



Souder, Miller & Associates ♦ 201 S. Halagueno St. ♦ Carlsbad, NM 88220  
(575) 689-7040

---

October 6, 2020

SMA #5E29133, BG65

NMOCD District 1  
1625 N. French Dr.  
Hobbs, NM 88240

**RE: LINER INSPECTION REPORT  
TRIONYX 6 FEDERAL #001H BATTERY (NRM2025328272)**

To Whom it May Concern:

Souder, Miller & Associates (SMA) is pleased to submit this letter report on behalf of Devon Energy Production (Devon) summarizing the liner inspection that occurred due to the Trionyx 6 Federal #001H Battery release. The site is located in Section 6, T25S, R32E (N32.152470 /W-103.720017) Lea County, New Mexico, on Federal land.

**Site Characterization**

On August 8, 2020, an overfilled water tank resulted in a fluid release of 34.35 bbls of crude oil inside the lined secondary containment of the tank battery. Initial response activities were conducted by the operator and included source elimination and site stabilization, which recovered approximately 34.35 bbls of crude oil.

The nearest significant watercourses are three FEMA flood zones, located approximately 20,430 feet to the southwest. Figures 1 and 2 show the release location and surrounding features within the vicinity of Trionyx 6 Federal #001H. Figure 3 shows the location of the facility, point of release, and photograph locations.

**Liner Integrity**

At the request of Devon, SMA conducted a liner integrity inspection per requirements of 19.15.29.11.A(5)(a) NMAC. NMOCD was notified on September 18, 2020 that the liner inspection was to occur, and the inspection was conducted on September 22, 2020. After a thorough visual inspection of the liner within the tank battery containment, the liner appeared to be intact and had the ability to contain the leak in question. The location where the release occurred was identified, and SMA verified that the release did not occur outside of the lined containment. A photo log of the inspection is included in Appendix A.

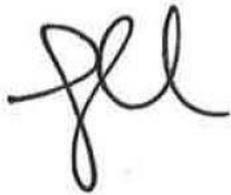
SMA recommends no further action for this release.

Devon Energy  
Trionyx 6 Federal #001H (NRM2025328272)

5E29133 BG65

Souder, Miller and Associates appreciates the opportunity to provide environmental services to you. If you have any questions or comments concerning this report, please call Ashley Maxwell at (505) 325-7535.

