



August 29, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division
811 S. First St.
Artesia, New Mexico 88210

Re: Request for Permit Modification to change an Approved C-147 Containment and Recycle Facility (2RF-141) from a Non-commercial to a Commercial Recycle Facility and add an AST in Lea County New Mexico

Ms. Venegas,

Devon Energy (OGRID #6137) would like to request permission to modify the permit issued for their Cotton Draw Containment and Recycle Facility (2RF-141). This is a request for a permit to change the non-commercial Cotton Draw facility to a commercial facility and add an Above-Ground Storage Tank (AST).

Enclosed in this submission is a new C-147 form permit modification, a C-147 for the AST, variance requests, leak detection plan, and a closure cost estimate that includes the AST. These documents are all stamped by an engineer licensed in the State of New Mexico. A bond in the amount estimated will be filed accordingly.

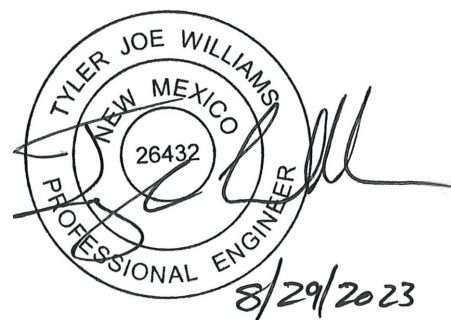
Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at twilliams@envirotechconsulting.com at your convenience.

Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

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

Tyler Williams, P.E.
President and Principal Engineer





September 26, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division
811 S. First St.
Artesia, New Mexico 88210

Re: *Response to V. Venegas Email Received 9/26/2023 Regarding Permit Modification Request for Devon Energy Cotton Draw Recycle Facility (2RF-141)*

Ms. Venegas,

Devon Energy (OGRID #6137) has requested a permit modification for their Cotton Draw Facility (2RF-141). Per request for clarification from V. Venegas of NM OCD Devon agrees to the following conditions.

Devon Energy Services will comply with all conditions previously approved for the Cotton Draw permit. No Changes to the operations procedures, maintenance, monitoring procedures, or closing procedures will be made aside from the requested modification to add one (1) 40,000-BBL Above Ground Storage Tank. However, the total operational volume of 2RF-141 will be 540,000-BBL, 40,000-BBL new, requested Above Ground Storage Tank, and 500,000-BBL previously approved, earthen containments.

Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at mratke@envirotechconsulting.com at your convenience.

Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

A handwritten signature in black ink, appearing to read "Mitchell Ratke".

Mitchell Ratke, EIT
Project Engineer

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

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

Form C-147
Revised April 3, 2017

Recycling Facility and/or Recycling Containment

Type of Facility: Recycling Facility Recycling Containment*
Type of action: Permit Registration
 Modification Extension
 Closure Other (explain) _____

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

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

1.
Operator: Devon Energy Corp. (For multiple operators attach page with information) OGRID #: 6137
Address: 333 West Sheridan, Oklahoma City, Oklahoma 737102-8260
Facility or well name (include API# if associated with a well): Cotton Draw Recycle Facility
OCD Permit Number: 2RF-141 (For new facilities the permit number will be assigned by the district office)
U/L or Qtr/Qtr Section 22 Township 25 South Range 31 East County: Eddy
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Recycling Facility:
Location of recycling facility (if applicable): Latitude 32.113744 Longitude -103.758072 NAD83
Proposed Use: Drilling* Completion* Production Plugging
**The re-use of produced water may NOT be used until fresh water zones are cased and cemented*
 Other, *requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.*
 Fluid Storage
 Above ground tanks Recycling containment Activity permitted under 19.15.17 NMAC explain type _____
 Activity permitted under 19.15.36 NMAC explain type: _____ Other explain _____
 For multiple or additional recycling containments, attach design and location information of each containment
 Closure Report (required within 60 days of closure completion): Recycling Facility Closure Completion Date: _____

3.
 Recycling Containment:
 Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)
Center of Recycling Containment (if applicable): Latitude 32.114521 Longitude -103.759656 NAD83
 For multiple or additional recycling containments, attach design and location information of each containment
 Lined Liner type: Thickness _____ mil LLDPE HDPE PVC Other 40-mil (Secondary)
 String-Reinforced 60-mil (Primary)
Liner Seams: Welded Factory Other Field Welds Volume: 500K bbl Dimensions: L 500 x W 550 x D 16.0
 Recycling Containment Closure Completion Date: _____

4.

