



January 14, 2026

**New Mexico Oil Conservation Division**

506 W. Texas Ave  
Artesia, NM 88210

RE: **ROSS DRAW UNIT #044H - Closure Request Report**

Incident Number: nAPP2529330869

GPS: 32.0347443°, -103.8758621°

Eddy County, New Mexico

ESRR Project No. VP-7643

To Whom It May Concern:

Earth Systems Response and Restoration (ESRR), presents the following Closure Request Report (CRR) to document the findings during a recent liner inspection conducted at ROSS DRAW UNIT #044H (Site) following an inadvertent release of produced water and crude oil within a lined secondary containment (LSC). Based on initial release response and liner inspection activities, WPX Energy Permian (WPX) is requesting No Further Action (NFA) at the Site.

**Site Location**

The Site is located in Unit D, Section 22, Township 26 South, Range 30 East, in Eddy County, New Mexico (32.0347443°, -103.8758621°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM) (**Figure 1**).

**Incident Description & Background**

On October 17, 2025, a surface flow line failed due to corrosion, releasing approximately 5 barrels (bbls) of produced water and 1 bbl of crude oil within a LSC (**Figure 2**). The release was fully contained within the LSC with no fluids escaping to the production pad or adjacent native soils. A vacuum truck was immediately dispatched to the Site recovering all fluids.

Notice was given to the New Mexico Oil Conservation Division (NMOCD) on October 20, 2025, by Notification of Release (NOR) and subsequently assigned Incident Number nAPP2529330869. A Corrective Action Form C-141 (Form C-141) was later submitted and approved by the NMOCD on October 27, 2025.

On November 24, 2025, WPX submitted a 48-hour Notification of Liner Inspection (Form C-141 L) for November 26, 2025.

**Site Characterization**

ESRR characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). The following proximities were estimated:

- Between ½ and 1 mile of any continuously flowing watercourse or any other significant watercourse;
- Between 1,000 feet and ½ mile of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- Greater than 5 miles of any occupied permanent residence, school, hospital, institution or church;

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- Between 1 and 5 miles of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between 1 and 5 miles of any other freshwater well or spring;
- Greater than 5 miles of any incorporated municipal boundary or a defined municipal fresh water well field covered under a municipal ordinance;
- Between 1,000 feet and ½ mile of any wetland;
- Greater than 5 miles of any subsurface mine;
- Between 1,000 feet and ½ mile of an unstable area (non-karst) and
- Between ½ and 1 mile of a 100-year floodplain.

During November 2025, Southwest Geophysical Consulting, LLC (SWC) performed an Environmental Karst Study (EKS). Based on the results from the EKS Report, SGC determined the following:

- *“No surface karst features exist within 200 feet (61 meters) of the spill delineation boundary.*
- *No anomalies consistent with subsurface air- or water-filled voids were found within the RD44 geophysical survey area, indicating the zone beneath the geophysical survey is not subject to collapse.*
- *Moderately well-layered stratigraphy is interpreted to exist beneath the area where the geophysical survey was conducted, indicating stable ground within the 200-foot survey boundary.”*

Receptor details used to determine the Site characterization are included in **Figure 3** and **Figure 4**. The **Environmental Karst Study Report** and **Referenced Well Records** for the closest depth to water well is attached.

Based on SGC’s EKS Report and DTW estimated to be greater than 100 feet below ground surface (bgs), the following Closure Criteria was applied:

<b>Constituents of Concern (COCs)</b> .....	<b>Closure Criteria<sup>‡</sup></b>
Chloride .....	20,000 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH) .....	2,500 mg/kg
TPH (GRO)+ TPH (DRO) .....	1,000 mg/kg
Benzene .....	10 mg/kg
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX) ...	50 mg/kg

<sup>‡</sup>The reclamation concentration requirements of 600 mg/kg Chloride and 100 mg/kg TPH apply to the top 4 feet of areas to be immediately reclaimed following remediation pursuant to NMAC 19.15.17.13.  
 TPH= Gasoline Range Organics (GRO) + Diesel Range Organics (DRO) + Oil Range Organics (ORO)  
 Laboratory Analytical Methods used: Environmental Protection Agency (EPA) 300.0, EPA 8015 NM, EPA 8021 B

**Liner Inspection**

On November 26, 2025, ESRR conducted a thorough visual inspection of the LSC and found no tears, cracks, cuts, breaks, or other signs of damage, confirming no evidence of a breach to the LSC. The liner appeared to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

**Closure Request**

Based on initial release response and liner inspection activities, WPX believes the completed remedial actions meet the requirements set forth in NMAC 19.15.29.13 regulations in order to be protective of human health, the environment, and groundwater. WPX believes NFA is warranted at the Site and respectfully requests Closure for Incident Number nAPP2529330869. If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or [gmoreno@earthsys.net](mailto:gmoreno@earthsys.net). **NMOCD Documentation & Correspondence** is attached.

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Sincerely,

**EARTH SYSTEMS RESPONSE & RESTORATION**

A handwritten signature in black ink, appearing to read "Gilbert Moreno".

Gilbert Moreno  
Carlsbad Operations Manager/ Project Geologist

A handwritten signature in black ink, appearing to read "Kris Williams".

Kris Williams, CHMM, REM  
Principal

cc: Jim Raley, WPX Energy Permian  
Bureau of Land Management

Attachments:

- Figure 1 - Site Map
- Figure 2 - Release Extent
- Figure 3 - Groundwater
- Figure 4 - Karst Potential
- Referenced Well Records
- Photographic Documentation
- Environmental Karst Study Report
- NMOCD Documentation & Correspondence



**Figure 1 – Site Map**

WPX Energy – ROSS DRAW UNIT #044H  
 GPS: 32.0347443, -103.8758621  
 Eddy County, New Mexico





**Figure 2 – Release Extent**

WPX Energy – ROSS DRAW UNIT #044H  
GPS: 32.0347443, -103.8758621  
Eddy County, New Mexico