Sincerely,  
Souder, Miller & Associates



Ashley Maxwell  
Project Scientist



Shawna Chubbuck  
Senior Scientist

**Attachments:**

**Figures:**

**Figure 1:** Site Map

**Figure 2:** Surface Water Protection Map

**Figure 3:** Site and Sample Location Map

**Appendices:**

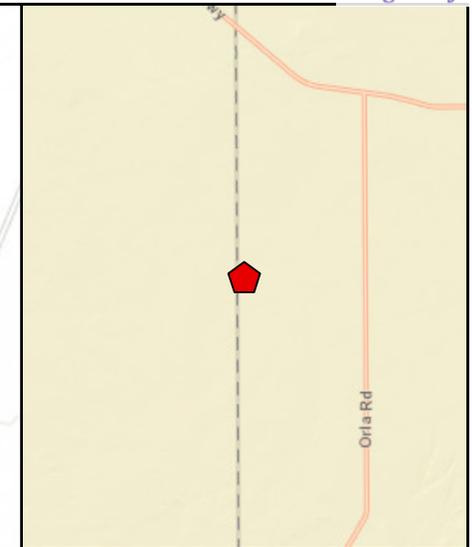
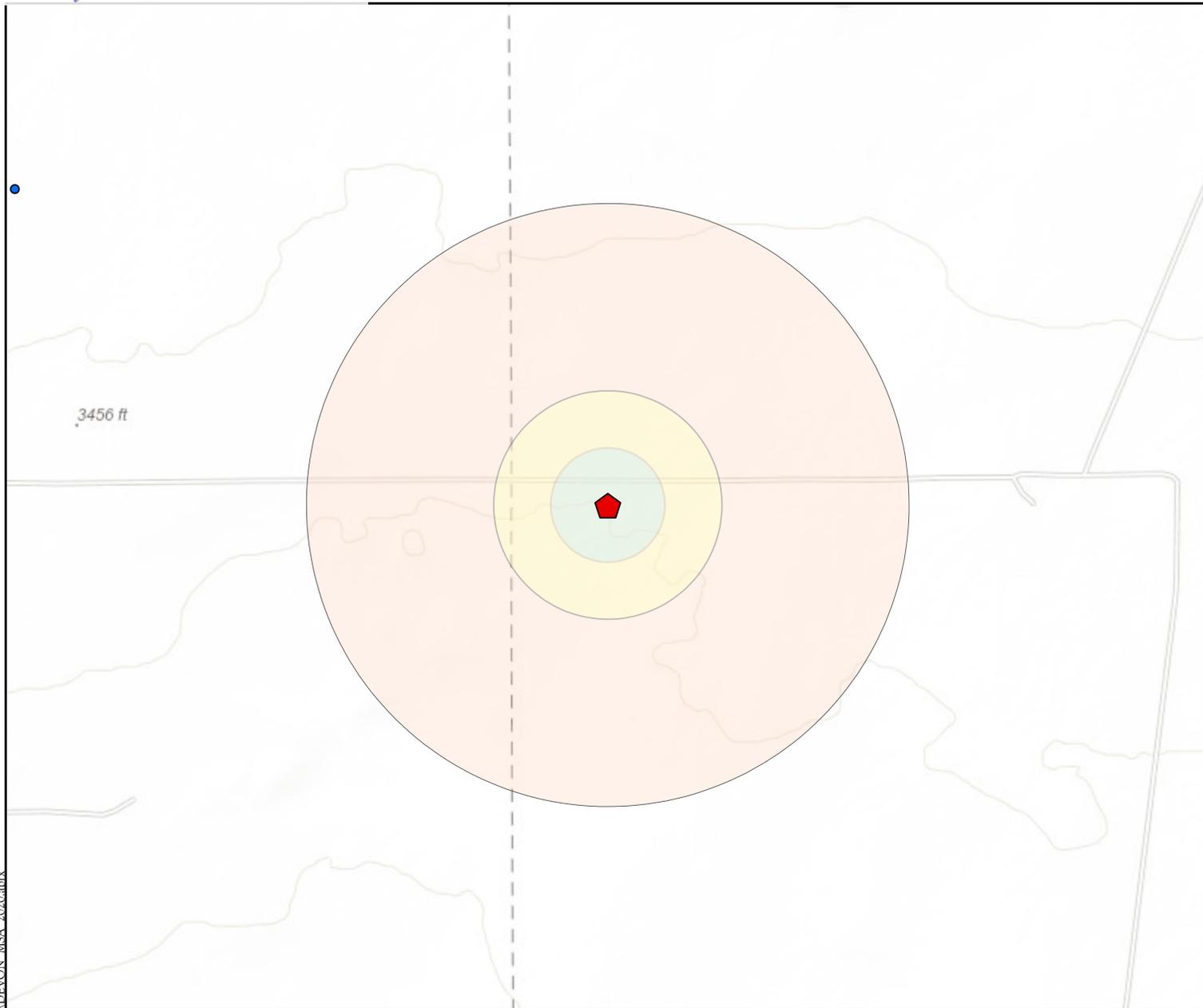
Appendix A: Liner Inspection Form & Photo Log

Appendix B: C141

Devon Energy  
Trionyx 6 Federal #001H (NRM2025328272)

