



April 12th, 2026

NMOCD District 2
 1811 S. First St.,
 Artesia, New Mexico 88210

SUBJECT: Liner Inspection Report for the Cotton Draw Unit 25 CTB 5 Release (nAPP2604948227), Lea County, New Mexico

To Whom It May Concern,

On behalf of Devon Energy, BDS Enterprises LLC has prepared this Liner Inspection Report summarizing the liner inspection that occurred after a produced water release that was related to oil and gas production activities at the Cotton Draw Unit 25 CTB 5. The site is in Unit D, Section 25, Township 24S, Range 31E, Lea County, New Mexico, on federal land. Figure 1 illustrates the vicinity and site location on a USGS 7.5-minute quadrangle map.

Table 1: Release Infor/mation and Closure Criteria			
Name	Cotton Draw Unit 25 CTB 5	Company	Devon Energy
API Number	N/A	Location	32.193200001, -103.738700001
Incident Number	nAPP2604948227		
Estimated Date of Release	2/17/2026	Date Reported to NMOCD	2/18/2025
Land-Owner	Federal	Reported To	NMOCD, BLM
Source of Release	Victaulic clamp failure		
Released Volume	45 bbl.	Released Material	Produced Water
Recovered Volume	45 bbl.	Net Release	0 bbl.
NMOCD Closure Criteria	<50 feet to groundwater		
BDS Response Dates	4/9/2026		



1.0 Background

On February 17th, 2026, a release was discovered at the Cotton Draw Unit 25 CTB 5. A Victaulic clamp failed, resulting in the release of approx. 45 bbl. of produced water into the lined, secondary containment. Initial response activities were conducted by the operator, and included source elimination by means of repair, site stabilization, and recovery of all standing fluid. Figures 1 and 2 illustrate the vicinity and site location, Figure 3 illustrates the general release area.

2.0 Site Information and Closure Criteria

The Cotton Draw Unit 25 CTB 5 is located approximately 38 miles southeast of Carlsbad, New Mexico on federally owned land at an elevation of approximately 3,544 feet above mean sea level (amsl). Based upon the New Mexico Office of the State Engineers (NMOSE) online water well database (Appendix A), depth to groundwater in the area is greater than 110 feet below grade surface (bgs). There is no known water source within ½-mile of the location, according to the NMOSE database.

On September 26, 2022, Ensolum drilled a water well approximately 1.8 miles east of the point of release to a depth of 110 feet bgs and completed the well as a dry hole.

The nearest significant watercourse is greater than 5 miles west of the location. Figure 2 illustrates the site with 0.5-mile radii to indicate that it does not lie within a sensitive area as described in 19.15.29.12.C(4) NMAC.

Based on the information presented herein, the applicable NMOCD Closure Criteria for this site is for a groundwater depth of less than 50 feet bgs. The site has been restored to meet the standards of Table I of 19.15.29.12 NMAC. Table 2 demonstrates the Closure Criteria applicable to this location. Pertinent well data is attached in Appendix A.

3.0 Liner Integrity

At the request of Devon Energy, on April 9th, BDS conducted a liner integrity inspection per the requirements of 19.15.29.11.A(5)(a) NMAC. NMOCD was notified on April 2, 2026, that the liner inspection would occur. BDS was able to perform a thorough visual examination of the liner within the production area of the lined containment, determining it to be in working order with no observable damage or breaches. A photolog of the inspection is included in Appendix B. Proof of notification to the Division is included in Appendix C.

4.0 Recommendations

As demonstrated by the field inspection of the liner, the liner was intact and retained all fluid that occurred during the release. BDS recommends closure of incident nAPP2604948227.



5.0 Scope and Limitations

The scope of our services included: liner assessment, verifying release stabilizations; regulatory liaison; and preparation of this liner inspection report. All work has been performed in accordance with generally accepted professional environmental consulting practices for oil and gas releases in the Permian Basin in New Mexico.

If there are any questions regarding this report, please contact Lupe Carrasco (575) 725-0787.

Submitted by:

BDS Enterprises, LLC

Lupe Carrasco

Lupe Carrasco
Environmental Scientist

ATTACHMENTS

Figures:

Figure 1: Topographic Site Map

Figure 2: Aerial Site Map

Figure 3: Site Characterization Map

Tables:

Table 2: NMOCD Closure Criteria

Appendices:

