

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Fax: 505.266-0745

January 17, 2020

REVISED January 22, 2020

Susan Lucas Kamat, Environmental Scientist
OCD Environmental Bureau
1220 South St. Francis Drive
Santa Fe, NM 87505
ONLINE SUBMISSION

RE: Temporary Pit Closure Report,
Devon Energy – Bell Lake 19-18 State Com 009H (Cuttings from 007H, 009H and 010H)

Dear Ms. Lucas Kamat,

On behalf of Devon Energy Production Co., R.T. Hicks Consultants submits this closure report for the above-referenced temporary pit in accordance with the approved C-144 closure plan and conditions of approval. This report includes the following information listed in Part 21 of the C-144 form:

Requirements	Location in this Submission
Proof of Closure Notice (to surface owner and Division)	Attachment 1 (Note that Closure Notice erroneously suggested that wells 13H and 17H were associated with this pit)
Proof of Deed Notice (on-site closure on private land only)	Not applicable; State Land (no deed)
Plot Plan, C-105 form (for on-site closures and temporary pits)	Attachment 2
Confirmation Sampling Analytical Results	Not applicable
Waste Material Sampling Analytical Results (required for on-site closure)	Attachment 3 (also submitted with closure notice)
Disposal Facility Name and Permit Number	Not applicable; on-site closure
Soil Backfilling and Cover Installation	Attachment 4
Re-vegetation Application Rates and Seeding Technique	Re-vegetation will be part of site reclamation after plugging and abandonment (interim reclamation approved with initial permit application).
Site Reclamation (photo documentation)	To follow after plugging and site reclamation
Updated C-144 form	Attachment 5

Please contact me if you have any questions.

Sincerely,
R.T. Hicks Consultants



Randall Hicks
Principal

Copy: NM State Land Office, Devon Energy (VIA EMAIL)

Attachment 1

R. T. HICKS CONSULTANTS, LTD.

901 Rio Grande Blvd NW ▲ Suite F-142 ▲ Albuquerque, NM 87104 ▲ 505.266.5004 ▲ Since 1996
Artesia ▲ Carlsbad ▲ Durango ▲ Midland

September 24, 2019

Mr. Rick Rickman
Mr. Jim Griswold
NMOCD District 1
1625 French Drive
Hobbs, NM 88240
VIA EMAIL

RE: Devon Energy Temporary Pit Closure Notice Bell Lake 19-18 State Com 009H

Dear Mr. Rickman and Mr. Griswold:

On behalf of Devon Energy., R. T. Hicks Consultants provides this notice to NMOCD with a copy to the State Land Office (email return receipt in lieu of US Mail) that closure operations at the above-referenced pit will begin Friday, September 27, 2019. The closure process should be complete about October 18.

The temporary pit that was permitted as being associated with the Bell Lake 19-18 State Com 009H well (See Figure 1) received solids from:

Bell Lake Unit 007H	30-025-45451	surface to TD (19545)
Bell Lake Unit 009H	30-025-45452	surface to TD (19430)
Bell Lake Unit 010H	30-025-45453	surface to TD (19478)
Bell Lake Unit 013H	30-025-45454	*no cuttings were added to temporary pit
Bell Lake Unit 017H	30-025-45455	surface to TD (19505)

*Per the Form C-103 for Unit 013H, while the conductor pipe was attempting to be set, the auger got stuck and crane removal was unsuccessful. A request to move SHL was to be filed in a new APD.

The C-144 that will be attached to the closure report will also provide this updated information. The "In-place Burial" closure plan for the pit was approved by NMOCD on February 21, 2019 and the permit application and approval are on the OCD website.

An excavator collected samples of cuttings from 5 locations and the composite shown on Figure 2. The laboratory reports of the cuttings samples are presented in Attachment A and Table 1 summarizes the results. Please note that the chain of custody was labeled only as Bell Lake.

Sampling Results Bell Lake Unit 9H in mg/kg (highlight blue = Practical Quantification Limit - aka ND)											
Name	Chloride	DRO	MRO	GRO	Benzene	Toluene	Ethylbenzene	Xylenes	GRO+DRO	TPH	BTEX
1	109,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
2	376,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
3	8,400	42.4	10.0	119.0	7.4	38.4	7.6	29.1	161.4	171.4	82.4
4	18,800	863.0	189.0	291.0	5.4	44.2	9.5	41.2	100.0	289.0	100.3
5	10,100	861.0	163.0	528.0	15.0	87.5	18.0	74.6	195.0	358.0	195.1
6	8,930	399.0	80.7	254.0	6.3	41.8	9.6	36.9	653.0	733.7	94.5
Average Cuttings	88,538	364.2	77.1	202.0	5.7	35.3	7.5	30.4	191.6	268.7	78.8
7 (composite) Mixing Dirt	80.00	10.00	10.00	10.00	0.05	0.05	0.05	0.15	20.00	30.00	0.30
3 Parts Mixing + 1 Part Cuttings	22,195				1.46				63	90	20
Burial Standard	80,000				10				1,000	2,500	50

*MRO range (<C28-C35) - depicted as EXT DRO >C28-C36

**When results were less than the reporting limit, the reporting limit was used.

With the exception of chlorides, laboratory analysis of cuttings sample meets in-place closure target concentrations found in Table II of 19.15.17.13 NMAC without mixing with 3 parts clean fill. After mixing with 3 parts non-waste material, the GRO+DRO concentration is 63 mg/kg.

