

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

**NM OIL CONSERVATION**  
State of New Mexico  
Energy Minerals and Natural Resources  
ARTESIA DISTRICT  
Oil Conservation Division  
1220 South St. Francis Dr.  
Santa Fe, NM 87505

Form C-141  
Revised August 8, 2011

DEC 18 2017

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

RECEIVED

**Release Notification and Corrective Action**

*NABI736055339*

**OPERATOR**

Initial Report     Final Report

Name of Company: WPX Energy Inc/RKI <i>241289</i>	Contact: Karolina Blaney
Address: 5315 Buena Vista Dr.	Telephone No.: 970 589 0743
Facility Name: RDU 34 well pad	Facility Type: Well Pad

Surface Owner: Federal	Mineral Owner: Federal	API No. 30-015-41578
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**LOCATION OF RELEASE**

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
D	22	26S	30E	600	FNL	435	FWL	Eddy

Latitude: 32.03364814N    Longitude: -103.87630939W

**NATURE OF RELEASE**

Type of Release: Produced Water and Oil	Volume of Release: 5 Bbls	Volume Recovered: 2 Bbls
Source of Release: Flowline	Date and Hour of Occurrence: 12/8/2017	Date and Hour of Discovery: 12/8/2017 - 12:00 hrs MT
Was Immediate Notice Given? <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not Required	If YES, To Whom? NMOCD Crystal Weaver & Michael Bratcher, BLM Shelly Tucker	
By Whom? Karolina Blaney	Date and Hour: 12/8/17 - 14:44 hrs MT	
Was a Watercourse Reached? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, Volume Impacting the Watercourse: N/A	

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

Describe Cause of Problem and Remedial Action Taken.\*  
The spill was caused by a failure of a buried flowline. Spilled water and oil migrated to the surface and estimated 5 bbls of fluids was spilled on location. None of the fluids has left the pad.

Describe Area Affected and Cleanup Action Taken.\*  
The impacted area was immediately mapped with a Trimble to establish horizontal extent of impacts. The impacted area was scraped off and sampled for BTEX, TPH, and chlorides in accordance with NM OCD Guidelines for Remediation of Leaks, Spills, and Releases. Further remediation will be based on these results. *Release will be delineated + remediated per OCD Rules, Regs + COA standards.*

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: <i>Karolina Blaney</i>	<b>OIL CONSERVATION DIVISION</b>	
Printed Name: Karolina Blaney	Approved by Environmental Specialist: <i>Crystal W</i>	
Title: Environmental Specialist	Approval Date: <i>12/26/17</i>	Expiration Date: <i>N/A</i>
E-mail Address: Karolina.blaney@wpenergy.com	Conditions of Approval: <i>See attached</i>	
Date: 12-18-17      Phone: 970-589-0743	Attached <input checked="" type="checkbox"/> <i>2RP-4529</i>	

\* Attach Additional Sheets If Necessary

*12/22/17 AB*

Operator/Responsible Party,

The OCD has received the form C-141 you provided on **12/18/17** regarding an unauthorized release. The information contained on that form has been entered into our incident database and remediation case number ARP-4529 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 II office in Artesia on or before 1/18/18. 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; C<sub>6</sub> thru C<sub>36</sub>), 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; C<sub>6</sub> thru C<sub>36</sub>), 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

## Weaver, Crystal, EMNRD

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**From:** Blaney, Karolina <Karolina.Blaney@wpxenergy.com>  
**Sent:** Monday, December 18, 2017 12:54 PM  
**To:** Weaver, Crystal, EMNRD; 'Tucker, Shelly'  
**Cc:** Bratcher, Mike, EMNRD; Raley, Jim  
**Subject:** WPX/RKI RDU 34 - C-141  
**Attachments:** RDU 34 - C-141.doc

Good afternoon,  
Attached is the C-141 report for the RDU 34 spill.  
Please let me know if you have any questions or concerns.  
Thank you and have a great afternoon,

### *Karolina Blaney*

Environmental Specialist  
WPX Energy  
Office: (575) 885-7514  
Cell: (970) 589-0743  
[karolina.blaney@wpxenergy.com](mailto:karolina.blaney@wpxenergy.com)