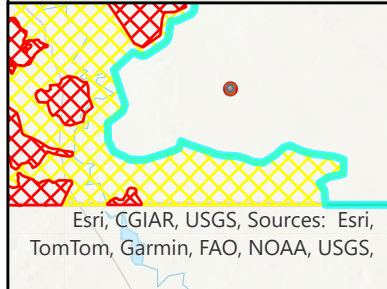
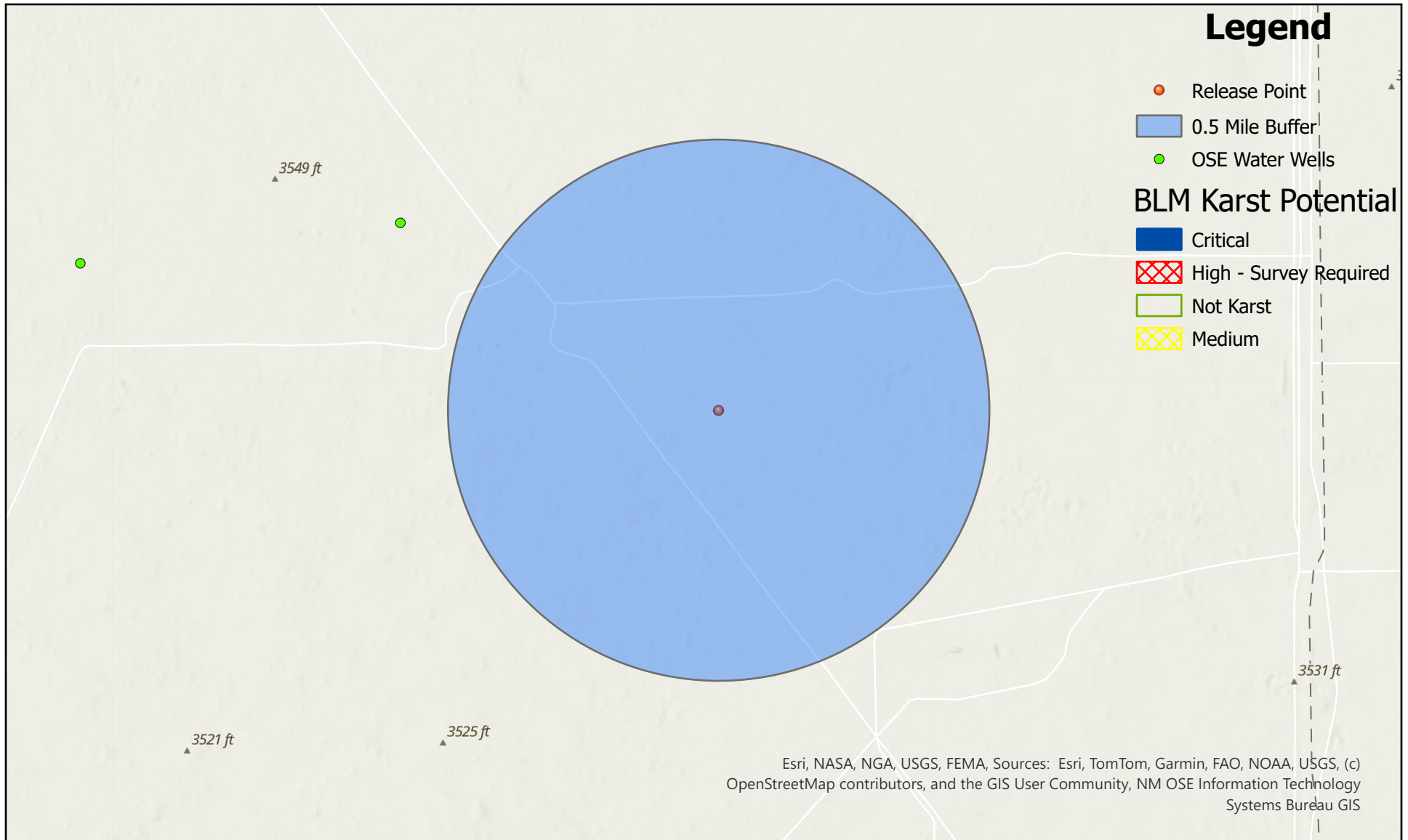
Appendix A: NMOSE Wells Report

Appendix B: Photolog & Field Notes

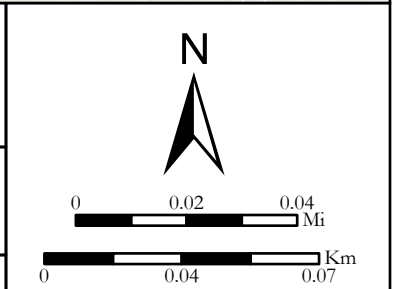
Appendix C: Liner Inspection Notification



FIGURES



<h3>Cotton Draw Unit 25 CTB 5 - Devon Energy</h3>	
Site Diagram	Figure 1
Location: 32.193200001,-103.738700001	
BDS Enterprises, LLC 1705 E. Greene St. Carlsbad, NM 88220	





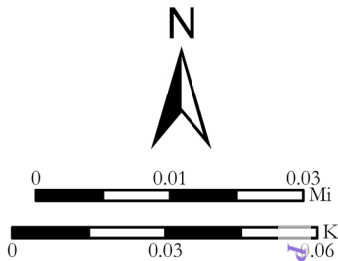
Vantor, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributor:contributors, User Community

Cotton Draw Unit 25 CTB 5 -Devon Energy

Site Diagram
Location: 32.193200001,-103.738700001

Figure 2

BDS Enterprises, LLC 1705 E. Greene St. Carlsbad, NM 88220





Microsoft, Vantor, S TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community

