

SITE REMEDIATION AND CLOSURE REPORT

REPORTABLE RELEASE

Spur Energy Partners

Holiday #1H Battery

GPS: Latitude 32.8023071 Longitude -104.2290268

Eddy County, NM

Incident ID No. NAPP2119633013

Prepared by:



Paragon Environmental LLC

225 Billy Walker Rd

Hobbs, NM 88240

903-522-0833

General Information

This report was prepared by Paragon Environmental LLC (Paragon) in response to the release for Spur Energy Partners (Spur) at the **Holiday #1H Battery** (Holiday).

Site Coordinates: Latitude: 32.8023071 Longitude: -104.2290268

Unit: UL D, Section 01, Township 20S, Range 25E

Date of Spill: 07/05/2021

Type of Spill: ☐ Crude Oil ☒ Produced Water ☐ Condensate ☐ Other (Specify):

Comments: Reportable release.
Released: 38 bbls of Produced Water
Recovered: 38 bbls of Produced Water

Incident ID: NAPP2119633013

Depth to Groundwater

According to the New Mexico State of Engineers Office, the nearest water data is less than 1/2 miles away and is 121 feet below grade surface (BGS). See Appendix A for details.

Soil Survey

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Piedmont alluvial deposits (Holocene to lower Pleistocene)-Includes deposits of higher gradient tributaries bordering major stream valleys, alluvial veneers of the piedmont slope, and alluvial fans. May locally include uppermost Pliocene deposits (QP). According to the United States Department of Agriculture Natural Resources Conservation Service soil survey, the soil in this area is comprised of the Reeves-Gypsum land complex, with 0 to 3 percent slopes. The drainage courses in this area are well-drained. There is a **high** potential for karst geology to be present in the area of the Holiday (Appendix B).

Release Description and Assessment

This release was caused by corrosion developing a hole in the equalizing load line. The release was contained in the falcon-lined containment. A vacuum truck was dispatched to aid in the recovery of the fluids and placed the recovered fluids back into the water tank. The line was repaired and put back into service.

Site Assessment and Soil Sampling Results

On February 9, 2022, Paragon sent an Environmental Technician to the site to conduct a Liner inspection and to obtain soil samples. The results of this sampling event are in the following data table and all the laboratory results can be found in Appendix E.

2-9-22 Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (High Karst Area)								
Sample Date 2-9-22		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
N. COMP.	0	ND	ND	ND	ND	ND	ND	16
E. COMP.	0	ND	ND	ND	ND	ND	ND	144
S. COMP.	0	ND	ND	ND	ND	ND	ND	32
W. COMP.	0	ND	ND	ND	ND	ND	ND	32

ND- Analyte Not Detected

The liner was cleaned prior to the inspection. The 48-hour notification was given to the state on 2-7-22, see Appendix F. During the inspection, there were no obvious rips or tears in the liner to make me believe that the liner needs any repair or has lost the integrity to contain any spilled fluids. The liner report can also be found in Appendix F.

Remediation Activity Summary

Based on the Liner Inspection and the composite sample results being below closure criteria no remediation is needed for this incident.

Closure Request

After careful review, Paragon respectfully requests that the incident, NAPP2119633013, be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Wayne Brunt at 903-522-0833 or wayne@paragonenvironmental.net.

Respectfully,

Wayne Brunt
Environmental Professional
Paragon Environmental LLC

Attachments

Figures:

- 1- Site Map
- 2- TOPO Map
- 3- Karst Map
- 4- Location Map

Appendices:

- Appendix A- Referenced Water Data
- Appendix B- Soil Survey & FEMA Flood Map
- Appendix C- C-141
- Appendix D- Photographic Documentation
- Appendix E- Laboratory Results
- Appendix F- Liner Inspection Notification and Form



Figures:

- 1-Site Map
- 2- TOPO Map
- 3- Karst Map
- 4- Location Map

Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Site Map

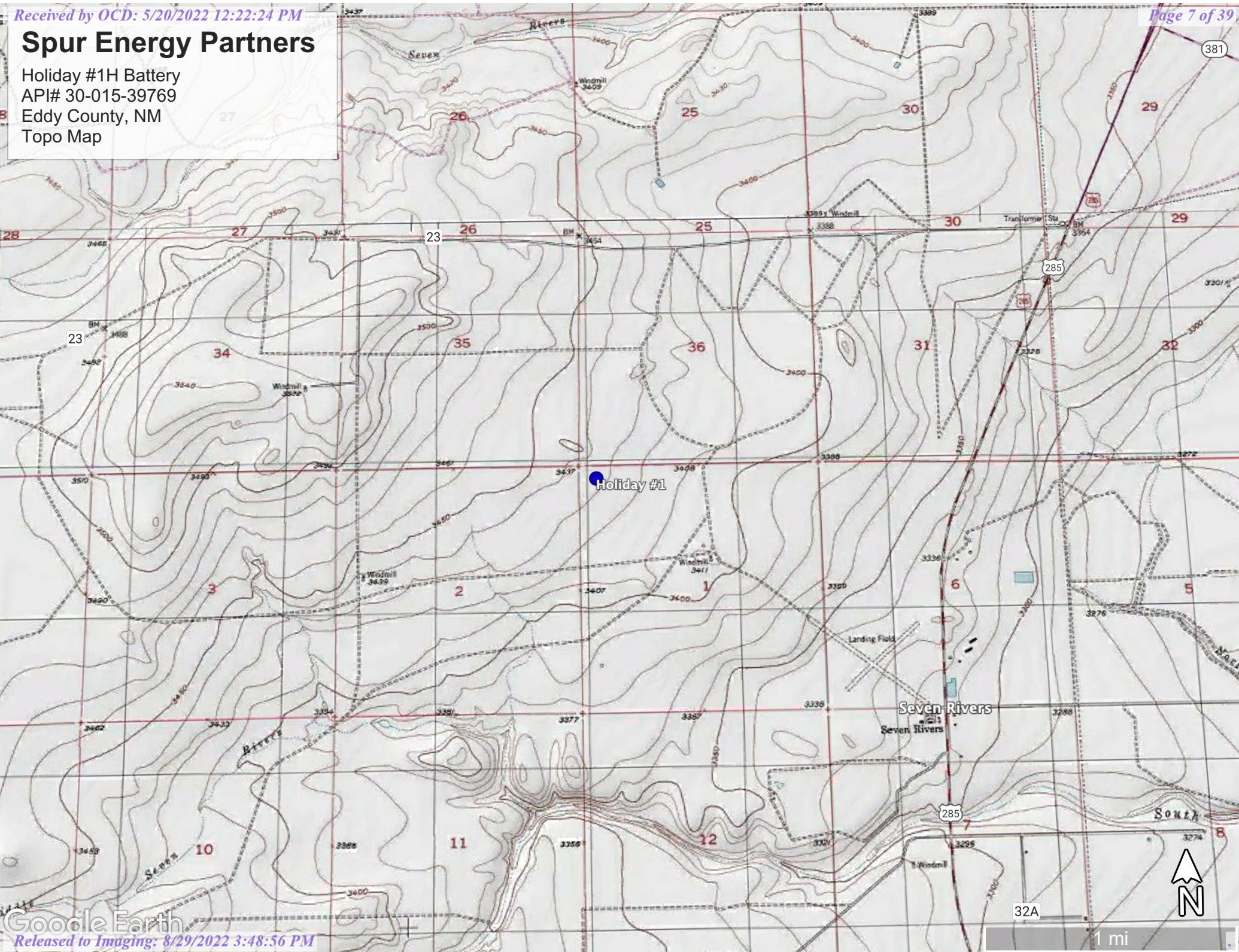
Legend

- Comp Samples
- Spill Area



Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Topo Map



Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Karst Map

Legend

- High
- Low
- Medium

Holiday #1

Seven Rivers

Pecos River

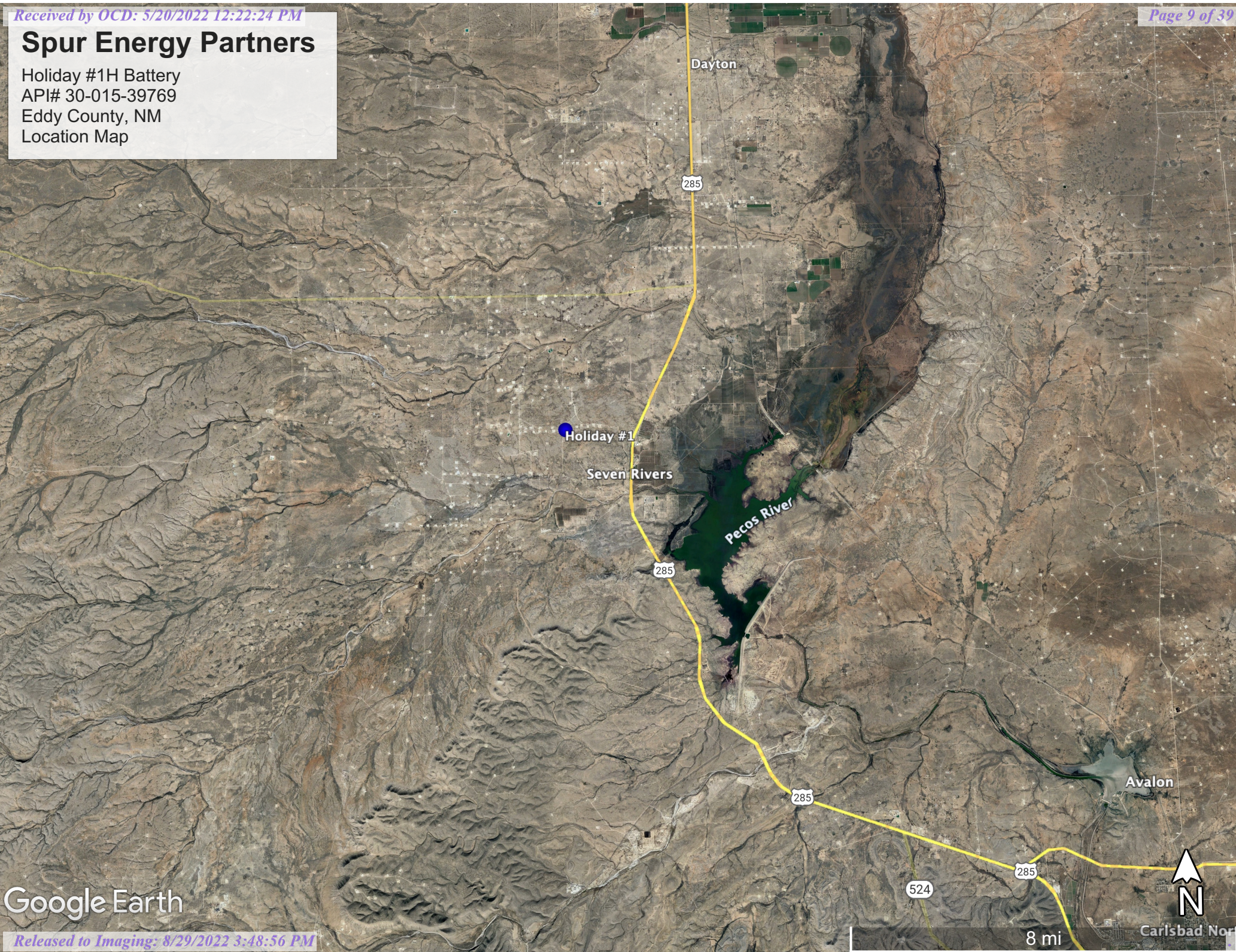
Brantley Lake State Park



6 mi

Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Location Map



Google Earth



Appendix A
Referenced Water Data:

New Mexico State of Engineers Office



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the
POD suffix indicates the
POD has been replaced
& no longer serves a
water right file.)

(R=POD has been
replaced,
O=orphaned,
C=the file is
closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)
(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
RA 10898 POD1		RA	ED	2	1	3	01	20S	25E	552198	3607248*	874	810	121	689
RA 05458		RA	ED		3	3	01	20S	25E	552101	3606747*	1358	500	95	405
Average Depth to Water:														108 feet	
Minimum Depth:														95 feet	
Maximum Depth:														121 feet	

Record Count: 2

UTMNAD83 Radius Search (in meters):

