Page 1 of 27

Incident ID	NAPP2207368796
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 ite	ms 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 o must be notified 2 days prior to liner inspection)	f the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate ODC)	District office must be notified 2 days prior to final sampling)
□ Description of remediation activities	
	ediate contamination that pose a threat to groundwater, surface water, C-141 report does not relieve the operator of responsibility for ons. The responsible party acknowledges they must substantially ditions that existed prior to the release or their final land use in
Signature:	Date:
email: chensley@spurenergy.com	Telephone: 346-339-1494
OCD Only	
Received by: Jocelyn Harimon	Date:09/12/2022
	f liability should their operations have failed to adequately investigate and ater, human health, or the environment nor does not relieve the responsible regulations.
Closure Approved by: Robert Hamlet	Date: <u>9/21/2022</u>
Printed Name: Robert Hamlet	Title: Environmental Specialist - Advanced

LINER INSPECTION AND CLOSURE REPORT REPORTABLE RELEASE

Spur Energy Partners

Bradley 8 Fee #2H Incident ID: nAPP2207368796 API #30-015-39811 Eddy County, NM

Prepared by:



Paragon Environmental LLC 1601 N. TURNER ST. STE.500 Hobbs, NM 88240 575-964-7814

GENERAL DETAILS

This report was prepared by Paragon Environmental LLC (Paragon) in response to the release for Spur Energy Partners (Spur) at the **Bradley 8 Fee #2H (Bradley)**.

Site Coordinates: Latitude: 32.6684264 Longitude: -104.4068375

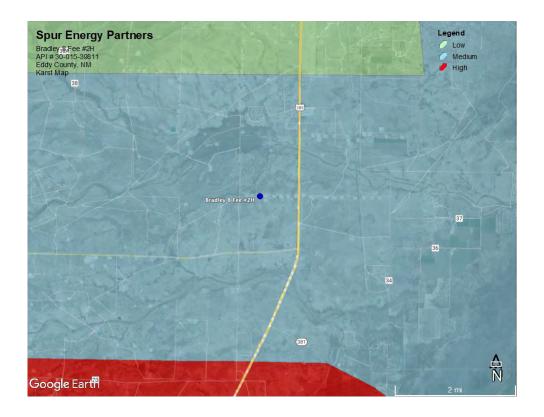
Unit UL N, Section 08, Township 19S, Range 26E

Incident ID: NAPP2207368796

REGULATORY FRAMEWORK

<u>Depth to Groundwater</u>: According to the New Mexico State of Engineers Office, the nearest water data is less than 1/2 mile away and is greater than 100 feet below the ground surface (BGS). See Appendix A for details.

<u>Soil Survey:</u> Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Piedmont alluvial deposits (Holocene to lower Pleistocene)-Including 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 comprises the Reagan-Upton complex, with 0 to 9 percent slopes. The drainage courses in this area are well-drained. The karst geology in the area of the Bradley is not in High Karst. See the map below.



RELEASE DETAILS

This release was due to corrosion inside the separator. The 62 bbls of crude oil released were contained in the Falcon Lined containment. A vacuum truck was dispatched and recovered the 61 bbls.

Date of Spill: 03/13/2022

Type of Spill: ⊠Crude Oil □Produced Water □ Condensate □Other (Specify):

<u>Comments:</u> Reportable release. Released: 62 bbls of Crude Oil Recovered: 61 bbls of Crude Oil

INITIAL SITE ASSESSMENT

On May 23, 2022, Paragon went to the Bradley and conducted an initial assessment. There were noticeable oil stains on the liner from the spill. There were no signs outside the containment that the liner had been breached. Therefore, no samples were taken. See the site map below showing the affected area.



REMEDIATION ACTIVITIES

On June 9, 2022, Paragon returned to the site with equipment and personnel to conduct cleanup activities. We initially sprayed the affected area with surface cleaner. We then power washed and squeegeed the runoff to where the vacuum truck could capture the fluids.

