

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources

MAY 17 2018

Form C-141
Revised April 3, 2017

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

Submit 1 Copy to appropriate District Office in
conformance with 19.15.29 NMAC.
DISTRICT II-ARTESIA O.C.D.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company	Devon Energy Production Company	Contact	Wesley Ryan, Production Foreman
Address	6488 Seven Rivers Hwy Artesia, NM 88210	Telephone No.	575-748-3371
Facility Name	Cotton Draw Unit 154H (release occurred along water trunk line at identified GPS coordinates)	Facility Type	Oil
Surface Owner Federal	Mineral Owner Federal	API No. 30-015-38952	

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	34	24S	31E					Eddy

Latitude_32.166939_ Longitude_103.762213_ NAD83

NATURE OF RELEASE

Type of Release	Volume of Release	Volume Recovered
Produced Water (PW)	98 BBLS	28 BBLS
Source of Release	Date and Hour of Occurrence	Date and Hour of Discovery
Valve on discharge valve	May 7, 2018 @ 11:09 AM MST	May 7, 2018 @ 11:09 AM MST
Was Immediate Notice Given?	If YES, To Whom?	
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not Required	OCD-Mike Bratcher & Crystal Weaver BLM-Shelly Tucker	
By Whom? Mike Shoemaker	Date and Hour	
	May 8, 2018 @ 11:17 AM MST	
Was a Watercourse Reached?	If YES, Volume Impacting the Watercourse.	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	N/A	

If a Watercourse was Impacted, Describe Fully.*
N/A

Describe Cause of Problem and Remedial Action Taken.*

The balon check valve washed out on the bottom of check on flow line discharge line causing a release into the pasture. Line was isolated and repairs were made.

Describe Area Affected and Cleanup Action Taken.*

Approximately 98bbbls of pw was released with approximately 28bbbls recovered via the dispatched vacuum truck. An environmental contractor will be contacted to assist with delineation and remediation efforts.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature: Dana DeLaRosa		OIL CONSERVATION DIVISION	
Printed Name: Dana DeLaRosa		Approved by Environmental Specialist: <i>[Signature]</i>	
Title: Field Admin Support		Approval Date: 5/17/18	Expiration Date: N/A
E-mail Address: Dana.Delarosa@dv.com		Conditions of Approval: See attached	
Date: 05/17/18 Phone: 575.746.5594		Attached <input checked="" type="checkbox"/> 2PP-4759	

* Attach Additional Sheets If Necessary

Operator/Responsible Party,

The OCD has received the form C-141 you provided on 5/17/2018 regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number 2RP-4259 has been assigned. **Please refer to this case number in all future correspondence.**

It is the Division's obligation under both the Oil & Gas Act and Water Quality Act to provide for the protection of public health and the environment. Our regulations (19.15.29.11 NMAC) state the following,

The responsible person shall complete division-approved corrective action for releases that endanger public health or the environment. The responsible person shall address releases in accordance with a remediation plan submitted to and approved by the division or with an abatement plan submitted in accordance with 19.15.30 NMAC. [emphasis added]

Release characterization is the first phase of corrective action unless the release is ongoing or is of limited volume and all impacts can be immediately addressed. Proper and cost-effective remediation typically cannot occur without adequate characterization of the impacts of any release. Furthermore, the Division has the ability to impose reasonable conditions upon the efforts it oversees. **As such, the Division is requiring a workplan for the characterization of impacts associated with this release be submitted to the OCD District 2 office in ARTESIA on or before 6/17/2018. If and when the release characterization workplan is approved, there will be an associated deadline for submittal of the resultant investigation report. Modest extensions of time to these deadlines may be granted, but only with acceptable justification.**

The goals of a characterization effort are: 1) determination of the lateral and vertical extents along with the magnitude of soil contamination. 2) determine if groundwater or surface waters have been impacted. 3) If groundwater or surface waters have been impacted, what are the extents and magnitude of that impact. 4) The characterization of any other adverse impacts that may have occurred (examples: impacts on vegetation, impacts on wildlife, air quality, loss of use of property, etc.). To meet these goals as quickly as possible, the following items must, at a minimum, be addressed in the release characterization workplan and subsequent reporting:

- Horizontal delineation of soil impacts in each of the four cardinal compass directions. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. This is not an exclusive list of potential contaminants. Analyzed parameters should be modified based on the nature of the released substance(s). Soil sampling must be both within the impacted area and beyond.
- Vertical delineation of soil impacts. Adsorbed soil contamination must be characterized for the following constituents using the associated laboratory methods: benzene, toluene, ethylbenzene, and total xylenes by either Method 8260 or 8021, total petroleum hydrocarbons by Method 8015 extended range (GRO+DRO+MRO; C₆ thru C₃₆), and for chloride by Method 300. As above, this is not an exclusive list of potential contaminants and can be modified. Vertical characterization samples should be taken at depth intervals no greater than five feet apart. Lithologic description of encountered soils must also be provided. At least ten vertical feet of soils with contaminant concentrations at or below these values must be demonstrated as existing above the water table.
- Nominal detection limits for field and laboratory analyses must be provided.
- Composite sampling is not generally allowed.
- Field screening and assessment techniques are acceptable (headspace, titration, EC [include algorithm for validation purposes], EM, etc.), but the sampling and assay procedures must be clearly defined. Copies of field notes are highly desirable. A statistically significant set of split samples must be submitted for confirmatory laboratory analysis, including the laterally farthest and vertically deepest sets of soil samples. Make sure there are at least two soil samples submitted

for laboratory analysis from each borehole or test pit (highest observed contamination and deepest depth investigated). Copies of the actual laboratory results must be provided including chain of custody documentation.

- Probable depth to shallowest protectable groundwater and lateral distance to nearest surface water. If there is an estimate of groundwater depth, the information used to arrive at that estimate must be provided. If there is a reasonable assumption that the depth to protectable water is 50 feet or less, the responsible party should anticipate the need for at least one groundwater monitoring well to be installed in the area of likely maximum contamination.

- If groundwater contamination is encountered, an additional investigation workplan may be required to determine the extents of that contamination. Groundwater and/or surface water samples, if any, must be analyzed by a competent laboratory for volatile organic hydrocarbons (typically Method 8260 full list), total dissolved solids, pH, major anions and cations including chloride and sulfate, dissolved iron, and dissolved manganese. The investigation workplan must provide the groundwater sampling method(s) and sample handling protocols. To the fullest extent possible, aqueous analyses must be undertaken using nominal method detection limits. As with the soil analyses, copies of the actual laboratory results must be provided including chain of custody documentation.

- Accurately scaled and well-drafted site maps must be provided providing the location of borings, test pits, monitoring wells, potentially impacted areas, and significant surface features including roads and site infrastructure that might limit either the release characterization or remedial efforts. Field sketches may be included in subsequent reporting, but should not be considered stand-alone documentation of the site's layout. Digital photographic documentation of the location and fieldwork is recommended, especially if unusual circumstances are encountered.

Nothing herein should be interpreted to preclude emergency response actions or to imply immediate remediation by removal cannot proceed as warranted. Nonetheless, characterization of impacts and confirmation of the effectiveness of remedial efforts must still be provided to the OCD before any release incident will be closed.

Jim Griswold

OCD Environmental Bureau Chief

1220 South St. Francis Drive

Santa Fe, New Mexico 87505

505-476-3465

jim.griswold@state.nm.us

Bratcher, Mike, EMNRD

From: DeLaRosa, Dana <Dana.DeLaRosa@dvn.com>
Sent: Thursday, May 17, 2018 10:40 AM
To: Bratcher, Mike, EMNRD; Weaver, Crystal, EMNRD; Tucker, Shelly
Cc: Shoemaker, Mike; Fulks, Brett
Subject: Cotton Draw Unit 154H_98BBLS PW_5.8.2018
Attachments: Cotton Draw Unit 154H_98bbbs pw_5.8.2018_Intial C141.doc; Cotton Draw Unit 154H_98BBLS PW_5.7.2018_GIS Image.pdf

Good Morning,

Attached you will find the C141 and GIS Image for the 98bbbl release that occurred at the Cotton Draw Unit 154H on 5.8.2018. The red dot on the GIS image represents the approximate origin of release.

