

Spill Volume(Bbls) Calculator		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
<u>140.000</u>	<u>20.000</u>	<u>2.000</u>
Cubic Feet Impacted		<u>466.667</u>
Barrels		<u>83.11</u>
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		<u>83.11</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		83.20000

Instructions
1. Input spill measurements below. Length and width need to be input in feet and depth in inches.
2. Select a soil type from the drop down menu.
3. Select a saturation level from the drop down menu.
(For data gathering instructions see appendix tab)

Measurements	
Length (ft)	140
Width (ft)	20
Depth (in)	2.000









October 14, 2025

NMOCD District 2
Mike Bratcher
Artesia, NM 88210

Bureau of Land Management
Crisha Morgan
Carlsbad Field Office

Re: Site Assessment and Closure Report
BKU 13A Battery
API No. 30-015-02971
GPS: Latitude 32.83649 Longitude -104.02642
UL "G", Sec. 13, T17S, R29E
Eddy County, NM
NMOCD Ref. No. NAPP2513335730

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment, conduct remediation activities and write a closure report for the release site known as the BKU 13A Battery (BKU). Details of the release are summarized below:

Release Details			
Type of Release:	Produced Water	Volume of Release:	83 bbls
		Volume Recovered:	81 bbls
Source of Release:	Dump Valve	Date of Release:	05/12/25
Was Immediate Notice Given?	Yes	If, Yes, to Whom?	NMOCD Portal
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	Federal	Mineral Owner:	Federal
4-inch water dump line corroded, releasing produced water into the lined containment.			

Topo and Wetlands Maps are provided in Figures #2 and #4.

REGULATORY FRAMEWORK & SITE CHARACTERIZATION

Surface impacts from unauthorized releases of fluids or gases are generally regulated by the New Mexico Oil Conservation Division (NMOCD) in accordance with 19.15.29 of the New Mexico Administrative Code (NMAC). 19.15.29 NMAC establishes reporting, site assessment/characterization, remediation, closure, variance, and enforcement procedures. Table I of 19.15.29.12 NMAC determines the closure criteria for soils impacted by a release based on depth to groundwater and the following characteristics:

- Depth to Groundwater in the affected area 101'
- Method to determine DTW NM OSE- RA-13535-POD1
- Did the release impact groundwater or surface water NO

Depth to groundwater information is provided in Appendix A.

What are the minimum distances between the closest lateral extents of the release and the following surface areas:

- A continuously flowing watercourse or any other significant watercourse- 1-5 miles
- Any lakebed, sinkhole, or playa lake- 1-5 mi
- An occupied permanent residence, school, hospital, institution, or church- 1-5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes- 1-5 mi
- Any other fresh water well or spring- 1-5 mi
- Incorporated municipal boundaries or a defined municipal fresh water well field- 1-5 mi
- A wetland- ½-1 mi
- A subsurface mine- >5 mi
- An (non-karst) unstable area- 1-5 mi
- Categorize the risk of this well/site being in a karst area geology- Low
- A 100-year floodplain- 1-5 mi
- Did the release impact areas not on an exploration, development, production, or storage site- No

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation- and is made up of Eolian and piedmont deposits (Holocene to middle Pleistocene)— Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (QEP). The soil in this area is made up of Kermit-Berino Fine Sands, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are both excessively-drained and well-drained. There is NOT a high potential for karst geology to be present around the BKU (Figure #3).

The Soil Survey and FEMA Flood Map are provided in Appendix B. A Karst Map is provided in Figure #3.

INITIAL SITE ASSESSMENT

On May 15, 2025, Paragon visited the BKU and conducted an initial site assessment. During the initial site assessment, the liner and the surrounding location were visually inspected, and it was determined that the release had not breached the lined containment, and the liner's integrity was still intact.

A Site Map is provided in Figure #1.

REMEDIAL ACTIVITIES

On July 14, 2025, Paragon mobilized personnel and equipment to conduct the cleaning of the liner. The remediation consisted of the following:

The stained area measured approximately 2924 s/f. We used a hand crew to remove approximately 9 cy of peagravel from the liner, which was disposed of at Lea Land disposal facility. We then sprayed degreaser, followed by heated water to power wash the liner clean. A vac truck was on site, sucking up the fluids as the crew sprayed the liner down and used a squeegee to move the fluids to the vac truck.

