	I uge I oj .
Incident ID	NRM2024759404
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 item	ms must be included in the closure report.						
A scaled site and sampling diagram as described in 19.15.29.11	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 I	District office must be notified 2 days prior to final sampling)						
□ Description of remediation activities							
	cdiate 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 litions 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:09/09/2022						
	Fliability 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: 12/8/2022						
Printed Name: Robert Hamlet	Title: Environmental Specialist - Advanced						

LINER INSPECTION AND CLOSURE REPORT REPORTABLE RELEASE

Spur Energy Partners

California 29 Fee #1 Battery Incident ID: NRM2024759404 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 California 29 Fee #1 Battery (California).

API#: 30-015-39195

<u>Site Coordinates</u>: Latitude: 32.7177887 Longitude: -104.4096298

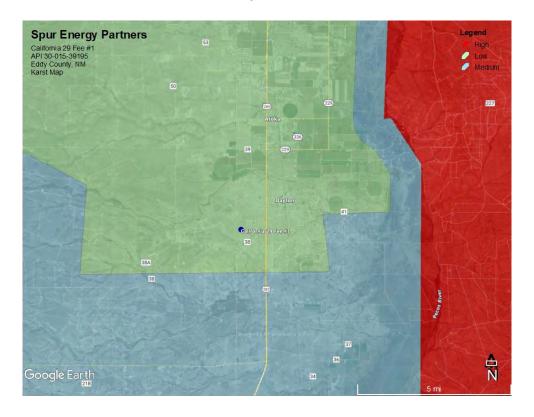
Unit UL L, Section 29, Township 18S, Range 26E

Incident ID: NRM2024759404

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 of a mile away and is 100 feet below 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)-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 Reagan loam, with 0 to 1 percent slopes. The drainage courses in this area are well-drained. The karst geology in the area of the California is not in a High Karst area. See the map below.



RELEASE DETAILS

This incident occurred from corrosion on the 4-inch load line coming off the water tank. This resulted in the release of 40 bbls of Produced Water that was contained in the Falcon Lined Containment. A vacuum truck was dispatched and recovered the 39.5 bbls of fluids.

Date of Spill: 09/01/2020

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

<u>Comments:</u> Reportable release. Released: 40 bbls of Produced Water Recovered: 39.5 bbls of Produced Water

INITIAL SITE ASSESSMENT

On July 12, 2022, Paragon went to the California and conducted an initial assessment. There was obvious staining on the liner from the spill. There was nothing outside the containment that showed any signs that the liner had been breached. Therefore, no samples were taken. See the site map below showing the affected area.



REMEDIATION ACTIVITIES

On July 18, 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 August 6, 2022, Paragon returned to the site to conduct a liner inspection. A 48-hour notification was sent out to the NMOCD on August 3, 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, NAPP2134127547, 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

