

2135 S. Loop 250 W  
Midland, Texas 79703  
United States  
www.GHD.com

Our Ref.: 12663172-NMOCD-1

March 12, 2025

New Mexico Oil Conservation Division  
506 W. Texas Avenue  
Artesia, New Mexico 88210

Closure Report  
Devon Energy Production Company, LP  
Cotton Draw 14 Battery  
Unit Letter D, Section 14, T25S, R31E  
GPS: 32.1367521, -103.75341  
Eddy County, New Mexico

## 1. Introduction

GHD Services Inc. (GHD), on behalf of Devon Energy Production Company, LP (Devon Energy), has prepared this *Closure Report* to document site assessment activities at the Cotton Draw 14 Battery. The purpose of the assessment was to determine the presence or absence of impacts to soil following a release of crude oil within a lined containment at the Site. Based on field observations, Devon Energy is submitting this *Closure Report*, describing Site assessment activities that have occurred and requesting closure for Incident Number nAPP2503424823.

## 2. Site Description and Release Summary

The Site is located in Unit D, Section 14, Township 25 South, Range 31 East, in Eddy County, New Mexico (32.1367521 N, -103.75341 W) and is associated with oil and gas exploration and production operations on federal land managed by the Bureau of Land Management (BLM).

On February 1, 2025, approximately 111 barrels (bbls) of crude oil were released into the lined secondary containment due to leak from a divert line from the lease automatic custody transfer (LACT) unit. A vacuum truck was dispatched to the Site to recover free-standing fluids; all 111 bbls of released crude oil were recovered from within the lined containment. The release was reported to the New Mexico Oil Conservation Division (NMOCD) on February 3, 2025, and was subsequently assigned Incident Number nAPP2503424823.

## 3. Site Characterization and Closure Criteria

The Site was characterized to assess applicability of Table I, Closure Criteria for Soils Impacted by a Release, of Title 19, Chapter 15, Part 29 (NMAC 19.15.29) of the New Mexico Administrative Code (NMAC). Results from the characterization desktop review are summarized below and a Site Map is presented on **Figure 1**.

According to the soil survey provided by the United States Department of Agriculture National Resources Conservation Services, the soils located within the Site consists of Simona-Bippous Complex and Tonuco loamy fine sand. Per the New Mexico Bureau of Geology and Mineral Resources, the shallow geology consists of interlayered eolian sands and mixed alluvium, Holocene to middle Pleistocene in age. The Site is located within an area of low karst potential.

Depth to groundwater at the Site is estimated to be greater than 55 feet below ground surface (ft bgs) based on the nearest groundwater well data. Groundwater was determined utilizing the New Mexico Office of the State Engineers (NMOSE) database for registered water wells. The nearest permitted groundwater well with depth to groundwater data is NMOSE well is C-4912-POD1 located approximately 227 ft away on the northeastern corner of the pad location. The well was completed to a depth of 55 ft bgs on December 3, 2024. No groundwater was encountered during drilling activities or recorded during a 72-hour observation period. The well was plugged on December 9, 2024. A copy of the referenced well record is included in **Attachment A**.

The nearest fresh water well for livestock watering purposes is located approximately 1.3 miles northeast of the Site. The Site is greater than 1.5 miles from a lakebed, sinkhole, or playa lake and greater than 4 miles from an occupied residence, school, hospital, institution, church. A freshwater emergent wetland is located approximately 0.64 miles northwest of the Site. The Site is greater than 1,000 feet to a freshwater well or spring. A 100-year flood zone is documented approximately 1.51 miles northwest of the Site. The nearest subsurface mine is greater than 5 miles away from the Site. The Site is not underlain by unstable geology (low potential karst designation area). The location of the Site is depicted on **Figure 1**. A detailed map of the Site is provided on **Figure 2**. The Site Characterization Documentation is included in **Attachment B**.

Based on the results of the Site Characterization desktop review, the following NMOCD Table I Closure Criteria (Closure Criteria) apply.

**Table 1** Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Benzene (mg/kg)	BTEX (mg/kg)	TPH (GRO+DRO) (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	Chloride (mg/kg)
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release.	10	50	1,000	2,500	10,000
Notes: --- = not defined. mg/kg = milligrams per kilogram. TPH = total petroleum hydrocarbons. GRO+DRO+MRO = Gasoline Range Organics + Diesel Range Organics + Motor Oil/Lube Range Organics. BTEX = benzene, toluene, ethylbenzene, and xylene.					

## 4. Site Assessment Activities

The liner inspection notice was provided on February 17, 2025. A liner integrity inspection was scheduled and completed on February 20, 2025, after the secondary containment was cleaned for a visual inspection. The liner was visually inspected and no rips, tears, holes, or damages in the liner was observed. The liner was determined to be intact with no integrity issues. Photographic documentation of the liner inspection is presented in **Attachment C**.

## 5. Closure Request

Based on the liner inspection and assessment activities at the Site, Devon Energy respectfully requests that no further actions be required, and requests closure of Incident Number nAPP2503424823 be granted.