Closure activities require excavating the side slopes of the pit and using the underlying caliche for stabilization of the cuttings. The cuttings will also be mixed with dry material from beneath the pit liner as necessary. The closure process will follow the submitted plan.

Thank you for your consideration of this notice of in-place closure.

Sincerely,
R.T. Hicks Consultants



Erica M. Hart, PG
Geologist

Copy: Devon Energy
 Ryan Mann, SLO via email

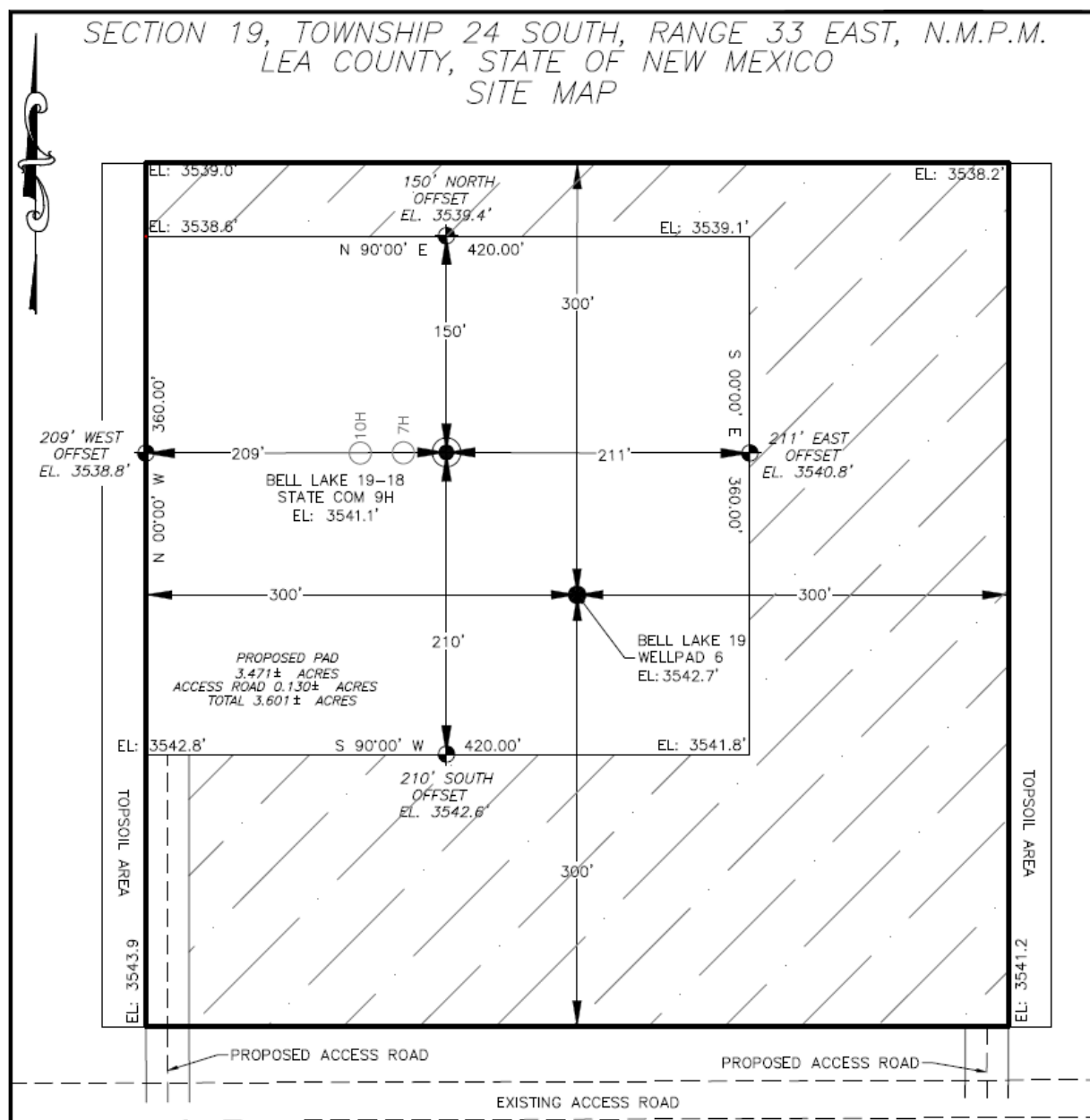


Figure 1 – Map showing wells associated with Bell Lake 19-18 State Com 009H pit.

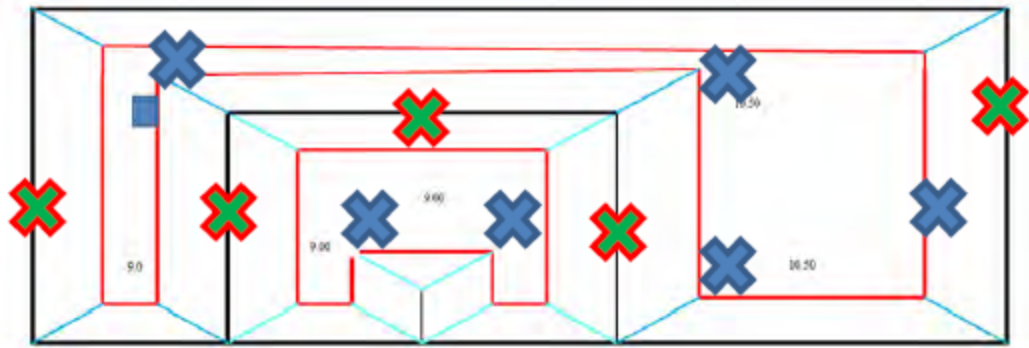
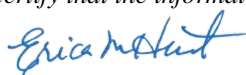


Image shows typical discrete pit sample locations (blue X) and the sub-sample locations for the "mixing dirt" (green X) composite sample to determine compliance with Table II.

