

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

Name of Company Devon Energy	Contact Tracy Kidd, Production Foreman	
Address P. O. Box 250 Artesia, NM 88211	Telephone No. 575-513-0628	
Facility Name Cotton Draw 65 SWD	Facility Type Salt Water Disposal	
Surface Owner	Mineral Owner	API No. 30-015-10843 <b>2RP-2300</b>

**LOCATION OF RELEASE**

Unit Letter G	Section 2	Township 25S	Range 31E	Feet from the 1980	North/South Line North	Feet from the 1980	East/West Line East	County Eddy
------------------	--------------	-----------------	--------------	-----------------------	---------------------------	-----------------------	------------------------	----------------

**NATURE OF RELEASE**

Type of Release: Produced Water	Volume of Release 255 bbls PW	Volume Recovered: 250 bbls
Source of Release Produced Water Line	Date and Hour of Occurrence 5-19-14 May 5, 2014 7:00 am PM SAS	Date and Hour of Discovery 5/5/22/14, 7:00 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Joah Weidemann/Devon	
By Whom? David Medlock with RW Trucking	Date and Hour 7:00 am	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\* At the Cotton Draw Unit No. 65 SWD, the check valve on the produced water header malfunctioned causing a release of 255 barrels of produced water. A vac truck was immediately called to the location and it recovered 250 barrels of fluid. The wells were shut-in and the valve was repaired. The fluids were contained within the earthen berms surrounding the location. The area was scraped and back dragged.

Describe Area Affected and Cleanup Action Taken.\* Talon/LPE completed the remediation activities per NMOCD approved work plan, Test pits were excavated at sample locations S-1 and S-2 for further vertical delineation purposes. The backhoe hit refusal at a depth of 4-feet deep. The samples were sent to lab for analysis. Upon receipt of the lab results, they were submitted to the NMOCD. Per NMOCD's stipulations the impacted soil in the vicinity of S-1 and S-2 was excavated to a depth of 4-feet deep and a 20 mil liner was installed. The impacted area in the area of S-3 was excavated to a depth of 0.5-feet deep. The impacted soil in the vicinity of S-4 was excavated to a depth of 1.5-feet deep. All contaminated soil was transported to Lea Land, LLC for disposal. The excavated areas were backfilled with new caliche and the location was re-contoured. No further actions are required. A complete closure report is attached.

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.

**OIL CONSERVATION DIVISION**

Signature: <i>Stacie Singleton</i>	Approved by District Supervisor:	
Printed Name: Stacie A Singleton	Approval Date:	Expiration Date:
Title: Environmental Professional	Attached <input type="checkbox"/>	
Date: 9/18/2014 Phone: 575-748-1844	Conditions of Approval:	

\* Attach Additional Sheets If Necessary

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
1301 W. Grand Avenue, 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 March 17, 1999

Submit 2 Copies to appropriate  
District Office in accordance  
with Rule 116 on back  
side of form

**Release Notification and Corrective Action**

**OPERATOR**

☐ Initial Report ☒ Final Report

Name of Company Devon Energy	Contact Tracy Kidd, Production Foreman
Address P. O. Box 250 Artesia, NM 88211	Telephone No. 575-513-0628
Facility Name Cotton Draw 65 SWD	Facility Type Salt Water Disposal

Surface Owner	Mineral Owner	API No. 30-015-10843 <b>2RP-1169</b>
---------------	---------------	---

**LOCATION OF RELEASE**

Unit Letter G	Section 2	Township 25S	Range 31E	Feet from the 1980	North/South Line North	Feet from the 1980	East/West Line East	County Eddy
------------------	--------------	-----------------	--------------	-----------------------	---------------------------	-----------------------	------------------------	----------------

**NATURE OF RELEASE**

Type of Release: Oil	Volume of Release 35 bbls	Volume Recovered 35 bbls
Source of Release: Gun barrel malfunctioned	Date and Hour of Occurrence 6/8/12, 8:48 am	Date and Hour of Discovery 6/8/12, 8:48 am
Was Immediate Notice Given? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	If YES, To Whom? Jim Amos / BLM & Mike Bratcher / OCD	
By Whom? Tracy Kidd & Dan Suniga	Date and Hour 6/8/12, 9:33 AM	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.\*

Describe Cause of Problem and Remedial Action Taken.\*

At the Cotton Draw 65 SWD, the gun barrel malfunctioned causing 35 barrels of oil to be released into the lined containment. All fluids were recovered.