Regards,

GHD



**Kayla Taylor**  
Senior Project Manager

(432) 210-5443  
Kayla.Taylor@GHD.com

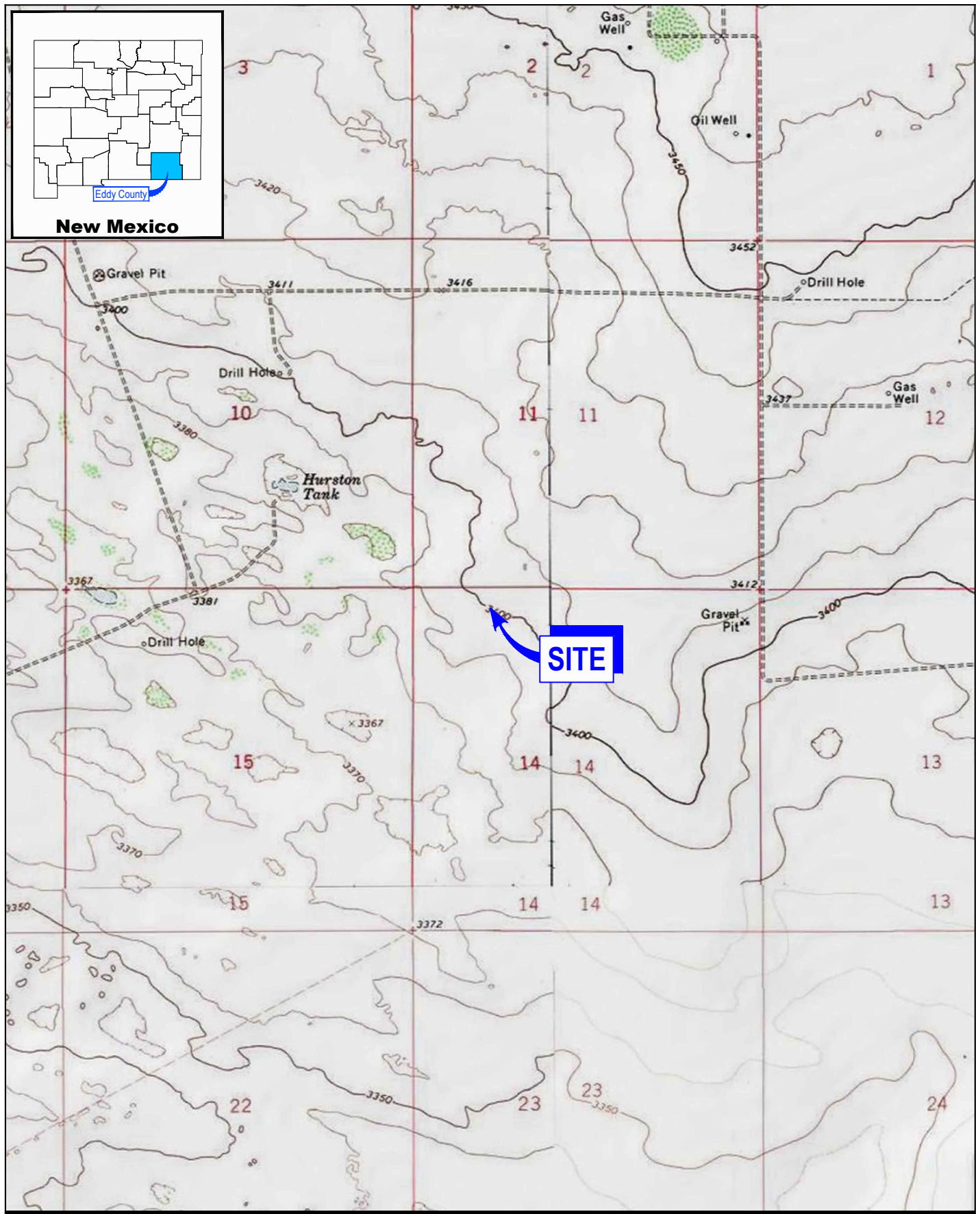


**Jessica Wright**  
Project Director

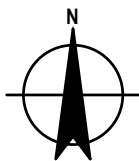
(713) 337-5419  
Jessica.Wright@GHD.com

KT/jlf/1

Encl.:      Figure 1 - Site Location Map  
              Figure 2 - Site Details Map  
              Attachment A - Referenced Well Records  
              Attachment B - Site Characterization Documentation  
              Attachment C - Photographic Documentation



0 1000 2000 ft  
 1" = 2000 ft  
 Coordinate System:  
 NAD 1983 State Plane-  
 New Mexico East (US Feet)