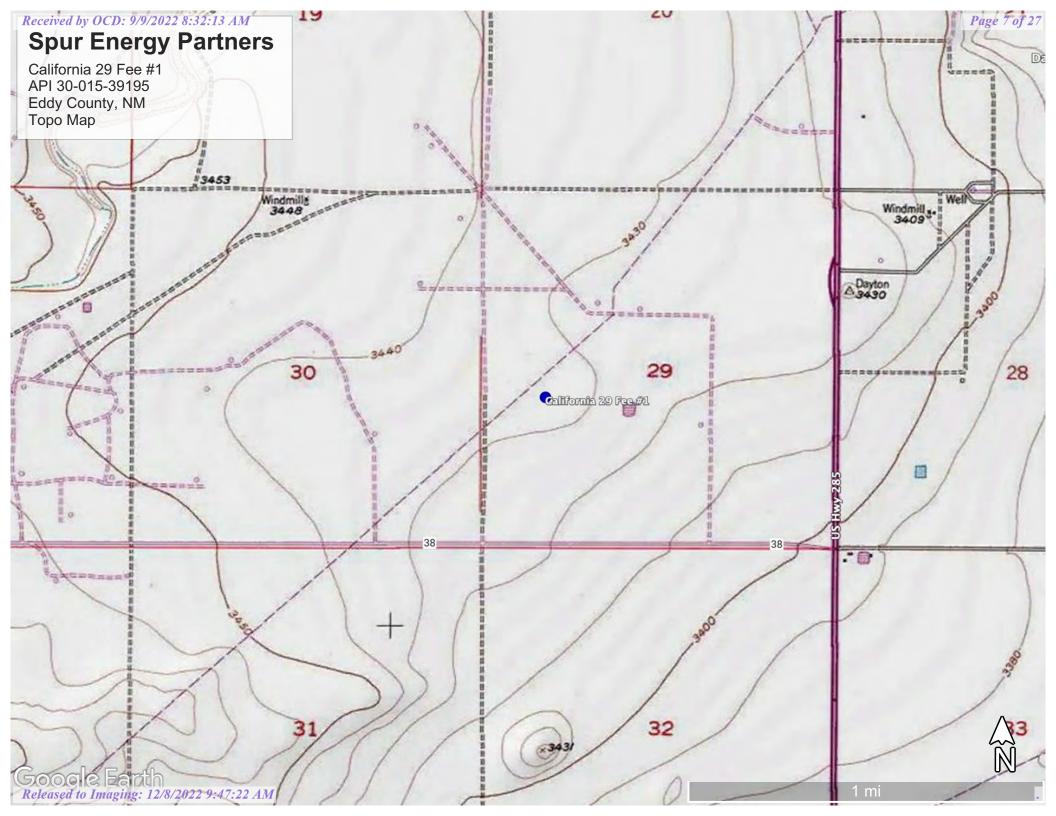
Appendices:

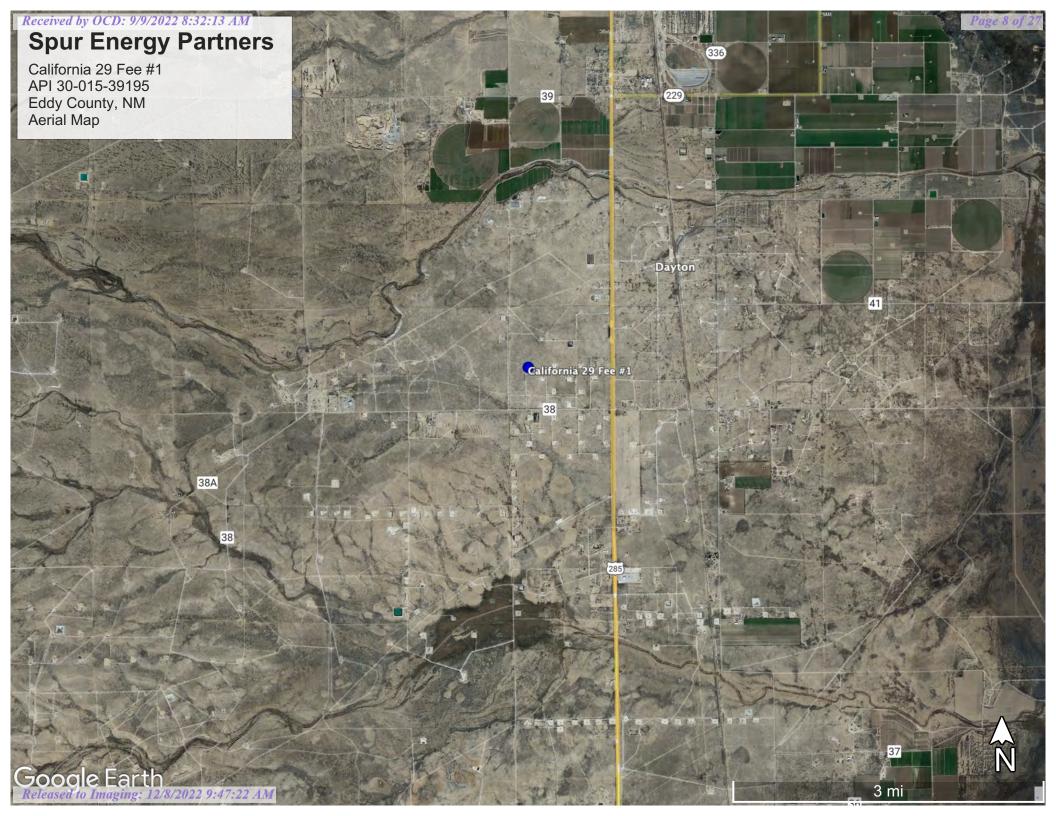
- Appendix A- Referenced Water Data
- Appendix B- Soil Survey & FEMA Flood Map
- Appendix C- C-141
- Appendix D- Email, Liner Inspection and Photographic Documentation