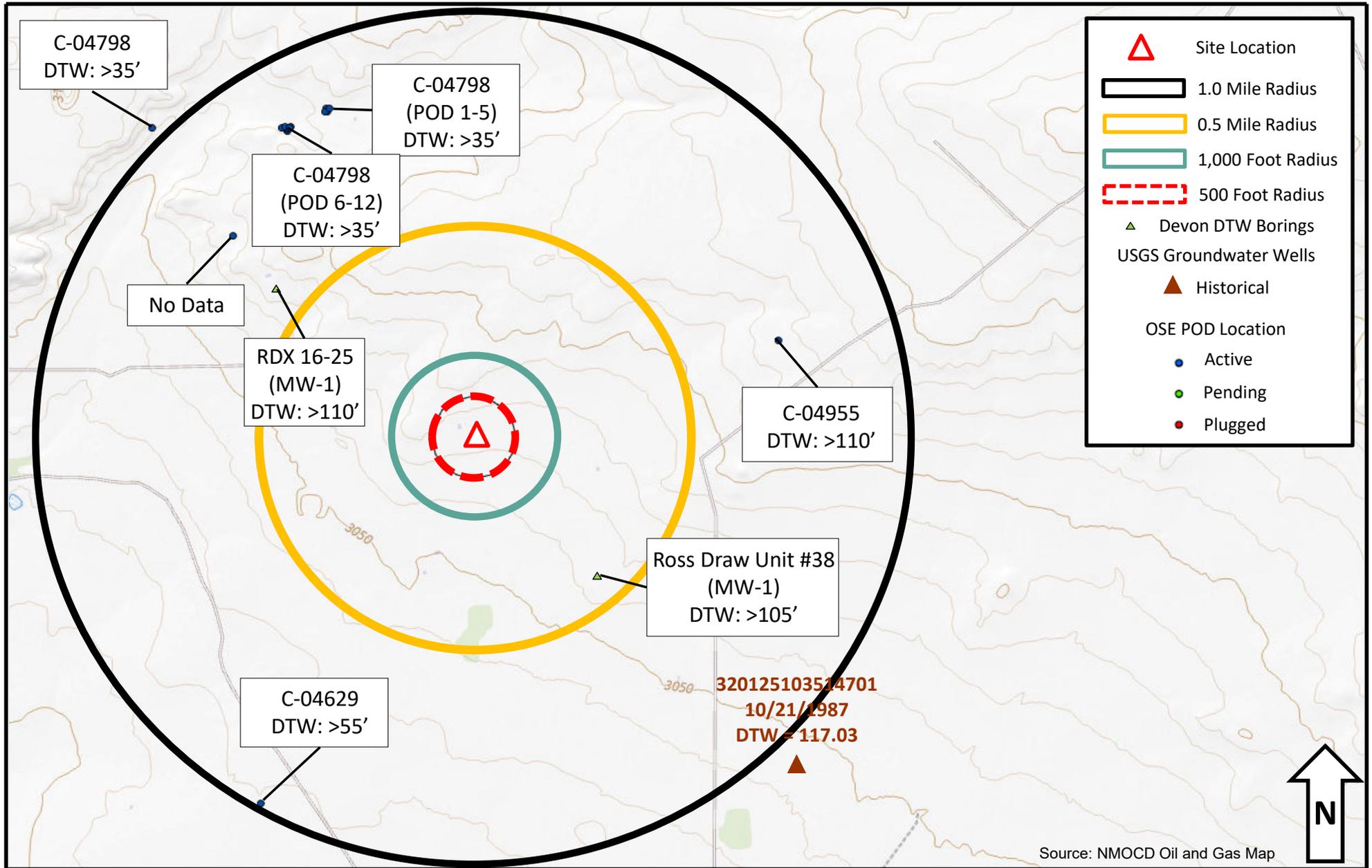
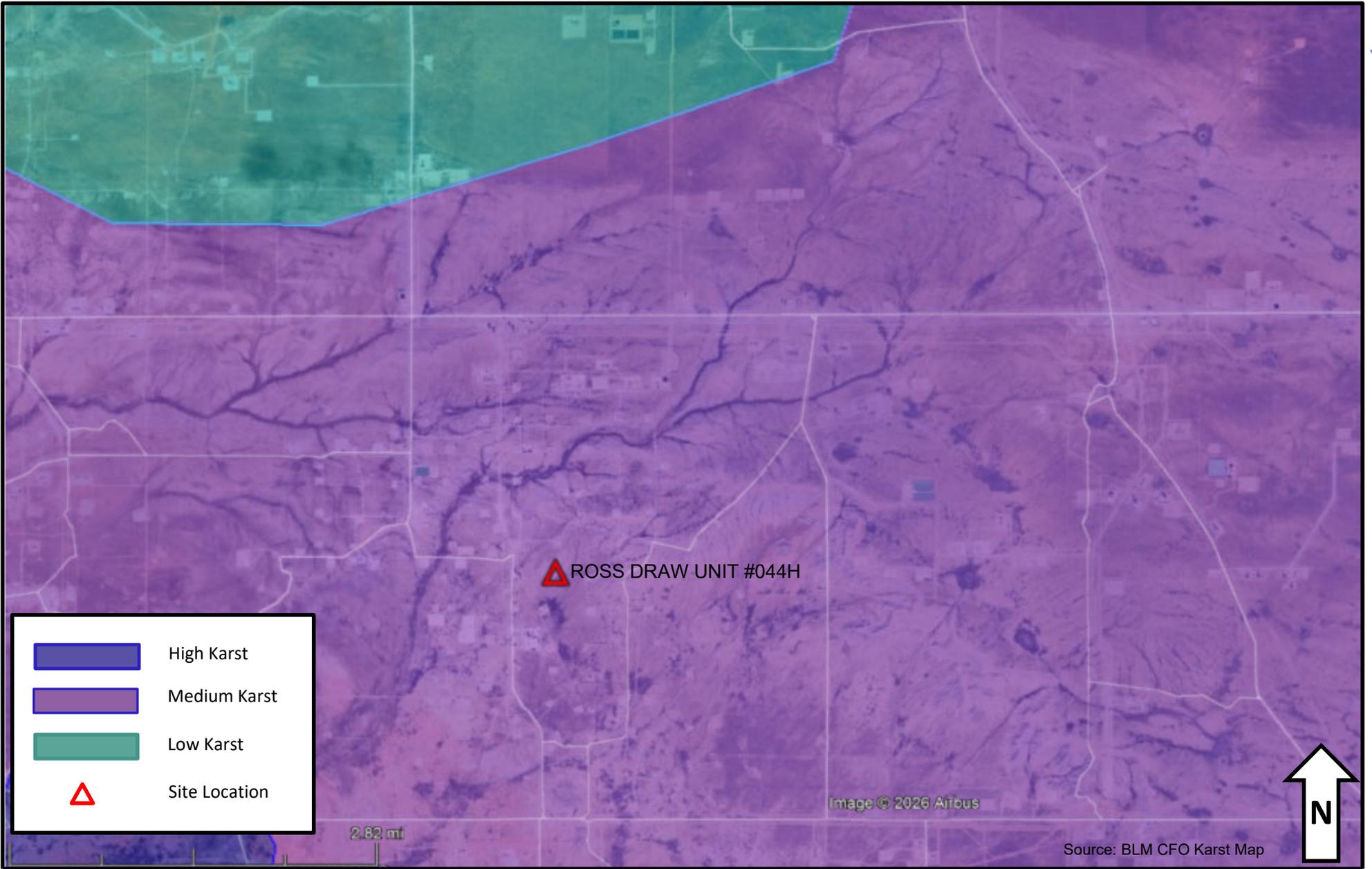


Figure 3 – Groundwater

WPX Energy – ROSS DRAW UNIT #044H  
 GPS: 32.0347443, -103.8758621  
 Eddy County, New Mexico



**Figure 4 – Karst Potential**

WPX Energy – ROSS DRAW UNIT #044H  
GPS: 32.0347443, -103.8758621  
Eddy County, New Mexico



							BORING LOG/MONITORING WELL COMPLETION DIAGRAM													
Drilling Method: Air Rotary							Sampling Method: None			Boring/Well Number: MW-1			Location: Ross Draw Unit #38							
Gravel Pack Type: 10/20 Sand							Gravel Pack Depth Interval: 3 Bags			Date: 12/8/2020			Client: WPX Energy							
Casing Type: PVC							Diameter: 2-inch		Depth Interval: 0-100 feet bgs		Logged By: J. Linn, PG			Drilled By: Talon LPE						
Screen Type: PVC							Slot: 0.010-inch		Diameter: 2-inch		Depth Interval: 100-105 ft		Boring Total Depth (ft. BGS): 105		Seal Type: None		Seal Depth Interval: None		Latitude: 32.030300	
											Well Total Depth (ft. BGS): 105		Longitude: -103.871338		Depth to Water (ft. BTOC): > 105		DTW Date: 12/16/2020			
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks				Well Completion							
0	NM	L	D	N	N	NM	SW	NS	Pale orange/pale pink to buff colored fine sand with minor medium and coarse sand											
5																				
10																				
15																				
20	NM	L	D	N	N	NM	SP	NS	Pale orange/pale pink poorly graded fine sand											
25																				
30																				
35	NM	L	D	N	N	NM	SP	NS	Tan/pale brown/pale orange poorly graded fine sand											
40																				
45																				
50																				
55																				
60																				
65	NM	L	D	N	N	NM	SP	NS	Brick red brown poorly graded fine sand											
70																				
75																				
80																				
85																				
90	NM	L	D	N	N	NM	SP	NS	Tan/pale brown/pale orange poorly graded fine sand - TD 105' BGS											
95																				
100	NM	L	D	N	N	NM	SP	NS												

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**PHOTO 1:** Southwestern view during initial site assessment. 10/21/2025



**PHOTO 2:** Southeastern view during initial site assessment. 10/21/2025

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PHOTO 3: Southwestern view outside of containment during liner inspection activities. 11/26/2025



PHOTO 4: Southwestern view outside of containment during liner inspection activities. 11/26/2025

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PHOTO 5: Eastern view outside of containment during liner inspection activities. 11/26/2025



PHOTO 6: Southern view outside of containment during liner inspection activities. 11/26/2025

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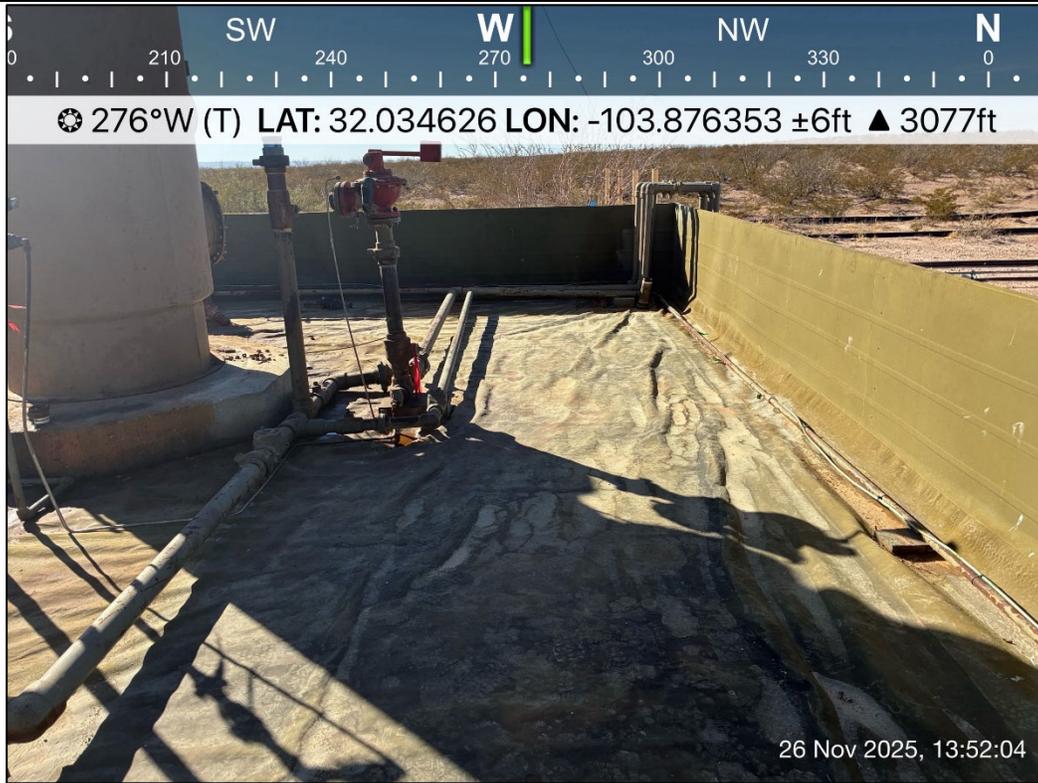


PHOTO 7: Western view during liner inspection activities. 11/26/2025



PHOTO 8: Southeastern view during liner inspection activities. 11/26/2025

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PHOTO 9: Northwestern view during liner inspection activities. 11/26/2025



PHOTO 10: Southwestern view during liner inspection activities. 11/26/2025

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PHOTO 11: Northwestern view of location sign. 11/26/2025



**Southwest Geophysical Consulting, LLC**



**Environmental Karst Study Report  
Devon Ross Draw Unit No. 044H  
Eddy County, New Mexico**

**Prepared For:**

**Earth Systems, LLC  
1910 Resource Court  
Carlsbad, NM 88220**

**Within 200 feet of the spill delineation boundary:**

- Negative  Positive for surface karst
- Stable  Unstable Ground
- Karst Monitor Recommended

**November 11, 2025**

ESYS-003-20251028

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## 1.0 INTRODUCTION

This report was commissioned by Earth Systems, LLC (hereinafter referred to as "the client"), on October 28, 2025, for the purpose of conducting an environmental karst study within an area encompassing the Devon Ross Draw Unit No. 044H release site (hereinafter termed "RD44") centered at N 32.034756° W 103.876064°.