Figure 2 – Sample locations for Bell Lake 19-18 State Com 009H pit. The wells associated with this pit are about 100 feet southeast of the pit.

Attachment 2

Submit to Appropriate District Office Two Copies District I 1625 N. French Dr., Hobbs, NM 88240 District II 811 S. First St., Artesia, NM 88210 District III 1000 Rio Brazos Rd., Aztec, NM 87410 District IV 1220 S. St. Francis Dr., Santa Fe, NM 87505		State of New Mexico Energy, Minerals and Natural Resources Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505			Form C-105 Revised April 3, 2017					
WELL COMPLETION OR RECOMPLETION REPORT AND LOG										
4. Reason for filing: <input type="checkbox"/> COMPLETION REPORT (Fill in boxes #1 through #31 for State and Fee wells only) <input checked="" type="checkbox"/> C-144 CLOSURE ATTACHMENT (Fill in boxes #1 through #9, #15 Date Rig Released and #32 and/or #33; attach this and the plat to the C-144 closure report in accordance with 19.15.17.13.K NMAC)								1. WELL API NO. 30-025-45453 2. Type of Lease <input checked="" type="checkbox"/> STATE <input type="checkbox"/> FEE <input type="checkbox"/> FED/INDIAN 3. State Oil & Gas Lease No.		
7. Type of Completion: <input checked="" type="checkbox"/> NEW WELL <input type="checkbox"/> WORKOVER <input type="checkbox"/> DEEPENING <input type="checkbox"/> PLUGBACK <input type="checkbox"/> DIFFERENT RESERVOIR <input type="checkbox"/> OTHER _____								5. Lease Name or Unit Agreement Name Bell Lake 19 18 State Com 6. Well Number: 010H		
8. Name of Operator Devon Energy Production Company, LP 10. Address of Operator						9. OGRID 6137 11. Pool name or Wildcat				
12. Location	Unit Ltr	Section	Township	Range	Lot	Feet from the	N/S Line	Feet from the	E/W Line	County
Surface:										
BH:										
13. Date Spudded	14. Date T.D. Reached	15. Date Rig Released 3/12/19			16. Date Completed (Ready to Produce) 8/17/19			17. Elevations (DF and RKB, RT, GR, etc.)		
18. Total Measured Depth of Well		19. Plug Back Measured Depth			20. Was Directional Survey Made?			21. Type Electric and Other Logs Run		
22. Producing Interval(s), of this completion - Top, Bottom, Name										
23. CASING RECORD (Report all strings set in well)										
CASING SIZE		WEIGHT LB./FT.		DEPTH SET		HOLE SIZE		CEMENTING RECORD		AMOUNT PULLED
24. LINER RECORD						25. TUBING RECORD				
SIZE	TOP	BOTTOM	SACKS CEMENT	SCREEN	SIZE	DEPTH SET	PACKER SET			
26. Perforation record (interval, size, and number)					27. ACID, SHOT, FRACTURE, CEMENT, SQUEEZE, ETC.					
					DEPTH INTERVAL			AMOUNT AND KIND MATERIAL USED		
28. PRODUCTION										
Date First Production		Production Method (<i>Flowing, gas lift, pumping - Size and type pump</i>)				Well Status (<i>Prod. or Shut-in</i>)				
Date of Test	Hours Tested	Choke Size	Prod'n For Test Period	Oil - Bbl	Gas - MCF	Water - Bbl.	Gas - Oil Ratio			
Flow Tubing Press.	Casing Pressure	Calculated 24-Hour Rate	Oil - Bbl.	Gas - MCF	Water - Bbl.	Oil Gravity - API - (<i>Corr.</i>)				
29. Disposition of Gas (<i>Sold, used for fuel, vented, etc.</i>)								30. Test Witnessed By		
31. List Attachments										
32. If a temporary pit was used at the well, attach a plat with the location of the temporary pit. see attached								33. Rig Release Date:		
34. If an on-site burial was used at the well, report the exact location of the on-site burial:										
Latitude 32.19681 Longitude -103.61443 NAD83										
I hereby certify that the information shown on both sides of this form is true and complete to the best of my knowledge and belief										
Signature 			Printed Name Erica Hart		Title Project Geologist		Date 1/16/2020			
E-mail Address erica@rthicksconsult.com										

This form is to be filed with the appropriate District Office of the Division not later than 20 days after the completion of any newly-drilled or deepened well and not later than 60 days after completion of closure. When submitted as a completion report, this shall be accompanied by one copy of all electrical and radio-activity logs run on the well and a summary of all special tests conducted, including drill stem tests. All depths reported shall be measured depths. In the case of directionally drilled wells, true vertical depths shall also be reported. For multiple completions, items 11, 12 and 26-31 shall be reported for each zone.