****Please see information below regarding notifications per Mike Shoemaker****

Thank you,

Dana DeLaRosa

Field Admin Support
Production
A-Schedule

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



During the initial notification provided by Mike Shoemaker the following information was provided:

Good Afternoon,

Devon identified the following release at approximately 11:09 PM MST on 05/07/18.

1. Cotton Draw 153 Water Trunk Line (The GPS Coordinates for this release are as follows the Lat:32.166939 Long: 103.762213) nearest Devon well is the Cotton Draw 153H-API #30-015-38535
 - a. The Balon check valve washed out on the bottom of check on flow line discharge line causing a release into the pasture. Approximately 98 bbls of produced water was released into the pasture. Approximately 28 bbls of produced water was recovered.

Since this notification the following information has been corrected and is correctly provided in the C-141.

Cotton Draw Unit 154H

98 BBLS PW_5.7.2018



This map is for illustrative purposes only and is neither a legally recorded map nor survey and is not intended to be used as one. Devon makes no warranty, representation, or guarantee of any kind regarding this map.

WGS_1984_Web_Mercator_Auxiliary_Sphere
Prepared by: Dana DeLaRosa
Map is current as of: 17-May-2018

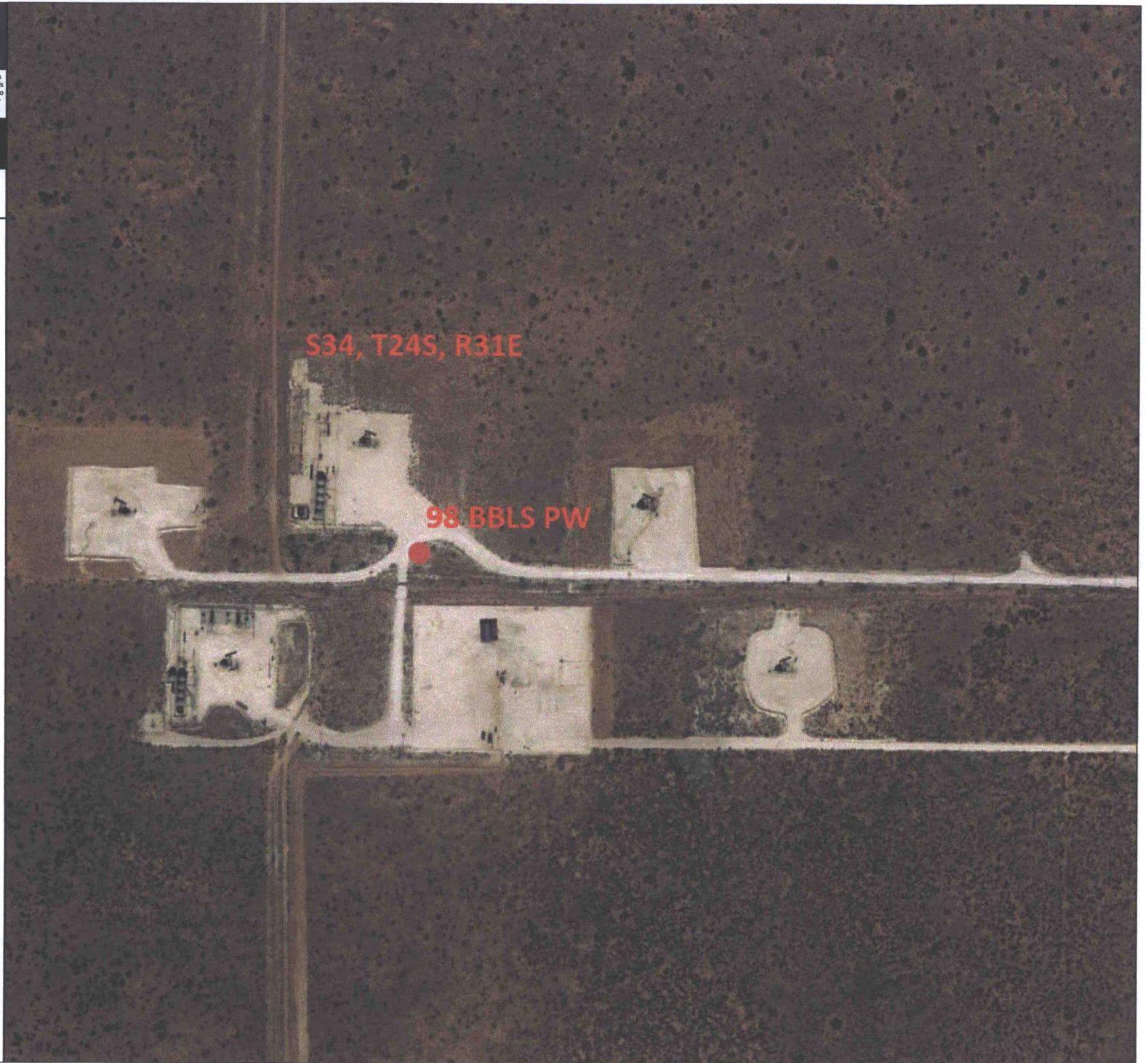


Miles

0 0.02 0.04 0.07 1:3,557

S34, T24S, R31E

98 BBLS PW



Bratcher, Mike, EMNRD

From: Shoemaker, Mike <Mike.Shoemaker@dvn.com>
Sent: Tuesday, May 8, 2018 3:04 PM
To: Bratcher, Mike, EMNRD; Shelly Tucker (stucker@blm.gov)
Subject: RE: Cotton Draw 153 Water Trunk Line

Please disregard the information presented in point a in the original e-mail string below regarding a lined containment. It is updated below to read correctly.

- a. The Balon check valve washed out on the bottom of check on flow line discharge line causing a release into the pasture. Approximately 98 bbls of produced water was released into the pasture. Approximately 28 bbls of produced water was recovered.

If you have any questions please let me know.

Thanks,