Bonding:

Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (These containments are limited to only the wells owned or operated by the owners of the containment.)

Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ 793,760.00 (work on these facilities cannot commence until bonding amounts are approved)

Attach closure cost estimate and documentation on how the closure cost was calculated.

5.

Fencing:

Four foot height, four strands of barbed wire evenly spaced between one and four feet

Alternate. Please specify Chain Link Game Fence

6.

Signs:

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.16.8 NMAC

7.

Variances:

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

Check the below box only if a variance is requested:

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

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

8.

Siting Criteria for Recycling Containment

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

General siting	
Ground water is less than 50 feet below the bottom of the Recycling Containment. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; aerial photo; satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

9.

Recycling Facility and/or Containment Checklist:

Instructions: Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.


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

10.

Operator Application Certification:

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

Name (Print): Josh Bruening Title: Supervisor

Signature:  Date: 10-2-2023

e-mail address: jbbuening@gmail.com Telephone: 405-552-7882

11.

OCD Representative Signature: Victoria Venegas Approval Date: 10/02/2023

Title: Environmental Specialist OCD Permit Number: 2RF-141

OCD Conditions _____

Additional OCD Conditions on Attachment _____

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

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1220 South St. Francis Dr.
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Form C-147
Revised April 3, 2017

Recycling Facility and/or Recycling Containment

Type of Facility: Recycling Facility Recycling Containment*
Type of action: Permit Registration
 Modification Extension
 Closure Other (explain) _____

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

1.
Operator: Devon Energy Corp. (For multiple operators attach page with information) OGRID #: 6137
Address: 333 West Sheridan, Oklahoma City, Oklahoma 737102-8260
Facility or well name (include API# if associated with a well): Cotton Draw Recycle Facility- AST
OCD Permit Number: 2RF-141 (For new facilities the permit number will be assigned by the district office)
U/L or Qtr/Qtr _____ Section 22 Township 25 South Range 31 East County: Eddy
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Recycling Facility:
Location of recycling facility (if applicable): Latitude 32.113744 Longitude -103.758072 NAD83
Proposed Use: Drilling* Completion* Production Plugging
**The re-use of produced water may NOT be used until fresh water zones are cased and cemented*
 Other, requires permit for other uses. Describe use, process, testing, volume of produced water and ensure there will be no adverse impact on groundwater or surface water.
 Fluid Storage
 Above ground tanks Recycling containment Activity permitted under 19.15.17 NMAC explain type _____
 Activity permitted under 19.15.36 NMAC explain type: _____ Other explain _____
 For multiple or additional recycling containments, attach design and location information of each containment
 Closure Report (required within 60 days of closure completion): Recycling Facility Closure Completion Date: _____

3.
 Recycling Containment:
 Annual Extension after initial 5 years (attach summary of monthly leak detection inspections for previous year)
Center of Recycling Containment (if applicable): Latitude 32.115697 Longitude 103.758169 NAD83
 For multiple or additional recycling containments, attach design and location information of each containment
 Lined Liner type: Thickness 40/40 mil LLDPE HDPE PVC Other _____
 String-Reinforced
Liner Seams: Welded Factory Other Field Welds Volume: 40,000 bbl Dimensions: L 12 x W 155 x D _____
 Recycling Containment Closure Completion Date: _____ *155' diameter round AST

4.

Bonding:

Covered under bonding pursuant to 19.15.8 NMAC per 19.15.34.15(A)(2) NMAC (These containments are limited to only the wells owned or operated by the owners of the containment.)

Bonding in accordance with 19.15.34.15(A)(1). Amount of bond \$ 793,760.00 (work on these facilities cannot commence until bonding amounts are approved)

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5.

Fencing:

Four foot height, four strands of barbed wire evenly spaced between one and four feet

Alternate. Please specify Chain Link Game Fence

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Signs:

12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

Signed in compliance with 19.15.16.8 NMAC

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

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Ground water is less than 50 feet below the bottom of the Recycling Containment. NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Minerals Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; aerial photo; satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; topographic map; visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

9.
Recycling Facility and/or Containment Checklist:
Instructions: Each of the following items must be attached to the application. Indicate, by a check mark in the box, that the documents are attached.