Describe Area Affected and Cleanup Action Taken.\* The area affected was inside the lined containment. A vac truck was immediately called to location and recovered 35 barrels of oil. No further action is required.

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.

**OIL CONSERVATION DIVISION**

Signature: <i>Stacie A Singleton</i>	Approved by District Supervisor:	
Printed Name: Stacie A Singleton	Approval Date:	
Title: Environmental Professional	Expiration Date:	Attached <input type="checkbox"/>
Date: 9/18/2014 Phone: 575-748-1844	Conditions of Approval:	

\* Attach Additional Sheets If Necessary



September 18, 2014

AMARILLO  
921 North Bivins  
Amarillo, Texas 79107  
Phone 806.467.0807  
Fax 806.467.0622

Mr. Mike Bratcher  
**NMOCD District 2**  
811 S. 1<sup>st</sup> Street  
Artesia, NM 88210

ARTESIA  
408 West Texas Ave.  
Artesia, New Mexico 88210  
Phone 575.746.8768  
Fax 575.748.8905

Subject: **Remediation and Closure Report**  
Devon Energy  
Cotton Draw Unit No. 65 SWD  
API #: 30-015-10843 **2RP-2300**

HOBBS  
318 East Taylor Street  
Hobbs, New Mexico 88241  
Phone 505.393.4261  
Fax 505.393.4658

Dear Mr. Bratcher:

Devon Energy has contracted Talon/LPE (Talon) to perform soil assessment and remediation services at the above referenced location. The results of our soil assessment, completed remediation activities and closure request are submitted herein.

MIDLAND  
2901 State Highway 349  
Midland, Texas 79706  
Phone 432.522.2133  
Fax 432.522.2180

#### **Incident Date**

May 5, 2014

OKLAHOMA CITY  
7700 North Hudson Ave  
Suite 10  
Oklahoma City, Oklahoma 73116  
Phone 405.486.7030  
Fax 806.467.0622

#### **Background Information**

The Cotton Draw Unit No. 65 SWD is located approximately fifty-four (54) miles southeast of Carlsbad in Eddy County, New Mexico. The legal location for this site is Section 2, Township 25 South, and Range 31 East. More specifically the latitude and longitude for the release point are 32.16116 North and -103.74568 West. A site plan is presented in Appendix I.

SAN ANTONIO  
13111 Lookout Way  
San Antonio, TX 78233  
Phone 210.265.8025  
Fax 210.568.2191

According to the soil survey provided by the United States Department of Agriculture Natural Resources Conservation Service, the soil in this area is made up of Berino complex with 0 to 3 percent slopes. Per the New Mexico Bureau of Geology and Mineral Resources, the local surface and shallow geology is Quaternary in age and is comprised of eolian sands and piedmont deposits which include silty soils underlain with sandy clay loam and hard caliche. Drainage courses in this area are normally dry. According to the New Mexico Office of the State Engineer there are 5 wells in the vicinity and appears to be dry wells. See Appendix II for the referenced groundwater data.

The ranking for this site is **0** based on the following:

ENVIRONMENTAL CONSULTING  
ENGINEERING  
DRILLING  
CONSTRUCTION  
SPILL MANAGEMENT  
GENERAL CONTRACTING

Depth to ground water	>100'
Wellhead Protection Area	>1000'
Distance to surface water body	>1000'

### Incident Description

At the Cotton Draw Unit No. 65 SWD, the check valve on the produced water header malfunctioned causing a release of 255 barrels of produced water. A vac truck was immediately called to the location and recovered 250 barrels of fluid. The wells were shut-in and the valve was repaired. The fluids were contained within the earthen berms surrounding the location. The area was scraped and back dragged. On May 12, 2014, Talon mobilized personnel to conduct soil sampling activities. The results of these sampling activities are summarized in the table below.