**From:** Blaney, Karolina  
**Sent:** Friday, December 08, 2017 2:44 PM  
**To:** 'Weaver, Crystal, EMNRD' <Crystal.Weaver@state.nm.us>; 'Tucker, Shelly' <stucker@blm.gov>  
**Cc:** 'Bratcher, Mike, EMNRD' <mike.bratcher@state.nm.us>; Raley, Jim <james.rale@wpxenergy.com>  
**Subject:** WPX/RKI RDU 34 - initial spill notification

Good afternoon,  
WPX discovered a spill this afternoon, 12/8/17, at 12:00 pm at the RDU 34 well pad. API # 30-015-41578, D-22-26S-30E.  
The spill was caused by a failure of a buried flowline. Approximately 5 bbls of produced fluids were spilled on location.  
None of the spilled fluids has left the pad. I will submit the C-141 report in the next 15 days but please do not hesitate to contact me if you have any questions.  
Thank you and have a great weekend,

### *Karolina Blaney*

Environmental Specialist  
WPX Energy  
Office: (575) 885-7514  
Cell: (970) 589-0743  
[karolina.blaney@wpxenergy.com](mailto:karolina.blaney@wpxenergy.com)

## Weaver, Crystal, EMNRD

---

**From:** Blaney, Karolina <Karolina.Blaney@wpxenergy.com>  
**Sent:** Friday, December 8, 2017 2:45 PM  
**To:** Weaver, Crystal, EMNRD; 'Tucker, Shelly'  
**Cc:** Bratcher, Mike, EMNRD; Raley, Jim  
**Subject:** WPX/RKI RDU 34 - initial spill notification

Good afternoon,

WPX discovered a spill this afternoon, 12/8/17, at 12:00 pm at the RDU 34 well pad. API # 30-015-41578, D-22-26S-30E. The spill was caused by a failure of a buried flowline. Approximately 5 bbls of produced fluids were spilled on location. None of the spilled fluids has left the pad. I will submit the C-141 report in the next 15 days but please do not hesitate to contact me if you have any questions.

Thank you and have a great weekend,

*Karolina Blaney*

Environmental Specialist

WPX Energy

Office: (575) 885-7514

Cell: (970) 589-0743

[karolina.blaney@wpxenergy.com](mailto:karolina.blaney@wpxenergy.com)

Jim Raley

Incident ID	NAB1736055339
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?	> 100 (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.

Oil Conservation Division

Incident ID	NAB1736055339
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: Jim Raley Title: Environmental Professional

Signature:  Date: 11/15/2021

email: jim.raley@dvn.com Telephone: 575-689-7597

**OCD Only**

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

Incident ID	NAB1736055339
District RP	
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** Each of the following items must be included in the plan.

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** Each of the following items must be confirmed as part of any request for deferral of remediation.

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: Jim Raley Title: Environmental Professional  
 Signature:  Date: 11/15/2021  
 email: jim.raley@dvn.com Telephone: 575-689-7597

**OCD Only**

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

- Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

November 11, 2021

District II  
New Mexico Oil Conservation Division  
811 South First Street  
Artesia, New Mexico 88210

**RE: Remediation Work Plan Addendum  
Ross Draw Unit #034  
Incident Numbers nAPP2107554265, nAB1736055339 (2RP-4529) and nAB1528240224  
(2RP-3322)  
Eddy County, New Mexico**

To Whom it May Concern:

WSP USA Inc. (WSP), on behalf of WPX Energy Permian, LLC. (WPX) is pleased to present the following Addendum to the original Remediation Work Plan Request, submitted to the New Mexico Oil Conservation Division (NMOCD) on May 21, 2021. This Addendum provides clarification for the proposed sampling plan and the depth to water determination at the Ross Draw Unit #034 (Site) located in Unit D, Section 22 Township 26 South, Range 30 East, Eddy County, New Mexico (Figure 1). The NMOCD denied the proposed sampling plan in the original Remediation Work Plan on August 19, 2021 based on concern that the depth to water determination at the Site was inadequate. Based on the additional clarification below, WPX is submitting this Addendum Remediation Work Plan Request to further clarify the proposed remediation actions and estimation of groundwater at the Site is greater than 101 feet below ground surface (bgs), no further than ½ mile from the Site, and has measurement data that is less than 25 years old. Figures and Attachments may be referenced from the original Remediation Work Plan Request.

