

December 30, 2024

New Mexico Oil Conservation Division

506 W. Texas Ave Artesia, NM 88210

RE: RDX Federal Com 28 #009H- Closure Request Report

Incident Number: nAPP2425636992

API: 30-015-43294

GPS: 32.0196704°, -103.8904924°

Eddy County, New Mexico

Project No. 2475

To Whom It May Concern:

Earth Systems Response and Restoration (ESRR), presents the following Closure Request Report (CRR) to document the findings during a recent liner inspection conducted at the RDX Federal Com 28 #009H (Site) following an inadvertent release of produced water within a lined secondary containment (LSC). Based on initial release response and liner inspection activities, WPX is requesting No Further Action (NFA) at the Site.

Site Location

The Site is located in Unit C, Section 28, Township 26 South, Range 30 East, in Eddy County, New Mexico (32.0196704°, -103.8904924°) and is associated with oil and gas exploration and production operations on Federal Land managed by the Bureau of Land Management (BLM) (Figure 1).

Incident Description & Background

On September 10, 2024, a leak occurred from the corrosion of a production tank, releasing approximately 12 barrels (bbls) of produced water within a LSC (**Figure 2**). The release was fully contained within the LSC with no fluids escaping to the production pad or adjacent pasture. A vacuum truck was immediately dispatched to the Site recovering the 12 bbls of produced water.

Immediate notice was given to the New Mexico Oil Conservation Division (NMOCD) on September 12, 2024, by Notification of Release (NOR) and a Corrective Action Form C-141 (Form C-141) and subsequently assigned Incident Number nAPP2425636992.

Due to unforeseen delays in repairs to above ground production equipment responsible for the incident, the power washing of the containment was postponed abiding to all WPX and ESRR safety precautions, required for an accurate and thorough visual inspection of the LSC by ESRR. To allow additional time for power washing of the containment and for ESRR to complete a liner inspection and finalize this CRR, WPX requested an extension of the December 9, 2024, deadline, received by the NMOCD on December 7, 2024, and approved on December 9, 2024 for an updated due date of March 10, 2025.

RDX Federal Com 28 #009H- Closure Request Report Incident Number: nAPP2425636992 Eddy County, New Mexico Project No. 2475



On December 11, 2024, WPX coordinated the LSC to be power washed clearing all debris and residual fluid for an accurate inspection of the LSC and submitted a 48-hour Notification of Liner Inspection (Form C-141 L) for December 16, 2024.

Site Characterization

ESRR characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29, Section 12 (19.15.29.12) of the New Mexico Administrative Code (NMAC). The following proximities were estimated:

- Between 1,000 feet and 1/2 mile of any continuously flowing watercourse or any other significant watercourse;
- Greater than 5 miles of any lakebed, sinkhole or playa lake (measured from the ordinary high-water mark);
- Greater than 5 miles of any occupied permanent residence, school, hospital, institution or church;
- Detween 1 and 5 miles of any spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes;
- Between 1 and 5 miles of any other freshwater well or spring;
- Greater than 5 miles of any incorporated municipal boundary or a defined municipal fresh water well field covered under a municipal ordinance;
- o Between 1,000 feet and 1/2 mile of any wetland;
- Greater than 5 miles of any subsurface mine;
- o Between 1 and 5 miles of any unstable area (i.e. high karst potential); and
- o Between 1,000 feet and 1/2 mile of a 100-year floodplain.

Receptor details used to determine the Site characterization are included in **Figure 2** and **Figure 3**. **Referenced Well Records** for the closest depth to water well are attached.

Based on the results from the desktop review and depth to water estimated to be greater than 100 feet below ground surface (bgs), the following Closure Criteria was applied:

Constituents of Concern (COCs)	Closure Criteria*
Chloride	20,000 milligram per kilogram (mg/kg)
Total Petroleum Hydrocarbon (TPH)	. 2,500 mg/kg
Gasoline Range Organics (GRO) + Diesel Range Organics (ORO)	. 2,500 mg/kg
Benzene	10 mg/kg
Benzene, Toluene, Ethylbenzene, Total Xylenes (BTEX)	50 mg/kg

[‡]The reclamation concentration requirements of 600 mg/kg Chloride and 100 mg/kg TPH apply to the top 4 feet of areas to be immediately reclaimed following remediation pursuant to NMAC 19.15.17.13.

Liner Inspection

On December 16, 2024, ESRR conducted a thorough visual inspection of the LSC and found no tears, cracks, cuts, breaks, or other signs of damage, confirming no evidence of a breach to the LSC. The liner appears to be in good condition and is performing as designed. **Photographic Documentation** of liner inspection activities is attached.