On July 25, 2025, Paragon submitted a liner inspection to be conducted on July 30, 2025. The liner inspection is attached in Appendix C.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2513335730, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

If you have any questions or need additional information, please get in touch with Tristan Jones by phone at (575)318-6841 or email at tristan@paragonenvironmental.net.

Respectfully,



Tristan Jones
Project Manager
Paragon Environmental, LLC



Chris Jones
Environmental Professional
Paragon Environmental, LLC



Attachments

Figures:

- 1- Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Wetlands Map
- 5- GW Map

Appendices:

- Appendix A – Referenced Water Surveys
- Appendix B – Soil Survey and FEMA Flood Map
- Appendix C – NMOCD Notification, Liner Inspection, & Photographic Documentation



Figures:

- 1- Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Wetlands Map
- 5- GW Map

Spur Energy Partners

BKU 13A Tank Battery
Eddy County, NM
Site Map

Legend

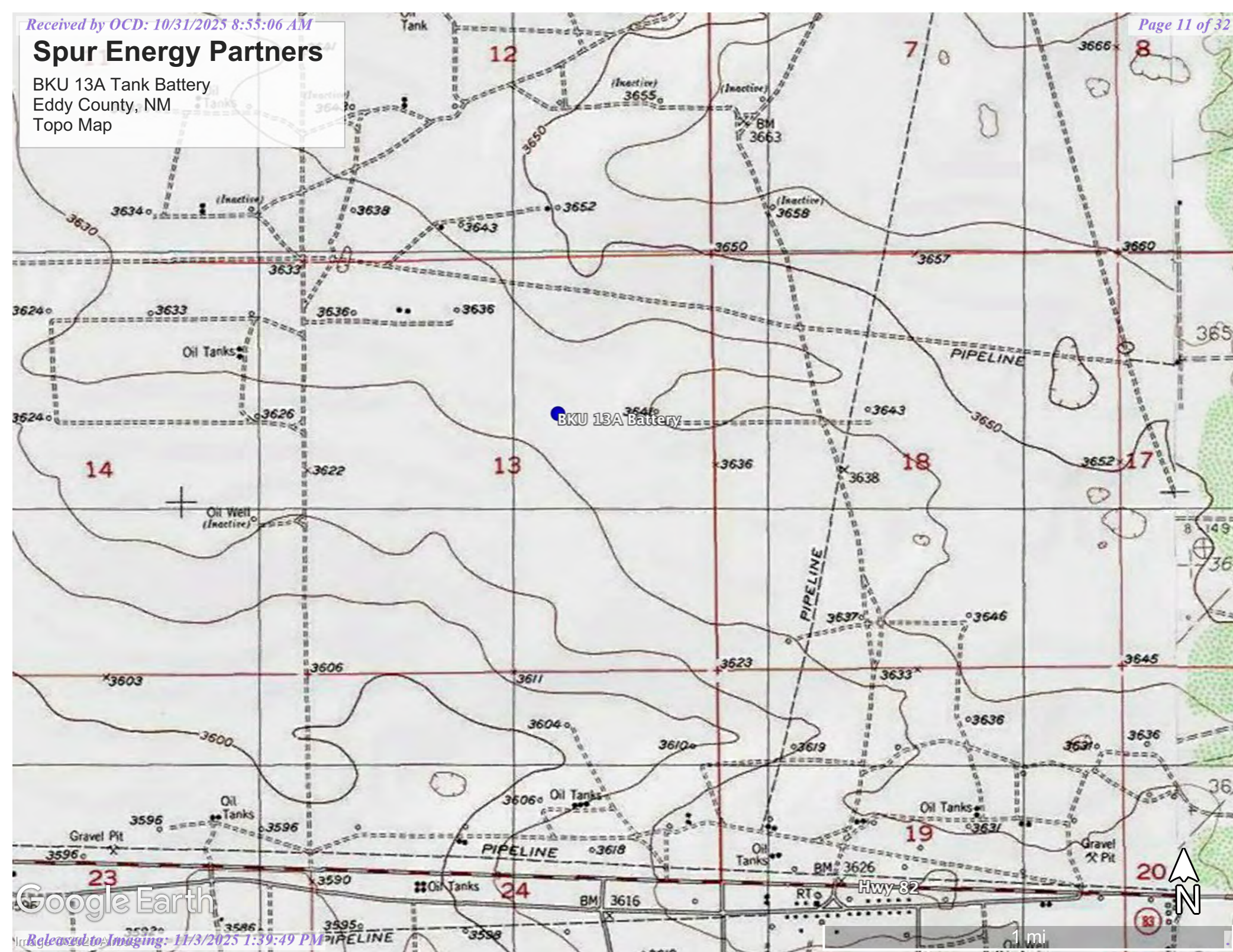
 Spill Area 2924 S/F



Google Earth

Spur Energy Partners

BKU 13A Tank Battery
Eddy County, NM
Topo Map

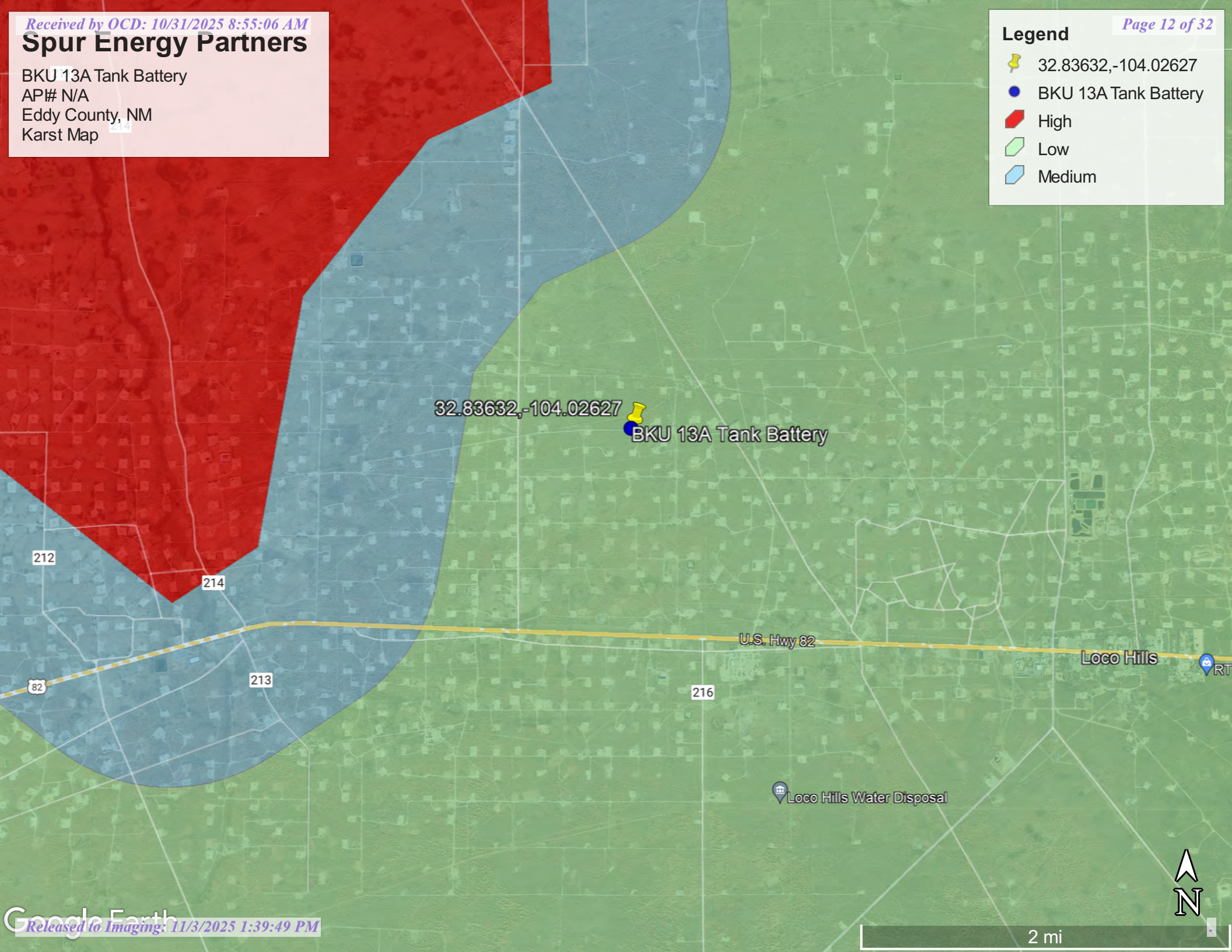


Spur Energy Partners

BKU 13A Tank Battery
AP# N/A
Eddy County, NM
Karst Map

Legend

-  32.83632,-104.02627
-  BKU 13A Tank Battery
-  High
-  Low
-  Medium



Spur Energy Partners

BKU 13A Tank Battery
Eddy County, NM
Wetlands Map

Legend

 Wetlands 0.9 mi

BKU 13A Battery

Hwy 82

1 mi



Google Earth

Spur Energy Partners

BKU #13A Tank Battery
Eddy County, NM
RA-13535 POD1
GW Map

Legend

 RA-13535-POD1 0.35mi

BKU 13A Battery



1000 ft

Google Earth



Appendix A:

Referenced Water Data

New Mexico State of Engineers Office

Water Right Summary



[get image](#)
[list](#)

WR File Number:	RA 13535	Subbasin:	RA	Cross Reference:
Primary Purpose:	MON MONITORING WELL			
Primary Status:	PMT Permit			
Total Acres:		Subfile:		Header:
Total Diversion:	0.000	Cause/Case:		
Owner:	SPUR ENERGY PARTNERS LLC	Owner Class:	User	
Contact:	KATHY PURVIS			

Documents on File

(acre-feet per annum)

Transaction Images	Trn #	Doc	File/Act	Status 1	Status 2	Transaction Desc.	From/To	Acres	Diversion	Consumptive
get images	773867	EXPL	2024-12-17	PMT	APR	RA 13535 POD1	T	0.000	0.000	

Current Points of Diversion

POD Number	Well Tag	Source	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map	Other Location Desc
RA 13535 POD1	NA		NE	NE	SE	13	17S	29E	591565.7	3633172.8		TW-1

* 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.



Appendix B:

Soil Survey

U.S.D.A.