#### **RELEASE BACKGROUND**

##### nAPP2107554265

On March 7, 2021, the failure of a polish rod packing associated with the well head resulted in the release of approximately 8 barrels (bbls) of crude oil and 1 bbl of produced water to the well pad surface and adjacent pasture. A vacuum truck was dispatched to the Site and recovered approximately 5 bbls of oil. Devon reported the release to NMOCD on a Release Notification and Corrective Action Form C-141 (Form C-141) on April 6, 2021 and was assigned Incident Number nAPP2107554265.

##### NAB1736055339 (2RP-4529)

On December 8, 2017, a buried flowline failed and resulted in the release of approximately 5 bbls of crude oil and produced water onto the well pad surface. A vacuum truck was dispatched to the Site and recovered approximately 2 bbls of crude oil and produced water. Devon reported

the release to the NMOCD on a Form C-141 on December 18, 2017 and was assigned Incident Number NAB1736055339 and Remediation Permit (RP) Number 2RP-4529.

NAB1528240224 (2RP-3322)

On October 6, 2015, a natural gas poly line northeast of the location parted and caught fire in the right of way (ROW) that included an additional two gas lines and 5 poly water lines. The poly water lines melted and resulted in the release of approximately 70 bbls of produced water onto the pipeline ROW. A vacuum truck was dispatched to the Site and recovered approximately 55 bbls of produced water. Devon reported the release to the NMOCD on a Form C-141 on October 7, 2015 and was assigned Incident Number NAB1528240224 and RP Number 2RP-3322.

### **SITE CHARACTERIZATION**

The Remediation Work Plan detailed site characterization according to Table 1, Closure Criteria for Soils Impacted by a Release, detailed in Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC).

### **CLOSURE CRITERIA**

Based on the results of the Site Characterization, the following NMOCD Table 1 Closure Criteria (Closure Criteria) apply:

- Benzene: 10 milligrams per kilogram (mg/kg)
- Benzene, toluene, ethylbenzene, and total xylenes (BTEX): 50 mg/kg
- Total petroleum hydrocarbons (TPH)-gasoline range organics (GRO) and TPH-diesel range organics (DRO): 1,000 mg/kg
- TPH: 2,500 mg/kg
- Chloride: 20,000 mg/kg

The reclamation requirement of 600 mg/kg chloride per NMAC 19.15.29.13.D (1) applies for the top 4 feet of areas that will be reclaimed immediately following remediation, specifically areas off pad within the pasture.

### **NMOCD Denial**

NMOCD emailed Mr. Jim Raley with WPX on August 19, 2021 indicating their denial of the May 2021 Remediation Work Plan Request based on the following:

- *When nearby wells are used to determine depth to groundwater, the wells should be no further than ½ mile away from the site, and data should be no more than 25 years old, and well construction information should be provided. If evidence of depth to ground water within a ½ mile radius of the site cannot be provided, impacted soils will need to*

*meet Table 1 Closure Criteria for ground water at a depth of 50 feet or less. The Closure Report is denied due to inadequate and unapproved sampling plan.*

## **ADDENDUM RESPONSE**

As indicated in the original Remediation Work Plan Request, depth to groundwater at the Site is estimated to be greater than 100 feet bgs based on soil boring MW-1, associated with Ross Draw Unit (RDU) #38, that was drilled by Talon LPE on December 8, 2020. The soil boring is located approximately 0.36 miles southeast of the Site (32.030491°, -103.871260°). Using a truck mounted drill rig equipped with hollow stem auger, the soil boring was advanced to a total depth of approximately 105 feet bgs. Groundwater was not observed within the soil boring after at least 72 hours. Following the observation period, the boring was plugged and abandoned. The boring log is included as Attachment 1.

In addition, WPX installed six other borings in December 2020 (RDX 16 #25H (MW-1), RDX 21-43 (MW-1), RDX 17-3 (MW-1), RDX 17-44 (MW-1), RDU 55 (MW-1), and RDU 57 (MW-1)) within a 3-mile radius of the Site and depth to water results for all six indicated groundwater was not encountered within 105 feet of the ground surface. Two other water wells, United States Geological Survey (USGS) well number 320125103514701 and New Mexico Office of the State Engineer (OSE) well number C 02165, indicate depth to water was 117 feet bgs and 180 feet bgs, respectively. Regionally, depth to water appears to be greater than 100 feet bgs and therefore the depth to water estimate for RDU #38 appears to be consistent with the regional data, thus a representative water well for estimating depth to water for the Site. Figure 1 depicts the nine water wells described above.