RDX Federal Com 28 #009H- Closure Request Report Incident Number: nAPP2425636992 Eddy County, New Mexico Project No. 2475



Closure Request

Based on initial release response and liner inspection activities, WPX believes the completed remedial actions meet the requirements set forth in NMAC 19.15.29.13 regulations in order to be protective of human health, the environment, and groundwater. WPX believes NFA is warranted at the Site and respectfully requests Closure for Incident Number nAPP2425636992.

If you have any questions or comments, please do not hesitate to contact Gilbert Moreno at (832) 541-7719 or gmoreno@earthsys.net. NMOCD Documentation of correspondence are attached.

Sincerely,

EARTH SYSTEMS RESPONSE & RESTORATION

Gilbert Moreno

Carlsbad Operations Manager-Project Geologist

cc: Jim Raley, WPX Energy Permian, LLC Bureau of Land Management

Attachments:

Figure 1 - Site Map

Figure 2 - Release Extent

Figure 3 - Ground Water

Figure 4 - Karst Potential

Referenced Well Records

Photographic Documentation

NMOCD Documentation & Correspondence

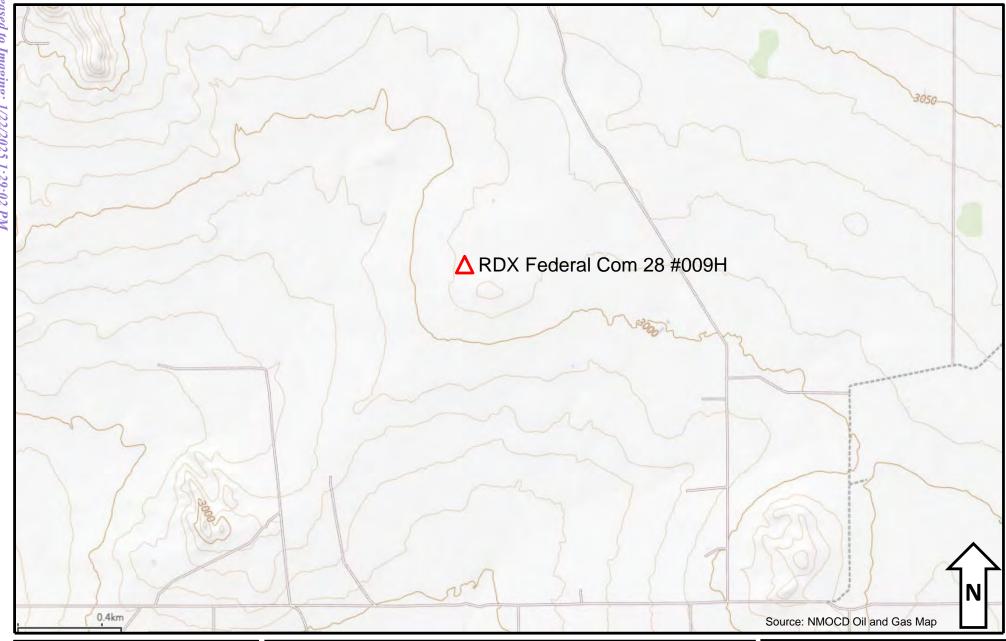




Figure 1 - Site Map

WPX Energy Permian – RDX Federal Com 28 #009H GPS: 32.0196704°,-103.8904924° Eddy County, New Mexico





Figure 2 – Release Extent

WPX Energy Permian – RDX Federal Com 28 #009H GPS: 32.0196704°,-103.8904924° Eddy County, New Mexico