On July 20, 2022, Paragon returned to the site to conduct a liner inspection. A 48-hour notification was sent to the NMOCD on July 18, 2022. The liner inspection concluded that the liner was all intact and in good condition. The integrity of the liner appears to have the ability to contain spills. See Appendix D for the email notification and liner report.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2207368796, be closed. Spur has complied with the applicable closure requirements. If you have any questions or need additional information, please contact Chris Jones at 575-964-7814 or chris@paragonenvironmental.net.

Respectfully,

Chris Jones

Environmental Professional Paragon Environmental LLC

Attachments

Figures:

- 1- Topo Map
- 2- Aerial Map

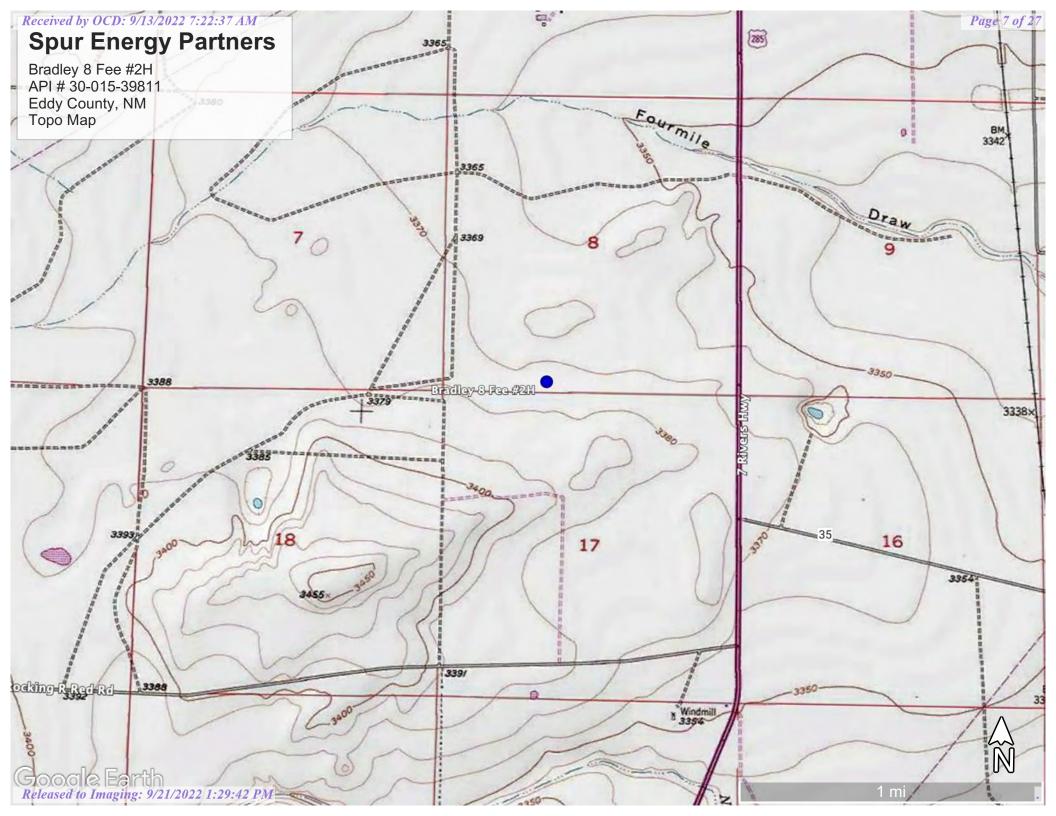
Appendices:

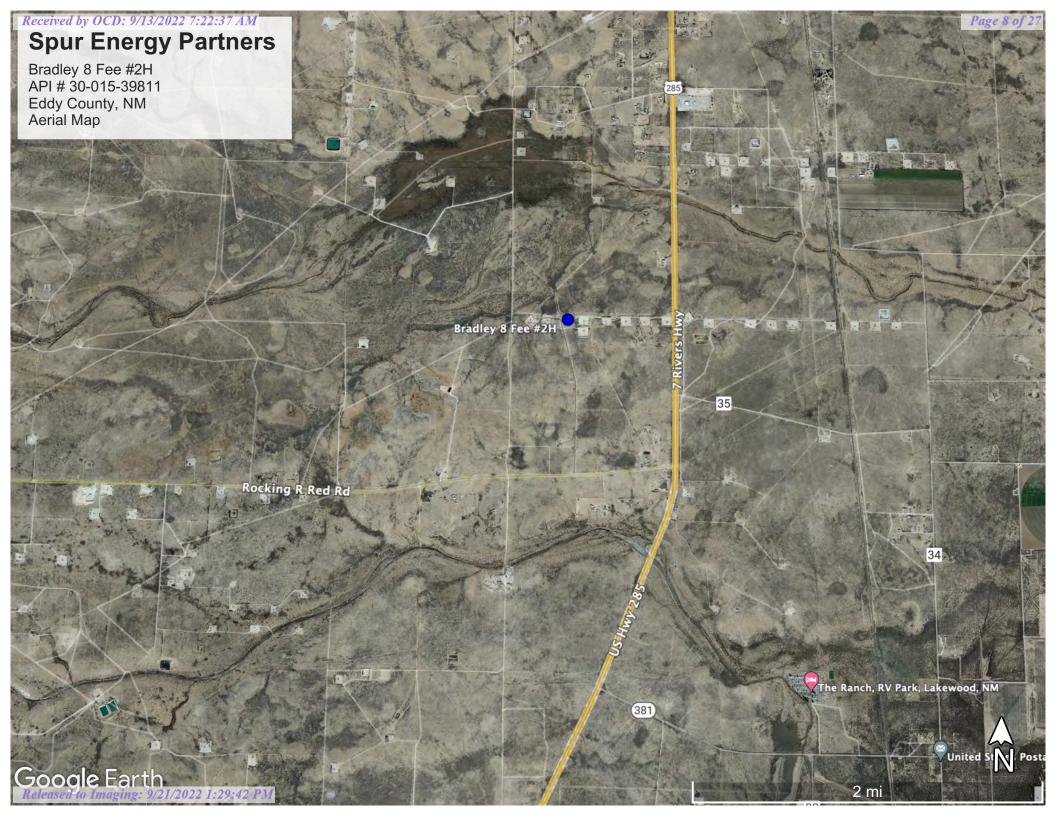
- Appendix A- Referenced Water Data
- Appendix B- Soil Survey & FEMA Flood Map
- Appendix C- C-141
- Appendix D- Email Correspondence, Liner Inspection, & Photographic Documentation



Figures:

Topo Map Aerial Map







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												
		Sub-		Q	Q Q	2							V	Water
POD Number	Code	basin	County	64 1	6 4	Sec	Tws	Rng	X	Y	DistanceDep	pthWellDep	thWater C	olumn
<u>RA 05037</u>		RA	ED		1 2	17	19S	26E	556091	3614436*	265	475	132	343
RA 11018 POD1		RA	ED	3	4 2	17	19S	26E	556396	3613928*	855	260	100	160

Average Depth to Water:

116 feet

Minimum Depth:

100 feet

Maximum Depth:

132 feet

Record Count: 2

<u>UTMNAD83</u> Radius Search (in meters):

Easting (X): 555992.569

Northing (Y): 3614682.759

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.

12/17/21 10:05 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER



New Mexico Office of the State Engineer

Point of Diversion Summary

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

 Well Tag
 POD Number
 Q64 Q16 Q4 Sec Tws Rng
 X
 Y

 RA 11018 POD1
 3 4 2 17 19S 26E
 556396 3613928*

Driller License: 1632 **Driller Company:** HOPPER PUMP & DRILLING, INC.