<p>Description:</p> <p>Blue Dots indicate approximate location of photos taken.</p>	<h2>Cotton Draw Unit 25 CTB 5 -Devon Energy</h2>		
	<p>Site Diagram</p> <p>Location: 32.193200001,-103.738700001</p>	<h1>Figure 3</h1>	
	<p>BDS Enterprises, LLC 1705 E. Greene St. Carlsbad, NM 88220</p>		



TABLES

Site Information (19.15.29.11.A(2,3, and 4)NMAC)		Source/Notes				
Depth to Groundwaer (feet bgs)	>100'	NMOSE				
Horizontal Distance From All Water Sources within 1/2 Mile (ft)	NA					
Horizontal Distance to Nearest Significant Watercourse (ft)	13.5 miles	East of Pecos River				
Closure Criteria (19.15.29.12.B(4) and Table 1 NMAC)						
Depth to Groundwater		Closure Criteria (units in mg/kg)				
		Chloride <small>*numerical limit or background whichever is greater</small>	TPH	GRO + DRO	BTEX	Benzene
< 50' BGS	X	600	100		50	10
51' to 100'		10,000	2500	1000	50	10
>100'		20,000	2500	1000	50	10
Surface Water		If yes, then				
<300' from continuously flowig watercourse or other significant watercourse?	No	600	100		50	10
<200' from lakebed, sinkhoe, or playa lake?	No					
Water Well or Water Source						
<500' from spring or a private, domestic fresh water well used by less than 5 households for domestic or stock watering purposes?	No					
<1000' from fresh water well or spring?	No					
Human and Other Areas						
<300" from an occupied permanent residence, school, hospital, institution, or church?	No					
<100' from wetland?	No					
within area overlying a subsurface mine	No					
within an unstable area?	No					
within a 100-year floodplain?	No					



APPENDIX A: NMOSE WELLS REPORT

Documents on File

Transaction Images	Trn #	Doc	File/Act	Status 1	Status 2	Transaction Desc.
 get images	732879	EXPL	2022-08-26	PMT	APR	C 04665 POD 1

Current Points of Diversion

POD Number	Well Tag	Source	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Ma
C 04665	NA		NW	NW	NE	30	24S	32E	621349.8	3562798.6	

* UTM location was derived from PLSS - see [Help](#)

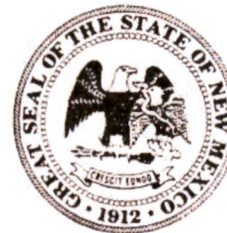
The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

12/10/25 3:15 PM MST Water Rights Summary

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WELL PLUGGING PLAN OF OPERATIONS



NOTE: A Well Plugging Plan of Operations shall be filed with and accepted by the Office of the State Engineer prior to plugging. This form may be used to plug a single well, or if you are plugging multiple monitoring wells on the same site using the same plugging methodology.

Alert! Your well may be eligible to participate in the Aquifer Mapping Program (AMP)-NM Bureau of Geology geoinfo.nmt.edu/resources/water/cgmn/ if within an area of interest and meets the minimum construction requirements, such as there is still water in your well, and the well construction reflected in a well record and log is not compromised, contact AMP at 575-835-5038 or -6951, or by email nmbg-waterlevels@nmt.edu, prior to completing this prior form. Showing proof to the OSE that your well was accepted in this program, may delay the plugging of your well until a later date.

I. FILING FEE: There is no filing fee for this form.

II. GENERAL / WELL OWNERSHIP: Check here if proposing one plan for multiple monitoring wells on the same site and attaching WD-08m

Existing Office of the State Engineer POD Number (Well Number) for well to be plugged: BH01 C-4665-POD
Name of well owner: COG Operating, LLC
Mailing address: 2208 W Main Street County: _____
City: Artesia State: New Mexico Zip code: 88210
Phone number: 575-988-2043 E-mail: charles.beauvais@conocophillips.com

III. WELL DRILLER INFORMATION:

Well Driller contracted to provide plugging services: West Texas Drilling Services
New Mexico Well Driller License No.: WD# 1184 Expiration Date: 10/31/2023

IV. WELL INFORMATION: Check here if this plan describes method for plugging multiple monitoring wells on the same site and attach supplemental form WD-08m and skip to #2 in this section.

Note: A copy of the existing Well Record for the well(s) to be plugged should be attached to this plan.

1) GPS Well Location: Latitude: 32 deg, 11 min, 42.72 sec
Longitude: 103 deg, 42 min, 45.3 sec, NAD 83

2) Reason(s) for plugging well(s):

Soil boring

3) Was well used for any type of monitoring program? No If yes, please use section VII of this form to detail what hydrogeologic parameters were monitored. If the well was used to monitor contaminated or poor quality water, authorization from the New Mexico Environment Department may be required prior to plugging.