DEVON ENERGY PRODUCTION COMPANY, LP  
 EDDY COUNTY, NEW MEXICO  
 COTTON DRAW 14 BATTERY  
 INCIDENT No. nAPP2503424823

Project No. 12663172  
 Date February 2025

SITE LOCATION MAP

FIGURE 1

Filename: \\ghdnet\ghd\US\Midland\Projects\562\12663172\Digital\_Design\ACAD\Figures\12663172-GHD-00-00-RPT-EN-D101\_DL-001.dwg

Data Source: USGS 7.5 Minute Quad "Phantom Banks and Paduca Breaks West, New Mexico"  
 Lat/Long: 32.059360° North, -103.759490° West



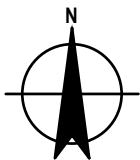


**LEGEND**

CONTAINMENT AREA



Coordinate System:  
NAD 1983 State Plane-  
New Mexico East (US Feet)



DEVON ENERGY PRODUCTION COMPANY, LP  
EDDY COUNTY, NEW MEXICO  
COTTON DRAW 14 BATTERY  
INCIDENT No. nAPP2503424823

Project No. 12663172  
Date February 2025

**SITE DETAILS MAP**

**FIGURE 2**

# **Attachment A**

## **Referenced Well Reports**





# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER

[www.ose.state.nm.us](http://www.ose.state.nm.us)

OSE DII ROSWELL NM  
17 DEC '24 PM2:46

1. GENERAL AND WELL LOCATION	OSE POD NO. (WELL NO.) C-4912-POD1		WELL TAG ID NO.		OSE FILE NO(S) C-4912-POD1			
	WELL OWNER NAME(S) Devon Energy Resources				PHONE (OPTIONAL)			
	WELL OWNER MAILING ADDRESS 205 E. Bender Road #150				CITY Hobbs	STATE NM	ZIP 88240	
	WELL LOCATION (FROM GPS)	DEGREES LATITUDE	MINUTES 8	SECONDS 13.8	N	* ACCURACY REQUIRED: ONE TENTH OF A SECOND		
		LONGITUDE	-103	45	11.8	W	* DATUM REQUIRED: WGS 84	
DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS – PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE								
2. DRILLING & CASING INFORMATION	LICENSE NO. 1833		NAME OF LICENSED DRILLER Jason Maley			NAME OF WELL DRILLING COMPANY Vision Resources		
	DRILLING STARTED 12-3-24		DRILLING ENDED 12-3-24		DEPTH OF COMPLETED WELL (FT) 55'	BORE HOLE DEPTH (FT) 55'	DEPTH WATER FIRST ENCOUNTERED (FT) N/A	
	COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN *add Centralizer info below <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)					STATIC WATER LEVEL IN COMPLETED WELL (FT) 0'	DATE STATIC MEASURED 12-3-24	
	DRILLING FLUID: <input checked="" type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES – SPECIFY:							
	DRILLING METHOD: <input checked="" type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input type="checkbox"/> OTHER – SPECIFY:						CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>	
	DEPTH (feet bgl)		BORE HOLE DIAM (inches)	CASING MATERIAL AND/OR GRADE (include each casing string, and note sections of screen)	CASING CONNECTION TYPE (add coupling diameter)	CASING INSIDE DIAM. (inches)	CASING WALL THICKNESS (inches)	SLOT SIZE (inches)
	FROM	TO						
	0	45	6"	PVC 2" SCH40	Thread	2"	SCH40	N/A
	45	55	6"	PVC 2" SCH40	Thread	2"	SCH40	.02
3. ANNULAR MATERIAL	DEPTH (feet bgl)		BORE HOLE DIAM. (inches)	LIST ANNULAR SEAL MATERIAL AND GRAVEL PACK SIZE-RANGE BY INTERVAL *(if using Centralizers for Artesian wells- indicate the spacing below)	AMOUNT (cubic feet)	METHOD OF PLACEMENT		
	FROM	TO						
				None pulled and plugged				

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 09/22/2022)

FILE NO. <u>C-4912</u>	POD NO. <u>1</u>	TRN NO. <u>771667</u>
LOCATION <u>255.31E.14 211</u>	WELL TAG ID NO. <u>—</u>	PAGE 1 OF 2