### 1.1 Goals of this Study

The goals of this study are to conduct a surface karst inventory and provide the client with the location and description of any surface karst features located within 200 feet (61 meters) of the spill delineation boundary (as defined by 19.15.29.12 NMAC<sup>[1]</sup>), and to determine whether stable ground exists (as defined by 19.15.2 NMAC Definitions<sup>[2]</sup>) within 200 feet of the spill delineation boundary of the Devon Ross Draw Unit No. 044H release as provided by the client via e-mail (**Release Extent-RDU 44.kmz**) on October 28, 2025, using electrical resistivity imaging<sup>[3]</sup>.

### 1.2 Summary of Findings

- **No surface karst features exist within 200 feet (61 meters) of the spill delineation boundary.**
- **No anomalies consistent with subsurface air- or water-filled voids were found within the RD44 geophysical survey area, indicating the zone beneath the geophysical survey is not subject to collapse.**
- **Moderately well-layered stratigraphy is interpreted to exist beneath the area where the geophysical survey was conducted, indicating stable ground within the 200-foot survey boundary.**

### 1.3 Affected Environment

The RD44 project site is located in evaporite karst terrain, a landform that is characterized by underground drainage through solutionally enlarged conduits. Evaporite karst terrain may contain sinkholes, sinking streams, caves, and springs. Sinkholes leading to underground drainages and voids are common. These karst features, as well as occasional fissures and discontinuities in the bedrock, provide the primary sources for rapid recharge of the groundwater aquifers of the region. Additionally, karst may develop by hypogene processes involving dissolution by upwelling fluids from depth independent of recharge from the overlying or immediately adjacent surface. Hypogene karst systems may not be connected to the surface and can remain undiscovered unless encountered during drilling or excavation.

Karst features are delicate resources that are often of geological, hydrological, biological, and archeological importance, and should be protected. The four primary concerns in these types of terrain are environmental issues, worker safety, equipment damage, and infrastructure integrity.

The Bureau of Land Management (BLM) categorizes all areas within the Carlsbad Field Office (CFO) zone of responsibility as having either low, medium, high, or critical cave potential based on geology, occurrence of known caves, density of karst features, and potential impacts to freshwater aquifers<sup>[4]</sup>. These designations are also recognized by the New Mexico State Land Office (NMSLO). This project occurs within a **MEDIUM** karst occurrence zone (MKOZ)<sup>[5]</sup> (**Figure 1**).

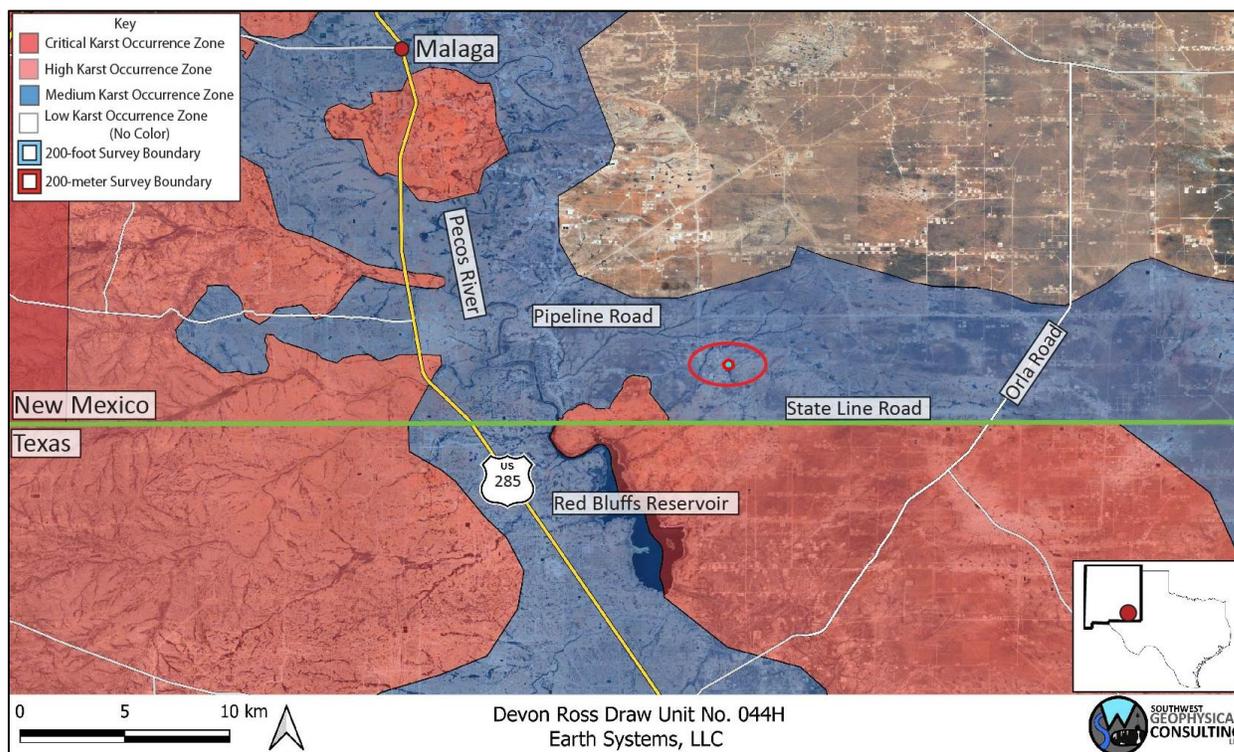


Figure 1: Karst occurrence zone overview. Background image credit: Google Earth. Image date: March 20, 2023. Image datum: WGS-84.

A medium karst occurrence zone is defined as an area in known soluble rock types that may have a shallow insoluble overburden. These areas may contain isolated karst features such as caves and sinkholes. Groundwater recharge may not be wholly dependent on karst features, but the karst features still provide the most rapid aquifer recharge in response to surface runoff <sup>[4]</sup>.

**Due to the rapidity with which evaporite karst develops, each location within a BLM-CFO-designated karst occurrence zone must be assessed on an individual basis to determine the existence of surface karst features and the possibility of sub-surface karst development each time a release occurs.**

#### **1.4 Limitations of Report**

This report should be read in full. No responsibility is accepted for the use of any part of this report in any other context or for any other purpose or by third parties. This report does not purport to give legal advice. Legal advice can only be given by qualified legal practitioners.

This report has been prepared for the use of Earth Systems, LLC, in accordance with generally accepted consulting practices. Every effort has been made to ensure the information in this report is accurate as of the time of its writing. This report has not been prepared for use by parties other than the client, their contracting party, and their respective consulting advisors. It may not contain sufficient information for the purposes of other parties or for other uses.

This report was prepared upon completion of the associated fieldwork using a standard template prepared by Southwest Geophysical Consulting and is based on information collected prior to fieldwork, conditions encountered on site, and data collected during the fieldwork and reviewed at the time of preparation. Southwest Geophysical Consulting disclaims responsibility for any changes that might have occurred at the site after this time. The interpreted results, locations, and depths noted in this report (if applicable) should be taken as an interpretation only and no decision should be based solely on this information. Physical verification of aerial imagery analysis results should be conducted in the field prior to using this information for remediation planning. Physical verification of geophysical results using geotechnical methods should be conducted.

To the best of our knowledge, the information contained in this report is accurate at the date of issue. Due to the nature of karst terrain, the information in this report shall not be used beyond two years past the date of the field work provided in section **2.3 Description of Survey**. Large weather events can shorten this time period as areas subject to karst development can rapidly form new features subsequent to these events.

## 2.0 LOCATION AND DESCRIPTION OF STUDY AREA

### 2.1 Description of Site

The site is located in Eddy County, New Mexico, 28.1 kilometers (17.5 miles) southeast of Malaga, east of the Pecos River, north of State Line Road, and south of Pipeline Road. The release area is located within section 22 of NM T26S R30E<sup>[6]</sup> (**Figure 1** and **Figure 2**). The region has rolling terrain with karstification occurring in the gypsite soils and underlying gypsum and dolomite bedrock<sup>[7]</sup> (see section **2.2 Local Geology Summary** for further information). The climate in this area of southeast New Mexico is semi-arid with an average annual precipitation of approximately 13 inches, of which about two-thirds falls as rain during summer thunderstorms from June to October. Summers are hot and sunny while winters are generally mild, with an average maximum temperature of 96°F in July and an average minimum temperature of 28°F in January<sup>[8]</sup>. This area is within the Chihuahuan Desert Thornscrub as defined by the Southwestern Regional ReGAP Vegetation map<sup>[9]</sup> and the vegetation consists mostly of areas of blue grama, nine-awned pappus grass, burro grass and low scrub including yucca. The spill delineation boundary is located within an MKOZ<sup>[5]</sup> (**Figure 1**) and within BLM-CFO-managed land<sup>[10]</sup> (**Figure 2**).