Driller Name: CURRY, CALEB

Drill Start Date: 08/08/2006 **Drill Finish Date:** 08/10/2006 **Plug Date:**

Log File Date:08/17/2006PCW Rcv Date:Source:ShallowPump Type:Pipe Discharge Size:Estimated Yield:4 GPMCasing Size:5.00Depth Well:260 feetDepth Water:100 feet

Water Bearing Stratifications: Top Bottom Description

100 130 Sandstone/Gravel/Conglomerate

Casing Perforations: Top Bottom
100 260

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.

12/17/21 10:06 AM POINT OF DIVERSION SUMMARY

Released to Imaging: 9/21/2022 1:29:42 PM

^{*}UTM location was derived from PLSS - see Help



Appendix B Soil Survey:

U.S.D.A.

FEMA Flood Map

Eddy Area, New Mexico

RE—Reagan-Upton association, 0 to 9 percent slopes

Map Unit Setting

National map unit symbol: 1w5d Elevation: 1,100 to 5,400 feet

Mean annual precipitation: 6 to 14 inches Mean annual air temperature: 60 to 64 degrees F

Frost-free period: 180 to 240 days

Farmland classification: Farmland of statewide importance

Map Unit Composition

Reagan and similar soils: 70 percent Upton and similar soils: 25 percent Minor components: 5 percent

Estimates are based on observations, descriptions, and transects of

the mapunit.

Description of Reagan

Setting

Landform: Fan remnants, alluvial fans Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Alluvium and/or eolian deposits

Typical profile

H1 - 0 to 8 inches: loam H2 - 8 to 60 inches: loam

Properties and qualities

Slope: 0 to 3 percent

Depth to restrictive feature: More than 80 inches

Drainage class: Well drained

Runoff class: Low

Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.60 to 2.00 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None Frequency of ponding: None

Calcium carbonate, maximum content: 40 percent

Maximum salinity: Very slightly saline to moderately saline (2.0 to

8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Moderate (about 8.2

inches)

Interpretive groups

Land capability classification (irrigated): 2e Land capability classification (nonirrigated): 6e



Hydrologic Soil Group: B

Ecological site: R070DY153NM - Loamy

Hydric soil rating: No

Description of Upton

Setting

Landform: Ridges, fans

Landform position (three-dimensional): Side slope, rise

Down-slope shape: Convex Across-slope shape: Convex

Parent material: Residuum weathered from limestone

Typical profile

H1 - 0 to 9 inches: gravelly loam H2 - 9 to 13 inches: gravelly loam H3 - 13 to 21 inches: cemented

H4 - 21 to 60 inches: very gravelly loam

Properties and qualities

Slope: 0 to 9 percent

Depth to restrictive feature: 7 to 20 inches to petrocalcic

Drainage class: Well drained

Runoff class: High

Capacity of the most limiting layer to transmit water (Ksat): Low to

moderately high (0.01 to 0.60 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None Frequency of ponding: None

Calcium carbonate, maximum content: 75 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0

mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Very low (about 1.4 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7s

Hydrologic Soil Group: D

Ecological site: R070DY159NM - Shallow Loamy

Hydric soil rating: No

Minor Components

Atoka

Percent of map unit: 3 percent

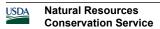
Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Pima

Percent of map unit: 2 percent

Ecological site: R042XC017NM - Bottomland



Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico Survey Area Data: Version 17, Sep 12, 2021

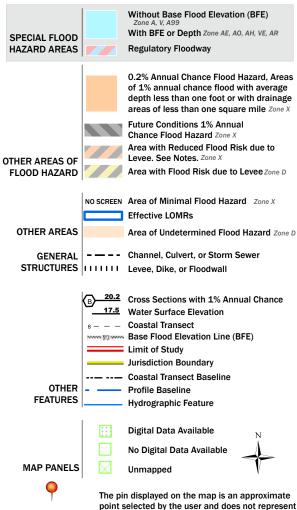
OReleas 250 Im 5 9/21/2022 P.29:42 PM

National Flood Hazard Layer FIRMette





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



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

an authoritative property location.