Easting (X): 552011.538

Northing (Y): 3608102.562

Radius: 1500


*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



New Mexico Office of the State Engineer

Point of Diversion Summary

		(quarters are 1=NW 2=NE 3=SW 4=SE)				(quarters are smallest to largest)				(NAD83 UTM in meters)	
Well Tag	POD Number	Q64	Q16	Q4	Sec	Tw	Rng	X	Y		
	RA 10898 POD1	2	1	3	01	20S	25E	552198	3607248*		
Driller License: 331		Driller Company:				SBQ2, LLC DBA STEWART BROTHERS DRILLING CO.					
Driller Name:											
Drill Start Date:	02/17/2006	Drill Finish Date:				03/08/2006		Plug Date:			
Log File Date:	03/27/2006	PCW Rcv Date:						Source:		Artesian	
Pump Type:		Pipe Discharge Size:						Estimated Yield:		1000 GPM	
Casing Size:	8.63	Depth Well:				810 feet		Depth Water:		121 feet	
Water Bearing Stratifications:				Top	Bottom	Description					
				460	802	Limestone/Dolomite/Chalk					
Casing Perforations:				Top	Bottom						
				542	802						

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

4/12/22 11:52 AM

POINT OF DIVERSION SUMMARY



Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

RG—Reeves-Gypsum land complex, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5f
Elevation: 1,250 to 5,000 feet
Mean annual precipitation: 10 to 25 inches
Mean annual air temperature: 57 to 70 degrees F
Frost-free period: 190 to 235 days
Farmland classification: Not prime farmland

Map Unit Composition

Reeves and similar soils: 55 percent
Gypsum land: 30 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Reeves

Setting

Landform: Ridges, plains, hills
Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope
Landform position (three-dimensional): Side slope, crest, nose slope, head slope
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Residuum weathered from gypsum

Typical profile

H1 - 0 to 8 inches: loam
H2 - 8 to 32 inches: clay loam
H3 - 32 to 60 inches: gypsiferous material

Properties and qualities

Slope: 0 to 1 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: 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: 25 percent
Gypsum, maximum content: 80 percent
Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
Sodium adsorption ratio, maximum: 4.0
Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Interpretive groups

Land capability classification (irrigated): 3s

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: B

Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Description of Gypsum Land**Setting**

Landform: Ridges, plains, hills

Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope

Landform position (three-dimensional): Side slope, crest, nose slope, head slope

Down-slope shape: Convex

Across-slope shape: Linear

Parent material: Residuum weathered from gypsum

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 8s

Hydric soil rating: No

Minor Components**Largo**

Percent of map unit: 5 percent

Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Cottonwood

Percent of map unit: 5 percent

Ecological site: R042XC033NM - Salty Bottomland

Hydric soil rating: No

Reagan

Percent of map unit: 5 percent

Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Data Source Information

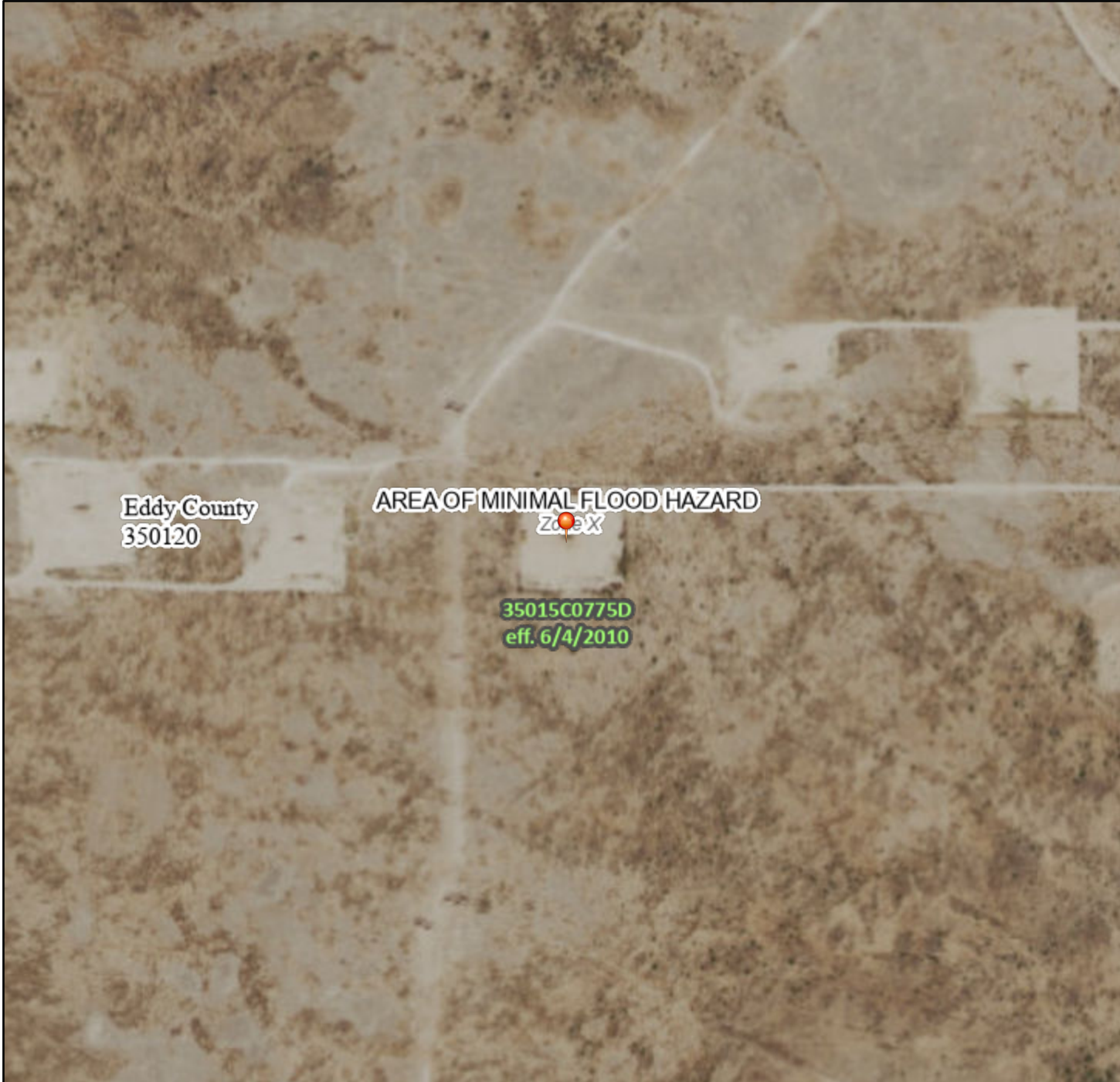
Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 17, Sep 12, 2021