5E29133 BG65

## **FIGURES**



**Buffer Distance**

- .5 Mile
- 1000 Feet
- 500 Feet

**Point of Release**

- Point of Release

**Wells**

- USGS Wells
- OSE Wells

**Karst Potential**

- Critical
- High
- Medium
- Low

**Scale**

0 437.5 875 1,750 2,625  
Feet

**North Arrow**

N

**Site Map**  
 Trionyx 6 Federal #001H - Devon Energy  
 32.152470, -103.720017, Lea County, New Mexico

Figure 1

P:\5 Devon\MSA 2020\5E29133\GIS\DEVON\_MSA\_2020.mxd  
Date Saved: 10/1/2020

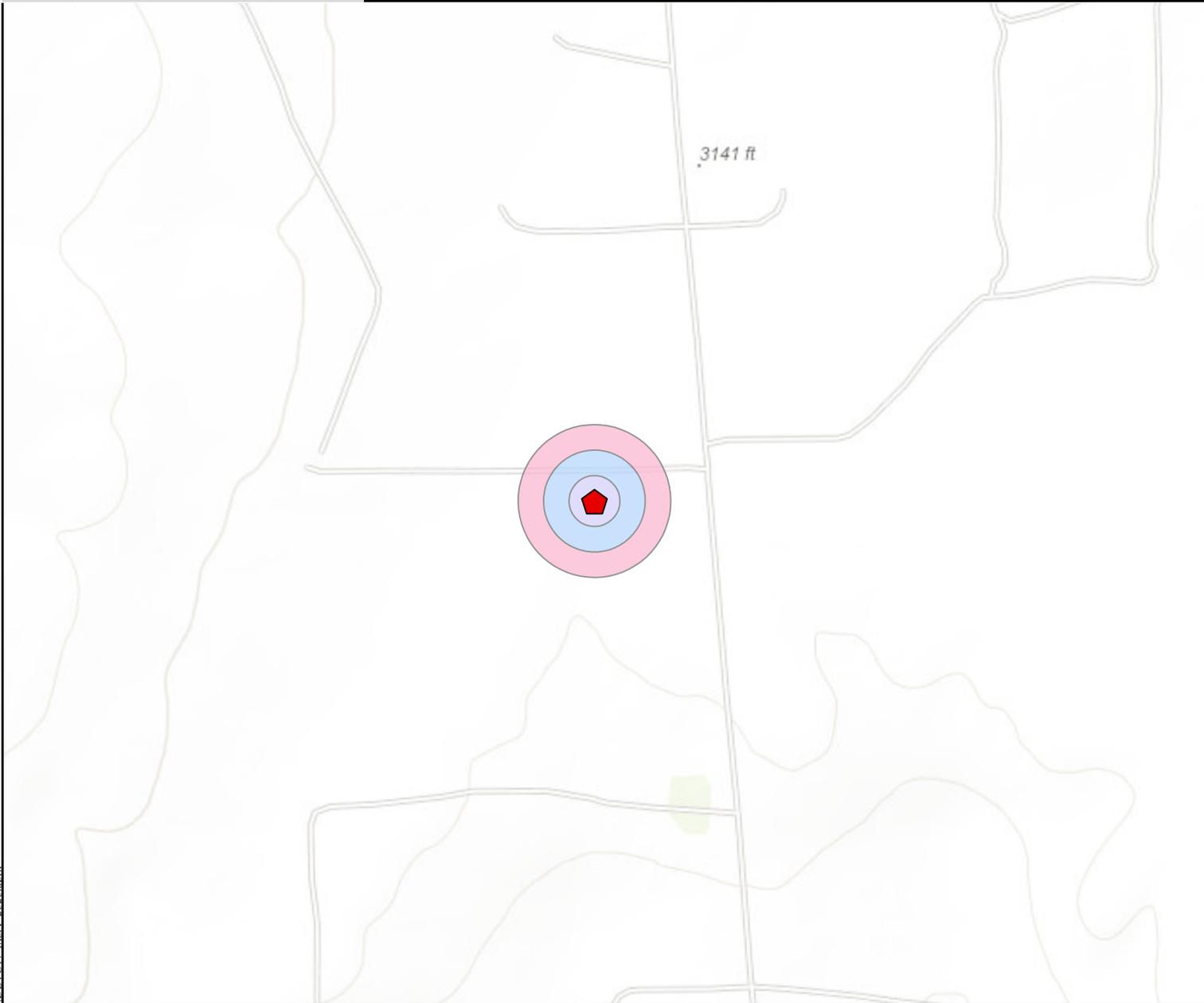
Revisions		
By: _____	Date: _____	Descr: _____
By: _____	Date: _____	Descr: _____

© Souder, Miller & Associates, 2020, All Rights Reserved

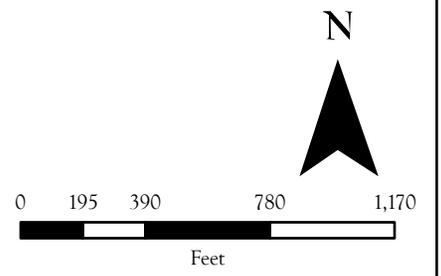
Drawn	P.R. Smith
Date	10/1/2020
Checked	_____
Approved	_____



201 South Halaguena Street  
 Carlsbad, New Mexico 88221  
 (575) 689-7040  
 Serving the Southwest & Rocky Mountains



- Buffer Distance**
- 300 Feet
  - 200 Feet
  - 100 Feet
  - Springs & Seeps
  - Streams & Canals
  - Rivers
  - Flowlines SENM
  - NM Wetlands
  - Lakes & Playas
  - FEMA Flood Zones 2011
  - Point of Release



*Surface Water Protection Map*  
 Trionyx 6 Federal #001H - Devon Energy  
 32.152470, -103.720017, Lea County, New Mexico

