### LINER INSPECTION AND CLOSURE REPORT REPORTABLE RELEASE

Spur Energy Partners Loco Hills SWD 35 #1 Incident ID: NRM2035146846 Eddy County, NM



Paragon Environmental LLC 1601 N. TURNER ST. STE.500 Hobbs, NM 88240 575-318-6841

### **GENERAL DETAILS**

This report was prepared by Paragon Environmental LLC (Paragon) in response to the release for Spur Energy Partners (Spur) at the Loco Hills SWD 35 #1 (Loco Hills).

API #: 30-015-31635 Site Coordinates: Latitude: 32.7856102 Longitude: -103.9196548 Unit UL P, Section 36, Township 17S, Range 30E Incident ID: NRM2035146846

### **REGULATORY FRAMEWORK**

**Depth to Groundwater**: According to the New Mexico State of Engineers Office, there is no water data less than 1/2 mile. See Appendix A for details.

**Soil Survey:** Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Eolian and Piedmont deposits (Holocene to middle Pleistocene)-Interlayed eolian sands and piedmontslope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (Qep). According to the United States Department of Agriculture Natural Resources Conservation Service soil survey, the soil in this area comprises the Kermit-Berino, with 0 to 3 percent slopes. The drainage courses in this area are excessively-drained. The karst geology in the area of the Loco Hills is in Low Karst. See the map below.



### **RELEASE DETAILS**

This release was due to equipment failure. The H-Pump barrel developed a crack on the extended part at the facility. This resulted in the release of 100 bbls of produced water. All fluids were contained in the Falcon Lined Containment. A vacuum truck was dispatched and recovered 97 bbls of the fluids.

### Date of Spill: 12/7/2020

**<u>Type of Spill:</u>**  $\Box$  Crude Oil  $\boxtimes$  Produced Water  $\Box$  Condensate  $\Box$  Other (Specify):

<u>Comments:</u> Reportable release. Released: 100 bbls of Produced Water Recovered: 97 bbls of Produced Water

### **INITIAL SITE ASSESSMENT**

On June 16, 2023, Paragon went to the Loco Hills and conducted an initial assessment. There was minimal staining on the liner. There were no signs outside the containment that the liner had been breached. Therefore, no samples were taken.

### **REMEDIATION ACTIVITIES**

On July 14, 2023, Paragon returned to the site to conduct a liner inspection. A 48-hour notification was sent out to the NMOCD on July 12, 2023. The inspection concluded that the liner was 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, NRM2035146846, be closed. Spur has complied with the applicable closure requirements. If you have any questions or need additional information, please contact Tristan Jones at 575-318-6841 or <u>tristan@paragonenvironmental.net</u>.

Respectfully,

Tristan Jones Project Coordinator Paragon Environmental LLC

Chris Jones Environmental Professional Paragon Environmental LLC

### **Attachments**

Figures:

- 1- Site Map
- 2- Торо Мар
- 3- Aerial Map

Appendices:

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



Figures:

1-Site Map 2- Topo Map 3- Aerial Map









Appendix A Referenced Water Data:

New Mexico State of Engineers Office

## Water Column/Average Depth to Water New Mexico Office of the State Engineer

(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

## UTMNAD83 Radius Search (in meters):

Easting (X): 601168

**Northing (Y):** 3628036

**Radius:** 1000

concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data. 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,

### 7/12/23 9:17 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER



Appendix B Soil Survey:

U.S.D.A.

FEMA Flood Map

### Eddy Area, New Mexico

### KM—Kermit-Berino fine sands, 0 to 3 percent slopes

### Map Unit Setting

National map unit symbol: 1w4q Elevation: 3,100 to 4,200 feet Mean annual precipitation: 10 to 14 inches Mean annual air temperature: 60 to 64 degrees F Frost-free period: 190 to 230 days Farmland classification: Not prime farmland

### **Map Unit Composition**

Kermit and similar soils: 50 percent Berino and similar soils: 35 percent Minor components: 15 percent Estimates are based on observations, descriptions, and transects of the mapunit.

