

From: Fulks, Brett
To: [Weaver, Crystal, EMNRD](#); [DeLaRosa, Dana](#); [Bratcher, Mike, EMNRD](#); agroves@slo.state.nm.us
Cc: [Shoemaker, Mike](#)
Subject: RE: [EXTERNAL] RE: Cotton Draw Unit 181 SWD_60BBL PW_9.5.2017
Date: Monday, October 16, 2017 3:03:03 PM
Attachments: [image001.png](#)

Crystal,

It was actually my understanding from our conversations, that the OCD was interested in approving the proposal of flushing, but that you all were still evaluating what conditions/stipulations to put around the closure to insure that the plan actually worked. Also in one early meeting with Jim Griswold on spills as a whole, Jim stated that the OCD was interested in alternative proposals to dig and haul remediation plans, which prompted this proposal in the first place. We have been awaiting an approval with conditions for the plan as approved and as such the impacted area off pad has unfortunately been left untouched. I see below that you mention the NMOCD has not changed its position on flushing, it is my understanding that numerous plans similar in nature have been authorized in the state, especially where protectable ground water is nonexistent or at great depths. In our most recent work plan request, we site ground water at 450', at approximately 2,681 meters away from our location, with the closest well being at 852' deep at approximately 1,996 meters away from the location, according to the New Mexico Office of the State Engineer site. We will work to supply you with the updates for 2RP-3905 and 2RP-3362 by 11/10 as requested, but would still like for the NMOCD to consider our work order as proposed for 2RP-3990.

Thanks,

Brett Fulks
EHS Representative

Devon Energy Corporation

6488 Seven Rivers Highway
Artesia, New Mexico 88210
575 748 1844 Direct
432 301 3223 Mobile



From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Monday, October 16, 2017 2:29 PM
To: Fulks, Brett <Brett.Fulks@dvn.com>; DeLaRosa, Dana <Dana.DeLaRosa@dvn.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; agroves@slo.state.nm.us
Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>
Subject: RE: [EXTERNAL] RE: Cotton Draw Unit 181 SWD_60BBL PW_9.5.2017

Brett/Mike,

I recall where we left off on the proposal for 2RP-3990 and it is stagnated as you mentioned but OCD has not changed it's position much on requests for flushing especially for locations where protectable groundwater is present. With that being said, Devon's best move forward with this project would be to reconsider their proposal and provide an alternative proposal which offers a different method of treatment for this location.

We look forward to seeing what else you have in mind. Please remit an alternative proposal for case 2RP-3990, as well as the closure reports for the other cases 2RP-3362 and 2RP-3905 by no later than 11/10/17.

Thank you,

Crystal Weaver

Environmental Specialist

OCD – Artesia District II

811 S. 1st Street

Artesia, NM 88210

Office: 575-748-1283 ext. 101

Cell: 575-840-5963

Fax: 575-748-9720

From: Fulks, Brett [mailto:Brett.Fulks@dvn.com]

Sent: Monday, October 16, 2017 1:26 PM

To: Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; DeLaRosa, Dana <Dana.DeLaRosa@dvn.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; agroves@slo.state.nm.us

Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>

Subject: RE: [EXTERNAL] RE: Cotton Draw Unit 181 SWD_60BBL PW_9.5.2017

Crystal,

For 2RP-3990, what is the status of our most recent proposal? The last communication I had with you on this was that the NMOCD was looking at our proposal and would let us know how they decided to handle it. The document you have attached for this RP is the very first iteration of this, after we proposed a different off pad approach and haven't received anything from the NMOCD in writing since 3/31/2017 as attached, when Mike said that the OCD would need time to review and comment on the proposal. I know that you and I have spoken on the phone since then at least once

and it was my understanding that the NMOCD was still determining how to handle remediation proposals such as this.

As far as 3P-3362, due to 2RP-3990's release being over the top of 3P-3362 and the delineation done there, this work has been completed, we just need to work with Talon to get you a closure report on this, I apologize for the oversight on this.

As far as 2RP-3905, we had Talon working on this and I'm not seeing where we got our initial work plan for that release submitted to you. This was all contained to a ROW with a ton of piping in it, Mike and I can follow up with Talon on this, thank you for bringing these to our attention.

Thanks,

Brett Fulks
EHS Representative

Devon Energy Corporation

6488 Seven Rivers Highway
Artesia, New Mexico 88210
575 748 1844 Direct
432 301 3223 Mobile



From: Weaver, Crystal, EMNRD [<mailto:Crystal.Weaver@state.nm.us>]
Sent: Thursday, October 12, 2017 12:53 PM
To: DeLaRosa, Dana <Dana.DeLaRosa@dvn.com>; Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; agroves@slo.state.nm.us
Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>; Fulks, Brett <Brett.Fulks@dvn.com>
Subject: [EXTERNAL] RE: Cotton Draw Unit 181 SWD_60BBL PW_9.5.2017

RE: Devon * Cotton Draw Unit SWD #181 * 30-015-41649 * 2RP-4407

Dana,

I have included a scanned copy of the signed Initial C-141 Remediation Permit along with an attached Conditions of Approval. The OCD tracking number for this event is 2RP-4407. Please remit a

site characterization plan or advise OCD of plan of action by no later than 10/19/17.

Please note: I was searching in our records for any other open cases on file for this API location and I located quite a few. 2RP-3362 is the oldest case on file and the last document we have on record for it is an approval of a work plan in 5/2016. Then we have 2RP-3905 with only an initial C-141 on file and nothing else done since and this release is from 9/2016. Also 2RP-3990 remains open, which I am thinking you may need to get with Brett Fulks regarding this one. **Please provide Devon's plan of action by no later than 10/31/17 on how they propose to move these projects forward.**

Thank you,

Crystal Weaver

Environmental Specialist
OCD – Artesia District II
811 S. 1st Street
Artesia, NM 88210
Office: 575-748-1283 ext. 101
Cell: 575-840-5963
Fax: 575-748-9720

From: DeLaRosa, Dana [<mailto:Dana.DeLaRosa@dvn.com>]

Sent: Tuesday, September 19, 2017 1:16 PM

To: Bratcher, Mike, EMNRD <mike.bratcher@state.nm.us>; Weaver, Crystal, EMNRD <Crystal.Weaver@state.nm.us>; agroves@slo.state.nm.us

Cc: Shoemaker, Mike <Mike.Shoemaker@dvn.com>; Fulks, Brett <Brett.Fulks@dvn.com>

Subject: Cotton Draw Unit 181 SWD_60BBL PW_9.5.2017

Good Afternoon,

Attached is the Initial C141 and GIS Image for the 60BBL produced water release that occurred on 9-5-2017 at the Cotton Draw Unit 181 SWD. The red dot on the GIS Image represents the approximate origin of release.

Thank you and have a great day,

Dana DeLaRosa

Field Admin Support
Production
B-Schedule

Devon Energy Corporation
PO Box 250
Artesia, NM 88211
575 746 5594



Confidentiality Warning: This message and any attachments are intended only for the use of the intended recipient(s), are confidential, and may be privileged. If you are not the intended recipient, you are hereby notified that any review, retransmission, conversion to hard copy, copying, circulation or other use of all or any portion of this message and any attachments is strictly prohibited. If you are not the intended recipient, please notify the sender immediately by return e-mail, and delete this message and any attachments from your system.