#### 4. HYDROGEOLOGIC LOG OF WELL

## 5. TEST; RIG SUPERVISION

## 6. SIGNATURE

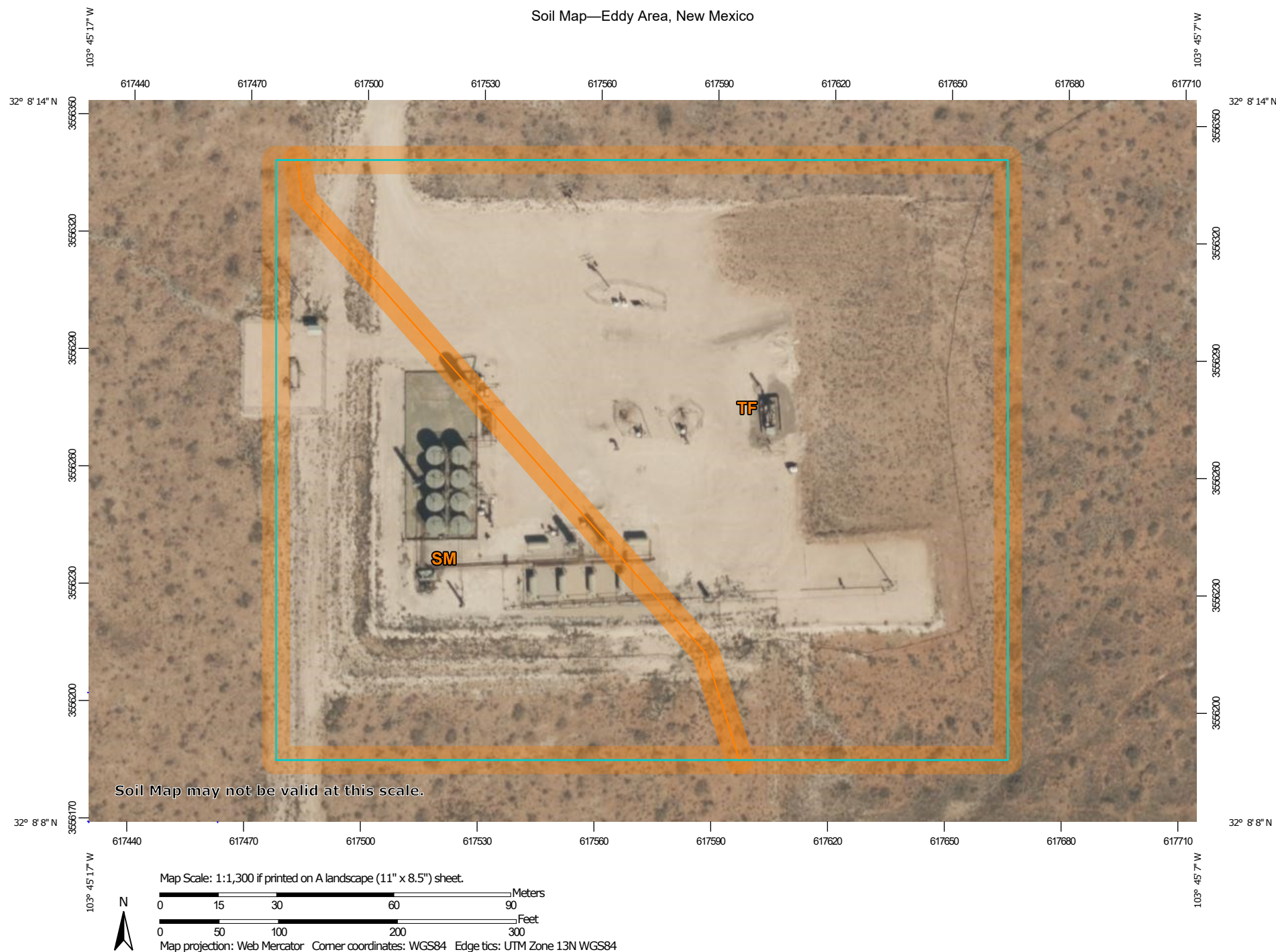
FOR OSE INTERNAL USE		WR-20 WELL RECORD & LOG (Version 09/22/2022)	
FILE NO. <u>C-4912</u>	POD NO. <u>1</u>	TRN NO. <u>771667</u>	
LOCATION <u>2-5S-31E-14 211</u>	WELL TAG ID NO. <u>-</u>		PAGE 2 OF 2



# **Attachment B**

## **Site Characterization Documentation**

# Soil Map—Eddy Area, New Mexico



Natural Resources  
Conservation Service

Web Soil Survey  
National Cooperative Soil Survey

3/6/2025  
Page 1 of 3

## Soil Map—Eddy Area, New Mexico

## MAP LEGEND

## Area of Interest (AOI)

 Area of Interest (AOI)

## Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

## Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

## Water Features



Streams and Canals

## Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

## Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
SM	Simona-Bippus complex, 0 to 5 percent slopes	2.5	34.7%
TF	Tonuco loamy fine sand, 0 to 3 percent slopes	4.7	65.3%
Totals for Area of Interest		7.2	100.0%

Map Unit Description: Simona-Bippus complex, 0 to 5 percent slopes---Eddy Area, New Mexico

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## Eddy Area, New Mexico

### SM—Simona-Bippus complex, 0 to 5 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w5x

*Elevation:* 1,800 to 5,000 feet

*Mean annual precipitation:* 8 to 24 inches

*Mean annual air temperature:* 57 to 70 degrees F

*Frost-free period:* 180 to 230 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Simona and similar soils:* 55 percent

*Bippus and similar soils:* 30 percent

*Minor components:* 15 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Simona

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Mixed alluvium and/or eolian sands

##### Typical profile

*H1 - 0 to 19 inches:* gravelly fine sandy loam

*H2 - 19 to 23 inches:* indurated

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* 7 to 20 inches to petrocalcic

