



# ENVIROTECH

ENGINEERING & CONSULTING, INC.

2500 North Eleventh Street ■ Enid, OK 73701 ■ (580) 234-8780 ■ Fax (580) 237-4302 ■ [www.envirotechconsulting.com](http://www.envirotechconsulting.com)

June 17<sup>th</sup>, 2020

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

**Re: Devon Energy Greenclean Big XL Containment and Recycling Facility C-147 Extension**

To Whom It May Concern:


On behalf of Devon Energy, ENVIROTECH ENGINEERING & CONSULTING, INC. respectfully submits the enclosed C-147 form and summary of monthly inspections and leak detection for the Greenclean Big XL Containment. For original site plans and submittals, please refer to the facility's original registration application, OCD Registration number 1RF-003, received June 19<sup>th</sup>, 2015. In accordance with NMAC 19.15.34.10 RECYCLING CONTAINMENTS, Devon Energy wishes to seek a one-year extension to the facility.

#### NMAC 19.15.34.10 RECYCLING CONTAINMENTS

C. Registered recycling containments may be operated for five years from the date on which the registration is filed with the division. The operator may extend the allowed time on an annual basis thereafter with division approval if, 30 days prior to the registration expiration, the operator files a form C-147 with an attached summary showing all monthly inspections at the containment, including the monitoring of the leak detection system, showing the containment's integrity has not been compromised.

Should you have any questions or require additional information, please do not hesitate to contact me at your convenience.

Sincerely,  
ENVIROTECH ENGINEERING & CONSULTING, INC.

  
Jimmy Stallings, P.E.  
President



#### Enclosures

Updated C-147 Form  
Summary of Monthly Inspections and Leak Detection Reports

020193-00

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

Form C-147  
Revised April 3, 2017

## Recycling Facility and/or Recycling Containment

Type of Facility: ☒ Recycling Facility ☒ Recycling Containment\*  
Type of action: ☒ Permit ☐ Registration  
☐ Modification ☒ Extension  
☐ Closure ☐ Other (explain) \_\_\_\_\_

\* At the time C-147 is submitted to the division for a Recycling Containment, a copy shall be provided to the surface owner.

Be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Devon Energy Corporation (For multiple operators attach page with information) OGRID #: 6137  
Address: 333 West Sheridan, Oklahoma City, Oklahoma 737102-8260  
Facility or well name (include API# if associated with a well): Greenclean Big XL Containment and Recycling Facility  
OCD Permit Number: 1RF-003 (For new facilities the permit number will be assigned by the district office)  
U/L or Qtr/Qtr Section 35 Township 23 South Range 33 East County: Lea  
Surface Owner: ☐ Federal ☒ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☒ **Recycling Facility:**  
Location of recycling facility (if applicable): Latitude 32.2657 Longitude -103.5378 NAD83  
Proposed Use: ☒ Drilling\* ☒ Completion\* ☒ Production\* ☒ Plugging \*  
*\*The re-use of produced water may NOT be used until fresh water zones are cased and cemented*  
☐ Other, *requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.*  
☒ Fluid Storage  
☒ Above ground tanks ☒ Recycling containment ☐ Activity permitted under 19.15.17 NMAC explain type \_\_\_\_\_  
☐ Activity permitted under 19.15.36 NMAC explain type: \_\_\_\_\_ ☐ Other explain \_\_\_\_\_  
☐ For multiple or additional recycling containments, attach design and location information of each containment  
☐ **Closure Report (required within 60 days of closure completion):** ☐ Recycling Facility Closure Completion Date: \_\_\_\_\_

3.  
☒ **Recycling Containment:**  
☐ Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)  
Center of Recycling Containment (if applicable): Latitude 32.26573079 Longitude -103.53789065 NAD83  
☐ For multiple or additional recycling containments, attach design and location information of each containment  
☒ Lined ☒ Liner type: Thickness 30 mil (secondary) 60-mil (primary) ☒ LLDPE ☒ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☒ String-Reinforced  
Liner Seams: ☒ Welded ☒ Factory ☒ Other Field Welds Volume: 285,991 bbl Dimensions: L 400 x W 400 x D 18  
☐ Recycling Containment Closure Completion Date: \_\_\_\_\_

4.

**Bonding:**

- ☒ Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (**These containments are limited to only the wells owned or operated by the owners of the containment.**)
- ☐ Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ \_\_\_\_\_ (**work on these facilities cannot commence until bonding amounts are approved**)
- ☐ Attach closure cost estimate and documentation on how the closure cost was calculated.