4) Does the well tap brackish, saline, or otherwise poor quality water? N/A If yes, provide additional detail, including analytical results and/or laboratory report(s): [Redacted]

5) Static water level: >100 feet below land surface / feet above land surface (circle one)

6) Depth of the well: 110 feet

- 7) Inside diameter of innermost casing: 2 inches.
- 8) Casing material: Temporary PVC SCH 40
- 9) The well was constructed with:
 - an open-hole production interval, state the open interval: N/A
 - a well screen or perforated pipe, state the screened interval(s): N/A
- 10) What annular interval surrounding the artesian casing of this well is cement-grouted? N/A
- 11) Was the well built with surface casing? No If yes, is the annulus surrounding the surface casing grouted or otherwise sealed? _____ If yes, please describe:
- 12) Has all pumping equipment and associated piping been removed from the well? N/A If not, describe remaining equipment and intentions to remove prior to plugging in Section VII of this form.

V. DESCRIPTION OF PLANNED WELL PLUGGING: If plugging method differs between multiple wells on same site, a separate form must be completed for each method.

Note: If this plan proposes to plug an artesian well in a way other than with cement grout, placed bottom to top with a tremie pipe, a detailed diagram of the well showing proposed final plugged configuration shall be attached, as well as any additional technical information, such as geophysical logs, that are necessary to adequately describe the proposal. Attach a copy of any signed OSE variance to this plugging plan.

Also, if this planned plugging plan requires a variance to 19.27.4 NMAC, attach a detailed variance request signed by the applicant.

- 1) Describe the method by which cement grout shall be placed in the well, or describe requested plugging methodology proposed for the well:

The temporary 2" well material will be removed. If no water is encountered, drill cuttings will be used to ten feet below ground surface (bgs) and plugged using hydrated bentonite. If groundwater is encountered the boring will be plugged, tremie from bottom to a slurry of Portland Type I/II cement in lifts.
- 2) Will well head be cut-off below land surface after plugging? N/A

VI. PLUGGING AND SEALING MATERIALS:

Note: The plugging of a well that taps poor quality water may require the use of a specialty cement or specialty sealant. Attach a copy of the batch mix recipe from the cement company and/or product description for specialty cement mixes or any sealant that deviates from the list of OSE approved sealants.

- 1) For plugging intervals that employ cement grout, complete and attach Table A.
- 2) For plugging intervals that will employ approved non-cement based sealant(s), complete and attach Table B.
- 3) Theoretical volume of grout required to plug the well to land surface: 287
- 4) Type of Cement proposed: Type I/II
- 5) Proposed cement grout mix: <6.0 gallons of water per 94 pound sack of Portland cement.
- 6) Will the grout be: _____ batch-mixed and delivered to the site
X mixed on site

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7) Grout additives requested, and percent by dry weight relative to cement:

N/A

8) Additional notes and calculations:

N/A

VII. ADDITIONAL INFORMATION: List additional information below, or on separate sheet(s):

N/A

VIII. SIGNATURE:

I, Kalei Jennings, say that I have carefully read the foregoing Well Plugging Plan of Operations and any attachments, which are a part hereof; that I am familiar with the rules and regulations of the State Engineer pertaining to the plugging of wells and will comply with them, and that each and all of the statements in the Well Plugging Plan of Operations and attachments are true to the best of my knowledge and belief.

Kalei Jennings

08/15/2022

Signature of Applicant

Date

IX. ACTION OF THE STATE ENGINEER:

This Well Plugging Plan of Operations is:

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- Approved subject to the attached conditions.
- Not approved for the reasons provided on the attached letter.