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 2/14/2022 at 6:05 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	NAPP2207368796
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Spur Energy Partners					OGRID 328947			
Contact Name Chad Hensley					Contact Telephone 713-264-2517			
Contact email chensley@spurepllc.com					Incident # (assigned by OCD)			
Contact mail		919 Milam Street	Suite 2475					
			Location	n of R	elease S	ource		
			Latitude 32.668 (NAD 83 in a		Longitu Trees to 5 decir	ude -104.4068375		
Site Name Br	radley 8 Fee	#2H			Site Type	Production Facility		
Date Release	Discovered	3-13-22			API# 30-0	15-39811		
Unit Letter	Section	Township	Range		Cou	nty		
N	08	19S	26E	Eddy				
	Materia	al(s) Released (Select:	Nature an			Release		
Crude Oi		Volume Release		cii caiculati	ons or specific	Volume Recovered 61 (bbls)		
Produced	Water	Volume Releas	ed (bbls)			Volume Recovered (bbls)		
		Is the concentra	ation of dissolved >10,000 mg/l?	l chloride	in the	e Yes No		
Condensa	ate	Volume Releas	ed (bbls)		Volume Recovered (bbls)			
☐ Natural C	as	Volume Releas	ed (Mcf)			Volume Recovered (Mcf)		
Other (describe) Volume/Weight Released (provide units)			s) Volume/Weight Recovered (provide units)					
Cause of Rel	ease							
Ì								

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Incident ID	NAPP2207368796
District RP	
Facility ID	
Application ID	

Was this a major release as defined by	If YES, for what reason(s) does the respon	nsible party	consider this a major release?
19.15.29.7(A) NMAC?	>25 bbls		
⊠ Yes □ No			
	otice given to the OCD? By whom? To where Bratcher, Jim Griswold, and OCD online.		n and by what means (phone, email, etc)?
	Initial Re	esponse	
The responsible	party must undertake the following actions immediately	y unless they o	could create a safety hazard that would result in injury
☐ The source of the rele	ease has been stopped.		
_	as been secured to protect human health and	the enviror	nment.
	ave been contained via the use of berms or d		
All free liquids and re	ecoverable materials have been removed and	d managed	appropriately.
If all the actions describe	d above have <u>not</u> been undertaken, explain v	why:	
Per 19.15.29.8 B. (4) NM	AC the responsible party may commence re	emediation	immediately after discovery of a release. If remediation
has begun, please attach	a narrative of actions to date. If remedial	efforts have	e been successfully completed or if the release occurred hall information needed for closure evaluation.
			nowledge and understand that pursuant to OCD rules and
			I perform corrective actions for releases which may endanger t relieve the operator of liability should their operations have
			water, surface water, human health or the environment. In y for compliance with any other federal, state, or local laws
and/or regulations.	The Control of the Control of the Special Control of the Control o	responsion.	, 101 00mp
Printed Name: Chad Hen	sley	Title: HS	E Coordinator
Signature:	end	Date:	9/12/2022
email: chensley@spurene	ergy.com	Telepho	ne: 364-339-1494
OCD Only			
-	Hawke as		00/42/2022
Received by: <u>Jocelyn</u>	marimon	Date:	09/12/2022

State of New Mexico Oil Conservation Division

Form C-141

Incident ID	NAPP2207368796
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?	(ft bgs)				
Did this release impact groundwater or surface water?	☐ Yes ⊠ No				
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ⊠ 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)?	☐ Yes ⊠ No				
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ⊠ 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?	☐ Yes ⊠ No				
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ⊠ No				
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ⊠ No				
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ⊠ No				
Are the lateral extents of the release overlying a subsurface mine?					
Are the lateral extents of the release overlying an unstable area such as karst geology?					
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ⊠ No				
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ⊠ 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 well Field data	ls.				
☐ Data table of soil contaminant concentration data					
Depth to water determination Determination of victor sources and significant victors average within 14 mile of the letteral extents of the release					
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					

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

□ Laboratory data including chain of custody

Received by OCD: 9/13/2022 7:22:37 AM Form C-141 State of New Mexico Page 2 Oil Conservation Division

	Fuge 21 0j 2
Incident ID	NAPP2207368796
District RP	
Facility ID	
Application ID	

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.