The Closure Criteria for Incident Numbers nAPP2107554265, nAB1736055339 (2RP-4529) and nAB1528240224 (2RP-3322) is reflective of depth to water determination as stipulated by NMOCD, which includes:

<b>Depth to Water Criteria</b>	<b>Response – Water Well RDU #58 (MW-01)</b>
Well located within ½-mile of the Site	Approximately 0.36 miles from the Site
Depth to water measurement within the last 25 years	Well drilled and depth to water measured in December 2020
Well Construction Provided	The boring log and well construction information was provided in the original Remediation Work Plan Request and included in Attachment 1 of this Addendum

## **CONCLUSION**

Based on data from the RDU #38 (MW-1) soil boring and its overall correlation with regional depth to water findings, WPX believes the established Closure Criteria should be utilized for delineation and excavation purposes for the three releases included in the Remediation Work Plan Request.

WPX respectfully requests a reconsideration of the May 2021 Remediation Work Plan Request as it pertains to Incident Numbers nAPP2107554265, nAB1736055339 (2RP-4529) and nAB1528240224 (2RP-3322). If approved, WPX will commence with field activities promptly.

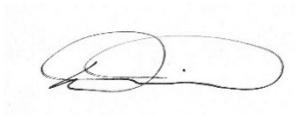
If you have any questions or comments, please do not hesitate to contact Mr. Dan Moir at (303) 887-2946.

Sincerely,

WSP USA Inc.



Anna Byers  
Consultant, Geologist



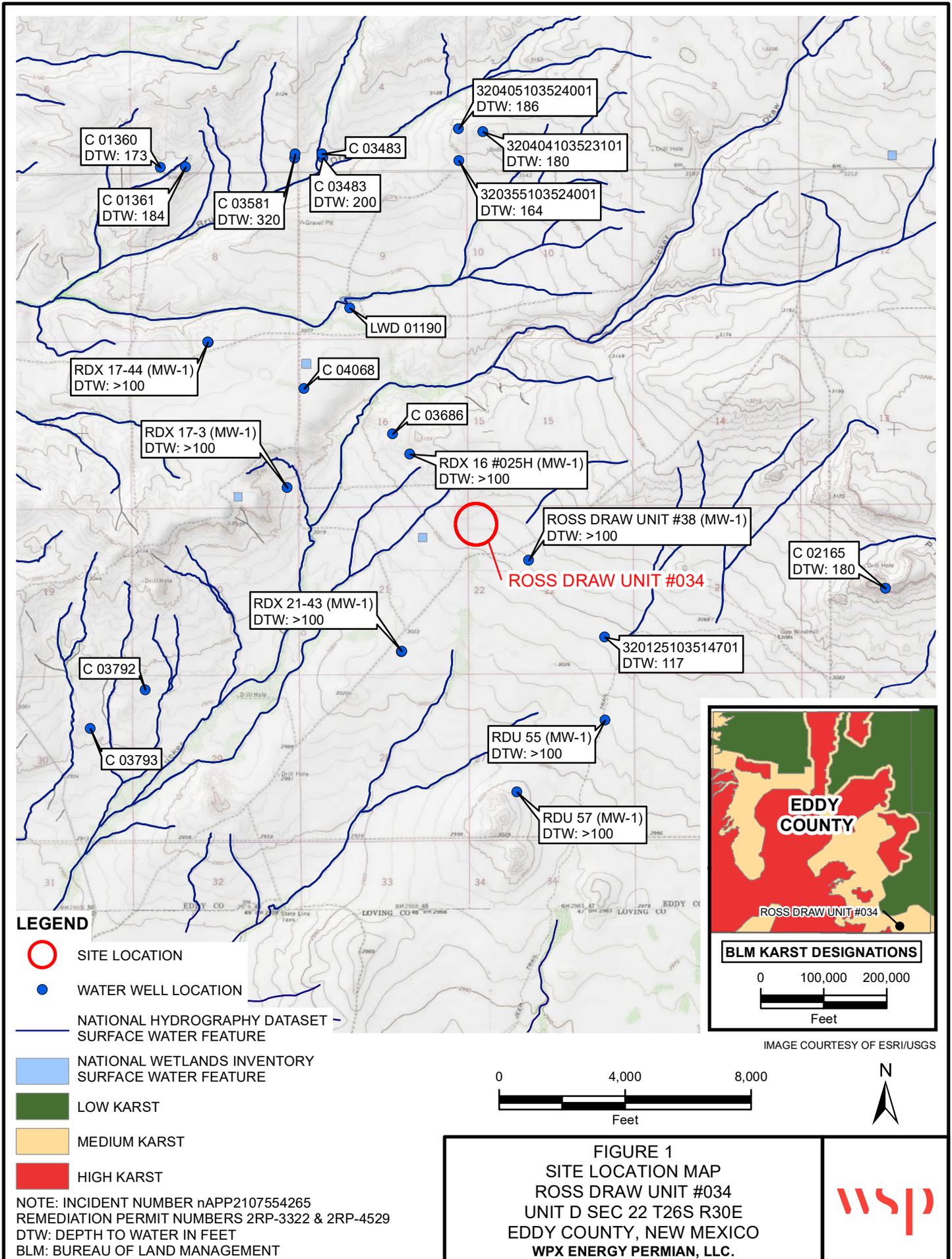
Daniel R. Moir, P.G.  
Lead Consultant, Geologist