Figures:

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

closed) (quarters are smallest to largest) (NAD83 UTM in meters)

/T	f+1
(In	reen

		POD													
		Sub-		Q	\mathbf{Q}	Q								•	Water
POD Number	Code	basin	County	64	16	4	Sec	Tws	Rng	X	Y	DistanceDept	hWellD	epthWater C	olumn
RA 04160		RA	ED	1	4	1	29	18S	26E	555542	3620580*	490	160	100	60
<u>RA 04136</u>		RA	ED		1	1	32	18S	26E	555246	3619273*	872	152	90	62
RA 04784		RA	ED				30	18 S	26E	554252	3620259*	1075	205	190	15
RA 08812 REPAR		RA	ED		4	4	29	18 S	26E	556451	3619679*	1221	350	150	200
RA 04283		RA	LE	1	4	3	20	18 S	26E	555538	3621384*	1260	158	125	33
RA 09286		RA	ED	2	4	4	29	18 S	26E	556550	3619778*	1282	300		

Average Depth to Water:

131 feet

Minimum Depth:

90 feet

Maximum Depth:

190 feet

Record Count: 6

UTMNAD83 Radius Search (in meters):

Easting (X): 555320.652

Northing (Y): 3620142.208

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.

8/5/22 11:42 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER

Received by OCD: 9/9/2022 8:32:13 AM





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 Tws Rng

X

RA 08812 REPAR

4 4 29 18S 26E

556451 3619679*

Driller License: 461

Driller Company:

C & J DRILLING COMPANY

Driller Name: Drill Start Date:

10/03/1994

10/17/1994

Plug Date:

Log File Date:

09/26/1996

C & J DRILLING

PCW Rcv Date:

Drill Finish Date:

Source:

Pump Type: Casing Size: **Pipe Discharge Size:**

Estimated Yield:

Depth Well:

350 feet **Depth Water:** 150 feet

Shallow

*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.

8/5/22 11:43 AM

POINT OF DIVERSION SUMMARY



Appendix B Soil Survey:

U.S.D.A.

FEMA Flood Map

Eddy Area, New Mexico

Rc—Reagan loam, 0 to 1 percent slopes

Map Unit Setting

National map unit symbol: 1w5l Elevation: 1,100 to 5,300 feet

Mean annual precipitation: 7 to 15 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 200 to 240 days

Farmland classification: Farmland of statewide importance

Map Unit Composition

Reagan and similar soils: 97 percent Minor components: 3 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 82 inches: loam

Properties and qualities

Slope: 0 to 1 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

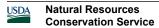
Available water supply, 0 to 60 inches: Moderate (about 8.2

inches)