Figure 2

P:\5 Devon\MSA 2020\5E29133\GIS\DEVON\_MSA\_2020.aprx  
Date Saved: 10/1/2020

Revisions		
By: _____	Date: _____	Descr: _____
By: _____	Date: _____	Descr: _____

© Souder, Miller & Associates, 2020, All Rights Reserved

Drawn	P.R. Smith
Date	10/1/2020
Checked	_____
Approved	_____



201 South Halaguena Street  
 Carlsbad, New Mexico 88221  
 (575) 689-7040  
 Serving the Southwest & Rocky Mountains



Legend:

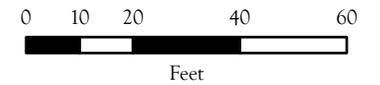
Secondary Containment

Sample Points

Photograph Locations

Point of Release

N



Site and Sample Location Map  
 Trionyx 6 Federal #001H - Devon Energy  
 32.152470, -103.720017, Lea County, New Mexico

Figure 3

P:\5-Devon\MSA 2020\GIS\201313\GIS\DEVON\_MSA\_2020.aprx

Date Saved:  
10/1/2020

Revisions  
 By: \_\_\_\_\_ Date: \_\_\_\_\_ Descr: \_\_\_\_\_  
 By: \_\_\_\_\_ Date: \_\_\_\_\_ Descr: \_\_\_\_\_

Drawn P.R. Smith  
 Date 10/1/2020  
 Checked \_\_\_\_\_  
 Approved \_\_\_\_\_



201 South Halaguena Street  
 Carlsbad, New Mexico 88221  
 (575) 689-7040  
 Serving the Southwest & Rocky Mountains

© Souder, Miller & Associates, 2020, All Rights Reserved

Devon Energy  
Trionyx 6 Federal #001H (NRM2025328272)

5E29133 BG65

**Appendix A  
LINER INSPECTION FORM  
&  
PHOTO LOG**

**Souder, Miller & Associates  
Liner Inspection Form**



Project Name: Trionyx & Fed 1 Inspection Date: 9/22/2020  
Client Name: Devon Energy  
Client Representative(s): Lupe Carrasco  
SMA Inspector(s): Sebastian Orozco/Phil Smith  
Project Location: Royal Lea Latitude: 32.152470 Longitude: -103.720017

**Inspection Parameters as Outlined in 19.15.29.11.A(5) NMAC**

**PRIOR TO INSPECTION:**

Two (2) Business Day Notification of Inspection to Appropriate Division Office (Y/N): Y  
Date of Notice: 9/18/2020

Material Covering Liner Removed by Client (Y/N): Y

Affected Areas Exposed by Client (Y/N): Y

**INSPECTION:**

Liner Thoroughly Inspected for Damage (Y/N): Y

All Damaged Areas Observed Marked in **White Paint** on Liner  
Photos and Field Notes Detailing Failures Attached to This Form

**To Be Completed by Client Representative:**

Can Responsible Party Demonstrate:  
Liner Integrity Was Maintained (per SMA Inspection) (Y/N): Y  
Release Was Contained to Lined Containment Area (Y/N): Y  
Liner Was Able to Contain the Leak (Y/N): Y

If YES:  
Certify on Form C-141 That Liner Remains Intact

If NO to Any of Above:  
Responsible Party Must Delineate Horizontal & Vertical Extent  
Depending on Release:  
See Table 1 19.15.29.12 NMAC  
See Subparagraph (e) Paragraph (5) of Subsection A 19.15.29.11 NMAC

**Additional Comments:**

**SMA INSPECTOR SIGNATURE**

Sebastian Orozco  
Date: 9/22/2020

**CLIENT REPRESENTATIVE**

Tom Bynum  
Date: 10/8/2020

150

180

210

240

☉ 191°S (T) ● 32.152364, -103.720457 ±3 m ▲ 1028 m



300

330

N

30

☉ 346°NW (T) ● 32.152364, -103.720457 ±2 m ▲ 1028 m



240

270

300

330

☀ 293°W (T) ● 32.152364, -103.720457 ±2 m ▲ 1028 m



150

180

210

240

☉ 197°S (T) ● 32.15238, -103.720518 ±2 m ▲ 1021 m



☉ 343°NW (T) ● 32.15238, -103.720518 ±1 m ▲ 1021 m



60

90

120

150

93°E (T) 32.152417, -103.720537 ±2 m 1022 m



60

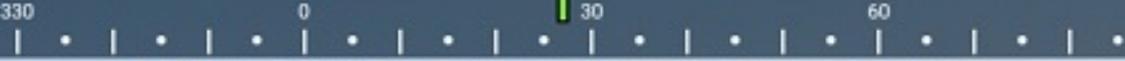
90

120

150

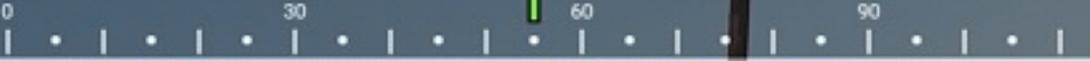
☀ 94°E (T) ● 32.152456, -103.720531 ±2 m ▲ 1024 m