Southeastern New Mexico		Northwestern New Mexico	
T. Anhy	T. Canyon	T. Ojo Alamo	T. Penn A "
T. Salt	T. Strawn	T. Kirtland	T. Penn. "B"
B. Salt	T. Atoka	T. Fruitland	T. Penn. "C"
T. Yates	T. Miss	T. Pictured Cliffs	T. Penn. "D"
T. 7 Rivers	T. Devonian	T. Cliff House	T. Leadville
T. Queen	T. Silurian	T. Menefee	T. Madison
T. Grayburg	T. Montoya	T. Point Lookout	T. Elbert
T. San Andres	T. Simpson	T. Mancos	T. McCracken
T. Glorieta	T. McKee	T. Gallup	T. Ignacio Otzte
T. Paddock	T. Ellenburger	Base Greenhorn	T.Granite
T. Blinebry	T. Gr. Wash	T. Dakota	
T.Tubb	T. Delaware Sand	T. Morrison	
T. Drinkard	T. Bone Springs	T.Todilto	
T. Abo	T.	T. Entrada	
T. Wolfcamp	T.	T. Wingate	
T. Penn	T.	T. Chinle	
T. Cisco (Bough C)	T.	T. Permian	

No. 1, from.....to.....

No. 2, from.....to.....

No. 3, from.....to.....

No. 4, from.....to.....

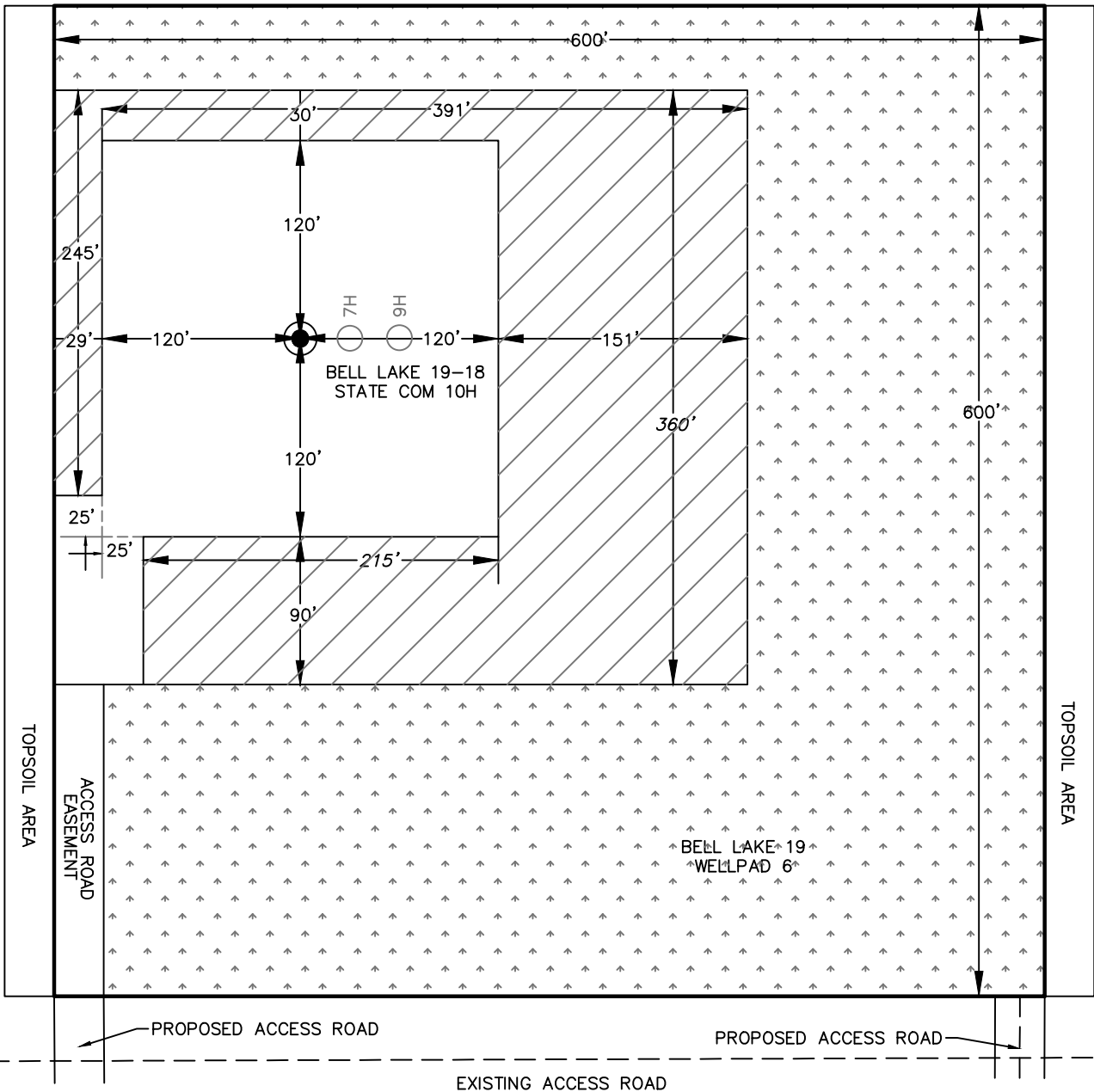
Include data on rate of water inflow and elevation to which water rose in hole.

No. 1, from.....to.....feet.....
 No. 2, from.....to.....feet.....
 No. 3, from.....to.....feet.....

