6-Mile Buffer

Well Number	Water Level Below Ground Surface (ft)	Distance from Source (mi)
C02250	390	4.23
C03639	365	2.72
C04256	340	5.47
C02440	155	5.85
C03891	429	5.90

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Author: A. Asay
Revision: 0
Date: 2/28/2020



Attachment A
NMOCD Form 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
Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 8, 2011
Submit 1 Copy to appropriate District Office in
accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

Initial Report Final Report

Name of Company Devon Energy Production Company	Contact Jake Harrington, Production Foreman
Address 6488 Seven Rivers Hwy Artesia, NM 88210	Telephone No. 432-214-5175
Facility Name Cotton Draw Unit 172H	Facility Type Oil
Surface Owner Federal	Mineral Owner Federal
API No 30-015-42426	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	01	25S	31E	195	South	1345	East	Eddy

Latitude: 32.1525726

Longitude: -103.7273788

NATURE OF RELEASE

Type of Release Produced Water and Oil	Volume of Release 15bbls produced water & 10bbls oil	Volume Recovered 15bbls produced water & 10bbls oil
Source of Release 2" drain line from slop tank to the circulating pump	Date and Hour of Occurrence January 7, 2016 @ 6:15 AM	Date and Hour of Discovery January 7, 2016 @ 6:15 AM
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Shelly Tucker, BLM Mike Bratcher, OCD	
By Whom? Ray Carter, Asst. Production Foreman	Date and Hour Shelly Tucker, BLM January 7, 2017 @ 1:30 PM Mike Bratcher, OCD January 7, 2017 @ 1:35 PM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse N/A	

If a Watercourse was Impacted, Describe Fully.*

N/A

Describe Cause of Problem and Remedial Action Taken.*

The 2" drain line from the slop tank to the circulating pump froze and ruptured due to freezing temperatures. The drain was isolated and isolated so that the line could be replaced. Repairs are complete and the line is back in service.

Describe Area Affected and Cleanup Action Taken.*

Approximately 15bbls produced water and 10bbls oil were released into lined containment. A vacuum truck was called and recovered all 15bbls produced water and all 10bbls oil from lined containment. The containment was checked for holes and none were found. No further action is necessary.

Requesting closure of this incident. 2RP-4070

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: <i>Sheila Fisher</i>	<u>OIL CONSERVATION DIVISION</u>	
Printed Name: Sheila Fisher	Approved by Environmental Specialist:	
Title: Field Admin Support	Approval Date:	Expiration Date:
E-mail Address: Sheila.fisher@dvn.com	Conditions of Approval:	Attached <input type="checkbox"/>
Date: 1/10/17 Phone: 575.748.1829		

* Attach Additional Sheets If Necessary



Attachment B
Photographs



View of sediment buildup within lined secondary containment

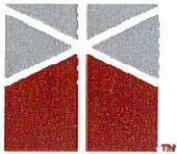


View of sediment and minor pooling within lined secondary containment





Attachment C
Liner Inspection Field Form



HRL
COMPLIANCE
SOLUTIONS

Liner Inspection Form

Client Devon Energy

Date of Inspection 2/21/2020

Site Name Cotton Draw Unit #1724

Latitude 32.152681

Longitude -103.726638

Observations	Yes	No	Comments
Is the liner present?	✓		
Is the liner torn?		✓	
Are there visible holes in the liner?		✓	
Is the liner retaining any liquids?	✓		Small amt of stormwater
Does it appear the liner had the ability to contain the leak?	✓		

Type of Liner: Poly Earthen Metal Other (describe below):

Other Concerns or Observations: Spray poly liner
No staining surrounding containment
indicative of seepage

Inspector Name Kevin Smith

Inspector Signature Kevin Smith

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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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	NAB1929428497
District RP	2RP-5677
Facility ID	
Application ID	pAB1929428231

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?	<u>155</u> (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 not 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

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	NAB1929428497
District RP	2RP-5677
Facility ID	
Application ID	pAB1929428231

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.

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: Tom Bynum Title: EHS Consultant

Signature: Tom Bynum Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

OCD Only

Received by: _____ Date: _____

Incident ID	NAB1929428497
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Facility ID	
Application ID	pAB1929428231

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Tom Bynum Title: EHS Consultant

Signature: Tom Bynum Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature: _____ Date: _____

Incident ID	NAB1929428497
District RP	2RP-5677
Facility ID	
Application ID	pAB1929428231

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: Tom Bynum Title: EHS Consultant

Signature: *Tom Bynum* Date: 3/5/2020

email: tom.bynum@dvn.com Telephone: 575-748-1688

OCD Only

Received by: Cristina Eads Date: 04/08/2020

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: *Cristina Eads* Date: 05/11/2020

Printed Name: Cristina Eads Title: Environmental Specialist