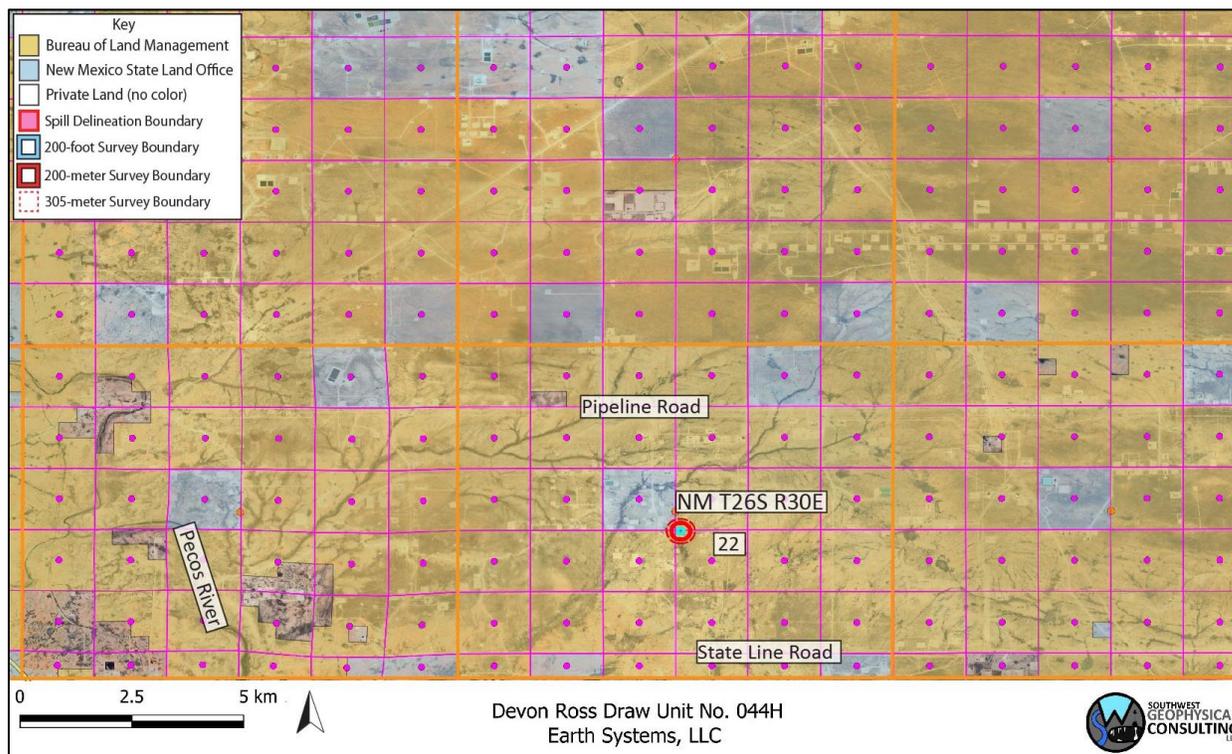


Figure 2: Land ownership and PLSS overview. Background image credit: Google Earth. Image date: March 20, 2023. Image datum: WGS-84.

## 2.2 Local Geology Summary

The site for the RD44 survey is located at an elevation of 939 meters (3,079 feet), ± 2 meters (6.6 feet). This region is entirely underlain by the Permian Rustler Formation (Pru). The area is mantled by thin gypsiferous soils (gypsite), Quaternary eolian deposits (Qe), and alluvium (Qal)<sup>[11]</sup> up to 5 meters in depth (**Figure 3**).

The Rustler Formation is an evaporite facies composed mainly of thin siltstones and sandstones interbedded with claystones, dolomite, and gypsum, and contains both karst-forming strata (the Forty-niner and Tamarisk members) and two shallow aquifers (the Magenta and Culebra Dolomite members)<sup>[12]</sup>.

The Pru overlies the Permian Salado Formation (Psl – not shown in the below image), a layer of extremely soluble halite which can readily dissolve to create caves, sinkholes, and other karst features; however, due to its extremely soluble nature, only non-soluble silt and sand remain from the dissolution of this layer at the surface<sup>[12]</sup>. The Rustler Formation may be subject to collapse if a void has developed beneath it in the Salado Formation<sup>[13]</sup>.

The survey area is covered by the easily accessible Geologic Map of New Mexico (2003) at 1:500,000 scale<sup>[14]</sup> and the Digital Geologic Map of New Mexico in ARC/INFO Format<sup>[11]</sup>.

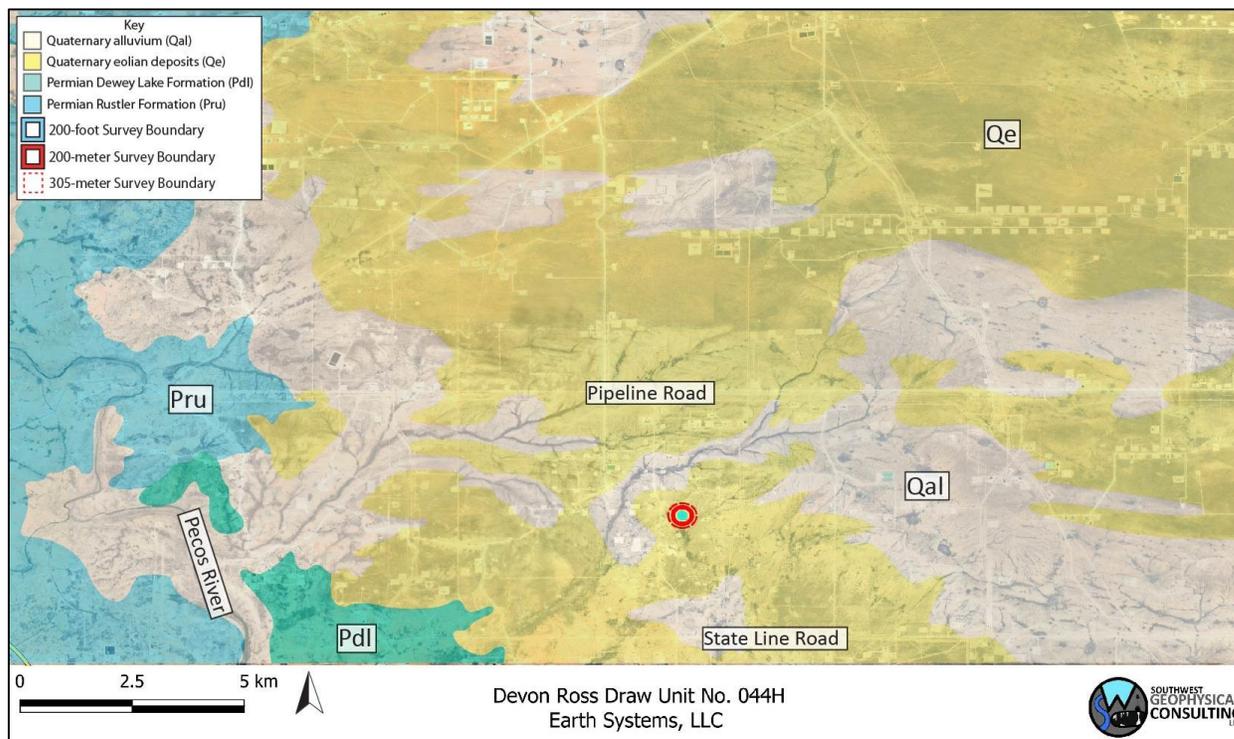


Figure 3: Geology overview. Geology map credit: The Digital Geologic Map of New Mexico in ARC/INFO Format. Background image credit: Google Earth. Image date: March 20, 2023. Image datum: WGS-84.

## 2.3 Description of Survey

### 2.3.1 Surface Karst Survey

Southwest Geophysical Consulting, in partnership with SWCA Environmental Consultants, provides surface karst surveys using small, uncrewed aerial systems (sUAS) that are flown by qualified, FAA licensed drone pilots and that meet the stringent Bureau of Land Management – Carlsbad Field Office requirements for both pedestrian and aerial karst surveys.

The surface karst survey includes a desk study prior to the flight which allows us to provide client feedback in the event of any previously known karst features in the area. The desk study is performed out to 305 meters (1,000 feet) from the spill delineation boundary per New Mexico Oil Conservation Division guidance<sup>[1]</sup> (**Figure 4**). The study was performed using satellite and aerial imagery from Google Earth Pro dated March 20, 2023 (please note features less than one meter in diameter are generally not visible using this method); the Southwest Geophysical Cave and Karst Database dated October 27, 2025<sup>[15]</sup>; the Ross Ranch, NM-TX, 1:24,000 quad, 1968, USGS topographic map; Phantom Banks, NM-TX, 1:24,000 quad, 1968, USGS; and the latest lidar imagery from CalTopo.com. Please note that we use older topographic maps because newer maps have had caves removed from them. These searches and queries returned no karst feature within the 305-meter survey boundary.