*Drainage class:* Well drained

*Runoff class:* Very high

*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Calcium carbonate, maximum content:* 15 percent

*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 1.0

*Available water supply, 0 to 60 inches:* Very low (about 2.1 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7e

*Hydrologic Soil Group:* D

Map Unit Description: Simona-Bippus complex, 0 to 5 percent slopes---Eddy Area, New Mexico

---

*Ecological site:* R070BD002NM - Shallow Sandy  
*Hydric soil rating:* No

### Description of Bippus

#### Setting

*Landform:* Flood plains, alluvial fans  
*Landform position (three-dimensional):* Talf, rise  
*Down-slope shape:* Convex, linear  
*Across-slope shape:* Linear  
*Parent material:* Mixed alluvium

#### Typical profile

*H1 - 0 to 37 inches:* silty clay loam  
*H2 - 37 to 60 inches:* clay loam

#### Properties and qualities

*Slope:* 0 to 5 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Well drained  
*Runoff class:* Very low  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.60 to 2.00 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* Occasional  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 40 percent  
*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Moderate (about 8.7 inches)

#### Interpretive groups

*Land capability classification (irrigated):* 2e  
*Land capability classification (nonirrigated):* 3e  
*Hydrologic Soil Group:* B  
*Ecological site:* R070BC017NM - Bottomland  
*Hydric soil rating:* No

### Minor Components

#### Simona

*Percent of map unit:* 8 percent  
*Ecological site:* R070BD002NM - Shallow Sandy  
*Hydric soil rating:* No

#### Bippus

*Percent of map unit:* 7 percent  
*Ecological site:* R070BC017NM - Bottomland



Map Unit Description: Simona-Bippus complex, 0 to 5 percent slopes---Eddy Area, New Mexico

---

*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Map Unit Description: Tonuco loamy fine sand, 0 to 3 percent slopes---Eddy Area, New Mexico

---

## Eddy Area, New Mexico

### TF—Tonuco loamy fine sand, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w61

*Elevation:* 3,000 to 4,100 feet

*Mean annual precipitation:* 10 to 14 inches

*Mean annual air temperature:* 60 to 64 degrees F

*Frost-free period:* 200 to 217 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Tonuco and similar soils:* 98 percent

*Minor components:* 2 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Tonuco

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Mixed alluvium and/or eolian sands

##### Typical profile

*H1 - 0 to 5 inches:* loamy fine sand

*H2 - 5 to 15 inches:* loamy fine sand

*H3 - 15 to 19 inches:* indurated

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* 6 to 20 inches to petrocalcic

*Drainage class:* Excessively drained

*Runoff class:* Very high

*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Maximum salinity:* Nonsaline (0.0 to 1.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 1.0

*Available water supply, 0 to 60 inches:* Very low (about 1.3 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7e

*Hydrologic Soil Group:* D

*Ecological site:* R070BD004NM - Sandy

*Hydric soil rating:* No

Map Unit Description: Tonuco loamy fine sand, 0 to 3 percent slopes---Eddy Area, New Mexico