From	To	Thickness In Feet	Lithology

From	To	Thickness In Feet	Lithology

SECTION 19, TOWNSHIP 24 SOUTH, RANGE 33 EAST, N.M.P.M.
LEA COUNTY, STATE OF NEW MEXICO
INTERIM SITE BUILD PLAN



DENOTES INTERIM PAD RECLAMATION AREA

DENOTES GRADING SITE RECLAMATION AREA

2.021± ACRES INTERIM PAD RECLAMATION AREA

4.663± ACRES GRADING SITE RECLAMATION AREA

1.580± ACRES NON-RECLAIMED AREA

8.264± ACRES GRADING SITE RECLAMATION AREA

0 100 200



DEVON ENERGY PRODUCTION COMPANY, L.P.
BELL LAKE 19-18 STATE COM 10H
LOCATED 481 FT. FROM THE SOUTH LINE
AND 1152 FT. FROM THE EAST LINE OF
SECTION 19, TOWNSHIP 24 SOUTH,
RANGE 33 EAST, N.M.P.M.
LEA COUNTY, STATE OF NEW MEXICO

HORIZON ROW LLC

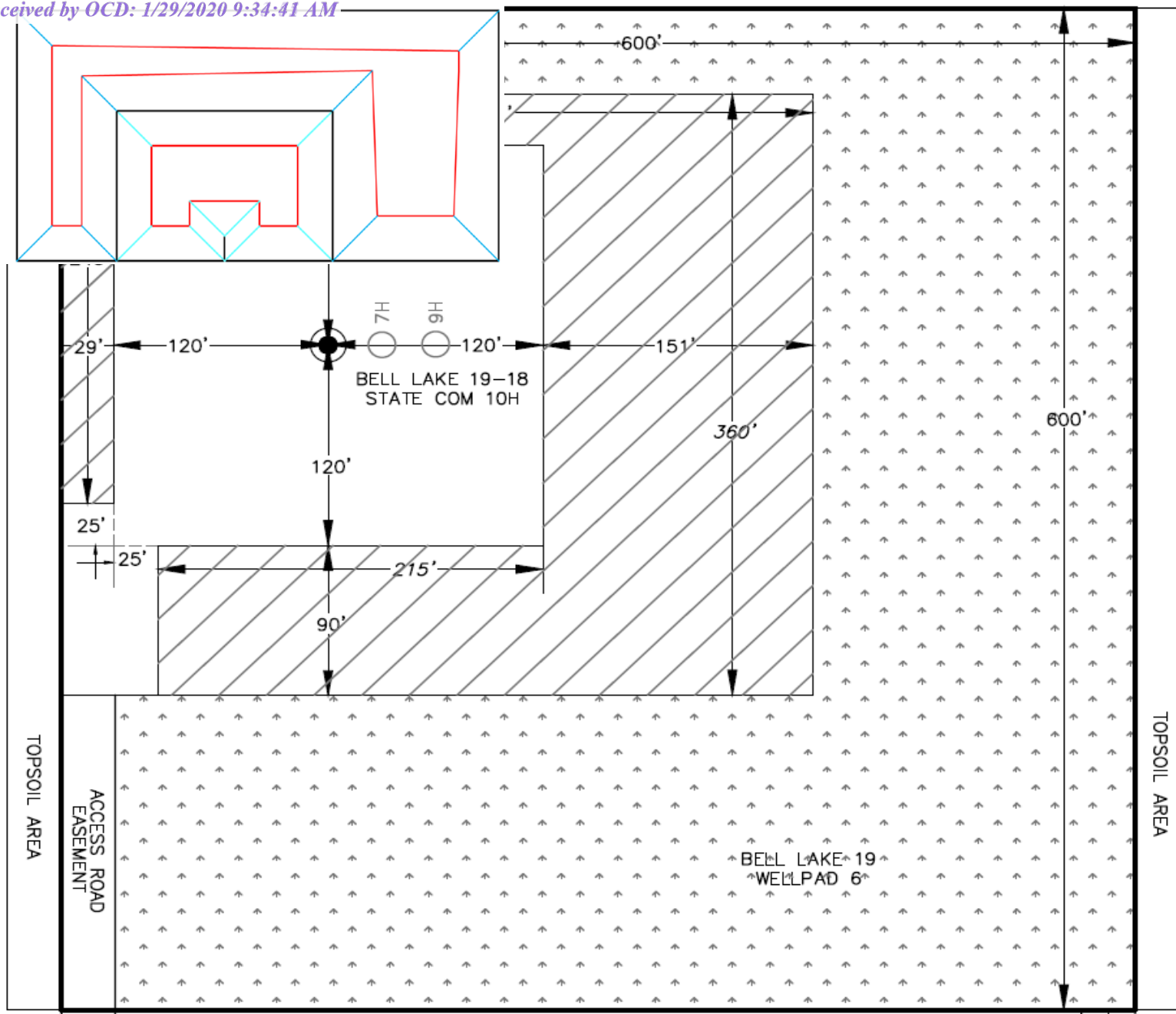
DEVON ENERGY PRODUCTION CO., L.P.