Surface karst surveys are conducted by sUAS at low elevation within 200 meters of the spill delineation boundary<sup>[4]</sup> (**Figure 4**) following a preplanned raster pattern flightpath designed for the purpose of generating at least 75% imagery overlap. The collected high-resolution, georeferenced imagery is stitched together to develop orthomosaic imagery which is further developed into a digital elevation model (DEM); the DEM is then processed into a local relief model (LRM) (**Figure 6**). This LRM is color coded to enhance differences in elevation of as little as five centimeters. The orthoimagery, DEM, and LRM are uploaded to a server where they are analyzed by an experienced karst geologist. Finally, the data is reviewed by a senior karst geologist for quality assurance and downloaded into a table for inclusion in a written report<sup>[16]</sup>.

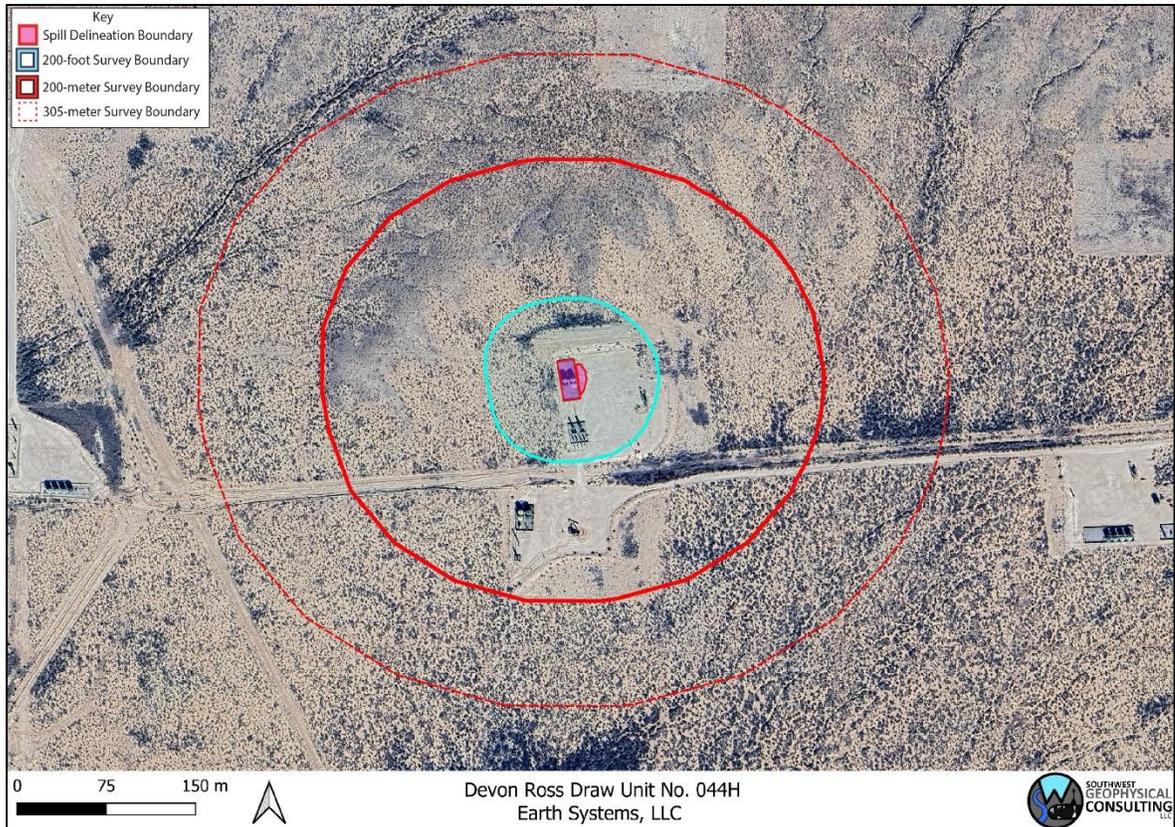


Figure 4: Surface survey overview. Background image credit: Google Earth. Image date: March 20, 2023. Datum: WGS-84.

The resolution of the orthoimagery is clear enough that features as small as 10 centimeters can be positively identified in most circumstances. Occasionally there are ambiguous features identified during an aerial survey that will need to be checked in the field if they are impacted by the proposed remediation efforts. Specifically, it is difficult to tell the difference between solution tubes, abandoned uncased well bores, and some burrows in drone imagery. If an ambiguous feature is located during imagery analysis, it is marked with a yellow dot in **Figure 6**. If a feature of any likelihood is subsequently verified in the field prior to publication of the report, the dot will be changed to a red triangle if confirmed as a karst feature or deleted if not.

The imagery for this study was collected via aerial survey by Pat Lagodney of SWCA on November 1, 2025. Surface karst features may have developed after this date and will not be noted in this report. Imagery analysis was completed by Dave Decker of Southwest Geophysical Consulting on November 5, 2025.

### 2.3.2 Geophysical Survey

For this survey, an Advanced Geosciences Inc. (AGI) SuperSting™ Wifi R8 with an 8-channel switchbox, a 42-electrode line of 40-centimeter-long (1.3 feet) stainless-steel electrodes, and a tablet controller were used to image the subsurface. The Spill Delineation Boundary provided by the client was used to plan the resistivity line and define the survey boundaries. The RD44 survey consisted of two resistivity lines in a dipole-dipole configuration laid out south to north (RD4401) and west to east (RD4402) at 4-meter electrode spacing, resulting in two 164-meter-long lines. (Figure 5, Table 1).

A preconfigured command file was used to run the data collection (DiDi42) which consisted of a dipole-dipole survey. This electrode configuration provided a depth of investigation of up to 38 meters (125 feet) in this location at a resolution of 2.0 to 2.5 meters (6.6 to 8.2 feet) near the surface. A Leica GS18 GPS was used to record electrode locations and elevations. On this survey, the estimated horizontal error mean was 7 cm (2.75 inches) and the estimated vertical error mean was 12 cm (4.7 inches).

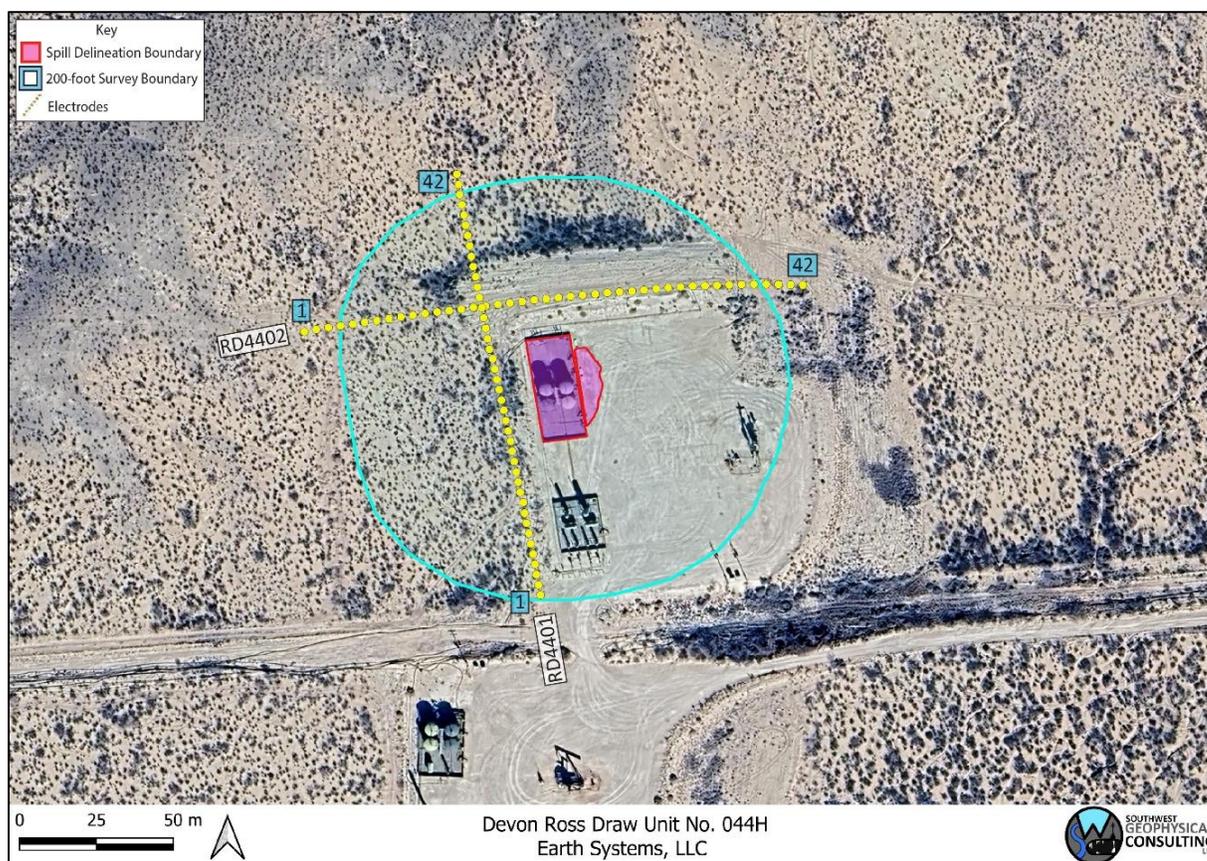


Figure 5: Geophysical survey overview. Both survey lines were conducted with 42 electrodes at 4-meter spacing (yellow dots denoted with blue numbers). Background image credit: Google Earth. Image date: March 20, 2023. Image datum: WGS-84.

**Table 1** provides basic line data. Detailed information including electrode number, location in latitude/longitude (decimal degree format), and elevation in meters can be found in the accompanying data files.