Mike Shoemaker
EHS Representative

Devon Energy Corporation
6488 Seven Rivers Highway
Artesia, New Mexico 88210
575-746-5566 Office
575-513-5035 Mobile



From: Shoemaker, Mike
Sent: Tuesday, May 08, 2018 11:17 AM
To: Mike Bratcher (mike.bratcher@state.nm.us) <mike.bratcher@state.nm.us>; Shelly Tucker (stucker@blm.gov) <stucker@blm.gov>
Subject: Cotton Draw 153 Water Trunk Line

Good Afternoon,

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1. Cotton Draw 153 Water Trunk Line (The GPS Coordinates for this release are as follows the Lat:32.166939 Long: 103.762213) nearest Devon well is the Cotton Draw 153H-API #30-015-38535
 - a. The Balon check valve washed out on the bottom of check on flow line discharge line causing a release into the pasture. Approximately 98 bbls of produced water was released into the lined SPCC containment ring. Approximately 28 bbls of produced water was recovered.

A C-141 will be prepared and submitted with GPS coordinates of the area affected.

Thanks,

Mike Shoemaker
EHS Representative

Devon Energy Corporation
6488 Seven Rivers Highway
Artesia, New Mexico 88210
575-746-5566 Office
575-513-5035 Mobile



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Bratcher, Mike, EMNRD

From: Shoemaker, Mike <Mike.Shoemaker@dvn.com>
Sent: Tuesday, May 8, 2018 11:17 AM
To: Bratcher, Mike, EMNRD; Shelly Tucker (stucker@blm.gov)
Subject: Cotton Draw 153 Water Trunk Line

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 - a. The Balon check valve washed out on the bottom of check on flow line discharge line causing a release into the pasture. Approximately 98 bbls of produced water was released into the lined SPCC containment ring. Approximately 28 bbls of produced water was recovered.

A C-141 will be prepared and submitted with GPS coordinates of the area affected.

Thanks,

Mike Shoemaker
EHS Representative

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6488 Seven Rivers Highway
Artesia, New Mexico 88210
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575-513-5035 Mobile



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