### **Description of Kermit**

### Setting

Landform: Plains, alluvial fans Landform position (three-dimensional): Talf, rise Down-slope shape: Convex, linear Across-slope shape: Linear Parent material: Mixed alluvium and/or eolian sands

### **Typical profile**

*H1 - 0 to 7 inches:* fine sand *H2 - 7 to 60 inches:* fine sand

### **Properties and qualities**

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Negligible
Capacity of the most limiting layer to transmit water (Ksat): Very high (20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Low (about 3.1 inches)

### Interpretive groups

Land capability classification (irrigated): None specified Land capability classification (nonirrigated): 7e Hydrologic Soil Group: A Ecological site: R070BD005NM - Deep Sand Hydric soil rating: No

### Description of Berino

### Setting

Landform: Plains, fan piedmonts Landform position (three-dimensional): Riser Down-slope shape: Convex Across-slope shape: Linear Parent material: Mixed alluvium and/or eolian sands

### **Typical profile**

H1 - 0 to 17 inches: fine sand H2 - 17 to 50 inches: fine sandy loam H3 - 50 to 58 inches: loamy sand

### **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 slightly saline (2.0 to 4.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Moderate (about 7.2 inches)

### Interpretive groups

Land capability classification (irrigated): 4e Land capability classification (nonirrigated): 7e Hydrologic Soil Group: B Ecological site: R070BD003NM - Loamy Sand Hydric soil rating: No

### **Minor Components**

### Active dune land

Percent of map unit: 15 percent Hydric soil rating: No

### **Data Source Information**

Soil Survey Area: Eddy Area, New Mexico Survey Area Data: Version 18, Sep 8, 2022



# National Flood Hazard Layer FIRMette



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Basemap Imagery Source: USGS National Map 2023

regulatory purposes.

<sup>0</sup>Releaseato Imaging: 8/4/2023 1.19924:05 AM

1,500

2,000



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 SPUR ENERGY PARTNERS	OGRID 328947	
Contact Name BRAIDY MOULDER	Contact Telephone 713-264-2517	
Contact email bmoulder@spurepllc.com	Incident # (assigned by OCD)	-
Contact mailing address 919 MILAM STREET SUITE 247 HOUSTON, TX 77002	5	

### **Location of Release Source**

Latitude 32.7856102

Longitude -103.9196548

(NAD 83 in decimal degrees to 5 decimal places)

Site Name LOCO HILLS SWD 35 #001	Site Type PRODUCTION
Date Release Discovered 12/7/2020	API# (if applicable) 30-015-31635

Unit Letter	Section	Township	Range	County	
р	36	178	30E	EDDY	

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)

Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
Produced Water	Volume Released (bbls) 100	Volume Recovered (bbls) 97
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	Yes No
Condensate	Volume Released (bbls)	Volume Recovered (bbls)
Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)
	1	

Cause of Release

H-pump barrel developed a crack on the extended part of H pump at the facility. Causing 100bbl release. All fluid remained inside the falcon containment.

2	Oil Conservation Division	mendent ID	
		District DD	
		Facility ID	
		Application ID	
		Application ID	
Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the responsible par AMOUNT OF FLUID RELEASED	ty consider this a major release?	
🛛 Yes 🗌 No			
f YES, was immediate	notice given to the OCD? By whom? To whom? Wh	en and by what means (phone, e	mail. etc)?
OCD AND BLM WER	RE NOTIFIED ON 12/7/2020 at 3:15pm		, , -
	Initial Respons	e	
The responsible	e party must undertake the following actions immediately unless the	y could create a safety hazard that woul	d result in injury
$\boxtimes$ The source of the re	lease has been stopped.		
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**Oil Conservation Division** 

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### 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?	<u>50</u> (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?	🗌 Yes 🛛 No
Are the lateral extents of the release overlying an unstable area such as karst geology?	🗌 Yes 🛛 No
Are the lateral extents of the release within a 100-year floodplain?	🗌 Yes 🛛 No
Did the release impact areas <b>not</b> 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 wells.
- Field data
- Data table of soil contaminant concentration data
- $\square$  Depth to water determination
- Determination of water sources and significant watercourses within <sup>1</sup>/<sub>2</sub>-mile of the lateral extents of the release
- Boring or excavation logs
- $\boxtimes$ 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.