**Table 1: Survey Line Data Table.** The .kmz file contains all the points for the survey line listed in the file name. These data are available in the accompanying files RD44\_ERI\_Points.xlsx and ESYS-003-20251028\_RD44\_Data\_Files.kmz.

File Name:	Completed By:	Date:
RD4401.kmz	Steven Kesler – Field Geologist Britt Bommer – Field Geologist Aaron Beirl – Field Geologist	11/4/2025
RD4402.kmz		11/4/2025

EarthImager™ 2D software was used to download and process the data and to provide the model used to make our interpretations. The design of the survey and the orientation of each of the lines provides the information necessary to make the determination of “stable” or “unstable” ground at this site.

A typical starting model was used for the data processing due to the two-layer model of the geology in the area; specifically, generally high-resistivity gypsum and dolomite at the surface and low-resistivity saturated gypsum and dolomite bedrock at depth. The starting model used was “average apparent resistivity” and a default inversion setting of “surface,” with a minimum apparent resistivity set to 0.1 Ohm-meters (Ohm-m or  $\Omega$ -m) and a max apparent resistivity set to 100,000  $\Omega$ -m (**Table 2**).

**Table 2: Software Information and Settings**

Software Name:	EarthImager™ 2D
Version:	2.4.4.649
Starting Model:	Average Apparent Resistivity
Default Inversion Settings:	Surface
Changes to Default Inversion Settings:	Max Apparent Resistivity = 100 k $\Omega$ -m Min Apparent Resistivity = 0.1 $\Omega$ -m

**Note:** Raw data files (.dat files for EarthImager™ 2D) and processed data (.trn files, terrain files for surface correction in EarthImager™ 2D and .out files, the processed .dat files) are available upon request.

All field work, including setup, stow, and travel, was completed by Steven Kesler, Britt Bommer, and Aaron Beirl on November 4, 2025.

### 3.0 RESULTS

#### 3.1 Surface Karst Survey

The desk study and surface karst survey showed no surface karst features located within the 200-meter (656-foot)<sup>[1]</sup> survey area surrounding the spill delineation boundary (Figure 6).

No springs exist within the 305-meter (1,000-foot)<sup>[1]</sup> survey boundary (Figure 6).

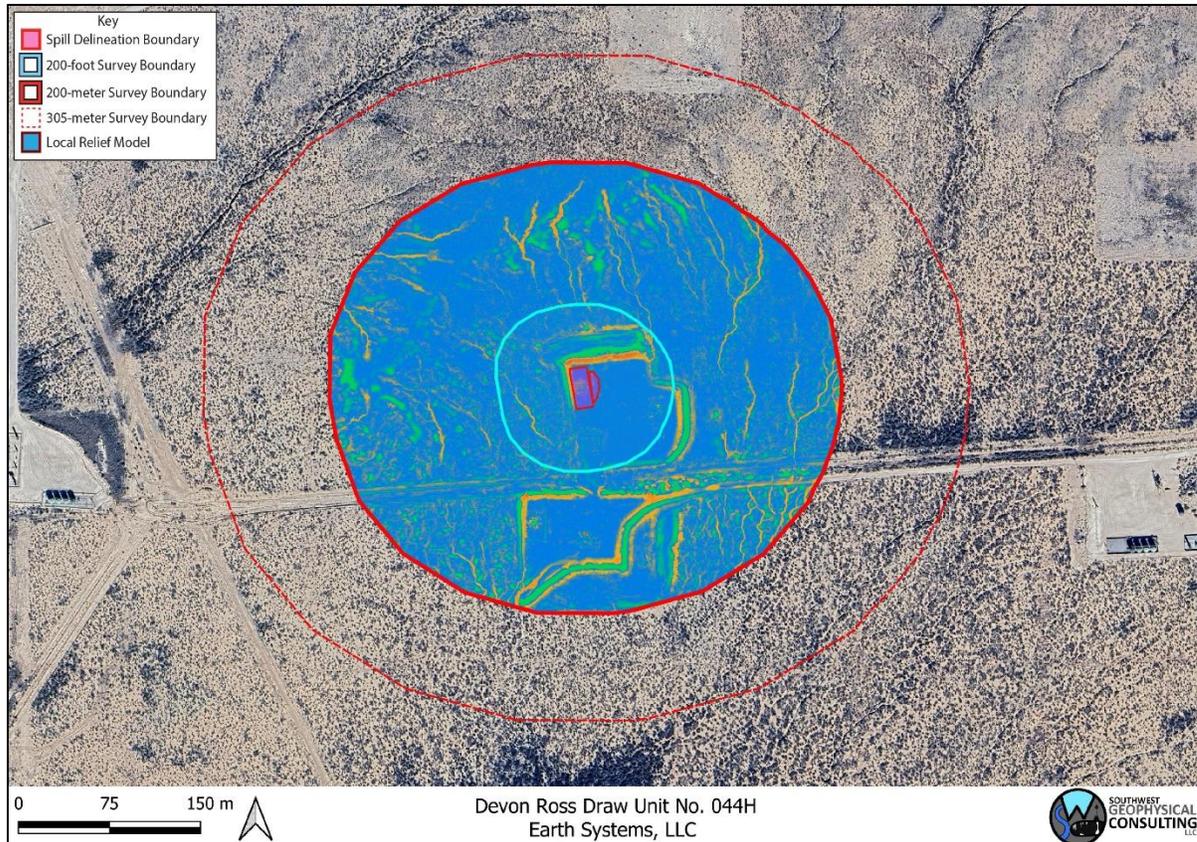


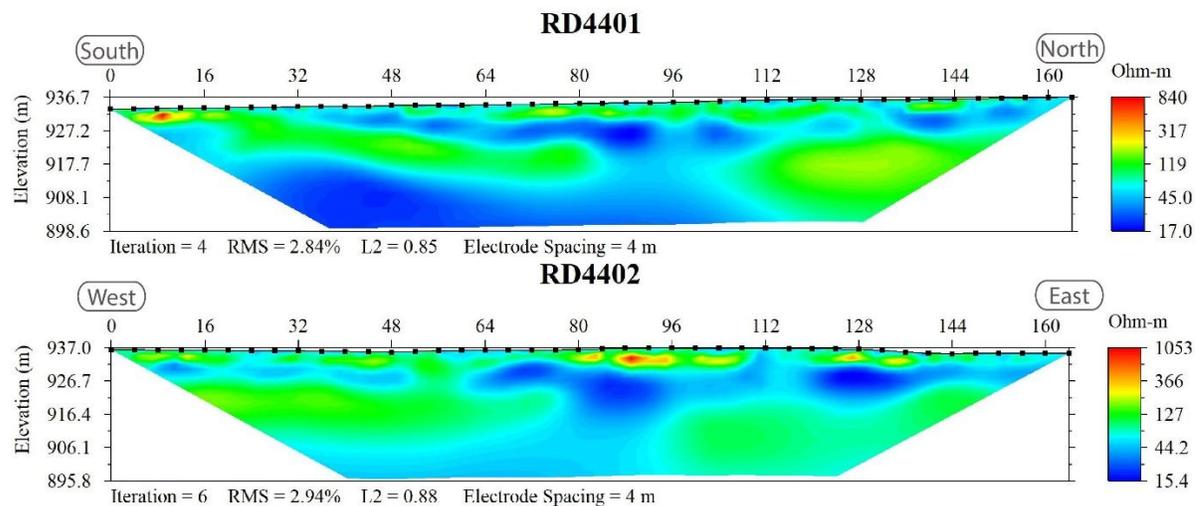
Figure 6: Surface karst survey results. Background image credit: Google Earth. Image date: March 20, 2023. Image datum: WGS-84.

Caution should be exercised while operating in or around all karst-related features due to the possibility of near-surface voids. Employing a BLM-CFO-approved karst monitor on site during these activities should be considered.

### 3.2 Geophysical Survey

Electrical resistivity tomography forms images of the subsurface by causing a current to flow through the rock and soil and then measuring the resistance of these materials as the current flows through them. This measurement is taken many times and the resulting data, once processed, is used to produce a model of the subsurface (**Figure 7**). This model is produced using "non-unique" solutions, which means that there are many models and interpretations which will satisfy the data. Using experience and knowledge of the local geology, a high-confidence model can be established and used to develop an accurate understanding of what lies below the surface. This survey was conducted with the express purpose of locating subsurface voids and does not purport to find paleokarst (old, non-active karst features that have been filled in with sand and sediment) or nascent karst features below the resolution limit of the survey.

The results of this study indicate a moderately well-layered geologic system with low resistivities between 15 and 1053 Ohm-m (**Figure 7**). Please keep in mind when viewing the 2D inverted resistivity sections that color maps can be widely different for each view. Always check the color map located on the right side of the image when viewing the 2D images to ensure you understand the range of resistivities presented. Distances along the top and depths along the left side are in meters. The color map along the right side is in Ohm-m. Due to the nature of the survey, shallower zones have higher resolution between electrodes than deeper zones; therefore, small features at depth will not be visible.



**Figure 7: 2D inverted resistivity sections RD4401 and RD4402. Reds and oranges indicate higher resistivity values. Yellows and greens are medium-resistivity values. Blues are low-resistivity values. Please note that the color scale is relative.**

#### 4.0 DISCUSSION

No surface karst features exist within 200 meters of the spill delineation boundary.