---

### Minor Components

#### **Tonuco**

*Percent of map unit:* 1 percent

*Ecological site:* R070BD004NM - Sandy

*Hydric soil rating:* No

#### **Dune land**

*Percent of map unit:* 1 percent

*Hydric soil rating:* No

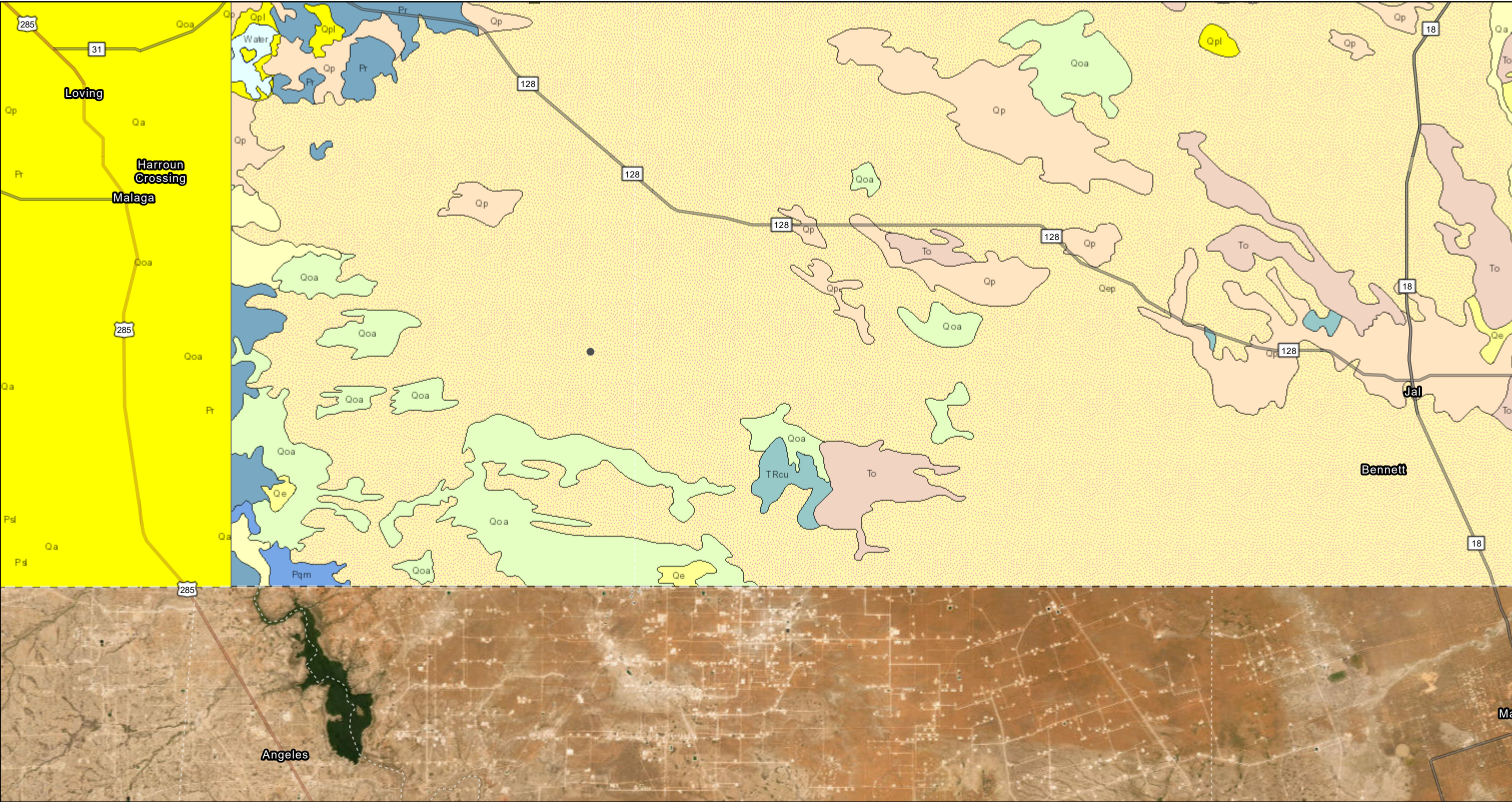
## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024



# Cotton Draw 14



3/3/2025, 4:58:47 PM

**GEOCHRONOLOGY**

- ▲ 40/39 Argon-Argon
- ▲ Carbon 14
- ▲ Chlorine 36
- ▲ Electron Spin Resonance
- ▲ Fission Track
- ▲ Helium 3
- ▲ K/Ar Potassium-Argon

- ▲ No Data
- ▲ Rb/Sr Rubidium-Strontium
- ▲ Sm/Nd Samarium-Neodymium
- ▲ Thermoluminescence
- ▲ U/Pb Uranium-Lead
- ▲ U/Th Uranium-Thorium Disequilibrium

Geologic Maps at Other Scales

- ▲ Bulletin

- Circular
- Geologic Map
- Memoir
- Open-File Report
- Thesis Map

Quaternary Faults

- 2 = Post-glacial (<15,000 years), fault landforms are more continuous than discontinuous and mapping is accurate
- 2 = Post-glacial (<15,000 years), fault landforms are more discontinuous than continuous and mapping is accurate

1:288,895

0 3 6 12 mi

0 5 10 20 km

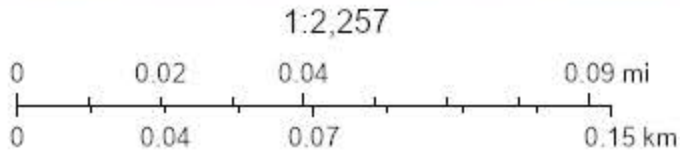
Texas Parks & Wildlife, CONANP, Esri, TomTom, Garmin, SafeGraph, METI/NASA, USGS, EPA, NPS, USDA, USFWS, Earthstar Geographics, NMBGMR



# Cotton Draw 14 Karst Potential



3/3/2025, 2:31:37 PM  
Karst Occurrence Potential  
Low



BLM, OCD, New Mexico Tech, Maxar, Microsoft, Esri, HERE, Garmin, iPC





## Cotton Draw 14



March 3, 2025

**Wetlands**

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.



# National Flood Hazard Layer FIRMette



103°45'31"W 32°8'28"N



## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 3/3/2025 at 9:15 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

# **Attachment C**

## **Photographic Documentation**

Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 1** View of northwestern corner of secondary containment.