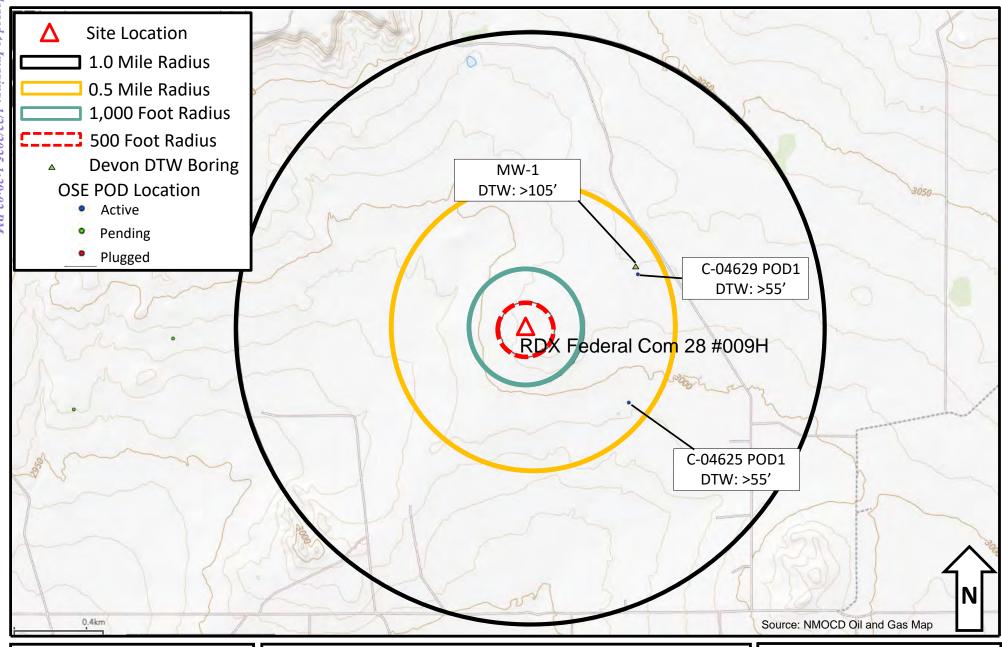




Figure 3 – Ground Water

WPX Energy Permian – RDX Federal Com 28 #009H GPS: 32.0196704°,-103.8904924° Eddy County, New Mexico





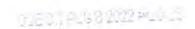
Figure 4 – Karst Potential

WPX Energy Permian – RDX Federal Com 28 #009H GPS: 32.0196704°,-103.8904924° Eddy County, New Mexico



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2904 W 2nd St. Roswell, NM 88201 voice: 575.624.2420 fax: 575.624.2421 www.atkinseng.com

August 4, 2022

DII-NMOSE 1900 W 2nd Street Roswell, NM 88201

Hand Delivered to the DII Office of the State Engineer

Re: Well Record C-4625 Pod1

To whom it may concern:

Attached please find a well log & record and a plugging record, in duplicate, for a one (1) soil borings, C-4625 Pod1.

If you have any questions, please contact me at 575.499.9244 or lucas@atkinseng.com.

Sincerely,

Lucas Middleton

Enclosures: as noted above

Sucan Middle

LUE DH 908 8 2022 PML 19



DSE D.T. AUG 8 2022 MLU L8

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2904 W 2nd St. Roswell, NM 88201 voice: 575.624.2420 fax: 575.624.2421 www.afkinseng.com

August 4, 2022

DII-NMOSE 1900 W 2nd Street Roswell, NM 88201

Hand Delivered to the DII Office of the State Engineer

Re: Well Record C-4629 Pod1

To whom it may concern:

Attached please find a well log & record and a plugging record, in duplicate, for a one (1) soil borings, C-4629 Pod1.

If you have any questions, please contact me at 575.499.9244 or lucas@atkinseng.com.

Sincerely,

Lucas Middleton

Enclosures: as noted above

Sucan Middle

DSE DIT AUG 8 2022 AMLULUS





PHOTO 1: Northeast view of the lined secondary containment during initial assessment activities. 09/10/2024



PHOTO 2: Northeastern view of the lined secondary containment during liner inspection. 12/16/2024





PHOTO 3: Southeast view of the lined secondary containment during liner inspection. 12/16/2024



PHOTO 4: Northwest view of the lined secondary containment during liner inspection. 12/16/2024



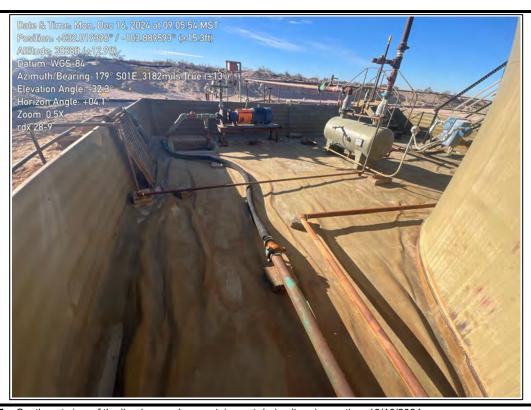


PHOTO 5: Southeast view of the lined secondary containment during liner inspection. 12/16/2024



PHOTO 6: Southeast view of the lined secondary containment during liner inspection. 12/16/2024