### Remedial Actions Taken

Test pits were excavated at sample locations S-1 and S-2 for further vertical delineation purposes. The backhoe hit refusal at a depth of 4-feet deep. The samples were sent to lab for analysis. The results are presented below.

Upon receipt of the lab results the data was submitted to the NMOCD. Per NMOCD's stipulations the impacted soil in the vicinity of S-1 and S-2 was excavated to a depth of 4-feet deep and a 20 mil liner was installed. The impacted area in the area of S-3 was excavated to a depth of 0.5-feet deep. The impacted soil in the vicinity of S-4 (per work plan) was excavated to a depth of 1.5-feet deep.

All contaminated soil was transported to Lea Land, LLC for disposal. The excavated areas were backfilled with new caliche and the location was re-contoured.

### Laboratory Results

See Appendix III for complete report of laboratory results.

July 28, 2014

Sample ID	Depth (feet)	BTEX (mg/kg)	Chlorides (mg/kg)	TPH (mg/kg) GRO	TPH (mg/kg) DRO
S-1	2'	--	2760	--	--
	3'	--	4480	--	--
	4'	--	1300	--	--
S-2	4'	--	2760	--	--

--Analyte Not Tested

Based upon the site ranking of 0, NMOCD Recommended Remedial Action Levels (RRAL's) are 50 mg/kg for BTEX, 10 mg for Benzene, and 5,000 mg/kg for TPH. The chloride remediation standard is considered to be 1,000 mg/kg based upon a water table depth greater than 100-feet deep.

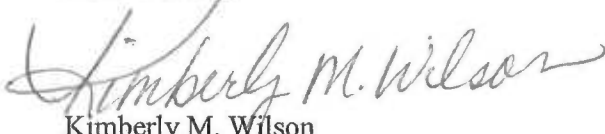
**Closure**

On behalf of Devon Energy, we respectfully request that no further actions be required and that closure with respect to this release be granted.


If we can provide additional information or be of further assistance please contact our office at 575.746.8768.

Respectfully submitted,

TALON/LPE

A handwritten signature in cursive script, appearing to read "Kimberly M. Wilson".

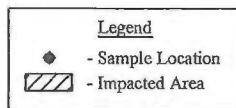
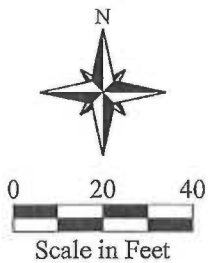
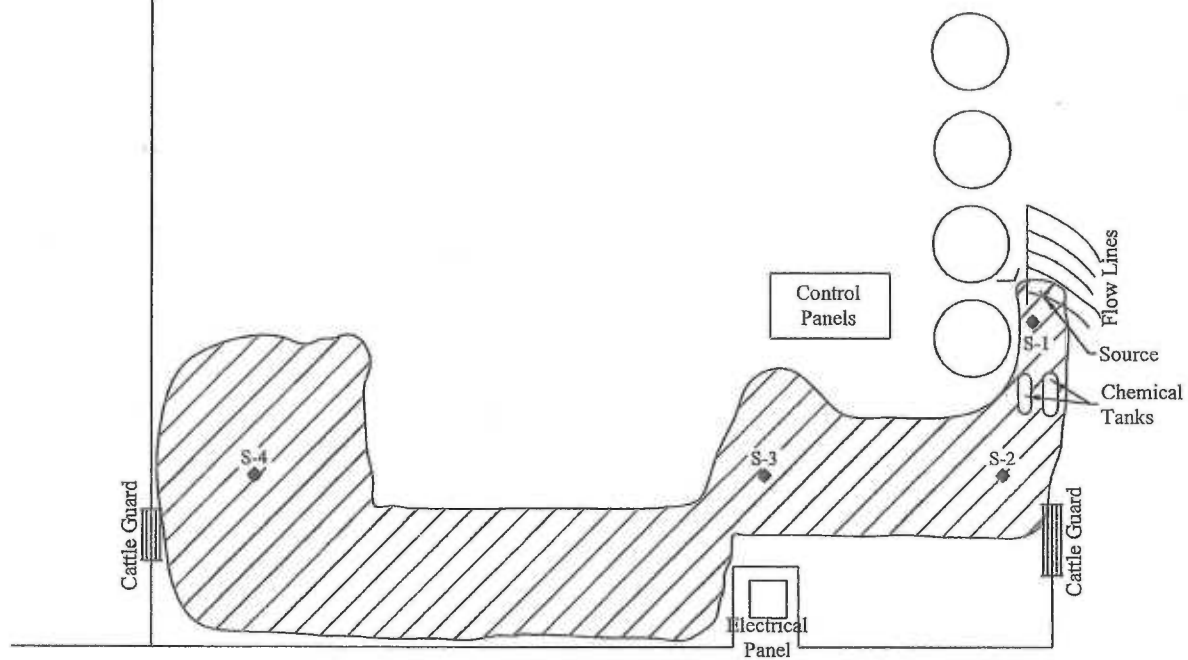
Kimberly M. Wilson  
Project Manager