Witness my hand and official seal this 22nd day of August, 2022

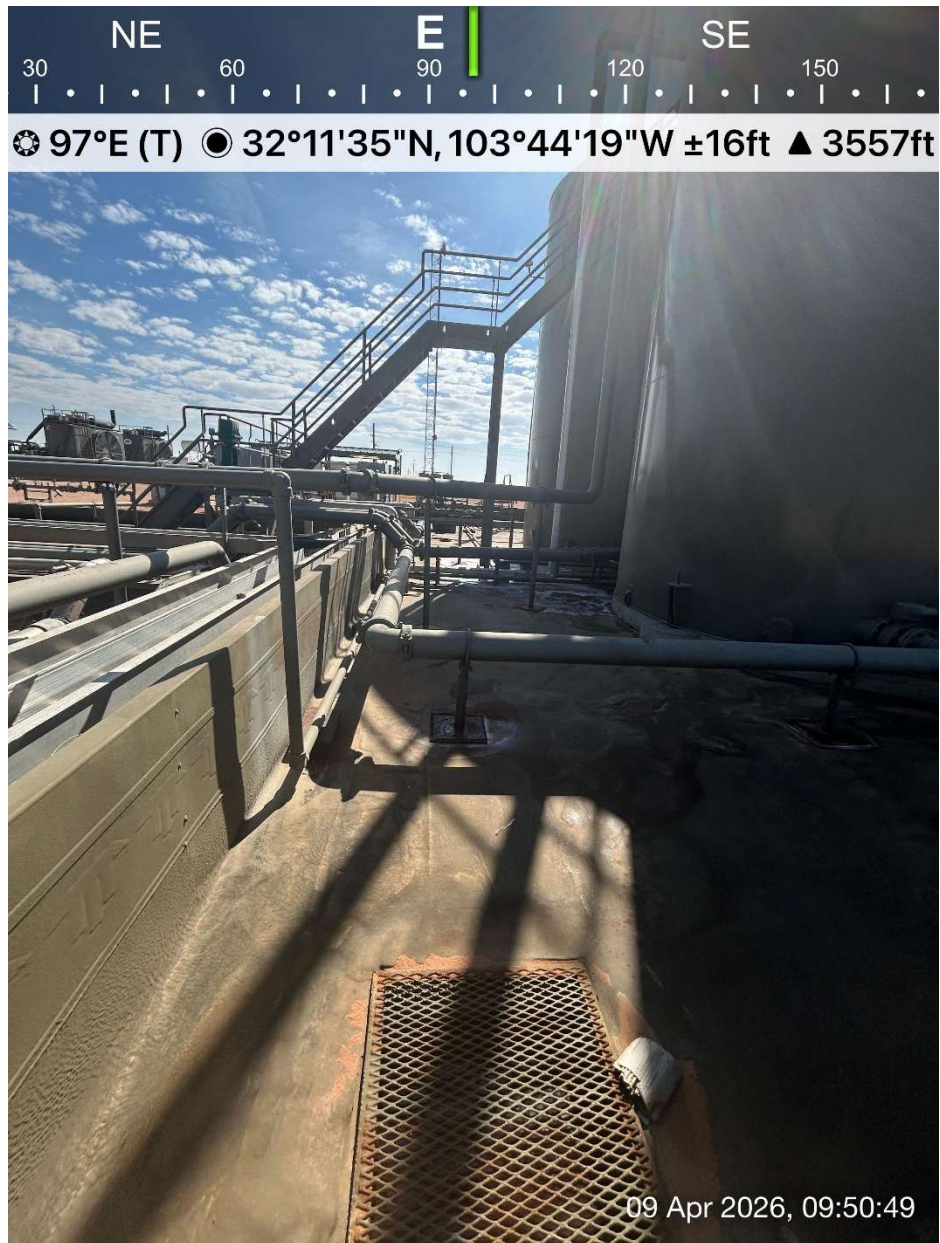
Mike A. Hamman
John R. D'Antonio Jr. P.E., New Mexico State Engineer

By: *K. Parekh*
KASHYAP PAREKH
W.R.M.E.