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Received by OCD: 7/24/202.	3 2:30:16 PM			<b>Page 19 of 27</b>
Form C-141	State of New Mexico		Incident ID	NRM2035146846
Page 4	Oil Conservation Division		District RP	
			Facility ID	
			Application ID	
I hereby certify that the inform regulations all operators are re- public health or the environme failed to adequately investigat addition, OCD acceptance of and/or regulations. Printed Name: Kathy Purve Signature: <u>Kathanim</u> email: <u>katherine.purvis@sp</u>	nation given above is true and complete to the equired to report and/or file certain release noti ent. The acceptance of a C-141 report by the C e and remediate contamination that pose a three a C-141 report does not relieve the operator of is.	best of my knowledge a fications and perform co OCD does not relieve the at to groundwater, surfa responsibility for compl Title: HSE Coordin Date: 7/19/23 Telephone: 575-44	nd understand that pursu prrective actions for rele operator of liability sho ce water, human health iance with any other feo ator 1-8619	uant to OCD rules and eases which may endanger ould their operations have or the environment. In deral, state, or local laws
OCD Only			0000	
Keceived by: <u>Shelly We</u>	lls	Date: _//24/2	.025	

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### **Remediation Plan**

Remediation Plan Checklist: Each of the following items must be included in the plan. Detailed description of proposed remediation technique Scaled sitemap with GPS coordinates showing delineation points Estimated volume of material to be remediated Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)  $\square$ Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation. Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction. Extents of contamination must be fully delineated. Contamination does not cause an imminent risk to human health, the environment, or groundwater. 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: Kathy Purvis. Title: HSE Coordinator Signature: Katherine Purvis Date: 7/19/23 email: katherine.purvis@spurenergy.com Telephone: 575-441-8619 OCD Only Received by: \_\_\_\_\_ Date: Approved Approved with Attached Conditions of Approval Denied Deferral Approved Signature: Date:

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Oil Conservation Division

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### 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.

**<u>Closure Report Attachment Checklist</u>**: 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: Kathy Purvis.

Signature: <u>Katharina Purvis</u>

email: katherine.purvis@spurenergy.com

Title: HSE Coordinator

Date: 7/19/23

Telephone: 575-441-8619

OCD Only

Received by: <u>Shelly Wells</u>

Date: 7/24/2023

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: Wells	Date: <u>8/4/2023</u>
Printed Name: <u>Shelly Wells</u>	Title: Environmental Specialist-Advanced

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Appendix D:

**Email Notification** 

Liner Inspection

Photographic Documentation

Subject:	Liner Inspection
Date:	Wednesday, July 12, 2023 at 9:04:09 AM Mountain Daylight Time
From:	Chris Jones
То:	Bratcher, Michael, EMNRD, Hamlet, Robert, EMNRD
CC:	Katherine Purvis, Braidy Moulder, Tristan Jones, Angel Pena (angel@paragonenvironmental.net)

Attachments: image001.jpg

All,

This is to inform you Paragon will be conducting a liner inspection at the Loco Hills SWD 35 #1 in regard to incident #NRM2035146846 on 7-14-23 at app 10 am.

If you have any questions or comments, please let me know.

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:	Loco Hills SWD 35 #1				
Lat/Long:	32.7856102, -103.9196548				
NMOCD Incident ID & Incident Date:	NRM2035146846, Decembe	er 7, 2020			
2-Day Notification Sent:	July 12, 2023				
Inspection Date:	July 14, 2023				
Liner Type:	Earthen w/liner	Earthen no liner	Polystar		
$\subset$	Steel w/poly liner	Steel w/spray epoxy	No Liner		
Other					

Other:

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

Comments: \_\_\_\_\_

Inspector Name: Angel Pena



### Photographic Documentation Assessment



### **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

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

Operator: 0	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	243792
	Action Type:
	[C-141] Release Corrective Action (C-141)

C	o	٧D	IT	10	NS	

Created B	y Condition	Condition Date
scwells	This release was discovered 12/7/2020 and the liner inspection wasn't carried out until 7/14/2023. Please note, per 19.15.29.11(A) NMAC "The responsible party must submit information characterizing the release to the appropriate division district office within 90 days of discovery of the release or characterize the release by submitting a final closure report within 90 days of discovery of the release in accordance with Subsection E of 19.15.29.12 NMAC."	8/4/2023

CONDITIONS

Action 243792