Drawn by
CHRIS MAAS

Date: 11/21/2018

Drawn for:





R.T. Hicks Consultants
 901 Rio Grande Blvd. NW
 Suite F-142
 Albuquerque, N. M. 87104

Drawing of Temporary Pit and Well in Relation to Pad Boundary

Plate 2

Bell Lake 19 State 10H (+9H&7H)

January 2019

Attachment 3

Sampling Results Bell Lake Unit 9H in mg/kg (highlight blue = Practical Quantification Limit - aka ND)											
Name	Chloride	DRO	MRO	GRO	Benzene	Toluene	Ethylbenzene	Xylenes	GRO+DRO	TPH	BTEX
1	109,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
2	376,000	10.0	10.0	10.0	0.1	0.1	0.1	0.2	20.0	30.0	0.3
3	8,400	42.4	10.0	119.0	7.4	38.4	7.6	29.1	161.4	171.4	82.4
4	18,800	863.0	189.0	291.0	5.4	44.2	9.5	41.2	100.0	289.0	100.3
5	10,100	861.0	163.0	528.0	15.0	87.5	18.0	74.6	195.0	358.0	195.1
6	8,930	399.0	80.7	254.0	6.3	41.8	9.6	36.9	653.0	733.7	94.5
Average Cuttings	88,538	364.2	77.1	202.0	5.7	35.3	7.5	30.4	191.6	268.7	78.8
7 (composite) Mixing Dirt	80.00	10.00	10.00	10.00	0.05	0.05	0.05	0.15	20.00	30.00	0.30
3 Parts Mixing + 1 Part Cuttings	22,195				1.46				63	90	20
Burial Standard	80,000				10				1,000	2,500	50

*MRO range (<C28-C35) - depicted as EXT DRO >C28-C36

**When results were less than the reporting limit, the reporting limit was used.



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

May 03, 2019

RANDALL HICKS

R T HICKS CONSULTANTS

901 RIO GRANDE BLVD SUITE F-142

ALBUQUERQUE, NM 87104

RE: BELL LAKE

Enclosed are the results of analyses for samples received by the laboratory on 05/02/19 9:00.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-18-11. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive, flowing style.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 1 (H901581-01)

BTEX 8021B			mg/kg		Analyzed By: ms				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/02/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	0.087	0.050	05/02/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	<0.050	0.050	05/02/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	<0.150	0.150	05/02/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	<0.300	0.300	05/02/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.8 % 73.3-129

Chloride, SM4500Cl-B			mg/kg		Analyzed By: AC				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	109000	16.0	05/03/2019	ND	400	100	400	0.00	

TPH 8015M			mg/kg		Analyzed By: MS				
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/02/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	<10.0	10.0	05/02/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	<10.0	10.0	05/02/2019	ND					

Surrogate: 1-Chlorooctane 104 % 41-142

Surrogate: 1-Chlorooctadecane 108 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 2 (H901581-02)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/02/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	<0.050	0.050	05/02/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	<0.050	0.050	05/02/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	<0.150	0.150	05/02/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	<0.300	0.300	05/02/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.7 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	376000	16.0	05/03/2019	ND	400	100	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	<10.0	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	<10.0	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 86.7 % 41-142

Surrogate: 1-Chlorooctadecane 105 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 3 (H901581-03)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	7.38	1.00	05/03/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	38.4	1.00	05/03/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	7.55	1.00	05/03/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	29.1	3.00	05/03/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	82.5	6.00	05/03/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.0 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8400	16.0	05/03/2019	ND	400	100	400	0.00	QM-07	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	119	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	42.4	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	<10.0	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 104 % 41-142

Surrogate: 1-Chlorooctadecane 96.3 % 37.6-147

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 4 (H901581-04)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	5.35	1.00	05/03/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	44.2	1.00	05/03/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	9.51	1.00	05/03/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	41.2	3.00	05/03/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	100	6.00	05/03/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 95.8 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	18800	16.0	05/03/2019	ND	400	100	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	291	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	863	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	189	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 124 % 41-142

Surrogate: 1-Chlorooctadecane 116 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 5 (H901581-05)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	15.0	1.00	05/03/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	87.5	1.00	05/03/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	18.0	1.00	05/03/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	74.6	3.00	05/03/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	195	6.00	05/03/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 92.0 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	10100	16.0	05/03/2019	ND	400	100	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	528	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	861	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	163	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 142 % 41-142

Surrogate: 1-Chlorooctadecane 117 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Sludge
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 6 (H901581-06)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	6.25	1.00	05/03/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	41.8	1.00	05/03/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	9.58	1.00	05/03/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	36.9	3.00	05/03/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	94.5	6.00	05/03/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 96.4 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8930	16.0	05/03/2019	ND	400	100	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	254	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	399	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	80.7	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 124 % 41-142

Surrogate: 1-Chlorooctadecane 114 % 37.6-147

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

R T HICKS CONSULTANTS
 RANDALL HICKS
 901 RIO GRANDE BLVD SUITE F-142
 ALBUQUERQUE NM, 87104
 Fax To: NONE

Received: 05/02/2019
 Reported: 05/03/2019
 Project Name: BELL LAKE
 Project Number: NONE GIVEN
 Project Location: NOT GIVEN

Sampling Date: 05/01/2019
 Sampling Type: Soil
 Sampling Condition: Cool & Intact
 Sample Received By: Tamara Oldaker

Sample ID: 7 COMP (H901581-07)

BTEx 8021B		mg/kg		Analyzed By: ms					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	05/03/2019	ND	1.61	80.3	2.00	2.68	
Toluene*	<0.050	0.050	05/03/2019	ND	1.71	85.5	2.00	3.89	
Ethylbenzene*	<0.050	0.050	05/03/2019	ND	1.68	83.8	2.00	3.01	
Total Xylenes*	<0.150	0.150	05/03/2019	ND	5.09	84.8	6.00	3.75	
Total BTEX	<0.300	0.300	05/03/2019	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.2 % 73.3-129