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

10.
Operator Application Certification:
 I hereby certify that the information and attachments submitted with this application are true, accurate and complete to the best of my knowledge and belief.

Name (Print): Josh Bruening Title: Supervisor
 Signature:  Date: 9-14-2023
 e-mail address: josh.bruening@dvn.com Telephone: 405-552-7882

11.
OCD Representative Signature: _____ **Approval Date:** _____

Title: _____ **OCD Permit Number:** _____

OCD Conditions _____
 Additional OCD Conditions on Attachment



August 28, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division

RE: Rule 34 Variance Request –Produced Water Recycling Containment Primary Liner

Ms. Venegas:

Devon Energy (Devon) is requesting a variance to Rule 34 Part 12(A)(4) requiring primary liners to be 45-mil string reinforced LLDPE. Devon is requesting approval to use 40-mil LLDPE in place of the specified material in an above ground storage tank (AST). Based on our experience, we feel that the requested material will allow us to provide equal environmental protection in our impoundments.

Due to the construction of the 45-mil reinforced LLDPE material, nondestructive QA/QC testing cannot be performed. The proposed 40-mil LLDPE will be seamed in a manner that will allow nondestructive pressure testing of the seams to ensure proper sealing.

The proposed LLDPE is appropriate material for the proposed use in the impoundment and is compatible with the material that will be stored. This material will provide equal or better environmental protection as the specified 45-mil reinforced LLDPE.

The proposed new liner system cross-section is as follows: prepare subgrade, 10 oz. geotextile, 40-mil LLDPE, 200 mil geonet, 40-mil LLDPE. This will replace the cross-section required by the current rule. It should also be noted that this variance has been granted on past sites.

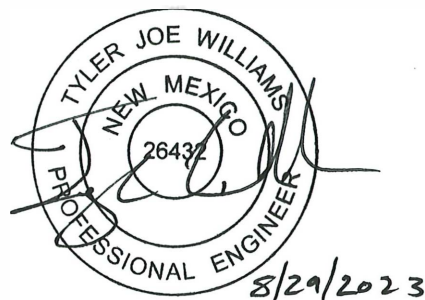
Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at twilliams@envirotechconsulting.com at your convenience.

Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

A handwritten signature in black ink, appearing to read 'Tyler Williams'.

Tyler Williams, P.E.
President and Principal Engineer





August 28, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division

RE: Rule 34 Variance Request –Produced Water Recycling Containment Liner

Ms. Venegas:

Devon Energy (Devon) is requesting a variance to Rule 34 Part 12(A)(4) requiring secondary liners to be 30-mil string reinforced LLDPE. Devon is requesting approval to use 40-mil LLDPE for an above ground storage tank (AST). Based on our experience, we feel that the requested material will allow us to provide greater environmental protection in our impoundments.

Due to the construction of the 30-mil reinforced LLDPE material, nondestructive QA/QC testing cannot be performed. The proposed 40-mil LLDPE will be seamed in a manner that will allow nondestructive pressure testing of the seams to ensure proper sealing.

The proposed LLDPE is appropriate material for the proposed use in the impoundment and is compatible with the material that will be stored. This material will provide equal or better environmental protection as the specified 30-mil reinforced LLDPE.

The proposed new liner system cross-section for the AST is as follows: prepare subgrade, 10 oz. geotextile, 40-mil LLDPE, 200-mil geonet, 40-mil LLDPE. This will replace the cross-section required by the current rule. It should also be noted that this variance has been granted on past sites.

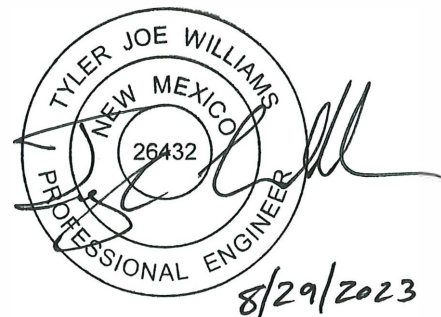
Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at twilliams@envirotechconsulting.com at your convenience.

Thank you for your consideration.

Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

Tyler Williams, P.E.
President and Principal Engineer





August 28, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division

RE: Rule 34 Variance Request –Produced Water Recycling Containment

Ms. Venegas:

Devon Energy (Devon) is requesting a variance to Rule 34 Part 12(A)(2) requiring "...The levee shall have an outside grade no steeper than three horizontal feet to one vertical foot (3H:1V)."

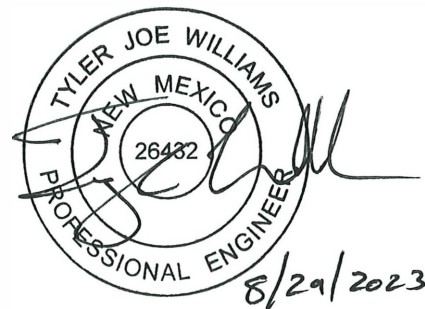
Devon is requesting approval to use an Above Ground Storage Tank (AST) as a containment structure at the Devon Cotton Draw Recycle Facility. Based on our experience AST's work well for this purpose, they are structurally sound and easy to maintain. This AST will have vertical walls on both interior and exterior sides and thus requires a variance for use. The AST will, however be double lined like other containments to limit the risk of leakage. It should also be noted that this variance has been granted on past sites.

Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at twilliams@envirotechconsulting.com at your convenience.

Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

Tyler Williams, P.E.
President and Principal Engineer





August 28, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division

RE: Rule 34 Variance Request –Produced Water Recycling Containment

Ms. Venegas:

Devon Energy (Devon) is requesting a variance to Rule 34 Part 12(A)(2) requiring "... The operator shall construct the containment in a levee with an inside grade no steeper than two horizontal feet to one vertical foot (2H:1V)."

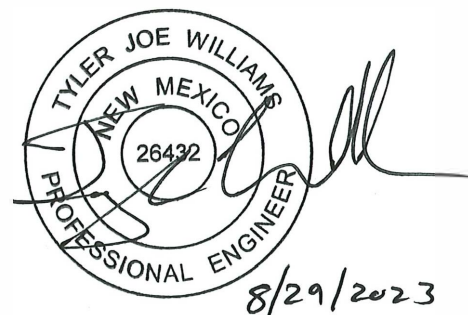
Devon is requesting approval to use an Above Ground Storage Tank (AST) as a containment structure at the Devon Cotton Draw Recycle Facility. Based on our experience AST's work well for this purpose, they are structurally sound and easy to maintain. This AST will have vertical walls on both interior and exterior sides and thus requires a variance for use. The AST will, however be double lined like other containments to limit the risk of leakage. It should also be noted that this variance has been granted on past sites.

Should you have any questions or require additional information, please contact me by phone at 580-234-8780 or by email at twilliams@envirotechconsulting.com at your convenience.

Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

Tyler Williams, P.E.
President and Principal Engineer





August 28, 2023

Ms. Victoria Venegas
New Mexico EMNRD
Oil Conservation Division

RE: Rule 34 Variance Request –Produced Water Recycling Containment

Ms. Venegas:

Devon Energy (Devon) is requesting a variance to Rule 34 Part 12(A)(3) requiring *"The edges of all liners shall be anchored in the bottom of a compacted earth-filled trench."*

Devon is requesting approval to use an Above Ground Storage Tank (AST) as a containment structure at the Devon Cotton Draw Recycle Facility. Based on our experience AST's work well for this purpose, they are structurally sound and easy to maintain. Clips will be used at the top of the steel walls to secure the liner. These clips are specifically designed to hold the AST liner in place and provide the same type of liner security as an anchor trench. It should also be noted that this variance has been granted on past sites.

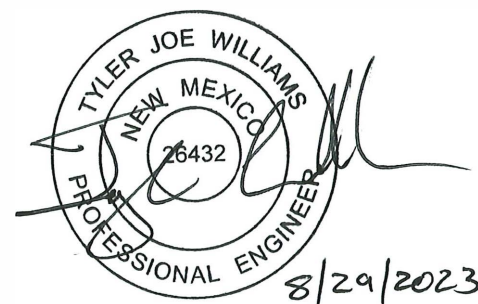
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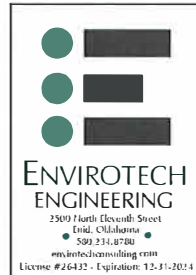
Thank you for your consideration.
Best regards,

ENVIROTECH ENGINEERING & CONSULTING, INC.