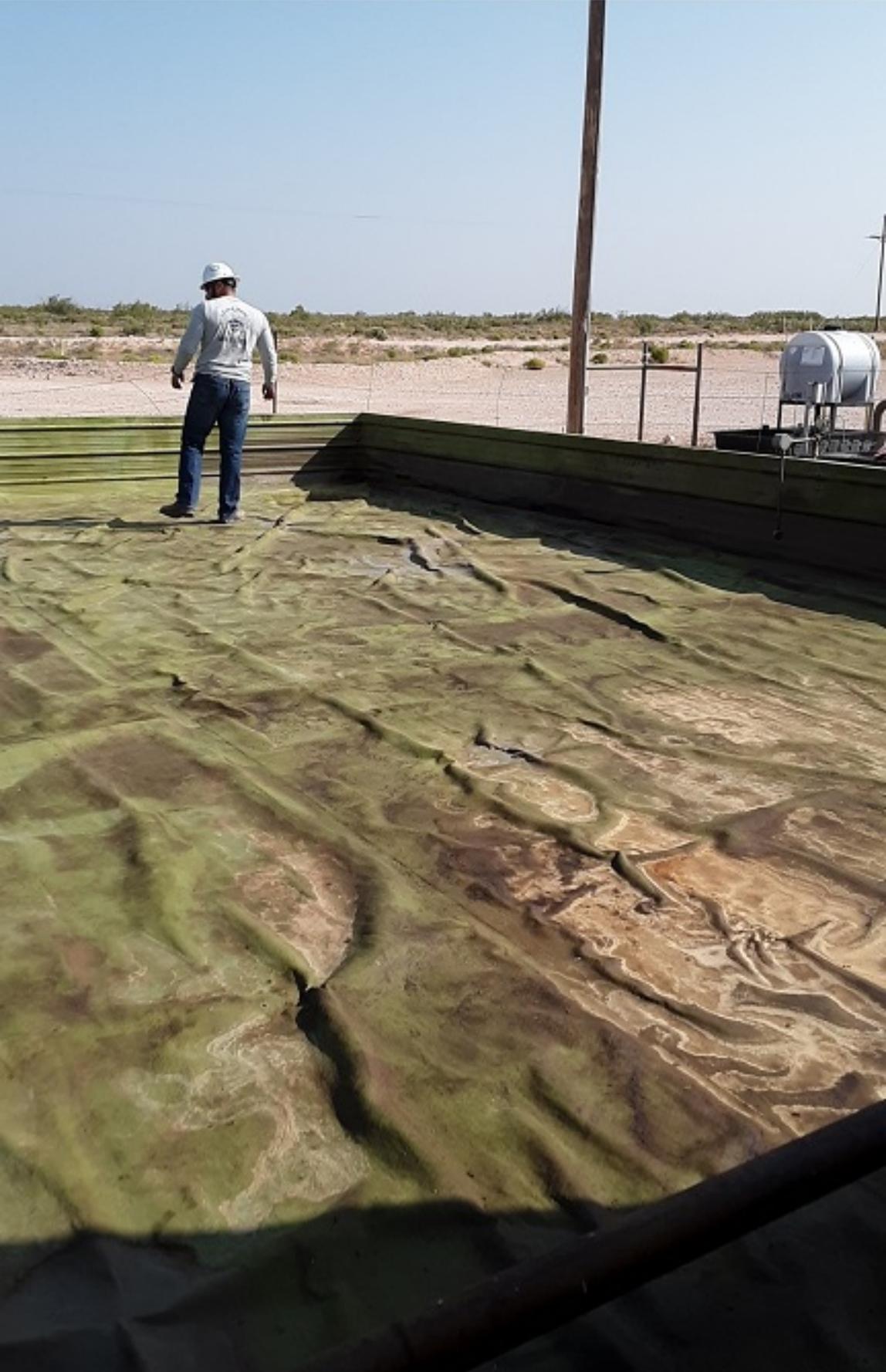


☉ 27°N (T) ● 32.15251, -103.720526 ±2 m ▲ 1022 m





☉ 54°NE (T) ● 32.15251, -103.720526 ±1 m ▲ 1022 m



120

150

180

210

171°S (T) 32.152525, -103.720462 ±1 m ▲ 1022 m



60

90

120

150

98°E (T) 32.152385, -103.720518 ±2 m ▲ 1020 m



90

120

150

180

☉ 126°SE (T) ● 32.152267, -103.720521 ±1 m ▲ 1027 m



Devon Energy  
Trionyx 6 Federal #001H (NRM2025328272)

5E29133 BG65

## **APPENDIX B C141**

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

Form C-141  
Revised August 24, 2018  
Submit to appropriate OCD District office

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

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party Devon Energy Production Company	OGRID 6137
Contact Name Amanda Davis	Contact Telephone 575-748-0176
Contact email Amanda.Davis@dvn.com	Incident # (assigned by OCD)
Contact mailing address 6488 Seven Rivers Hwy	

### Location of Release Source

Latitude 32.152470 Longitude -103.720017  
*(NAD 83 in decimal degrees to 5 decimal places)*

Site Name Trionyx 6 Fed 1 Battery	Site Type Oil
Date Release Discovered 8/8/2020	API# (if applicable)

Unit Letter	Section	Township	Range	County
M	6	25S	32E	Lea

Surface Owner:  State  Federal  Tribal  Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 34.35 BBLS	Volume Recovered (bbls) 34.35 BBLS
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of total dissolved solids (TDS) in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **Water tank ran over causing fluid release. All fluid stayed inside lined containment.**

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? This is considered a major release because it is over 25 BBLs.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Immediate notice was not given.	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:  
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. 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 attach all information needed for closure evaluation.
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.
Printed Name: <u>Kendra DeHoyos</u> Title: <u>EHS Associate</u> Signature: <u>Kendra DeHoyos</u> Date: <u>9/3/2020</u> email: <u>Kendra.DeHoyos@dvn.com</u> Telephone: <u>575-748-0167</u>
<b><u>OCD Only</u></b> Received by: <u>Ramona Marcus</u> Date: <u>9/9/2020</u>

NRM2025328272

<b>Spills In Lined Containment</b>	
<b>Measurements Of Standing Fluid</b>	
Length(Ft)	100
Width(Ft)	21
Depth(in.)	2
Total Capacity without tank displacements (bbls)	62.34
No. of 500 bbl Tanks In Standing Fluid	5