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	05/03/2019	ND	400	100	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/03/2019	ND	189	94.7	200	11.5	
DRO >C10-C28*	<10.0	10.0	05/03/2019	ND	190	94.9	200	8.44	
EXT DRO >C28-C36	<10.0	10.0	05/03/2019	ND					

Surrogate: 1-Chlorooctane 95.4 % 41-142

Surrogate: 1-Chlorooctadecane 89.4 % 37.6-147

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Notes and Definitions

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager

101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

. Released to Imaging: 10/19/2021 3:00:49 PM

Attachment 4

Closure Letter Attachment 4
Devon – Bell Lake 19-18 State Com 009H Cuttings Pit

SOIL BACKFILLING & COVER INSTALLATION

In accordance with the requirements listed in paragraph D of 19.15.17.13 NMAC and the conditions of approval, the operator employed the following steps for in-place burial of the waste material from the temporary pit:

1. The 009H temporary pit C-144 application was approved by NMOCD to accept cuttings from the drilling of the entirety of three wells (007H, 009H and 010H). Refer to the Notice of Closure for API numbers and specific intervals of each well associated with this pit.
2. Samples from the contents of the pit were recovered on May 1, 2019. The samples were analyzed for Chloride, TPH, GRO+DRO, Benzene, and BTEX at Cardinal Laboratories in Hobbs, New Mexico. As noted in the subsequent closure notice and Attachment 3 of this report, the cuttings/mixing dirt ratio meet the concentration limits of the parameters listed in Table II of the Pit Rule.
3. A closure notice was submitted to the NMOCD and to the State Land Office (via email) on September 24, 2019.
4. On September 27, 2019, closure activities commenced with the mixing of the cuttings and sloping of the material so that the overlying liner will shed infiltrating fluids.
5. On November 18, 2019, Hicks Consultants confirmed that the mixed cuttings passed a paint filter test and were located at least 4 feet below surrounding grade.
6. Following inspection, having achieved all applicable requirements associated with in-place burial, a geomembrane liner was installed to completely cover the stabilized cuttings on November 18, 2019.
7. Clean backfill material was placed on the geomembrane liner to hold it in place.
8. Equipment operators returned to the pit and completed the placing backfill on October 15, 2019. The soil cover consists of at least four feet of compacted, non-waste containing, earthen material. The topsoil is reserved on location for final reclamation. Alternative to re-vegetation and re-contouring (interim reclamation) was approved with permit application, requesting the surface be completed as part of the production pad serving several wells, consisting of a compacted caliche surface. Final restoration is to be completed at the time of plugging and abandonment as described in subsection H of 19.15.17.13 NMAC.

Closure Letter Attachment 4
Devon – Bell Lake 19-18 State Com 009H Cuttings Pit

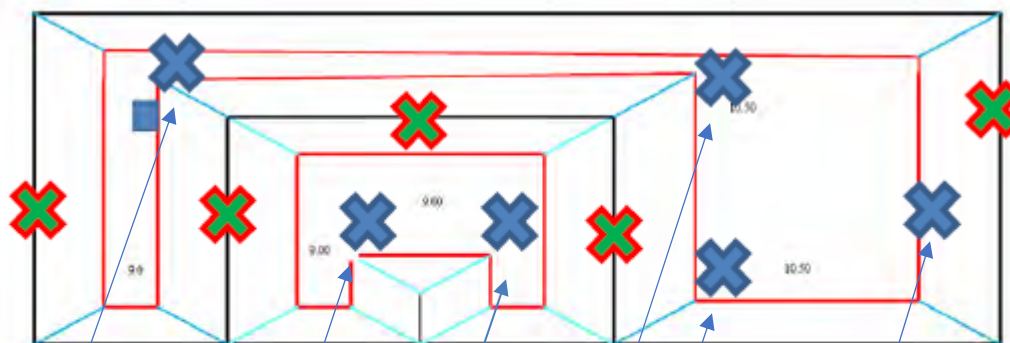


Image shows typical discrete pit sample locations (blue X) and the sub-sample locations for the "mixing dirt" (green X) composite sample to determine compliance with Table II.

4

1

2

5

3

6

The composite sample (7) is comprised of materials from the green "X" locations.

- Sample Location 1: 8 feet below surface (3 feet of salts)
- Sample Location 2: 8 feet below surface (5 feet of salts)
- Sample Location 3: 8 feet below surface (6 feet of sludge)
- Sample Location 4: 8 feet below sludge line on liner wall (2 feet of sludge)
- Sample Location 5: 10 feet below surface (8 feet of sludge)
- Sample Location 6: 10 feet below surface (8 feet of sludge)
- Sample Location 7: at surface beneath the liner

**Closure Letter Attachment 4
Devon – Bell Lake 19-18 State Com 009H Cuttings Pit**



Figure 1 - Well Site (11/18/19)



Figure 2 – Reclaimed soil 4 feet below ground surface (11/18/19)

**Closure Letter Attachment 4
Devon – Bell Lake 19-18 State Com 009H Cuttings Pit**



Figure 3 - Paint Filter Test (11/18/19)



Figure 4 – Completed Closure (11/26/19)

Attachment 5

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

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

Form C-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOC District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration
☒ Permit of a pit or proposed alternative method
☒ Closure of a pit, below-grade tank, or proposed alternative method
☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

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

1.