National Flood Hazard Layer FIRMette



104°27'3"W 32°36'47"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
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
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 3/24/2022 at 12:58 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.



Appendix C:

C-141

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	OGRID
Contact Name	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address	

Location of Release Source

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Site Type
Date Release Discovered	API# (if applicable)

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

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


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

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: _____	Title: _____
Signature:  _____	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: <u>Ramona Marcus</u>	Date: <u>10/4/2021</u>

Spill Volume(Bbls) Calculator		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
<u>64.000</u>	<u>32.000</u>	<u>1.250</u>
Cubic Feet Impacted		<u>213.333</u>
Barrels		<u>37.99</u>
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		<u>37.99</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		38

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 53871

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 53871
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
marcus	None	10/4/2021

Form C-141

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State of New Mexico
Oil Conservation Division

Incident ID	NAPP2119633013
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	121 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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

Form C-141

State of New Mexico
Oil Conservation Division

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Incident ID	NAPP2119633013
District RP	
Facility ID	
Application ID	

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

Printed Name: Braidy Moulder

Title: HSE Manager

Signature: Braidymoulder

Date: 4-12-22

email: bmoulder@spurepllc.com

Telephone: 713-264-2517

OCD Only

Received by: _____

Date: _____

Form C-141

Page 5

State of New Mexico
Oil Conservation Division

Incident ID	NAPP2119633013
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

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

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Braidy Moulder

Title: HSE Manager

Signature: Braidy Moulder

Date: 4-12-22

email: bmoulder@spurepllc.com

Telephone: 713-264-2517

OCD Only

Received by: _____

Date: _____

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

Closure Approved by: Jennifer Nobui Date: 08/29/2022Printed Name: Jennifer NobuiTitle: Environmental Specialist A