cc: Jim Raley, Devon  
Bureau of Land Management

Attachments:

Figure 1 Site Location Map  
Attachment 1 Referenced Well Records

FIGURES





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

							BORING LOG/MONITORING WELL COMPLETION DIAGRAM																	
Drilling Method: Air Rotary							Sampling Method: None			Boring/Well Number: MW-1			Location: RDX 16-25											
Gravel Pack Type: 10/20 sand							Gravel Pack Depth Interval: 3 bags			Date: 12/10/2020			Client: WPX Energy											
Casing Type: PVC							Diameter: 2-inch			Depth Interval: 0-105 feet bgs			Logged By: J. Linn, PG			Drilled By: Talon LPE								
Screen Type: PVC							Slot: 0.010-inch			Diameter: 2-inch			Depth Interval: 105-110 ft			Seal Type: None			Seal Depth Interval: None			Latitude: 32.0399004		
										Boring Total Depth (ft. BGS): 110			Longitude: -103.8833368			Well Total Depth (ft. BGS): 110			Depth to Water (ft. BTOC): > 110			DTW Date: 12/16/2020		
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks				Well Completion											
0	NM	L	D	N	N	NM	SW	NS	Pale orange to pink tan well graded sand with silt															
5																								
10																								
15																								
20																								
25	NM	L	D	N	N	NM	SP	NS	Pale pinky orange poorly graded fine sand															
30																								
35																								
40	NM	L	D	N	N	NM	SW	NS	Orange to pale red well graded sand with gravel															
45																								
50	NM	L	D	N	N	NM	SP	NS	Pale pinky orange poorly graded fine sand															
55																								
60	NM	L	D	N	N	NM	SP	NS	Pale pinky orange poorly graded fine sand with minor medium and coarse sand - TD: 110' bgs															
65																								
70																								
75																								
80																								
85																								
90																								
95																								
100																								
105																								
110																								

							BORING LOG/MONITORING WELL COMPLETION DIAGRAM																	
Drilling Method: Air Rotary							Sampling Method: None			Boring/Well Number: MW-1			Location: RDX Federal Com 21-43											
Gravel Pack Type: 10/20 Sand							Gravel Pack Depth Interval: 3 Bags			Seal Type: None			Seal Depth Interval: None			Date: 12/9/2020			Client: WPX Energy					
Casing Type: PVC							Diameter: 2-inch			Depth Interval: 0-100 feet bgs			Boring Total Depth (ft. BGS): 110			Logged By: J. Linn, P.G.			Drilled By: Talon LPE					
Screen Type: PVC							Slot: 0.010-inch			Diameter: 2-inch			Depth Interval: 100 - 105 ft			Well Total Depth (ft. BGS): 105			Latitude: 32.022571			Longitude: -103.884371		
																Depth to Water (ft. BTOC): > 105			DTW Date: 12/16/2020					
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks						Well Completion									
0	NM	L	D	N	N	NM	SP	NS	Pale orange to tan poorly graded fine sand															
5																								
10																								
15																								
20	NM	H	D	N	N	NM	CL	NS	Pale orange/tan/pale red clay, dry, with silt, fine sand, and minor caliche															
25																								
30																								
35																								
40	NM	L	D	N	N	NM	SP	NS	Pale orange to pale red poorly graded fine sand															
45																								
50																								
55																								
60	NM	L	D	N	N	NM	SP	NS	Golden yellow poorly graded fine sand with minor silt and clay															
65																								
70																								
75																								
80	NM	L	D	N	N	NM	SP	NS	Pale orange to pale red poorly graded fine sand with minor silt/clay															
85																								
90																								
95																								
100	NM	H	D	N	N	NM	SC	NS	Buff to orange color fine sand with medium sand and clay															
105																								
	NM	H	D	N	N	NM	CL	NS	Brown orange clay with silt and fine sand															
	NM	H	D	N	N	NM	SC	NS	Golden yellow and buff colored clay with fine sand - TD Boring: 110' BGS; Sand 110' - 105' BGS															

