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## **Pronghorn SWD #001 Closure Report**

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**API No. 30-025-32735  
1RP-5723  
Release Date: 09/13/2019**

**U/L B, Section 24, Township 19S, Range 32E  
Lea County**

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**06/02/2020  
Prepared By:**



**7 W Compress Road  
Artesia, NM 88210**



June 2, 2020

New Mexico Energy, Minerals & Natural Resources  
NMOCD District II  
C/O Mike Bratcher, Robert Hamlet & Victoria Venegas  
811 S. First Street  
Artesia, NM 88210

Bureau of Land Management  
C/O Jim Amos  
620 E. Green Street  
Carlsbad, NM 88220

Spur Energy Partners  
C/O Braidy Moulder  
920 Memorial City Way, Suite 1000  
Houston, TX 77024

**SUBJECT:      Closure Request for Spur Energy Partners – Pronghorn SWD #001  
API No. 30-025-32735  
1RP-5723  
U/L B, Section 24, Township 19S, Range 32E  
Lea County**

To Whom It May Concern,

On behalf of Spur Energy Partners, Energy Staffing Services (ESS) has prepared this CLOSURE REPORT that describes the assessment and remediation for the release associated with the Pronghorn SWD #001 dated September 13<sup>th</sup>, 2019 with RP# 1RP-5723.

**BACKGROUND**

The site is located in Lea County, New Mexico. The release was discovered on September 13<sup>th</sup>, 2019. The release was caused by corrosion on the check valve resulting in the plug blowing out.

The check valve was replaced. The release was in the lined facility. Approximately 15bbbls of produced water was released. A vacuum truck was dispatched to the facility with an unknown volume recovered. The approved corresponding C-141 for the release is attached. The approximate area of impact was 11,924 sq. ft.

## GROUNDWATER RESEARCH

ESS has conducted a groundwater study of this area. It has been determined that according to the New Mexico Office of the State Engineer that closest well to the site is 5,033' with water depth of 185'bgs (below ground surface). The well is listed below:

L 07023 is 5,033' from the site with water depth at 185'bgs.

With the data collected during the groundwater research protocol, there is verifiable record of groundwater in the vicinity of the site detailed herein. There is no eminent danger of groundwater impact found at this site.

The Closure Criteria for Soils Impacted by a Release is shown below, based on ground water of 185'bgs the site falls into the >100' depth category. Please see the groundwater data and map attached.

Closure Criteria for Soil NMAC 19.15.29			
Depth	Constituent	Method	Limit
>100 feet	Chloride	EPA 300.0 OR SM4500 CL B	20,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method	2,500 mg/kg
	GRO + DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

## KARST RESEARCH

The Karst Mapping Data found for this site shows the site is located inside the low area marked in green. Please see the attached Karst Map.

## REMEDIATION

On March 23<sup>rd</sup>, 2020, Hungry Horse, LLC dispatched a crew to the location to hand shovel the area within the lined facility. The impacted area was excavated and stockpiled on plastic to be hauled to a disposal area. Approximately 84 cu. yds. of impacted material were hauled to Lea Landfill for disposal. After the containment was excavated of all impacted material, the liner was inspected. Multiple small areas of perforation were found and patched. The containment was then backfilled with approximately 98 cu. yds. of pea gravel.

## SCOPE OF WORK AND LIMITATIONS

The scope of our services consisted of the review of Hungry Horse site assessment and remediation as well as regulatory liaison and preparation of this closure report by ESS. All work has been performed in accordance with the NMOCD Rules and Regulations for Spills and Releases dated August 14<sup>th</sup>, 2018 (19.15.29 NMAC).