A handwritten signature in cursive script, appearing to read "David J. Adkins".

David J. Adkins  
District Manager

## **APPENDIX I**

### **SITE MAP**



Date: 05/27/2014

Scale: 1" = 40'

Drawn By: TJS

Cotton Draw 65 SWD  
 Devon Energy Corporation  
 Eddy County, New Mexico  
 Figure 1 - Site Plan

**APPENDIX II**  
**GROUNDWATER DATA**  
**NM OCD STIPULATIONS**





# 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		Q Q Q				Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
	Code	basin	64	16	4	Sec							
C 02572	ED		4	2	2	02	25S	31E	618695	3559294*	200	852	
C 02571	ED		4	1	2	02	25S	31E	618292	3559294*	203	860	
C 02573	ED		1	4	2	02	25S	31E	618499	3559091*	203		
C 02574	ED		1	1	2	02	25S	31E	618092	3559494*	449		
C 02569	ED		4	4	2	02	25S	31E	618699	3558891*	451	1016	
C 02568	ED		4	3	1	01	25S	31E	619103	3558892*	728	1025	
C 02570	ED		4	2	4	02	25S	31E	618704	3558489*	831	895	

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: --

Record Count: 7

UTM NAD83 Radius Search (in meters):

Easting (X): 618495

Northing (Y): 3559294

Radius: 2000

\*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.

6/2/14 11:03 AM

Page 1 of 1

WATER COLUMN/ AVERAGE  
DEPTH TO WATER

## Kimberly M. Wilson

---

**From:** Patterson, Heather, EMNRD [Heather.Patterson@state.nm.us]  
**Sent:** Wednesday, July 30, 2014 7:36 AM  
**To:** Kimberly M. Wilson  
**Cc:** Sheldon Hitchcock; Bratcher, Mike, EMNRD; David Adkins  
**Subject:** Cotton Draw 65

RE: Devon \* Cotton Draw Unit 65 SWD \* 30-015-10843 \* 2RP-2300

Kimberly,

As per our conversation on 7/29/2014 concerning the above referenced site, the OCD would like to see a liner used in both the areas of S1 and S2.

In addition, we would like to ask for a final C-141 be submitted on a previous release on this site. Devon had a release on 6/18/2012 that was fully contained in the lined facility and fully recovered. The OCD reference number is 2RP-1169. If you can send a signed Final C-141 for this release, we can close it at the same time.

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

Thank you, and if you have any questions or concerns, and for notification, please contact me.