							BORING LOG/MONITORING WELL COMPLETION DIAGRAM																	
Drilling Method: Air Rotary							Sampling Method: None			Boring/Well Number: MW-1			Location: RDX 17 #3											
Gravel Pack Type: 10/20 Sand							Gravel Pack Depth Interval: 3 Bags			Date: 12/8/2020			Client: WPX Energy											
Casing Type: PVC							Diameter: 2-inch			Depth Interval: 0-102 feet bgs			Logged By: J. Linn, PG			Drilled By: Talon LPE								
Screen Type: PVC							Slot: 0.010-inch			Diameter: 2-inch			Depth Interval: 102-107 ft			Seal Type: None			Seal Depth Interval: None			Latitude: 32.036765		
										Boring Total Depth (ft. BGS): 107			Longitude: -103.895993			Well Total Depth (ft. BGS): 107			Depth to Water (ft. BTOC): > 107			DTW Date: 12/16/2020		
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks						Well Completion									
0	NM	L	D	N	N	NM	SP	NS	Pale orange poorly graded fine sand															
5																								
10																								
15																								
20																								
25	NM	L	D	N	N	NM	SP	NS	Same as above with slight increase in coarse sand and gravel															
30																								
35																								
40	NM	L	D	N	N	NM	SP	NS	Pale orange poorly graded fine sand with very slight silt															
45																								
50																								
55	NM	L	D	N	N	NM	SP	NS	Pale orange poorly graded fine sand															
60																								
65	NM	M	SL M	N	N	NM	SM	NS	Pale red orange clayey silty fine sand with minor coarse sand and gravel															
70																								
75																								
80																								
85																								
90	NM	L	SL M	N	N	NM	SP	NS	Pale orange poorly sorted fine sand - TD 107' BGS															
95																								
100																								
105																								
105																								

							BORING LOG/MONITORING WELL COMPLETION DIAGRAM																								
Boring/Well Number:							MW-1			Location:			RDX Federal Com 17-44H																		
Date:							12/8/2020			Client:			WPX Energy																		
Drilling Method:				Air Rotary			Sampling Method:				None			Logged By:			J. Linn, PG			Drilled By:			Talon LPE								
Gravel Pack Type:				10/20 Sand			Gravel Pack Depth Interval:				3 Bags			Seal Type:		None		Seal Depth Interval:		None		Latitude:			32.049656						
Casing Type:		PVC		Diameter:		2-inch		Depth Interval:		0-105 ft bgs		Boring Total Depth (ft. BGS):				110				Longitude:			-103.904054								
Screen Type:		PVC		Slot:		0.010-inch		Diameter:		2-inch		Depth Interval:		105 - 110 ft		Well Total Depth (ft. BGS):				110				Depth to Water (ft. BTOC):		> 110		DTW Date:		12/16/2020	
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks							Well Completion															
0	NM	L	D	N	N	NM	CE	NS	Buff to pale pink colored caliche																						
5																															
10																															
15																															
20																															
25																															
30																															
35	NM	L	D	N	N	NM	SW	NS	Pinky orange well graded sand with minor silt																						
40																															
45																															
50																															
55	NM	L	D	N	N	NM	SP	NS	Pinky pale brown orange poorly graded fine sand with minor silt																						
60																															
65																															
70	NM	L	D	N	N	NM	SW-SM SW-SC	NS	Pinky brown orange well-graded sand with silt and clay																						
75																															
80																															
85	NM	L	D	N	N	NM	SP	NS	Pinky pale brown orange poorly graded fine sand with minor silt - TD: 110' bgs																						
90																															
95																															
100	NM	L	D	N	N	NM	SP	NS																							
105																															