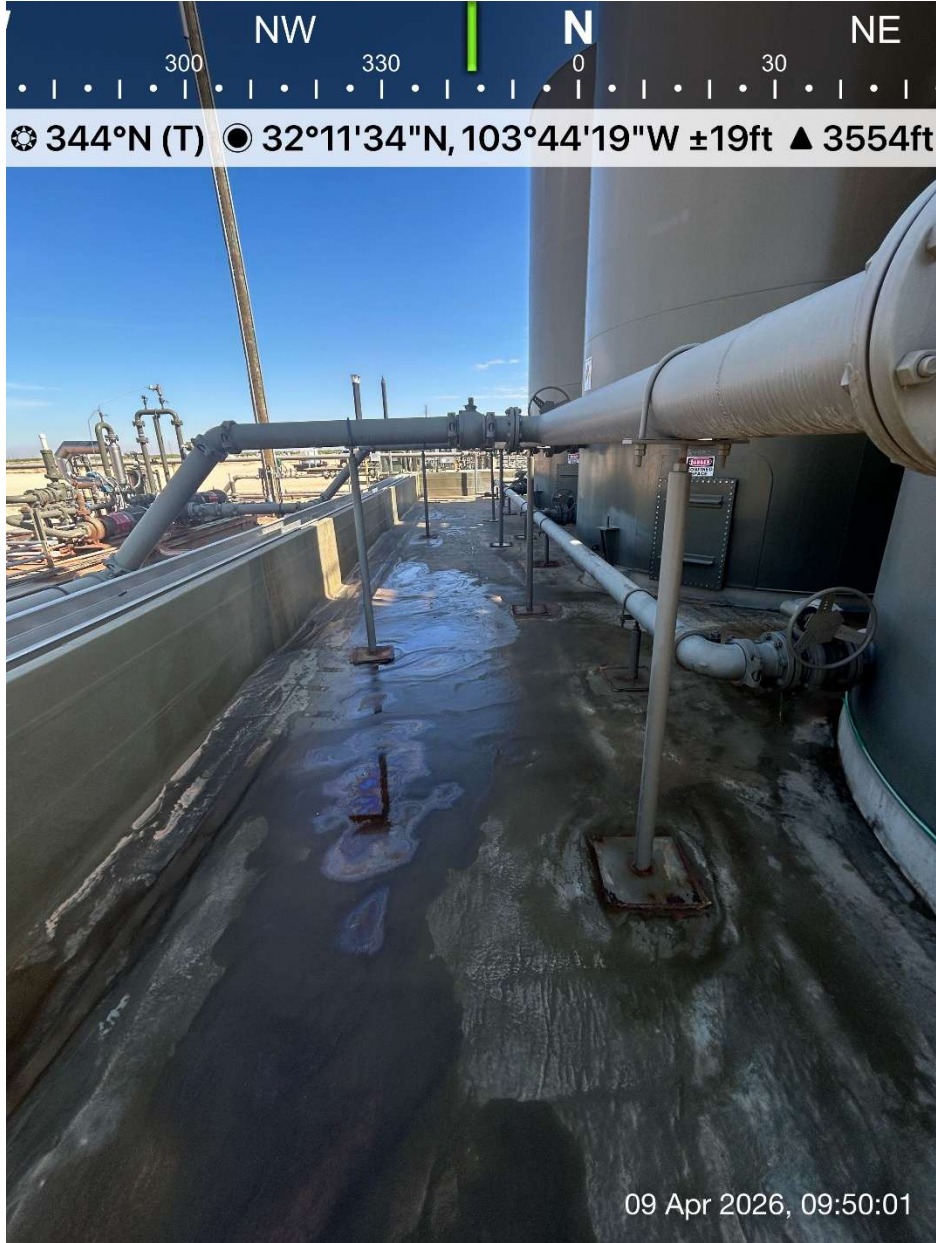




APPENDIX B: PHOTOLOG & FIELD NOTES



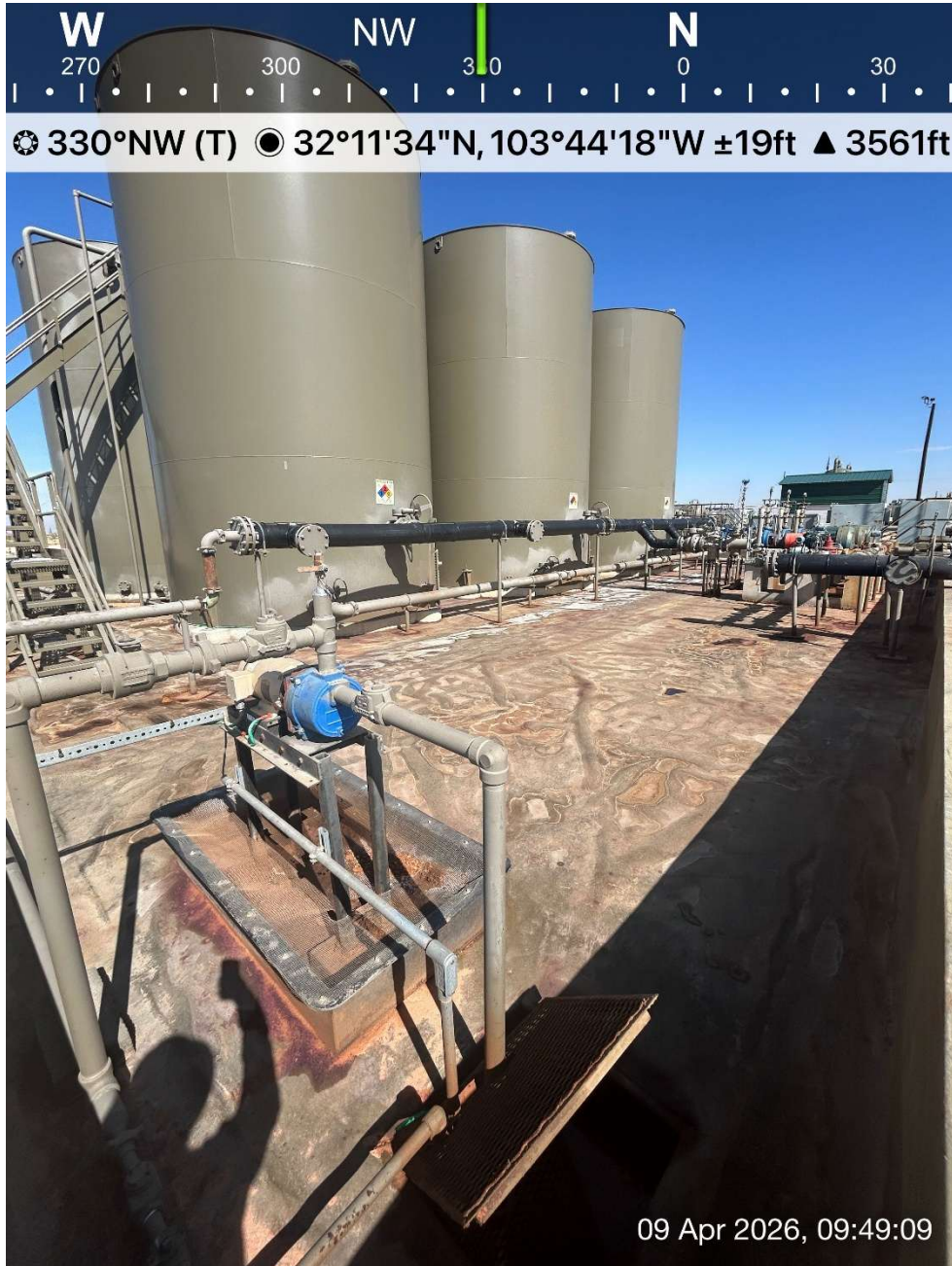
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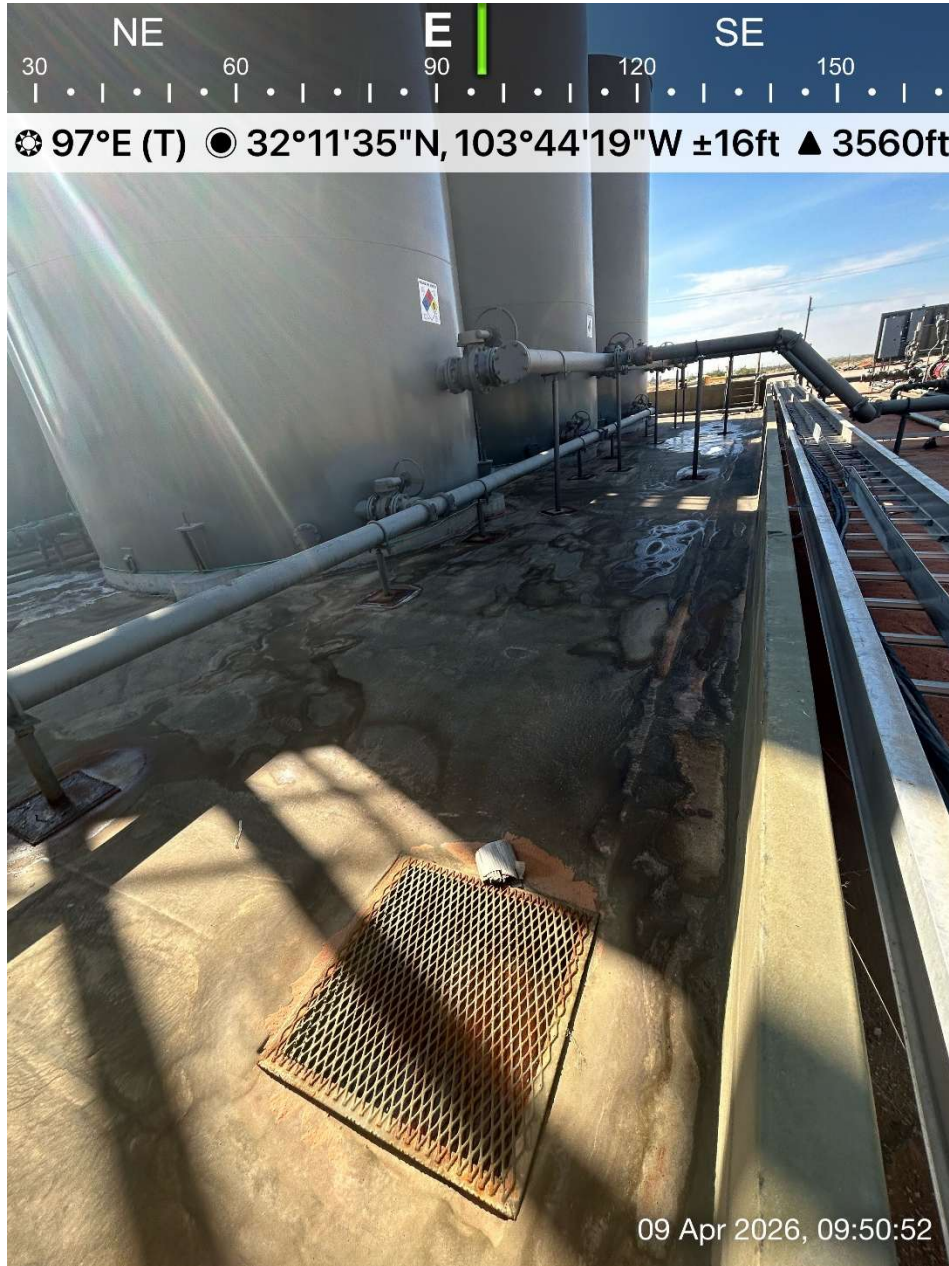
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APPENDIX C: LINER INSPECTION NOTIFICATION

PO BOX 2286 • CARLSBAD. N M 88220 • OFFICE (575) 689-8324 • FAX (575) 689-8325

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

Action 555426

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 555426
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	COTTON DRAW UNIT 25 CTB 5
Date Release Discovered	02/17/2026
Surface Owner	Federal

Incident Details	
<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

Nature and Volume of Release	
<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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Coupling Produced Water Released: 45 BBL Recovered: 45 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)	Vict clamp failure allowed fluids to lined secondary containment.