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: Chad Hensley.	Title: HSE Coordinator			
Signature:	Date:			
email: chensley@spurenergy.com	Telephone: 346-339-1494			
OCD Only				
Received by:Jocelyn Harimon	Date:09/12/2022			

Page 22 of 27

Incident ID	NAPP2207368796
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 Checknet: Each of the following the	ms 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 o must be notified 2 days prior to liner inspection)	f the liner integrity if applicable (Note: appropriate OCD District office
Laboratory analyses of final sampling (Note: appropriate ODC)	District office must be notified 2 days prior to final sampling)
□ Description of remediation activities	
	ediate contamination that pose a threat to groundwater, surface water, C-141 report does not relieve the operator of responsibility for ons. The responsible party acknowledges they must substantially ditions that existed prior to the release or their final land use in
email: <u>chensley@spurenergy.com</u>	Telephone: 346-339-1494
OCD Only	
Received by:	Date:09/12/2022
	f liability should their operations have failed to adequately investigate and ater, human health, or the environment nor does not relieve the responsible regulations.
Closure Approved by:	Date:
Printed Name:	Title:
	



Appendix D:

Email Notification

Liner Inspection

Photographic Documentation

Subject: Liner Inspections

Date: Monday, July 18, 2022 at 7:04:13 PM Mountain Daylight Time

From: Chris Jones

To: OCDOnline@state.nm.us, Bratcher, Mike, EMNRD, Hamlet, Robert, EMNRD, Nobui, Jennifer,

EMNRD

CC: Chad Hensley, Braidy Moulder

Attachments: image001.jpg

Mike,

This is to inform you all that Paragon will be conducting Liner Inspections on behalf of Spur Energy on 7-20-22 beginning at 800 am MST at the following locations going in this order.

HEARSE 36 STATE COM BATTERY- nAPP2113945611- 32.61025,-104.43676

Shelby 23 Tank Battery- nAPP2202848888- 32.636495,-104.449015

Bradley 8 Fee #2- nAPP2207368796- 32.6684265,-104.4068375

SECREST ET AL #001- nAPP2118846106- 32.6808357,-104.41922

Clydesdale 1 Fee #6H Battery- nAPP2130547657- 32.68579,-104.4303

These are all in a general location from each other and should be an easy day of it. If you have any questions or show up at a site we are not at feel free to give me a call and verify.

Thank You,

Chris Jones Environmental Professional 1601 N. Turner Ste. 500 Hobbs, NM 88240 chris@paragonenvironmental.net 575-631-6977 cell



"We do not inherit the Earth from our ancestors; we borrow it from our children." Chief Seattle



Paragon Environmental LLC

Liner Inspection Form

Company Name: SPUR ENERGY PARTNERS

Site: Bradley 8 Fee #2H Battery

Lat/Long: 32.6684265, -104.4068375

NMOCD Incident ID: nAPP2207368796

Incident Date: 03/13/22

2-Day Notification

Sent: 07/18/2022

Inspection Date: 07/21/2022

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:			
COMMICING.			

Inspector Name: Tristan Jones



Photographic Documentation

Liner Inspection









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

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 142623

CONDITIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	142623
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created		Condition Date
rhamle	We have received your closure report and final C-141 for Incident #NAPP2207368796 BRADLEY 8 FEE #2H BATTERY, thank you. This closure is approved.	9/21/2022