Heather Patterson  
Environmental Specialist  
NMOCD District II  
(575)748-1283 ext.101

-----  
This email was processed through Xeams to filter junk messages.  
If you feel this message has been tagged incorrectly, you can  
change its category by clicking the link below.  
[Click here to mark email as junk.](#)  
OR  
[here to mark email as good.](#)  
-----

**APPENDIX III**  
**LABORATORY RESULTS**



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

July 28, 2014

KIMBERLY WILSON

TALON LPE

408 W. TEXAS AVE.

ARTESIA, NM 88210

RE: COTTON DRAW #65 SWD

Enclosed are the results of analyses for samples received by the laboratory on 07/25/14 11:27.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-13-5. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

Hope S. Moreno For Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

TALON LPE  
KIMBERLY WILSON  
408 W. TEXAS AVE.  
ARTESIA NM, 88210  
Fax To: (575) 745-8905

Received: 07/25/2014  
Reported: 07/28/2014  
Project Name: COTTON DRAW #65 SWD  
Project Number: NONE GIVEN  
Project Location: 6-2-25-31

Sampling Date: 07/22/2014  
Sampling Type: Soil  
Sampling Condition: \*\* (See Notes)  
Sample Received By: Celey D. Keene

**Sample ID: S-1 2' (H402283-01)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2760	16.0	07/28/2014	ND	400	100	400	0.00	

**Sample ID: S-1 3' (H402283-02)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4480	16.0	07/28/2014	ND	400	100	400	0.00	

**Sample ID: S-1 4' REFUSAL (H402283-03)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1300	16.0	07/28/2014	ND	400	100	400	0.00	

**Sample ID: S-2 4' REFUSAL (H402283-04)**

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AP					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2760	16.0	07/28/2014	ND	400	100	400	0.00	

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

*Hope S. Moreno*

Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

**Notes and Definitions**

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
*	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

---

Cardinal Laboratories

\*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.



---

Hope S. Moreno For Celey D. Keene, Lab Director/Quality Manager

# CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

101 East Marland, Hobbs, NM 88240  
TEL 505 226 FAX (575) 393-2476

BILL TO		ANALYSIS REQUEST	
<b>Company Name:</b>	Talon/LPE	<b>P.O. #:</b>	
<b>Project Manager:</b>	Kimberly Wilson	<b>Company:</b>	Talon/LPE
<b>Address:</b>	408 W. Texas Ave.	<b>Attn:</b>	
<b>City:</b>	Artesia	<b>State:</b>	NM Zip: 88210
<b>Phone #:</b>	575-746-8768	<b>Fax #:</b>	575-746-8905
<b>Project #:</b>	W994-104.01	<b>Project Owner:</b>	Dillon
<b>Project Name:</b>	Hutton Draw b5 SWD	<b>Lab I.D.:</b>	
<b>Project Location:</b>	b-2-25-31	<b>Sample I.D.:</b>	
<b>Sampler Name:</b>	Ken Swift	<b>Date:</b>	7-22-14
<b>FOR LAB USE ONLY</b>		<b>Time:</b>	
<b>MATRIX</b>	<b>PRESERV</b>	<b>SAMPLING</b>	
(G) RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	
WASTEWATER	OIL	SLUDGE	
OTHER : ACID/BASE :	ICE / COOL	OTHER :	
DATE	TIME		
1 3-1 2'	7-22-14		
2 3-1 3'	7-22-14		
3 3-1 4' Reused	7-22-14		
4 3-2 4' Reused	7-22-14		
<b>Relinquished By:</b>		<b>Received By:</b>	
<b>Date:</b>	<b>Time:</b>	<b>Date:</b>	<b>Time:</b>
7-25-14	11:27		
<b>Delivered By:</b>	<b>CHECKED BY:</b>	<b>Sample Condition</b>	
Ken Swift		Cool Intact Yes No	
<b>Sampler - UPS - Bus - Other:</b>	<b>REMARKS:</b>	RUSH	

PLEASE NOTE: Liability and Damages: Cardinal's liability and client's exclusive remedy for any claim arising from or based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruption, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal. Inclusion of such claim is based upon any of the above stated reasons or otherwise.