5.

**Fencing:**

- ☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet
- ☒ Alternate. Please specify Chain Link Game Fence

6.

**Signs:**

- ☒ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

7.

**Variances:**

Justifications and/or demonstrations that the proposed variance will afford reasonable protection against contamination of fresh water, human health, and the environment.

*Check the below box only if a variance is requested:*

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval. If a Variance is requested, include the variance information on a separate page and attach it to the C-147 as part of the application.

**If a Variance is requested, it must be approved prior to implementation.**

8.

**Siting Criteria for Recycling Containment**

*Instructions: The applicant must provide attachments that demonstrate compliance for each siting criteria below as part of the application. Potential examples of the siting attachment source material are provided below under each criteria.*

**General siting**

**Ground water is less than 50 feet below the bottom of the Recycling Containment.**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☒ No  
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

☐ Yes ☒ No  
☐ NA

- Written confirmation or verification from the municipality; written approval obtained from the municipality

Within the area overlying a subsurface mine.

☐ Yes ☒ No

- Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division

Within an unstable area.

☐ Yes ☒ No

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map

Within a 100-year floodplain. FEMA map

☐ Yes ☒ No

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

☐ Yes ☒ No

- Topographic map; visual inspection (certification) of the proposed site

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

☐ Yes ☒ No

- Visual inspection (certification) of the proposed site; aerial photo; satellite image

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

☐ Yes ☒ No

- NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site

Within 500 feet of a wetland.

☐ Yes ☒ No

- US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site

9.

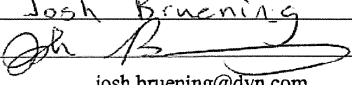
**Recycling Facility and/or Containment Checklist:***Instructions: Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.*

- ☒ Design Plan - based upon the appropriate requirements.
- ☒ Operating and Maintenance Plan - based upon the appropriate requirements.
- ☒ Closure Plan - based upon the appropriate requirements.
- ☒ Site Specific Groundwater Data -
- ☒ Siting Criteria Compliance Demonstrations -
- ☒ Certify that notice of the C-147 (only) has been sent to the surface owner(s)

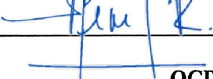
10.

**Operator Application Certification:**

I hereby certify that the information and attachments submitted with this application are true, accurate and complete to the best of my knowledge and belief.

Name (Print): Josh Bruening Title: Completions Engineer  
 Signature:  Date: 6/17/2020  
 e-mail address: josh.bruening@dvn.com Telephone: (405) 552-7882

11.

OCD Representative Signature: Victoria Venegas  Approval Date: 01/27/2021  
 Title: Environmental Specialist OCD Permit Number: 1RF-3

- ☐ OCD Conditions
- ☒ Additional OCD Conditions on Attachment

Devon Energy  
GreenClean Big XL Containment and Recycling Facility  
OCD Registration Number 1RF-003

DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
9/15/2015							
10/26/2015							
11/16/2015							
1/10/2016							
1/19/2016							
3/15/2016						X	Slight erosion on south side outer wall
3/22/2016						X	Slight erosion on south side outer wall
3/30/2016						X	Slight erosion on south side outer wall
4/6/2016						X	Slight erosion on south side outer wall
4/14/2016						X	Slight erosion on south side outer wall
4/20/2016						X	Slight erosion on south side outer wall
4/26/2016						X	Slight erosion on south side outer wall
5/3/2016						X	
5/11/2016						X	Slight erosion on south side outer wall
5/17/2016						X	Slight erosion on south side outer wall
5/24/2016							Note of fresh water in sump
5/31/2016							
6/7/2016							
6/13/2016							
6/23/2016							
6/28/2016							
7/8/2016							Added sand bags
7/20/2016							
7/26/2016							
8/3/2016							
8/10/2016							
8/26/2016							
9/1/2016							
9/8/2016							
9/15/2020							
9/27/2016							
10/6/2016							
10/12/2016							
10/18/2016							
10/27/2016							
10/31/2016							
11/21/2016							
11/28/2016							
12/9/2016						X	Small erosion
12/17/2016						X	Small erosion
12/26/2016							
1/2/2017							

Devon Energy  
GreenClean Big XL Containment and Recycling Facility  
OCD Registration Number 1RF-003

DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
1/9/2017							
1/16/2017							
1/23/2017							
1/30/2017							
2/6/2017							
2/13/2017							
2/20/2017							
2/27/2017							
3/6/2017							
3/13/2017							
3/20/2017							
3/27/2017							
4/3/2017							
4/10/2017							
4/17/2017							
4/24/2017							
5/5/2017							
5/12/2017							
5/19/2017							
5/24/2017							
6/2/2017							
6/9/2017							
6/15/2017							
6/23/2017							
6/30/2017							
7/8/2017							
7/13/2017							
7/21/2017							
7/27/2017							
8/4/2017							
8/10/2017							
8/16/2017							
8/24/2017							
9/1/2017							
9/7/2017							
9/15/2017							
9/21/2017							
9/29/2017							
10/6/2017							
10/12/2017							
10/24/2017							
11/2/2017							

Devon Energy  
GreenClean Big XL Containment and Recycling Facility  
OCD Registration Number 1RF-003

DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
11/9/2017							
11/16/2017							
11/25/2017							
12/1/2017							
12/8/2017							
12/14/2017							
12/22/2017							
12/30/2017							
1/5/2018							
1/12/2018							
1/19/2018							
1/26/2018							
2/2/2018							
2/9/2018							
2/16/2018							
2/23/2018							
3/2/2018							
3/9/2018							
3/16/2018							
3/23/2018							
3/30/2018							
4/6/2018							
4/13/2018							
4/20/2018							
4/27/2018							
5/4/2018							
5/11/2018	4.0						
5/18/2018	4.0						
5/25/2018	8.6						
6/1/2018	8.0						
6/8/2018	6.0						
6/15/2018	2.0						
6/22/2018	5.0						
6/29/2018	2.0						
7/6/2018	3.0						
7/13/2018	3.0						
7/20/2018	3.0						
7/27/2018							
8/3/2018							
8/10/2018							
8/17/2018	6.5						
8/24/2018	2.0						

Devon Energy  
GreenClean Big XL Containment and Recycling Facility  
OCD Registration Number 1RF-003

DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
8/31/2018							
9/7/2018							
11/19/2018	9.5						
11/27/2018	12.5						Ratchet strap used to hold up fence for layflat
12/3/2018	9.5						
12/10/2018	9.5						
12/17/2018	9.5						
12/28/2018	9.5						
1/1/2019	9.5						
1/7/2019							
1/14/2019	9.5						
1/21/2019	9.5						
1/28/2019							
2/4/2019	9.0						
2/11/2019	3.5						
2/18/2019	3.5						
2/25/2019							
3/4/2019	3.0						
3/11/2019	3.5						WTX used strap to bend fence
3/18/2019	6.0						WTX has area pulled up for hose
3/25/2019	7.0						Fence pulled up with ratchet for layflat
4/1/2019	9.0						
4/8/2019	11.0						Fence bent up for layflat
4/15/2019	11.0						Fence bent up for layflat
4/22/2019	8.0						Fence bent up for layflat
4/29/2019	9.0						
5/6/2019	11.5						
5/13/2019	9.5						
5/20/2019	2.0						
5/27/2019	5.0						
6/3/2019	7.0						
6/10/2019							Fence bent for layflat
6/17/2019	10.0						Fence bent for layflat
6/24/2019							Fence bent for layflat
7/1/2019	11.5						Fence bent for layflat
7/8/2019	11.5						
8/2/2019	4.0						
8/15/2019	4.0						
8/23/2019	14.0						
9/6/2019	14.0						
9/13/2019							
9/20/2019	3.0						



Devon Energy  
GreenClean Big XL Containment and Recycling Facility  
OCD Registration Number 1RF-003

DATE	Fluid Level	SCADA ISSUES	BIRD DETERRENT ISSUES	FLUID IN LEAN DETECTION	FENCE ISSUES	BERM OR LINER ISSUES	SITE VISIT NOTES
10/3/2019	5.0						
10/11/2019	4.0						
10/25/2019	4.0						
11/8/2019	3.0						
12/13/2019	3.0						
12/27/2019							
1/7/2020	3.0						
1/14/2020	3.0						
1/31/2020	3.0						
2/7/2020	3.0						
2/14/2020	2.0						
2/21/2020	2.0						
2/28/2020	3.0						
3/6/2020	3.0						
3/13/2020	6.0						
3/20/2020	6.0						
3/27/2020	6.0						
4/3/2020							
4/10/2020	5.0						
4/17/2020	7.0						
4/24/2020	6.0						
5/1/2020	4.0						
5/8/2020	3.0						
5/15/2020	3.0						
5/22/2020	3.0						
5/29/2019	2.0						