Interpretive groups

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

Hydrologic Soil Group: B



Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Minor Components

Reeves

Percent of map unit: 1 percent

Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Reagan

Percent of map unit: 1 percent

Ecological site: R042XC007NM - Loamy

Hydric soil rating: No

Upton

Percent of map unit: 1 percent

Ecological site: R042XC025NM - Shallow

Hydric soil rating: No

Data Source Information

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

Received by OCD: 9/9/2022 8:32:13 AM National Flood Hazard Layer FIRMette





Without Base Flood Elevation (BFE) With BFE or Depth Zone AE, AO, AH, VE, AR SPECIAL FLOOD HAZARD AREAS Regulatory Floodway 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 OTHER AREAS OF Area with Flood Risk due to Levee Zone D FLOOD HAZARD NO SCREEN Area of Minimal Flood Hazard Zone X Effective LOMRs OTHER AREAS Area of Undetermined Flood Hazard Zone D - - - Channel, Culvert, or Storm Sewer **GENERAL** STRUCTURES | LILLIL Levee, Dike, or Floodwall 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation **Coastal Transect** Base Flood Elevation Line (BFE) Limit of Study Jurisdiction Boundary **Coastal Transect Baseline** OTHER **Profile Baseline FEATURES** Hydrographic Feature Digital Data Available No Digital Data Available MAP PANELS Unmapped The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 8/5/2022 at 1:40 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 Sp	ur Energy Paı	tners	OGRID	328947	7	
Contact Nam	^{ne} Ker	nny Kidd		Contact Te	elephone 57	75-616-5400	
Contact ema	**	dd@spurepllc	.com	Incident #	(assigned by OCD)		
Contact mail	ing address	2407 Pec	os Drive Artes	ia, NM 88210			
			Location	of Release So	ource		
Latitude3	32.7177887			Longitude _		298	
			(NAD 83 in dec	rimal degrees to 5 decin	nal places)		
Site Name : (California	29 Fee #1 Ba	attery	Site Type	Production	n Facility	
Date Release	Discovered	9-01-2020		API# (if app	API# (if applicable) 30-015-39195		
		m 1:				1	
Unit Letter	Section	Township	Range	Coun	nty	1	
L	29	18S	26E	Eddy			
Surface Owner	r: State	☐ Federal ☐ Tr	ibal 🗽 Private (A	Name:	Release)
Crude Oil		(s) Released (Select al Volume Release		calculations or specific	Volume Reco		elow)
☐ Produced	Water	Volume Release	d (bbls) 40		Volume Reco	vered (bbls)	39.5
Is the concentration of dissolved chloride produced water >10,000 mg/l?			hloride in the	Yes N	O		
Condensa	nte	Volume Release	d (bbls)		Volume Reco	vered (bbls)	
Natural G	ias	Volume Release	d (Mcf)		Volume Reco	vered (Mcf)	
Other (de	scribe)	Volume/Weight	Released (provide	e units)	Volume/Weig	ht Recovered (p	provide units)

Cause of Release

A leak developed on the 4" load line of the water tank. A Vac truck was used to recover 39.5 bbl All fluid remained in the containment.

Received by OCD: 9/9/2022 8:32:13 AM State of New Mexico
Page 2 Oil Conservation Division

ag				

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major	If YES, for what reason(s) does the respo	nsible party consider this a major release?
release as defined by 19.15.29.7(A) NMAC?	The Volume of release is gro	eater than 5bbl
▼ Yes □ No		
If VES was immediate n	otice given to the OCD? Ry whom? To w	nom? When and by what means (phone, email, etc)?
Yes, immediat	=	Spur Energy via email correspondence to Victoria Venegas,
	Initial R	esponse
The responsible	party must undertake the following actions immediate	y unless they could create a safety hazard that would result in injury
X The source of the rele	ease has been stopped.	
	is been secured to protect human health and	the environment.
_ ^		likes, absorbent pads, or other containment devices.
All free liquids and re	ecoverable materials have been removed an	d managed appropriately.
If all the actions describe	d above have <u>not</u> been undertaken, explain	why:
has begun, please attach	a narrative of actions to date. If remedial	emediation immediately after discovery of a release. If remediation efforts have been successfully completed or if the release occurred blease attach all information needed for closure evaluation.
I hereby certify that the info	rmation given above is true and complete to the	best of my knowledge and understand that pursuant to OCD rules and
public health or the environing failed to adequately investig	ment. The acceptance of a C-141 report by the Cate and remediate contamination that pose a three	fications and perform corrective actions for releases which may endanger DCD does not relieve the operator of liability should their operations have at to groundwater, surface water, human health or the environment. In responsibility for compliance with any other federal, state, or local laws
Printed Name: Rebe	ecca Pons	Title: Project Manager
Signature:		Date:09/02/2020_
email: rpons@tale	onlpe.com	Telephone: 575-441-0980
OCD Only		
		District
Received by:		Date:

State of New Mexico Oil Conservation Division

Form C-141

Incident ID	NRM2024759404
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.

(ft bgs)						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ Yes ⊠ No						
☐ 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.						
s.						

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

Received by OCD: 9/9/2022 8:32:13 AM Form C-141 State of New Mexico Page 2 Oil Conservation Division

	Page 20 of 2	7
Incident ID	NRM224759404	
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 notified public health or the environment. The acceptance of a C-141 report by the Offailed to adequately investigate and remediate contamination that pose a three addition, OCD acceptance of a C-141 report does not relieve the operator of and/or regulations.	CD does not relieve the operator of liability should their operations have at to groundwater, surface water, human health or the environment. In
Printed Name: Chad Hensley.	Title: HSE Coordinator
Signature: And Hend	Date: 09/09/2022
email: <u>chensley@spurenergy.com</u>	Telephone: 346-339-1494
OCD Only	00/00/2022
Received by: Jocelyn Harimon	Date:

Mexico Page 21 of 27

Incident ID	NRM224759404
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: chensley@spurenergy.com	Telephone: 346-339-1494
onen <u>sicility especiely con</u>	
OCD Only	
Received by: Jocelyn Harimon	Date:09/09/2022
	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:

Liner Inspection

Email Notification

Photographic Documentation



Paragon Environmental LLC

Liner Inspection Form

Company Name: SPUR ENERGY	PARTNERS
---------------------------	----------

Site: California 29 Fee #1

Lat/Long: 32.7177887,-104.4096298

NMOCD Incident ID: nRM2024759404

Incident Date: 09/01/20

2-Day Notification

Sent: 08/03/2022

Inspection Date: 08/06/2022

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:		

Inspector Name: Tristan Jones

Subject: Liner Inspections

Date: Wednesday, August 3, 2022 at 9:51:53 AM Mountain Daylight Time

From: Chris Jones

To: EMNRD Bratcher Mike, EMNRD Hamlet Robert, Nobui Jennifer EMNRD

Attachments: image001.jpg

All,

This is to inform you all that Paragon will be conducting liner inspections on behalf of Spur Energy at the referenced sites on the following days:

8-5-22 We will begin at app 8 am and go in this order.

Pinto 36 St Com 1- napp2216838692 Saber Fed 1- nrm2004833416 Skelly Unit 968- napp2106449127 Tex Mack 11 Fed 3- napp2119557530 JG State 7 Battery- napp2130548510

8-6-22 We will begin these at app 8 am and will go in this order:

California 29 Fee 1- nrm2024759404
Tarpan 33 Fee #4H- napp2129837754
Clydesdale 1 Fee 6H Battery- napp2130547657
Stonewall 9 Fee 8H-napp2134127547
Loco Hills SWD 35 #2- nrm2033528219

If you have any questions or miss us and want to meet up, please give me a call or send me an email.

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



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 141953

CONDITIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	141953
	Action Type:
	[C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	$^{\prime}$	Condition Date
rhamlet	We have received your closure report and final C-141 for Incident #NRM2024759404 CALIFORNIA 29 FEE #1 BATTERY, thank you. This closure is approved.	12/8/2022