Appendix D:
Photographic Documentation

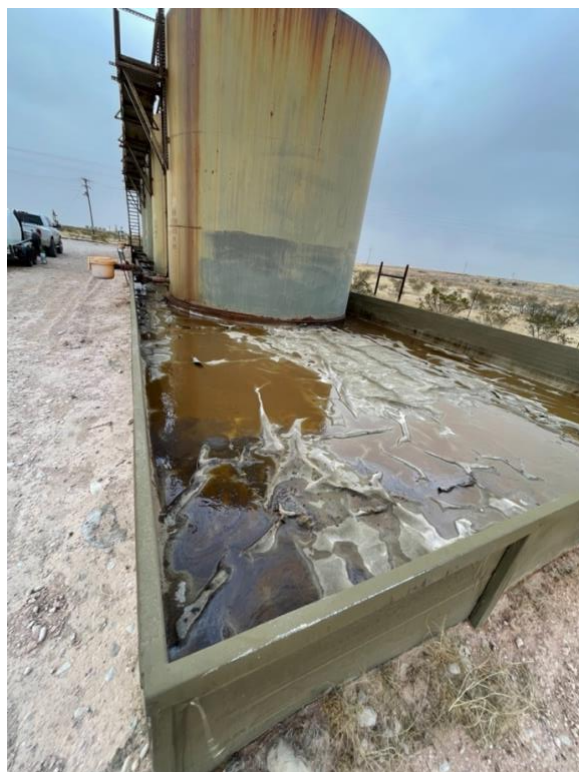


Photographic Documentation

Liner Inspection Composite Samples From Around The Containment



Cleaned & Completed





Appendix E:
Laboratory Results



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

February 15, 2022

CASON SPURLOCK

PARAGON ENVIROMENTAL

5002 CARRAIGE RD

HOBBS, NM 88242

RE: HOLIDAY 1 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/11/22 10:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-21-14. 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".

Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 02/11/2022
 Reported: 02/15/2022
 Project Name: HOLIDAY 1 BATTERY
 Project Number: SPUR
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: NORTH COMP (H220542-01)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	02/14/2022	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 113 % 66.9-136

Surrogate: 1-Chlorooctadecane 128 % 59.5-142

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Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 02/11/2022
 Reported: 02/15/2022
 Project Name: HOLIDAY 1 BATTERY
 Project Number: SPUR
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: EAST COMP (H220542-02)

BTX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	144	16.0	02/14/2022	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 105 % 66.9-136

Surrogate: 1-Chlorooctadecane 117 % 59.5-142

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 02/11/2022
 Reported: 02/15/2022
 Project Name: HOLIDAY 1 BATTERY
 Project Number: SPUR
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: SOUTH COMP (H220542-03)

BTX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41		
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95		
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87		
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74		
Total BTX	<0.300	0.300	02/12/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/14/2022	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 106 % 66.9-136

Surrogate: 1-Chlorooctadecane 120 % 59.5-142

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 02/11/2022
 Reported: 02/15/2022
 Project Name: HOLIDAY 1 BATTERY
 Project Number: SPUR
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Tamara Oldaker

Sample ID: WEST COMP (H220542-04)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41		
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95		
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87		
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74		
Total BTEX	<0.300	0.300	02/12/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/14/2022	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 116 % 66.9-136

Surrogate: 1-Chlorooctadecane 133 % 59.5-142

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Notes and Definitions

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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

[illegible]



Appendix F:

Liner Inspection and Email Notification



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners

Site: Holiday #1H Battery

Lat/Long: 32.8023071, -104.2290268

NMOCD Incident ID NAPP2119633013
& Incident Date: 7-5-212-Day Notification
Sent: 2-7-22

Inspection Date: 2-9-22

Liner Type: Earthen w/liner Earthen no liner Polystar
Steel w/poly liner Steel w/spray epoxy No Liner

Other: _____

Visualization	Yes	No	Comments
Is there a tear in the liner?		x	
Are there holes in the liner?		x	
Is the liner retaining any fluids?		x	
Does the liner have integrity to contain a leak?	x		

Comments: _____

Inspector Name: Travis Collins

Inspector Signature: Travis Collins



Cason Spurlock <cason@paragonenvironmental.net>

Holiday #1 Battery

1 message

Cason <cason@paragonenvironmental.net>

Mon, Feb 7, 2022 at 5:57 AM

To: mike.bratcher@state.nm.us, robert.hamlet@state.nm.us, chad.hensley@state.nm.us, Braidy Moulder <boulder@spurepllc.com>, Dakota Neel <dneel@spurepllc.com>

Gentleman,

On behalf of Spur Energy, Paragon will be conducting a liner inspection at the referenced location. This inspection will be conducted in reference to incidents NAPP2119633013, NAPP2119561140, and NRM2026056833. We will be conducting this inspection on 2-9-22 at approximately 9 am. If you have any questions or care to join you can reach out and let me know.

--
Paragon Environmental
225 Billy Walker Rd
Hobbs, NM 88240

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 109076

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 109076
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Approved	8/29/2022