A handwritten signature in black ink, appearing to read 'Tyler Williams'.

Tyler Williams, P.E.
President and Principal Engineer





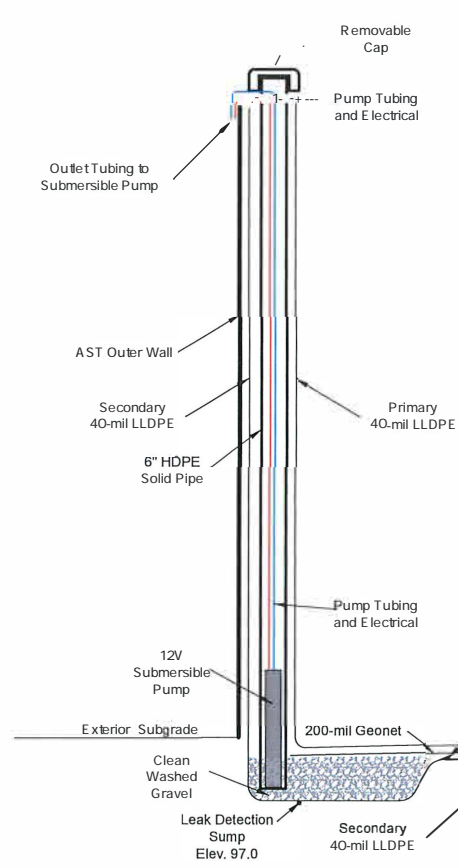
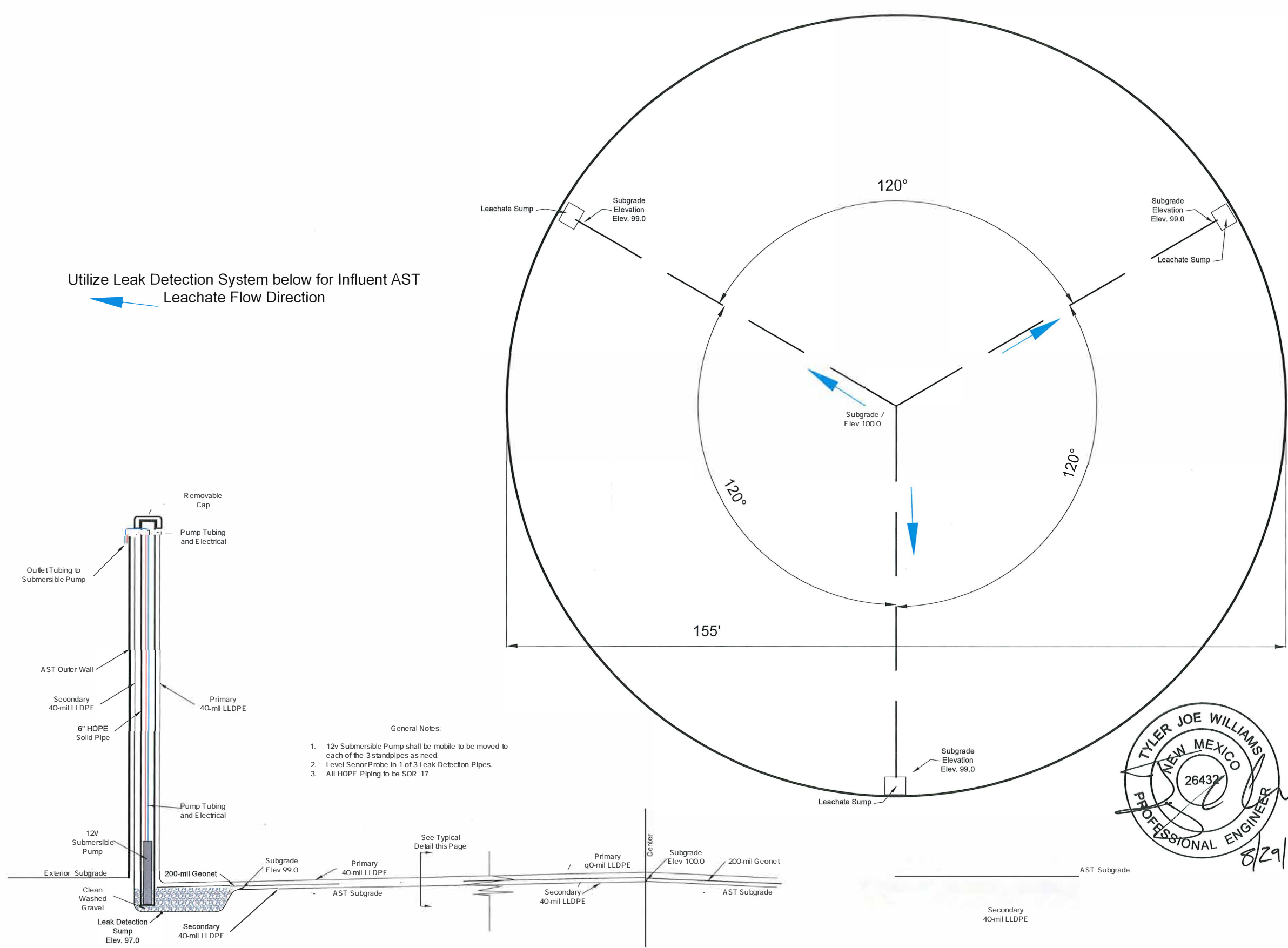
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NO.	DATE	DESCRIPTION