FEMA Flood Map

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

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

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

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

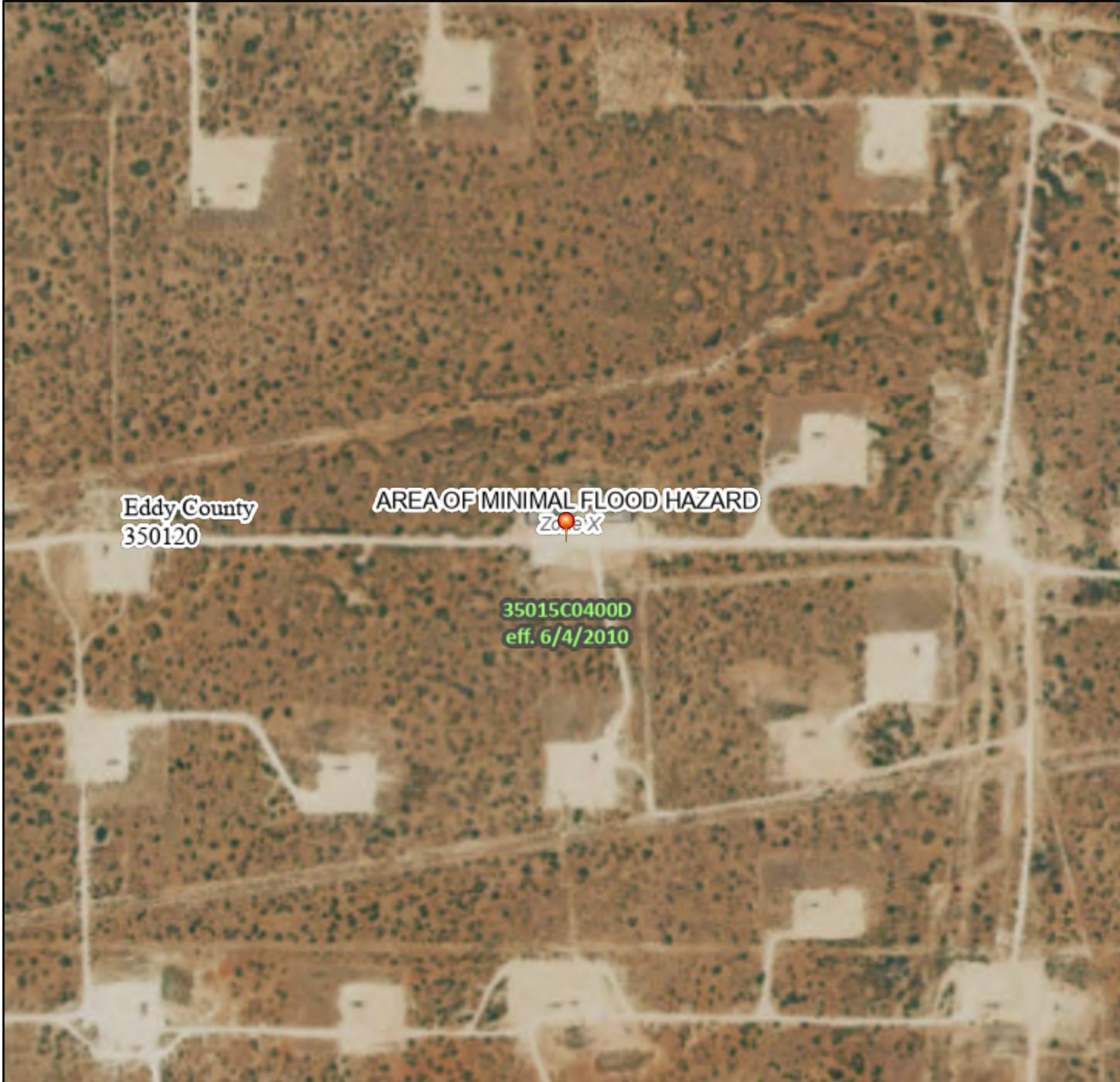
Data Source Information

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

National Flood Hazard Layer FIRMette



104°1'53"W 32°50'26"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
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
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 10/19/2022 at 10:34 AM 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:

NMOCD Notification

Liner Inspection

Photographic Documentation



Angel Pena <angel@paragonenvironmental.net>

The Oil Conservation Division (OCD) has accepted the application, Application ID: 488869

<OCDOnline@state.nm.us>

Fri, Jul 25 at 5:15 PM

To: <angel@paragonenvironmental.net>

To whom it may concern (c/o Angel Pena for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2513335730.

The liner inspection is expected to take place:

When: 07/30/2025 @ 08:00

Where: G-13-17S-29E 0 FNL 0 FEL (32.83649,-104.02642)

Additional Information: Angel Pena
675-605-0773

Additional Instructions: Latitude of Spill Location: 32.836498

Longitude of Spill Location: -104.026428

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
[1220 South St. Francis Drive](#)
[Santa Fe, NM 87505](#)