**Photo 2** View western side of secondary containment facing south.



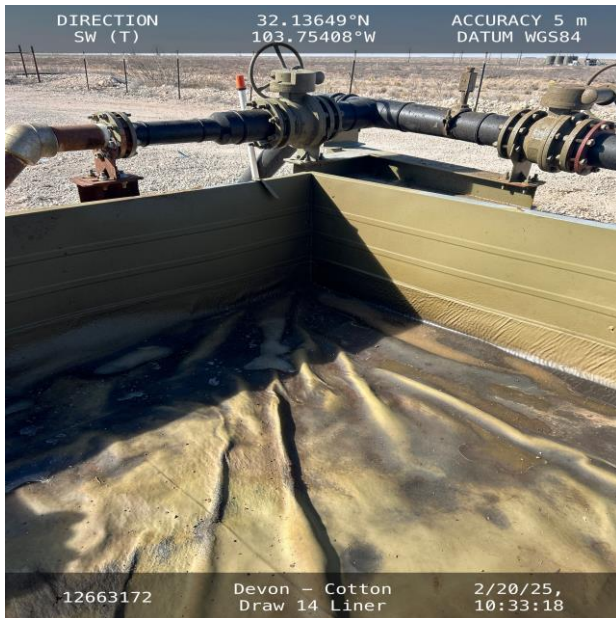
**Photo 3** View of western side of secondary containment facing north.



**Photo 4** View western side of secondary containment facing south.



Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 5** View of southwestern corner of secondary containment.



**Photo 6** View of western side of secondary containment facing north.



**Photo 7** View of southern side of secondary containment facing east.



**Photo 8** View of southern side of secondary containment facing east.



Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 9** View of eastern side of secondary containment facing north.



**Photo 10** View of eastern side of secondary containment facing south.



**Photo 11** View of the eastern side of secondary containment facing north.



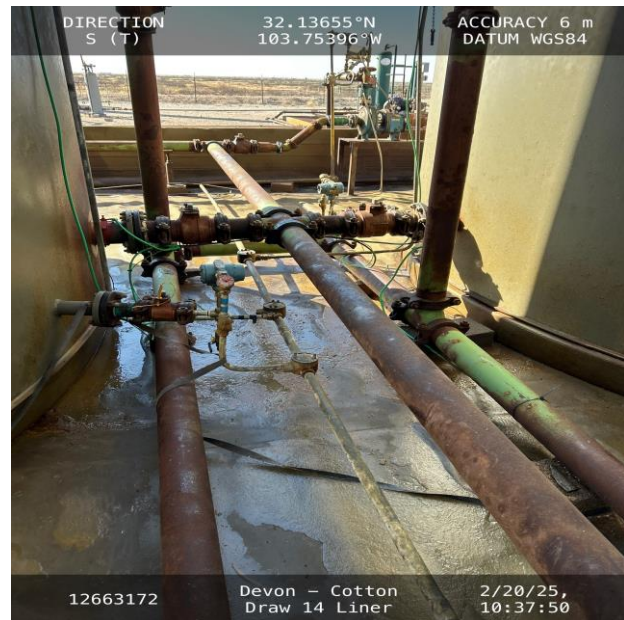
**Photo 12** View of interior containment facing south.



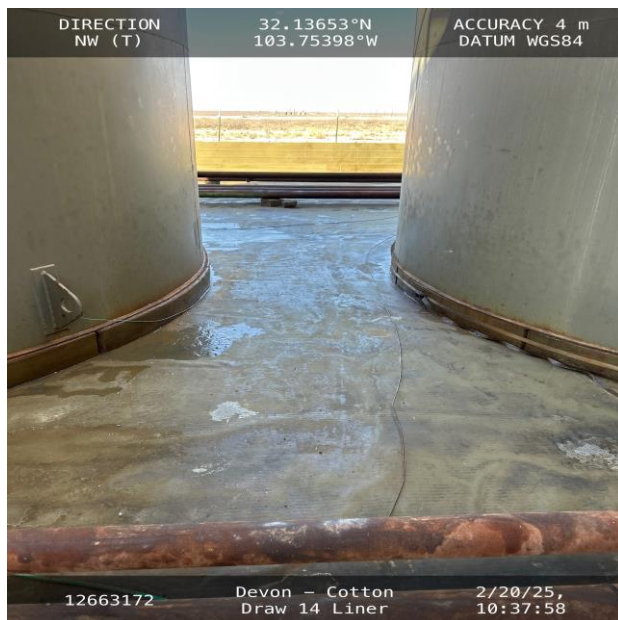
Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 13** View of interior containment facing north.