							<b>BORING LOG/MONITORING WELL COMPLETION DIAGRAM</b>						
Boring/Well Number: MW-1							Location: Ross Draw Unit #55						
Date: 12/9/2020							Client: WPX Energy						
Drilling Method: Air Rotary			Sampling Method: None				Logged By: J. Linn, PG			Drilled By: Talon LPE			
Gravel Pack Type: 10/20 Sand			Gravel Pack Depth Interval: 3 Bags				Seal Type: None		Seal Depth Interval: None		Latitude: 32.016165		
Casing Type: PVC		Diameter: 2-inch		Depth Interval: 0-101'7"			Boring Total Depth (ft. BGS): 106'7"			Longitude: -103.86346			
Screen Type: PVC		Slot: 0.010-inch		Diameter: 2-inch		Depth Interval: 101'7" - 106'7"		Well Total Depth (ft. BGS): 106'7"			Depth to Water (ft. BTOC): >106' 7"		DTW Date: 12/16/2020
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks			Well Completion	
0	NM	L	D	N	N	NM	SP	NS	Pale pink to buff colored poorly graded sand with minor silt				
5													
10													
15													
20	NM	L	D	N	N	NM	SW	NS	Pale tan orange well graded fine sand with minor medium and coarse sand				
25													
30													
35	NM	L	D	N	N	NM	SP	NS	Pale orange brown poorly graded fine sand with minor gravel				
40													
45													
50													
55													
60													
65	NM	L	D	N	N	NM	SP	NS	Grey poorly graded fine sand with minor gravel				
70													
75													
80													
85													
90	NM	L	D	N	N	NM	SP	NS	Darker grey poorly graded fine sand with minor silt and minor medium sand				
95													
100	NM	M	D	N	N	NM	SC	NS	Dark grey fine sand with moderate silt and clay - TD 106'7"				
106'7"													

				<b>BORING LOG/MONITORING WELL COMPLETION DIAGRAM</b>											
Boring/Well Number: MW-1				Location: Ross Draw Unit #57											
Date: 12/9/2020				Client: WPX Energy											
Drilling Method: Air Rotary				Sampling Method: None				Logged By: J. Linn, PG				Drilled By: Talon LPE			
Gravel Pack Type: 10/20 Sand				Gravel Pack Depth Interval: 3 Bags				Seal Type: None		Seal Depth Interval: None		Latitude: 32.01032			
Casing Type: PVC		Diameter: 2-inch		Depth Interval: 0-105 feet bgs				Boring Total Depth (ft. BGS): 110				Longitude: -103.87246			
Screen Type: PVC		Slot: 0.010-inch		Diameter: 2-inch		Depth Interval: 105-110 ft		Well Total Depth (ft. BGS): 110				Depth to Water (ft. BTOC): > 110		DTW Date: 12/16/2020	
Depth Interval (ft)	Recovery (ft)	Plasticity	Moisture	Odor	Staining	PID (ppm)	USCS	Sample ID	Lithology/Remarks				Well Completion		
0	NM	L/M	D	N	N	NM	SM	NS	Tan/pale orange/pale brown poorly graded fine sand						
5															
10															
15															
20															
25															
30															
35															
40	NM	M	D	N	N	NM	SW	NS	Hard, dry pale pink orange well graded sand with gravel						
45															
50	NM	M	D	N	N	NM	SM	NS	Pale orange red tan silty fine sand						
55															
60	NM	L	D	N	N	NM	SW	NS	Dark brown greyish well graded sand						
65															
70	NM	L/M	D to SL M	N	N	NM	SW	NS	Grey well graded sand						
75															
80															
85															
90															
95															
100	NM	L/M	D	N	N	NM	SM	NS	Tan/pale orange/pale brown poorly graded fine sand - TD 110' bgs						
105															

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

CONDITIONS  
 Action 61866

**CONDITIONS**

Operator: WPX Energy Permian, LLC Devon Energy - Regulatory Oklahoma City, OK 73102	OGRID: 246289
	Action Number: 61866
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
amaxwell	Closure approved 09/14/2022. No further action required.	3/21/2023