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners

Site: BKU 13A Battery

Lat/Long: 32.83649, -104.02642

NMOCD Incident ID

& Incident Date: nAPP2513335730

2-Day Notification

Sent: 07/25/25

Inspection Date: 07/30/25

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: Angel Pena

Date: 07/30/25

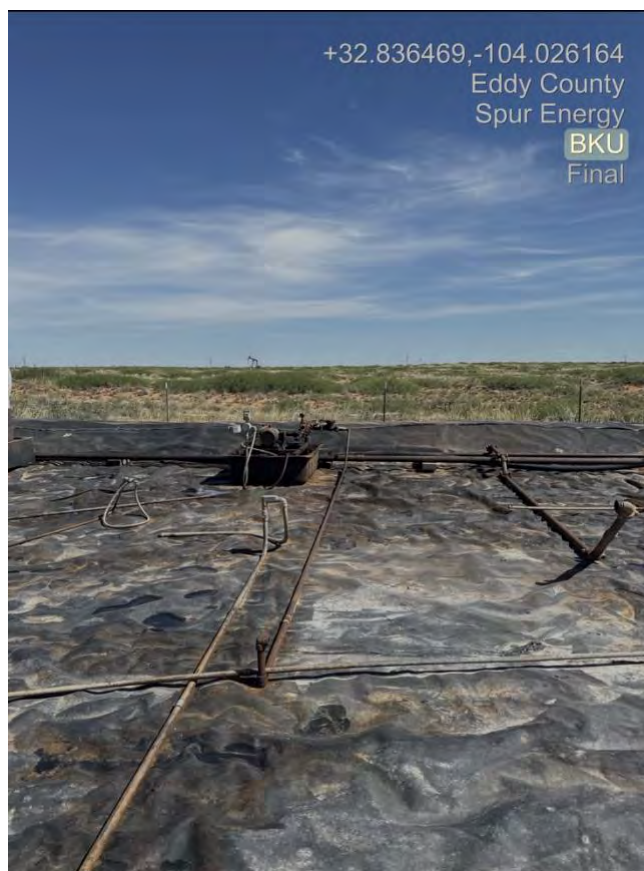
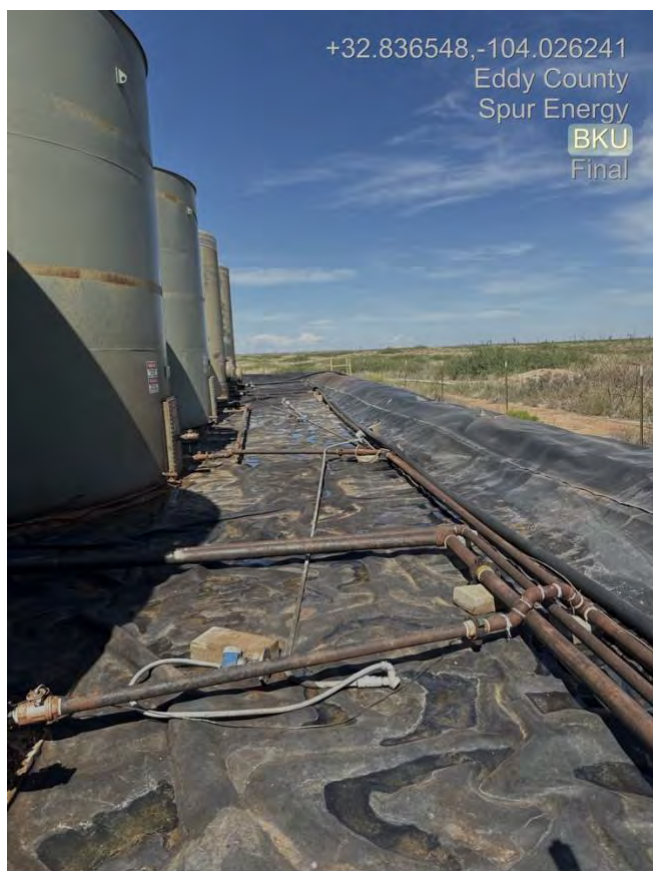


Photographic Documentation
Initial





Completed and Liner Inspection



Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 521934

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 521934
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2513335730
Incident Name	NAPP2513335730 BKU 13A BATTERY @ G-13-17S-29E
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source

Please answer all the questions in this group.

Site Name	BKU 13A BATTERY
Date Release Discovered	05/12/2025
Surface Owner	Federal

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Dump Line Produced Water Released: 83 BBL Recovered: 81 BBL Lost: 2 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	4" WATER DUMP LINE CORRODED RELEASING PW INTO LINED CONTAINMENT

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QUESTIONS, Page 2

Action 521934

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 521934
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	N/A

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 10/31/2025
--	--

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QUESTIONS, Page 3

Action 521934

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 521934
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	07/14/2025
On what date will (or did) the final sampling or liner inspection occur	07/30/2025
On what date will (or was) the remediation complete(d)	07/25/2025
What is the estimated surface area (in square feet) that will be remediated	2924
What is the estimated volume (in cubic yards) that will be remediated	9
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 521934

QUESTIONS (continued)

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	Action Number: 521934
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 10/31/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 6

Action 521934

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	521934
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	488869
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/30/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	5600

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	2924
What was the total volume (cubic yards) remediated	9
Summarize any additional remediation activities not included by answers (above)	THE GRAVEL ON TOP OF THE LINER WAS REMOVED, THE LINER WAS POWERWASHED, AND INSPECTED. THE LINER WAS FOUND TO HAVE THE ABILITY TO CONTAIN SPILLS. THE 2 BBLs LOST WERE NOT RECOVERABLE DUE TO THE GRAVEL IMPEDING VACUUM TRUCK OPERATIONS

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 (in .pdf format) 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.

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.

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 10/31/2025
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CONDITIONS

Action 521934

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 521934
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #nAPP2513335730 BKU 13A BATTERY, thank you. This Remediation Closure Report is approved.	11/3/2025