PHOTO 7: Southwest view of the lined secondary containment during liner inspection. 12/16/2024



PHOTO 8: Southwest view of the lined secondary containment during liner inspection. 12/16/2024



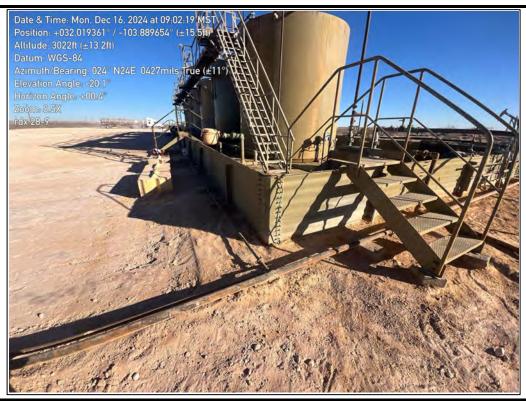


PHOTO 9: Northeast exterior view of the lined secondary containment during liner inspection. 12/16/2024

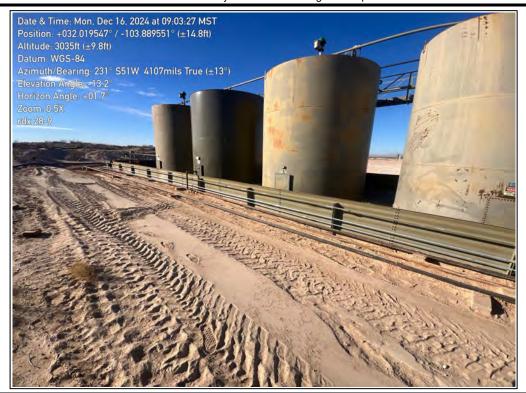


PHOTO 10: Southwest exterior view of the lined secondary containment during liner inspection. 12/16/2024



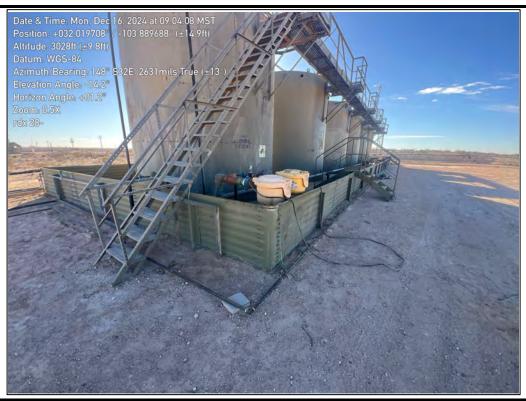


PHOTO 11: Southeast exterior view of the lined secondary containment during liner inspection. 12/16/2024



PHOTO 12: Southeast exterior view of the lined secondary containment during liner inspection. 12/16/2024





PHOTO 11: View of well location sign.

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

Phone: (505) 629-6116

Online Phone Directory
https://www.emnrd.nm.gov/ocd/contact-us

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

QUESTIONS

Action 410870

QUESTIONS

ı	Operator:	OGRID:
ı	WPX Energy Permian, LLC	246289
ı	Devon Energy - Regulatory	Action Number:
ı	Oklahoma City, OK 73102	410870
ı		Action Type:
ı		[NOTIFY] Notification Of Liner Inspection (C-141L)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2425636992
Incident Name	NAPP2425636992 RDX FEDERAL COM 28 #009H @ 30-015-43294
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-015-43294] RDX FEDERAL COM 28 #009H

Location of Release Source					
Site Name	RDX FEDERAL COM 28 #009H				
Date Release Discovered	09/10/2024				
Surface Owner	Federal				

Liner Inspection Event Information	
Please answer all the questions in this group.	
What is the liner inspection surface area in square feet	3,648
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	12/16/2024
Time liner inspection will commence	08:00 AM
Please provide any information necessary for observers to liner inspection	Gilbert Moreno (832) 541-7719
Please provide any information necessary for navigation to liner inspection site	From the intersection of HWY 285 & Longhorn Rd/Whitehorn Rd-Head East on Longhorn Rd/Whitehorn Rd 2.5 mislight left to stay on Longhorn Rd 2.8 miTurn left onto Pipeline Rd-continue E 2.8 miTurn right onto Tarbrush Rd-continue 0.3 mi-Turn left and continue E 0.5 mi-Turn right and continue SE 0.6 miTurn left and continue E 0.7 mi-Keep left and continue E 2.1 mi-Turn right and continue S 0.68 mi Turn right and continue W 0.54 mi Turn left and continue S 0.36 mi Turn right and continue O.05 mi to location.