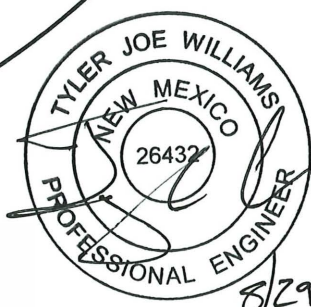
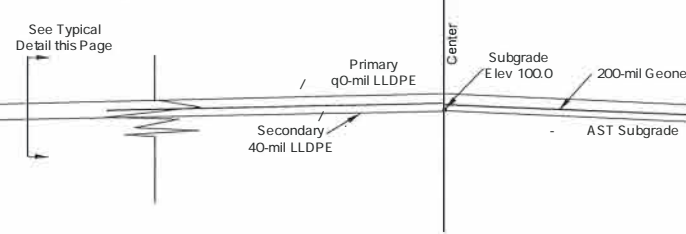


AST LEAK DETECTION PLAN
 COTTON D W RECYCLE F CILITY
 DE N ENERGY
 SECTION 22, TOWNSHIP 25 SO TH, NCE 31 EAST CO NTY, NM

DATE	AUGUST 2023
SCALE	NOT TO SCALE
DESIGNED BY	M. RATKE
DRAWN BY	A. WARE
CHECKED BY	T. WILLIAMS
PROJECT NO.	023232-00
SHEET NO.	FIGURE 1



- General Notes:**
- 12V Submersible Pump shall be mobile to be moved to each of the 3 standpipes as need.
 - Level Sensor Probe in 1 of 3 Leak Detection Pipes.
 - All HDPE Piping to be SOR 17



**Devon Energy
Cotton Draw Recycle Facility
Closure Cost Estimate**

Item	Units	Quantity	\$/Unit	Estimate Cost
1 Fluid removal				
Produced Water Impoundment	bbls	500,000	\$ 1.20	\$ 600,000.00
Freshwater Impoundment	bbls	10,000	\$ 1.20	\$ 12,000.00
Above Ground Storage Tank	bbls	40,000	\$ 1.20	\$ 48,000.00
2 Liner Wash Down (Steam trailer and crew)	hrs	10	\$ 200.00	\$ 2,000.00
3 Vac truck (final fluid removal)	hrs	2	\$ 105.00	\$ 210.00
4 Liner removal (fold-in-place)				
(Rostabout crews - 20 hrs)	hrs	5	\$ 150.00	\$ 750.00
(Track hoe - 20 hrs)	hrs	5	\$ 150.00	\$ 750.00
5 Equipment removal				
Tank clean-out and residue haul-off	ea	2	\$ 1,000.00	\$ 2,000.00
Equipment removal (tanks, gun barrel, FWKO)	ea	2	\$ 800.00	\$ 1,600.00
Electrical decommissioning (pumps and panels)	ea	2	\$ 100.00	\$ 200.00
Misc equipment clean-up and removal	hr	10	\$ 125.00	\$ 1,250.00
Remove AST	ca	1	\$ 75,000.00	\$ 75,000.00
6 Site Restoration				
Dozer - push in berms (bid)	ea	1	\$ 45,000.00	\$ 45,000.00
and final grading of the site				
Re-vegetation	ea	1	\$ 5,000.00	\$ 5,000.00
Estimated Total				\$ 793,760.00

8/29/2023

This Closure Cost Estimate was produced by Envirotech, an independent third-party.