No anomalies consistent with air-filled subsurface voids are found within the RD44 survey area. Small solutionally enlarged voids or fractures at or near the resolution limit of the survey (2.0 – 2.5 meters) may be present. Areas of high-resistivity (reds and oranges) near the surface are interpreted as dry gypsite soils and gypsum or dolomite bedrock of the Rustler Formation<sup>[17]</sup> (**Figure 7** and **Figure 8**). Low-resistivity areas between 15 – 20 Ohm-m may either represent fluid from the brine release, surface-to-subsurface hydrologic pathways, or a layer of either clays and halite lenses or moist or saturated layers within the Rustler Formation (**Figure 7**).

Please remember that these are interpretations made from knowledge of the local subsurface materials and experience. **They remain interpretations until verified by geotechnical methods.** Employing a BLM-CFO-approved karst monitor on site during any drilling and/or remediation activities that require excavation below four feet in depth should be considered.

Fracture sets within the subsurface can act as hydrologic pathways to the water table. Rapid dissolution of gypsum can occur along these pathways creating solution-enlarged fractures, and in some cases, voids within months to years. For this reason, this survey is valid only for this remediation event.

Within karst terrains like the project site, small air- or sediment-filled voids and/or brecciated zones and solutionally enlarged fractures that are below the resolution limit of the survey (2.5–3.0 meters) may exist; these may be encountered during excavation, and if so, should be evaluated by a karst specialist prior to continued work.

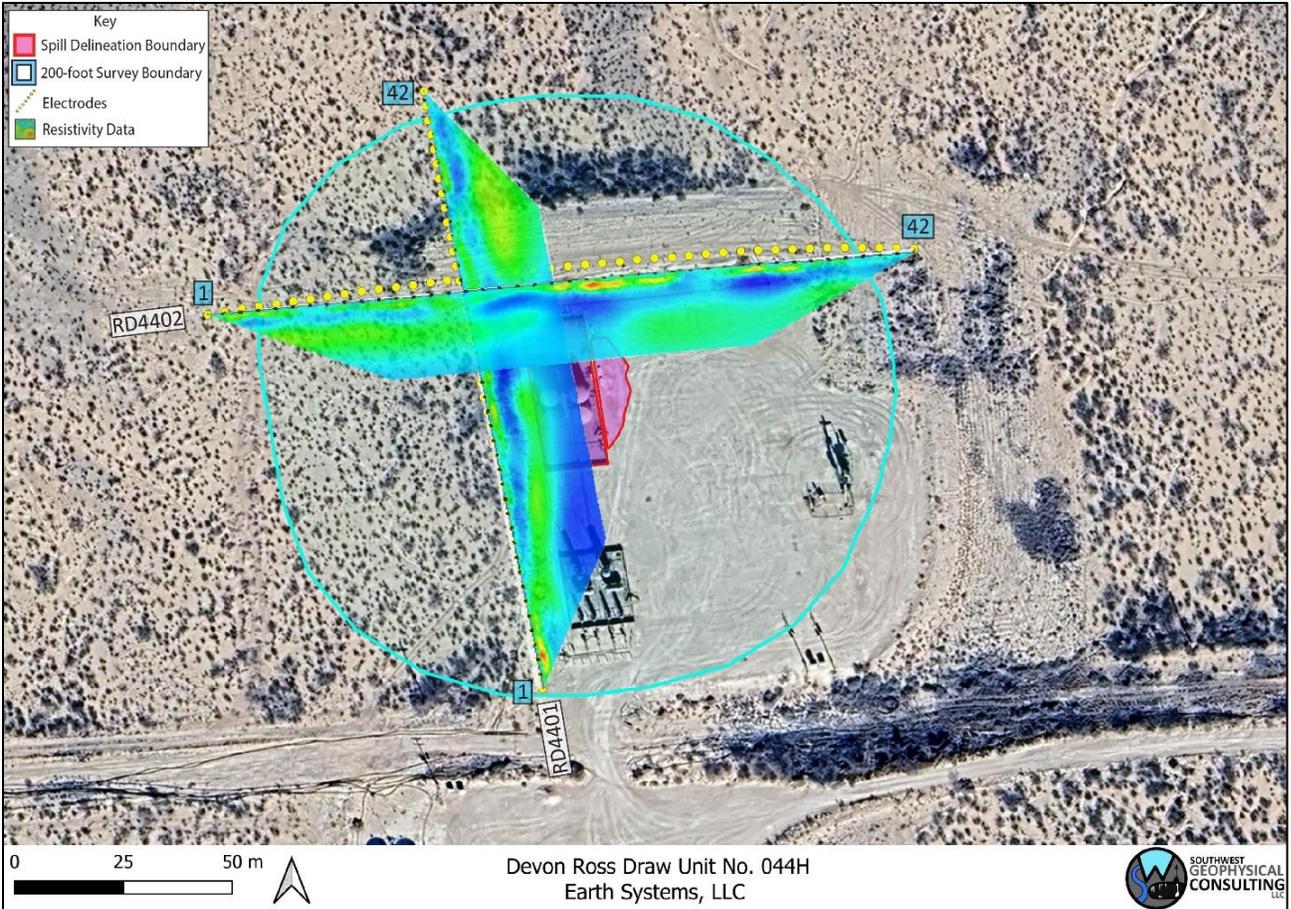


Figure 8: Data overlay. Colored trapezoids are the 2D inverted resistivity lines. Background image credit: Google Earth. Image date: March 20, 2023.

## 5.0 SUMMARY

- **The RD44 survey contains no surface karst features within 200 feet (61 meters) of the spill delineation boundary.**
- No surface karst feature exists within the 200-meter survey boundary and no springs are noted within the 305-meter survey boundary.
- **No shallow anomalies interpreted as large voids or related karst features that would present a danger to equipment operators are located within the geophysical survey area.**
- Intercepting a void during remediation is unlikely, but still possible. Small voids or solutionally enlarged fractures below the resolution limit of the survey may be encountered.
- **Moderately well-layered stratigraphy is interpreted to exist beneath the geophysical survey line, indicating stable ground in the area of the subsurface investigation.**
- When conducting any remediation activities in this area, employing a BLM-CFO approved karst monitor on site should be considered.

## 6.0 DISCLOSURE STATEMENT

Karst occurrence zones are prone to rapid karst formation and warrant careful planning and engineering to mitigate karst-forming processes that could be accelerated by removal of surface cover or the vibrations associated with heavy equipment used in the remediation process.

Mitigation measures for any karst features revealed during excavation shall be approved by the Bureau of Land Management – Carlsbad Field Office and follow the Natural Resources Conservation Service Conservation Practice Standard for Karst Sinkhole Treatment, Code 527, or the Bureau of Land Management Cave and Karst Management Handbook, H-8380-1.

Vigilance during remediation activities is paramount. If voids are encountered during excavation, contact the Bureau of Land Management Karst Division at (575) 234-5972, the New Mexico State Land Office Surface Resources Division at (505) 827-5768, or a BLM-CFO approved karst contractor and request an on-site investigation from a karst expert if one is not already on site. A karst consultant can generally be available in Eddy County within five hours.

Approved karst monitors should have karst feature identification training, at least two years of supervised experience identifying karst features, wilderness first aid training, SRT training, confined space training, gas monitor training, and a minimum of SPAR cave rescue training through NCRC. They should have with them the proper gear and be prepared both physically and mentally to enter a collapse feature within minutes to perform a rescue if needed. Monitoring services with qualified karst monitors, as well as cave surveys and geophysical surveys, are available from Southwest Geophysical Consulting.

Under no circumstances should an untrained, inexperienced person enter a cave, pit, sinkhole, or collapse feature. All field employees of Southwest Geophysical Consulting have extensive caving experience and the ability to determine whether entry into a karst feature is safe or presents a hazard. In the event it is necessary to enter a karst feature, Southwest Geophysical Consulting can provide these services on request.

Cave and karst resource inventory reports, karst feature investigations, and geophysical reports (along with the associated data files) commissioned at the request of the land manager should be submitted to BLM-CFO at [blm\\_nm\\_karst@blm.gov](mailto:blm_nm_karst@blm.gov).

Cave and karst resource inventory reports for the NMSLO should be submitted to the respective project manager.

Environmental karst reports should be submitted to the appropriate project manager at the New Mexico Oil Conservation Division.

## 7.0 REFERENCES

- 1 Division, O. C. *Title 19, Chapter 15, Part 29* (Oil Conservation Division, 2018).
- 2 NMSLO. (ed Oil Conservation Division) (New Mexico State Land Office, Santa Fe, NM, 2018).
- 3 Decker, D. & Jorgensen, G. L. *Environmental Karst Surveys White Paper* (Southwest Geophysical Consulting, LLC, 2024).
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- 6 Earthpoint. *Earthpoint Tools for Google Earth*, <<https://www.earthpoint.us/Townships.aspx>> (2022).
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- 8 W.R.C.C. *National Climate Data Center 1981-2010 Normal Climate Summary for Carlsbad, New Mexico (291469)*, 2010).
- 9 Whitehead, W. & Flynn, C. *Plant Utilization in Southeastern New Mexico: Botany, Ethnobotany, and Archaeology*. (Bureau of Land Management, Carlsbad Field Office, 2017).
- 10 NMSLO. Digital overlay (KML) of the surface land ownership in New Mexico (New Mexico State Land Office, Santa Fe, NM, 2024).
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- 13 Johnson, K. S. Evaporite Karst in the United States. *Carbonates and Evaporites* **12**, 2-14 (1997).
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- 16 Whitehead, W., Bandy, M. & Decker, D. Protocol for Using UAV Photography for Rapid Assessment of Karst Features in Southeast New Mexico. *Proceedings of the 2022 Cave and Karst Management Symposium* (2022).
- 17 Hill, C. A. *Geology of the Delaware Basin, Guadalupe, Apache and Glass Mountains, New Mexico and West Texas*. Vol. 96-39 (Permian Basin Section - SEPM, 1996).