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QUESTIONS, Page 2

Action 555426

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 555426
	Action Type: [NOTIFY] Notification Of Release (NOR)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

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 19.15.29.11(A)(5)(a) NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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ACKNOWLEDGMENTS

Action 555426

ACKNOWLEDGMENTS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 555426
	Action Type: [NOTIFY] Notification Of Release (NOR)

ACKNOWLEDGMENTS

<input checked="" type="checkbox"/>	I acknowledge that I am authorized to submit notification of a release on behalf of my operator.
<input checked="" type="checkbox"/>	I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
<input checked="" type="checkbox"/>	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.
<input checked="" type="checkbox"/>	I acknowledge the fact that 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.
<input checked="" type="checkbox"/>	I acknowledge the fact that, 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.

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CONDITIONS

Action 555426

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 555426
	Action Type: [NOTIFY] Notification Of Release (NOR)

CONDITIONS

Created By	Condition	Condition Date
jralej	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.	2/18/2026

Spill Volume Calculations

Free Standing Fluid Volume

How do you want to enter area?	Total area from app
Area from app (ft ²)	12176.00
Depth of fluid	0.25 in
Number of Tanks in Fluid Affected Area (if any):	0
Tank Diameter (if needed):	15.5 ft
Volume of Standing Fluid	45.18 bbl

Contaminated Soil Calculations

How do you want to enter area?	Total area from app
Area from app (ft ²)	0.00
Depth of impacted soil	0.25 in
Soil Type	Caliche
Spilled Material	Oil / Produced Water
Soil Saturation	Moist - some color change; little to no moisture left on hands
Volume of Spill In Soil	0.00 bbls
Total Spill Volume	45.18 bbls

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QUESTIONS

Action 556936

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 556936
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2604948227
Incident Name	NAPP2604948227 COTTON DRAW UNIT 25 CTB 5 @ FAPP2331754651
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Facility	[fAPP2331754651] Cotton Draw Unit 25 CTB 5

Location of Release Source

Please answer all the questions in this group.

Site Name	COTTON DRAW UNIT 25 CTB 5
Date Release Discovered	02/17/2026
Surface Owner	Federal

Incident Details

Please answer all the questions in this group.

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

Nature and Volume of Release

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.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Coupling Produced Water Released: 45 BBL Recovered: 45 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)	Vict clamp failure allowed fluids to lined secondary containment.

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

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QUESTIONS, Page 2

Action 556936

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 556936
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

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.ralej@dvni.com Date: 02/24/2026
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Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 3

Action 556936

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 556936
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

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	No
<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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CONDITIONS

Action 556936

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 556936
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	2/24/2026

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QUESTIONS

Action 570679

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 570679
	Action Type: [NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2604948227
Incident Name	NAPP2604948227 COTTON DRAW UNIT 25 CTB 5 @ FAPP2331754651
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Facility	[fAPP2331754651] Cotton Draw Unit 25 CTB 5

Location of Release Source	
Site Name	COTTON DRAW UNIT 25 CTB 5
Date Release Discovered	02/17/2026
Surface Owner	Federal

Liner Inspection Event Information	
<i>Please answer all the questions in this group.</i>	
What is the liner inspection surface area in square feet	10,388
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	04/09/2026
Time liner inspection will commence	09:00 AM
Please provide any information necessary for observers to liner inspection	(575) 725-0787
Please provide any information necessary for navigation to liner inspection site	32.193200001,-103.738700001

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CONDITIONS

Action 570679

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 570679
	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.	4/2/2026

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QUESTIONS

Action 575258

QUESTIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2604948227
Incident Name	NAPP2604948227 COTTON DRAW UNIT 25 CTB 5 @ FAPP2331754651
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2331754651] Cotton Draw Unit 25 CTB 5

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	COTTON DRAW UNIT 25 CTB 5
Date Release Discovered	02/17/2026
Surface Owner	Federal

Incident Details	
<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

Nature and Volume of Release	
<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	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Coupling Produced Water Released: 45 BBL Recovered: 45 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)	Vict clamp failure allowed fluids to lined secondary containment.

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QUESTIONS, Page 2

Action 575258

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

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: 04/15/2026
--	--

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QUESTIONS, Page 3

Action 575258

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	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 26 and 50 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Greater than 5 (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	04/01/2026
On what date will (or did) the final sampling or liner inspection occur	04/09/2026
On what date will (or was) the remediation complete(d)	04/09/2026
What is the estimated surface area (in square feet) that will be remediated	10388
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.

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QUESTIONS, Page 4

Action 575258

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<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>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	No
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@dvsn.com Date: 04/15/2026
<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 575258

QUESTIONS (continued)

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	570679
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	04/09/2026
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	10388

Remediation Closure Request	
<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	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	10388
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Liner Inspected

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: 04/15/2026
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CONDITIONS

Action 575258

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 575258
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved. Restoration complete.	4/21/2026