Venegas, Victoria, EMNRD

From: Venegas, Victoria, EMNRD
Sent: Monday, October 2, 2023 3:07 PM
To: Bruening, Josh; Mitchell Ratke
Subject: 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574]
Attachments: C-147 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574]
10.02.2023.pdf

2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574]

Good afternoon Mr. Bruening,

NMOCD has reviewed the modification request and related documents, submitted by [6137] DEVON ENERGY PRODUCTION COMPANY, LP on 09/14/2023 for 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574] in I-22-25S-31E, Eddy County, New Mexico.

[6137] DEVON ENERGY PRODUCTION COMPANY, LP has requested a Permit Modification to change the Approved C-147 Containment and Recycle Facility (2RF-141) from a Non-commercial to a Commercial Recycle Facility and to add an AST of 40,000.00 bbl of capacity.

[6137] DEVON ENERGY PRODUCTION COMPANY, LP requested variances from 19.15.34 NMAC for 2RF-141 - Cotton Draw Recycling Facility ID [FVV2325636574].

The following variances, specific to the ASTs containments have been approved:

- The variance to 19.15.34.12.A.(2) NMAC for the no side-slope requirement for the AST containments with vertical walls is approved.
- The variance to 19.15.34.12.A.(3) NMAC for the liners to be anchored to the top of the ASTs steel walls and no anchor trenches is approved.
- The variance to 19.15.34.12.A.(4) NMAC for the installation on the AST containment of a 40-mil non-reinforced LLDPE secondary liner is approved.
- The variance to 19.15.34.12.A.(4) NMAC for the installation on the AST containment of a 40-mil non-reinforced LLDPE primary liner is approved. The proposed new liner system cross-section for the ASTs is as follows: prepare subgrade, 10 oz. geotextile, 40-mil LLDPE primary liner, 200-mil geonet, 40-mil LLDPE secondary liner.

The requested modifications are approved with the following conditions of approval:

- [6137] DEVON ENERGY PRODUCTION COMPANY, LP will comply with all conditions previously approved for permit 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574].
- No changes will be made to operation, maintenance and monitoring procedures, or closure procedures other than the requested modification to add one (1) AST containment of 40,000.00 bbl capacity. The new total operational volume of 2RF-141 will be 540,000-BBL; 40,000-BBL new, requested Above Ground Storage Tank, and 500,000-BBL previously approved, earthen containment.
- The total closure cost estimate for 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574] in the amount of \$793,760.00, meets the requirements of NMAC 19.15.34.
- The financial assurance bond should be mailed to the Oil Conservation Division; Bonding and Compliance; 1220 South St Frances Drive; Santa Fe, NM 87505.

Victoria Venegas • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
506 W. Texas Ave. Artesia, NM 88210

(575) 909-0269 | Victoria.Venegas@emnrd.nm.gov

<https://www.emnrd.nm.gov/oed/>



District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720
District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720
District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 265430

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 265430
	Action Type: [C-147] Water Recycle Long (C-147L)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	[6137] DEVON ENERGY PRODUCTION COMPANY, LP has requested a Permit Modification to change the Approved C-147 Containment and Recycle Facility (2RF-141) from a Non-commercial to a Commercial Recycle Facility and add a 40,000.00 bbl AST. The requested modifications are approved with the following conditions of approval: • [6137] DEVON ENERGY PRODUCTION COMPANY, LP will comply with all conditions previously approved for permit 2RF-141 - COTTON DRAW RECYCLING FACILITY ID [FVV2325636574]. •No changes will be made to operation, maintenance and monitoring procedures, or closure procedures. •The financial assurance bond should be mailed to the OCD office in Santa Fe.	9/27/2023