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** Department

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

July 21, 2008

Form C-144 CLEZ

For closed-loop systems that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, submit to the appropriate NMOCD District Office.

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Closed-Loop System Permit or Closure Plan Application

(that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

Type of action: Permit Closure

Instructions: Please submit one application (Form C-144 CLEZ) per individual closed-loop system request. For any application request other than for a closed-loop system that only use above ground steel tanks or haul-off bins and propose to implement waste removal for closure, please submit a Form C-144.

Please 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 No.						
does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.						
Operator: DEVON ENERGY PRODUCTION COMPANY, L.P. OGRID #: 06137 011 COMS. DIV.						
Address: P.O. BOX 6459, Navajo Dam, NM 76419						
Facility or well name: Northeast Blanco Unit #432A						
API Number: 30.045-35142 OCD Permit Number: KGVD MHT 3 10						
U/L or Qtr/Qtr H Section 7 Township 30-N Range 07-W County: San Juan						
Center of Proposed Design: Latitude Longitude NAD: 1927 1983						
Surface Owner: Federal State Private Tribal Trust or Indian Allotment						
2.						
Closed-loop System: Subsection H of 19.15.17.11 NMAC						
Operation: Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent) P&A						
Above Ground Steel Tanks or Haul-off Bins						
Simple Gibbs (C. C1015 17 11 DMAC)						
Signs: Subsection C of 19.15.17.11 NMAC because the location, and emergency telephone numbers						
Signed in compliance with 19.15.3.103 NMAC						
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC						
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are						
attached. Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC						
Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC						
Closure Plan (Please complete Box 5) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC						
Previously Approved Design (attach copy of design) API Number:						
Previously Approved Operating and Maintenance Plan API Number:						
5. W. 4 D. 4 C. 4 C. 4 C. 4 C. 4 C. 4 C. 4 C						
Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC) Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two						
facilities are required.						
Disposal Facility Name: Envirotech Disposal Facility Permit Number: NM-01-0011						
Disposal Facility Name: See attached Company SWD wells Disposal Facility Permit Number:						
Will any of the proposed closed-loop system operations and associated activities occur on or in areas that will not be used for future service and operations? Yes (If yes, please provide the information below) No						
Required for impacted areas which will not be used for future service and operations: Soil Backfill and Cover Design Specifications based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC Re-vegetation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC						

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6. Operator Application Certification:						
I hereby certify that the information submitted with this application is true, accura	te and complete to the	e best of my knowledge and belief.				
Name (Print): Mike Pippin	Title: <u>Pe</u>	troleum Engineer				
Signature: Mike Esper	Date:	April 28, 2010				
e-mail address: mike@pippinllc.com	Telephone:	505-327-4573				
7. OCD Approval: Permit Application (including closure plan) Closure Plan (only)						
OCD Representative Signature: Boll Selle		Approval Date: 6/2/10				
Title: Envirolspec	OCD Permit Numb	er:				
8. Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed. Closure Completion Date:						
5. Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.						
Disposal Facility Name:	Disposal Facility Pe	rmit Number:				
Disposal Facility Name:	Disposal Facility Permit Number:					
Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations? Yes (If yes, please demonstrate compliance to the items below) \sum No						
Required for impacted areas which will not be used for future service and operations: Site Reclamation (Photo Documentation) Soil Backfilling and Cover Installation Re-vegetation Application Rates and Seeding Technique						
Operator Closure Certification: I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.						
Name (Print):	Title:					
Signature:	Date:					
e-mail address:	Telephone:					

DEVON ENERGY PRODUCTION COMPANY, L.P. Northeast Blanco Unit #432A Closed Loop Drilling & Completion Plans

Devon's closed loop system will not entail a drying pad, temporary pit, below grade tank or sump. It will include above ground tanks suitable for holding the cuttings and fluids for drilling and completion rig operations. The tank will be sufficient volume to maintain a safe free board between disposal of the liquids and solids from rig operations.

- 1. Fencing is not required for an above ground closed-loop system.
- 2. It will be signed in compliance with 19.15.3.103 NMAC
- 3. Frac tank(s) will be on location to store fresh water/KCL/returns

Closed-loop Operating and Maintenance Plan

Devon's closed-loop tank will be operated and maintained to contain liquids and solids in order to prevent contamination of fresh water sources, in order to protect public health and the environment. To ensure the operation is maintained the following steps will be followed:

1. The liquids will be vacuumed out and disposed of in the company disposal wells:

Middle Mesa SWD #2	SWD-441
Middle Mesa SWD #1	SWD-365
Simms Mesa SWD #1	SWD-339
Pump Mesa SWD #1	SWD-366

Solids in the closed-loop tanks will be vacuumed out and disposed of at Envirotech. (Permit #NM-01-0011) on a periodic basis to prevent over topping.

- 2. No hazardous waste, miscellaneous solid waste or debris will be discharged into or stored in the tank. Only fluids or cuttings used or generated by workover rig operations will be placed or stored in the tank.
- 3. The NMOCD Division District Office will be notified within 48 hours of the discovery of compromised integrity of the closed loop tank. Upon the discovery of the compromised tank, repairs will be enacted immediately.
- 4. All of the above operations will be inspected and a log will be signed and dated. During workover rig operations, the inspection will be daily.

Closed-loop Closure Plan

The closed-loop tank will be closed in accordance with 19.15.17.13. This will be done by transporting cuttings and all remaining sludges to Envirotech. (Permit #NM-01-0011) immediately following rig operations. All remaining liquids will be transported and disposed of in the aforementioned company disposal wells. The tanks will be removed from the location as part of the rig move. At time of well abandonment, the site will be reclaimed and re-vegetated to pre-existing conditions when possible. If area off the location is affected, it will be restored and re-vegetated upon completion of the work over project.