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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 410870

CONDITIONS

Operator:	OGRID:
WPX Energy Permian, LLC	246289
Devon Energy - Regulatory	Action Number:
Oklahoma City, OK 73102	410870
	Action Type:
	[NOTIFY] Notification Of Liner Inspection (C-141L)

CONDITIONS

Create By	d Condition	Condition Date
jrale	Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.	12/11/2024

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QUESTIONS

Action 417698

QUESTIONS

Operator:	OGRID:
WPX Energy Permian, LLC	246289
Devon Energy - Regulatory	Action Number:
Oklahoma City, OK 73102	417698
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2425636992
Incident Name	NAPP2425636992 RDX FEDERAL COM 28 #009H @ 30-015-43294
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-43294] RDX FEDERAL COM 28 #009H

Location of Release Source	
Please answer all the questions in this group.	
Site Name	RDX FEDERAL COM 28 #009H
Date Release Discovered	09/10/2024
Surface Owner	Federal

Incident Details		
Please answer all the questions in this group.		
Incident Type	Produced Water Release	
Did this release result in a fire or is the result of a fire	No	
Did this release result in any injuries	No	
Has this release reached or does it have a reasonable probability of reaching a watercourse	No	
Has this release endangered or does it have a reasonable probability of endangering public health	No	
Has this release substantially damaged or will it substantially damage property or the environment	No	
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No	

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Flow Line - Production Produced Water Released: 12 BBL Recovered: 12 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 417698

QUESTI	ONS (continued)
Operator: WPX Energy Permian, LLC	OGRID: 246289
Devon Energy - Regulatory Oklahoma City, OK 73102	Action Number: 417698
Oklahoma Gity, Ok 73102	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)
QUESTIONS	
Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e.	e. gas only) are to be submitted on the C-129 form.
Initial Response The responsible party must undertake the following actions immediately unless they could create a s	rafety hazard that would result in injury.
The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.
	ation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative ted or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of valuation in the follow-up C-141 submission.
to report and/or file certain release notifications and perform corrective actions for releating the OCD does not relieve the operator of liability should their operations have failed to a	knowledge and understand that pursuant to OCD rules and regulations all operators are require ases which may endanger public health or the environment. The acceptance of a C-141 report by adequately investigate and remediate contamination that pose a threat to groundwater, surface t does not relieve the operator of responsibility for compliance with any other federal, state, or
I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dvn.com

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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

QUESTIONS, Page 3

Action 417698

QUESTIONS (continued)

Operator:	OGRID:
WPX Energy Permian, LLC	246289
Devon Energy - Regulatory	Action Number:
Oklahoma City, OK 73102	417698
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release ar	nd the following surface areas:
A continuously flowing watercourse or any other significant watercourse	Between 1000 (ft.) and ½ (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
Requesting a remediation plan approval with this submission	Yes
Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes complete which includes the anticipated timelines for beginning and completing the remediation.	ed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC,
On what estimated date will the remediation commence	12/16/2024
On what date will (or did) the final sampling or liner inspection occur	12/16/2024
On what date will (or was) the remediation complete(d)	12/16/2024
What is the estimated surface area (in square feet) that will be remediated	3374
What is the estimated volume (in cubic yards) that will be remediated	0
These estimated dates and measurements are recognized to be the best guess or calculation at t	he time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 417698

QUESTIONS (continued)

Operator:	OGRID:
WPX Energy Permian, LLC	246289
Devon Energy - Regulatory	Action Number:
Oklahoma City, OK 73102	417698
	Action Type:
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
(Select all answers below that apply.)	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC,	

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC which includes the anticipated timelines for beginning and completing the remediation.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

I hereby agree and sign off to the above statement

Name: James Raley Title: EHS Professional Email: jim.raley@dvn.com Date: 01/07/2025

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 417698

ONS (continued)
OGRID: 246289
Action Number: 417698
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)
410870
12/16/2024
Yes
3648
mediation steps have been completed.
Yes
Yes
Yes
3374
0
The release was contained laterally by the lined containment and the liner was performing as designed.

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.

Name: James Raley
Title: EHS Professional
Email: jim.raley@dvn.com
Date: 01/07/2025

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CONDITIONS

Action 417698

CONDITIONS

Operator:	OGRID:
WPX Energy Permian, LLC	246289
Oklahoma City, OK 73102	Action Number: 417698
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Create By	d Condition	Condition Date
nvel	z Liner inspection approved, release resolved.	1/22/2025