Operator: Devon Energy Production Company, LP. OGRID #: 6137
Address: 333 W. Sheridan, Oklahoma City, OK 73102-8260
Facility or well name: Bell Lake 19-18 State Com 10H
API Number: 3002545453 (10H) 3002545452 (9H) 3002545451 7(H) 3002545453 (10H) OCD Permit Number: _____
U/L or Qtr/Qtr A Section 19 Township 24S Range 33E County: Lea
Center of Proposed Design **is about 100 feet north of:** Latitude 32.196486 Longitude -103.609940 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☐ Federal ☒ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.

☒ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC
Temporary: ☒ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☒ no
☒ Lined ☐ Unlined Liner type: Thickness 20 mil ☒ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☒ String-Reinforced
Liner Seams: ☒ Welded ☐ Factory ☐ Other _____ Volume: See Plate 1 and 2 Dimensions: See Plate 1 and 2

3.

☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC
Volume: _____ bbl Type of fluid: _____
Tank Construction material: _____
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness _____ mil ☐ HDPE ☐ PVC ☐ Other _____

4.

☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.

Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)
☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
☒ Four foot height, four strands of barbed wire evenly spaced between one and four feet
☐ Alternate. Please specify _____

6.

Netting: Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☐ Other _____
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☒ Signed in compliance with 19.15.16.8 NMAC

8.

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

- ☒ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval

All proposed variances have been previously-approved by OCD.

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No
☒ NA

Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells **See Figures 1 & 2**

☐ Yes ☒ No
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks) See Figure 3**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☒ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks) See Figure 4**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☒ No

Within an unstable area. **(Does not apply to below grade tanks) See Figure 5**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☒ No

Within a 100-year floodplain. **(Does not apply to below grade tanks) See Figure 6**

- FEMA map

☐ Yes ☒ No

Below Grade Tanks

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Temporary Pit Non-low chloride drilling fluid

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). **See Figure 7**

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image. **See Figure 8**

☐ Yes ☒ No

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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site
See Figures 1 & 2 and 7 (springs)

☐ Yes ☒ No

Within 300 feet of a wetland. **See Figure 9**

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☒ No

Permanent Pit or Multi-Well Fluid Management Pit

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☒ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☒ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☒ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☒ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

and 19.15.17.13 NMAC

☒ Previously Approved Design (attach copy of design) API Number: 30 025 45070 or Permit Number: _____

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC

☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Climatological Factors Assessment
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Quality Control/Quality Assurance Construction and Installation Plan
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Nuisance or Hazardous Odors, including H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

Proposed Closure: 19.15.17.13 NMAC

Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☒ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☐ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☒ On-site Closure Method (Only for temporary pits and closed-loop systems)
☒ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.

Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No


16. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

☒ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☒ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
☒ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☒ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
☒ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
☒ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☒ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☒ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**

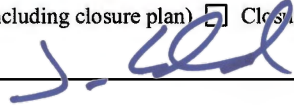
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Jamison Hart Title: Drilling Engineer

Signature:  Date: 01/07/2019

e-mail address: Jamison.Hart@dyn.com Telephone: 405-228-8370

18. **OCD Approval:** ☒ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 1/14/19

Title: Environmental Bureau Chief OCD Permit Number: _____

19. **Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☒ Closure Completion Date: 11/26/19

20. **Closure Method:**

☐ Waste Excavation and Removal ☒ On-Site Closure Method ☐ Alternative Closure Method ☐ Waste Removal (Closed-loop systems only)
☐ If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

☒ Proof of Closure Notice (surface owner and division)
☐ Proof of Deed Notice (required for on-site closure for private land only) n/a; State Land
☒ Plot Plan (for on-site closures and temporary pits)
☐ Confirmation Sampling Analytical Results (if applicable) n/a; in-place burial
☒ Waste Material Sampling Analytical Results (required for on-site closure)
☐ Disposal Facility Name and Permit Number n/a; in-place burial
☒ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique to follow abandonment when approved
☐ Site Reclamation (Photo Documentation)
 On-site Closure Location: Latitude 32.19681 Longitude -103.61443 NAD: ☐ 1927 ☒ 1983

- ☐ Plot Plan (for on-site closures and temporary pits)
☐ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☐ Disposal Facility Name and Permit Number
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique
☐ Site Reclamation (Photo Documentation)

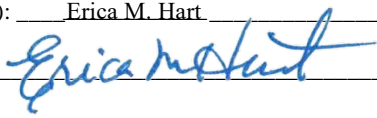
On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Erica M. Hart Title: Project Geologist, Consultant for Devon

Signature:  Date: 1/17/2020

e-mail address: erica@rthicksconsult.com Telephone: 575-704-2526

District I

1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II

811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 3618

CONDITIONS

Operator: DEVON ENERGY PRODUCTION COMPANY, LP 333 West Sheridan Ave. Oklahoma City, OK 73102	OGRID: 6137
	Action Number: 3618
	Action Type: [C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	NMOCD has reviewed the Closure Report for the Temporary Pit associated with the 30-025-45453 BELL LAKE 19 18 STATE COM #010H received from R.T. Hicks Consultants on behalf of DEVON ENERGY PRODUCTION COMPANY, LP [6137] on 01/29/2020. The Closure Report is approved.	10/19/2021