**8.0 GLOSSARY OF TERMS**

AGI	Advanced Geosciences Inc.
BLM-CFO	Bureau of Land Management - Carlsbad Field Office
brecciated	Fractured rock caused by faulting or collapse.
caprock-collapse sinkhole	Collapse of roof-spanning rock into a cave or void.
cave	Natural opening at the surface large enough for a person to enter.
cover-collapse sinkhole	Collapse of roof-spanning soil or clay ground cover into a subsurface void.
ERI	Electrical Resistivity Imaging
GPS	Global Positioning System
grike	A solutionally enlarged, vertical, or sub-vertical joint or fracture.
(H)	High confidence modifier for a PKF. This is typically reserved for a feature that is definitely karst but has not been confirmed in the field.
HKOZ	High Karst Occurrence Zone
karst	A landscape containing solutional features such as caves, sinkholes, swallets, and springs.
(L)	Low confidence modifier for a PKF. This is typically a feature that cannot be ruled out as karst but is most likely NOT karst related. This modifier may also be used for pseudokarst features.
(M)	Medium confidence modifier for PKF. This is an ambiguous feature that can't be positively identified as karst without a field visit (e.g., burrows, abandoned unlined wells, solution tubes, pseudokarst).
MKOZ	Medium Karst Occurrence Zone
NCRC	National Cave Rescue Commission
NKF	Non-karst feature. Used for features originally identified as PKF that have been subsequently identified in the field as non-karst related. This term may also be used for pseudokarst features.
NMSLO	New Mexico State Land Office
Ohm-m	Ohm-meter, a unit of measurement for resistivity. Sometimes abbreviated $\Omega$ -m.
paleokarst	Previously formed karst features that have been filled in by erosion and/or deposition of minerals.
Pat	Permian Artesia Group
Pc	Permian Capitan Formation
Pcs	Permian Castile Formation
Pdl	Permian Dewey Lake Formation
PKF	Possible karst feature. This term is reserved for features identified in satellite or aerial imagery that have NOT been visited in the

	field. Further modifiers include (H) for high confidence, (M) for medium confidence, and (L) for low confidence. These confidence levels are based on field experience.
PLSS	Public Land Survey System
Pqg	Permian Queen/Greyburg Formation
Pru	Permian Rustler Formation
pseudokarst	Karst-like features (sinkholes, conduits, voids etc.) that are not formed by dissolution. These types of features include soil piping, lava tubes, and some cover-collapse and suffosion sinkholes.
Psl	Permian Salado Formation
Psr	Permian Seven Rivers Formation
Pt	Permian Tansill Formation
Py	Permian Yates Formation
Qal	Quaternary alluvium
Qe	Quaternary eolian deposits
Qp	Quaternary piedmont deposits
Qpl	Quaternary playa lake deposits
RKF	Recognized karst feature. This term is reserved for karst features that have been physically verified in the field.
SPAR	Small Party Assisted Rescue
sUAS	Small, uncrewed aerial system
suffosion sinkhole	Raveling of soil into a pre-existing void or fracture.
swallet	A natural opening in the surface, too small for a person, that drains water to an aquifer. Some are "open," meaning a void can be seen below; some are "closed," meaning they are full of sediment.
SWG	Southwest Geophysical Consulting, LLC
UTM	Universal Transverse Mercator (projected coordinates)
(V)	Field verified modifier for a RKF. This indicates that the feature has been visited by a qualified karst professional in the field and fully identified
WGS	World Geodetic System (geographic coordinates)

## 9.0 ATTESTATION

### David D. Decker, PhD, PG, CPG

Chief Executive Officer, Principal Geologist

Southwest Geophysical Consulting, LLC

5117 Fairfax Dr. NW

Albuquerque, NM 87114

[dave@swgeophys.com](mailto:dave@swgeophys.com)

(505) 585-2550

## CERTIFICATE OF AUTHOR

I, David D. Decker, a Licensed Professional Geologist and a Certified Professional Geologist, do certify that:

- I am currently employed as a consulting geologist in the specialty of caves and karst with an office address of 5117 Fairfax Dr. NW, Albuquerque, NM, USA, 87114.
- I graduated with a Master of Science in Applied Physics with a specialization in Sensor Systems from the Naval Post Graduate School in Monterey, California, in 2003, and a Doctor of Philosophy in Earth and Planetary Sciences from the University of New Mexico, Albuquerque, New Mexico, in 2018.
- I am a Licensed Professional Geologist in the State of Texas, USA (PG-15242) and have been since 2021. I am a Certified Professional Geologist through the American Institute of Professional Geologists (CPG-12123) and have been since 2021.
- I have been employed as a geologist continuously since 2016. I was previously employed as a Fire Controlman, Naval Flight Officer, and Aerospace Engineering Duty Officer in the U.S. Navy and operated, maintained, and installed various sensor systems including magnetic, electromagnetic, radar, communications, and acoustic systems in various capacities from 1986 through 2010.
- I have been involved in various aspects of cave and karst studies continuously since 1985, including exploration, mapping, and scientific studies.
- I have read the definition of “qualified karst professional” set out in the ASTM Standard Practice for Preliminary Karst Terrain Assessment for Site Development (ASTM E-1527). I meet the definition of “qualified professional” for the purposes of this standard.
- I am responsible for the content, compilation, and editing of all sections of report number ESYS-003-20251028 entitled, “Environmental Karst Study Report, Devon Ross Draw Unit No. 044H, Eddy County, New Mexico.” I or a duly authorized and qualified representative of Southwest Geophysical Consulting, LLC, have personally visited this site and/or reviewed the aerial imagery on the date or dates mentioned in section **2.3 Description of Survey**.

- I have no prior involvement nor monetary interest in the described property or project, save for my fee for conducting this investigation and providing the report.

Dated in Albuquerque, New Mexico, November 12, 2025.



David D. Decker  
PhD, CPG-12123



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<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 529483

**QUESTIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 529483
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2529330869
Incident Name	NAPP2529330869 ROSS DRAW UNIT #044H @ 30-015-41580
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-015-41580] ROSS DRAW UNIT #044H

<b>Location of Release Source</b>	
Site Name	ROSS DRAW UNIT #044H
Date Release Discovered	10/17/2025
Surface Owner	Federal

<b>Liner Inspection Event Information</b>	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	2,951
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/26/2025
Time liner inspection will commence	01:00 PM
Please provide any information necessary for observers to liner inspection	Gilbert Moreno (832) 541-7719
Please provide any information necessary for navigation to liner inspection site	32.0347443,-103.8758621

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CONDITIONS

Action 529483

**CONDITIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 529483
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

**CONDITIONS**

Created By	Condition	Condition Date
jraley	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	11/24/2025

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**Santa Fe, NM 87505**

QUESTIONS

Action 543345

**QUESTIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2529330869
Incident Name	NAPP2529330869 ROSS DRAW UNIT #044H @ 30-015-41580
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-41580] ROSS DRAW UNIT #044H

<b>Location of Release Source</b>	
<i>Please answer all the questions in this group.</i>	
Site Name	ROSS DRAW UNIT #044H
Date Release Discovered	10/17/2025
Surface Owner	Federal

<b>Incident Details</b>	
<i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

<b>Nature and Volume of Release</b>	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Crude Oil   Released: 1 BBL   Recovered: 1 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion   Flow Line - Production   Produced Water   Released: 5 BBL   Recovered: 5 BBL   Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Spill to lined secondary containment of production equipment.

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QUESTIONS, Page 2

Action 543345

**QUESTIONS (continued)**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>No</b>
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

**Initial Response**

*The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury.*

The source of the release has been stopped	<b>True</b>
The impacted area has been secured to protect human health and the environment	<b>True</b>
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	<b>True</b>
All free liquids and recoverable materials have been removed and managed appropriately	<b>True</b>
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

*Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.*

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.

I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dvn.com Date: 01/15/2026
--	--

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QUESTIONS, Page 3

Action 543345

**QUESTIONS (continued)**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

**Site Characterization**  
*Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). 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 in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	Attached Document
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1000 (ft.) and ½ (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1000 (ft.) and ½ (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**  
*Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	11/26/2025
On what date will (or did) the final sampling or liner inspection occur	11/26/2025
On what date will (or was) the remediation complete(d)	11/26/2025
What is the estimated surface area (in square feet) that will be remediated	2951
What is the estimated volume (in cubic yards) that will be remediated	0

*These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed. The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.*

Sante Fe Main Office  
Phone: (505) 476-3441

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 4

Action 543345

**QUESTIONS (continued)**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dv.nm.gov Date: 01/15/2026
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 543345

**QUESTIONS (continued)**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>529483</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>11/26/2025</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>2951</b>

<b>Remediation Closure Request</b>	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>2951</b>
What was the total volume (cubic yards) remediated	<b>0</b>
Summarize any additional remediation activities not included by answers (above)	<b>The release was contained laterally by the lined containment and the liner was performing as designed</b>

*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 (in .pdf format) 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.*

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.

I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dv.com Date: 01/15/2026
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CONDITIONS

Action 543345

**CONDITIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 543345
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**CONDITIONS**

Created By	Condition	Condition Date
scott.rodgers	App ID 543345 Liner Inspection approved	2/10/2026