**Photo 14** View of interior portion of secondary containment facing south.



**Photo 15** View of interior portion of secondary containment facing northwest.



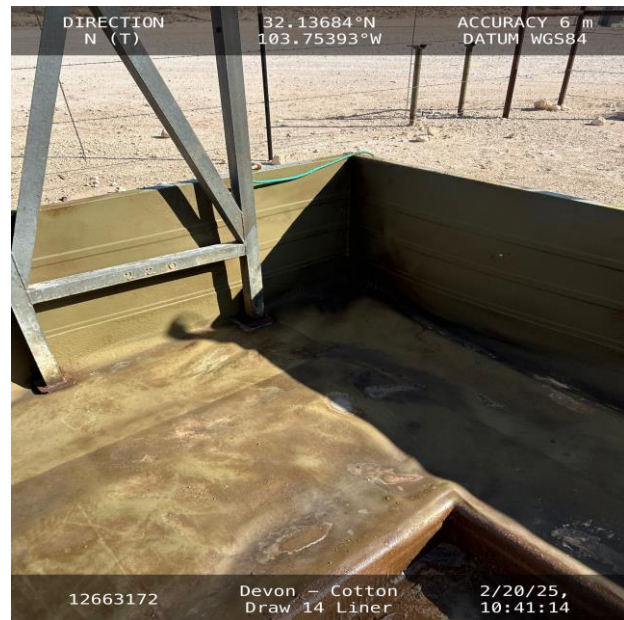
**Photo 16** View of interior portion of secondary containment facing east.



Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 17** View of eastern side of secondary containment facing north.



**Photo 18** View of northwestern corner of secondary containment.



**Photo 19** View of eastern side of secondary containment facing south.

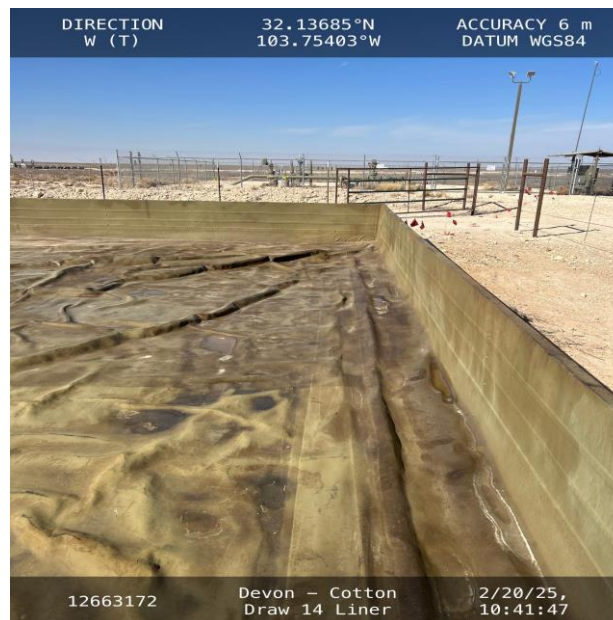


**Photo 20** View of northern side of secondary containment facing west.

Devon Energy Production Company, LP  
 Cotton Draw 14 Battery  
 Incident No. naPP2503424823  
 Eddy County, New Mexico



**Photo 21** View of northern side of secondary containment facing east.



**Photo 22** View of northern side of secondary containment facing west.



**Photo 23** View of central portion of secondary containment facing south.



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**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS

Action 441852

**QUESTIONS**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 441852
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Prerequisites</b>	
Incident ID (n#)	nAPP2503424823
Incident Name	NAPP2503424823 COTTON DRAW 14 BATTERY @ 0
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2130734943] COTTON DRAW 14 BATTERY

**Location of Release Source**

Please answer all the questions in this group.

Site Name	COTTON DRAW 14 BATTERY
Date Release Discovered	02/01/2025
Surface Owner	Federal

**Incident Details**

Please answer all the questions in this group.

Incident Type	Oil 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	Cause: Equipment Failure   Dump Line   Crude Oil   Released: 111 BBL   Recovered: 111 BBL   Lost: 0 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	Not answered.
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)	Divert line from lact developed leak. This allowed the release of approx. 111 bbls oil to lined secondary containment. Fluids fully recovered. -- Major notification made via email.

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QUESTIONS, Page 2

Action 441852

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.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 safety 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.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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@dvsn.com Date: 03/12/2025
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QUESTIONS, Page 3

Action 441852

**QUESTIONS (continued)**

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	Action Number: 441852
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Site Characterization</b>	
<i>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.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (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
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 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 ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

<b>Remediation Plan</b>	
<i>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.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>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.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>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>	
On what estimated date will the remediation commence	02/18/2025
On what date will (or did) the final sampling or liner inspection occur	02/20/2025
On what date will (or was) the remediation complete(d)	02/20/2025
What is the estimated surface area (in square feet) that will be remediated	9000
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>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.</i>	

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QUESTIONS, Page 4

Action 441852

**QUESTIONS (continued)**

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 441852
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>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.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
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.
<i>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>	
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@dv.com Date: 03/12/2025
<i>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.</i>	

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QUESTIONS, Page 6

Action 441852

**QUESTIONS (continued)**

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	Action Number: 441852
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	432513
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/20/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	9000

**Remediation Closure Request**

*Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.*

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	9000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	Secondary Containment inspection completed. No breach of liner.

*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 (in .pdf format) 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.*

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.

I hereby agree and sign off to the above statement	Name: James Raley Title: EHS Professional Email: jim.raley@dmv.com Date: 03/12/2025
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CONDITIONS

Action 441852

CONDITIONS

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CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	App ID 441852 Liner Inspection approved	3/17/2025