No. of Other Tanks In Standing Fluid	
OD Of Other Tanks In Standing Fluid(feet)	
Total Volume of standing fluid accounting for tank displacement.	34.35

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

*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?	_N/A_ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

**Characterization Report Checklist:** *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico  
Oil Conservation Division

Page 4

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

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.

Printed Name: Tom Bynum Title: EHS Consultant  
 Signature: *Tom Bynum* Date: 10/8/2020  
 email: tom.bynum@dvn.com Telephone: 575-748-2663

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

State of New Mexico  
Oil Conservation Division

Page 6

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

## Closure

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 (electronic submittals in .pdf format are preferred) 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.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

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.

Printed Name: Tom Bynum Title: EHS Consultant  
 Signature: *Tom Bynum* Date: 10/8/2020  
 email: tom.bynum@dvn.com Telephone: 575-748-2663

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

Incident ID	NRM2025328272
District RP	
Facility ID	
Application ID	

## Closure

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 (electronic submittals in .pdf format are preferred) 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.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

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.

Printed Name: Tom Bynum Title: EHS Consultant  
 Signature: *Tom Bynum* Date: 10/8/2020  
 email: tom.bynum@dvn.com Telephone: 575-748-2663

**OCD Only**

Received by: Robert Hamlet Date: 3/19/2021

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: *Robert Hamlet* Date: 3/19/2021

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced

**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 10726

**CONDITIONS OF APPROVAL**

Operator: PIMA ENVIRONMENTAL SERVICES, L Suite 500 Hobbs, NM88240	1601 N. Turner	OGRID: 329999	Action Number: 10726	Action Type: C-141
--	----------------	------------------	-------------------------	-----------------------

OCD Reviewer	Condition
rhamlet	We have received your closure report and final C-141 for Incident #NRM2025328272 TRIONYX 6 FED 1 BATTERY, thank you. This closure is approved.