On behalf of Spur Energy Partners and Energy Staffing Services, we respectfully request closure of the release on the Pronghorn SWD #001. If you have any questions or concerns, please direct them to Natalie Gladden, Director of Environmental and Regulatory Services for Energy Staffing Services, LLC. She can be contacted either via cell phone at (575) 390-6397 or via email at [natalie@energystaffingllc.com](mailto:natalie@energystaffingllc.com)

Sincerely,



Natalie Gladden  
Director of Environmental & Regulatory Services  
Energy Staffing Services  
7 W Compress Road  
Artesia, NM 88210

### ATTACHMENTS:

- C-141
- Groundwater Data & Map
- Site Map
- Karst Map
- Photo Pages
- Liner Photos
- Final 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

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

Oil Conservation Division  
 1220 South St. Francis Dr.  
 Santa Fe, NM 87505

Incident ID	NRM1927460517
District RP	1RP-5723
Facility ID	fGRL1000759914
Application ID	pRM1927460612

## Release Notification

### Responsible Party

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

### Location of Release Source

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

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

Unit Letter	Section	Township	Range	County

Surface Owner:  State  Federal  Tribal  Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

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

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

Cause of Release

State of New Mexico  
Oil Conservation Division

Incident ID	NRM1927460517
District RP	1RP-5723
Facility ID	fGRL1000759914
Application ID	pRM1927460612

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

### Initial Response

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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: _____ Title: _____ Signature: <u>Delann Opreat</u> Date: _____ email: _____ Telephone: _____
<b><u>OCD Only</u></b> Received by: <u>Ramona Marcus</u> Date: <u>10/01/2019</u>



# New Mexico Office of the State Engineer

## Wells with Well Log Information

No wells found.

**UTMNA83 Radius Search (in meters):**

**Easting (X):** 620382.32

**Northing (Y):** 3613439.66

**Radius:** 1000

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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.

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WELLS WITH WELL LOG INFORMATION



# New Mexico Office of the State Engineer

## Wells with Well Log Information

No wells found.

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 620382.32

**Northing (Y):** 3613439.66

**Radius:** 5000

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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.

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WELLS WITH WELL LOG INFORMATION



# New Mexico Office of the State Engineer

## Wells with Well Log Information

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

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

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

(quarters are smallest to largest)

(NAD83 UTM in meters)

(in feet)

POD Number	Code	POD Subbasin	County	Source	q	q	q	Sec	Tws	Rng	X	Y	Distance	Start Date	Finish Date	Log File Date	Depth Well	Depth Water	Driller	License Number
<a href="#">L 07023</a>		L	LE	Shallow	2	3	3	32	19S	33E	622840	3609047*	5033	11/12/1970	11/15/1970	11/19/1970	262	185	MURRELL ABBOTT	46
<a href="#">CP 00317</a>		CP	LE	Shallow	3	4	3	05	20S	33E	623054	3607235*	6755	02/05/1966	02/17/1966	02/24/1966	680	325	ABBOTT, MURRIEL	46
<a href="#">CP 01656 POD3</a>		CP	LE		3	4	3	17	19S	32E	613374	3613633	7011	03/28/2017	03/28/2017	05/05/2017	30		BRYAN, EDWARD	1711
<a href="#">CP 01656 POD1</a>		CP	LE		3	4	3	17	19S	32E	613368	3613646	7017	03/28/2017	03/28/2017	05/05/2017	70		EDWARD BRYAN	1711
<a href="#">CP 01656 POD2</a>		CP	LE		3	4	3	17	19S	32E	613364	3613648	7021	03/28/2017	03/28/2017	05/05/2017	70		BRYAN, EDWARD	1711
<a href="#">CP 00639 POD1</a>		CP	LE	Shallow	3	1	20		19S	32E	613029	3612880*	7374	02/09/1982	02/10/1982	03/23/1982	350	345	FELKINS, LARRY	882
<a href="#">CP 00640 POD1</a>		CP	LE	Shallow	2	2	19		19S	32E	612621	3613280*	7762	02/08/1982	02/09/1982	03/04/1982	260	102	FELKINS, LARRY	882
<a href="#">L 03454</a>		L	LE	Shallow	2	2	30		18S	33E	622200	3621422*	8186	03/29/1957	03/30/1957	04/17/1957	100	35	MUSSELWHITE, O.R.	99
<a href="#">CP 00677</a>		CP	LE		1	1	26		18S	32E	617750	3621373*	8358	05/09/1985	05/09/1985	05/15/1985	700		GLENN, CLARK A."CORKY" (LD)	421
<a href="#">CP 00642 POD1</a>		CP	ED	Shallow	2	2	25		19S	31E	611025	3611657*	9525	02/10/1982	02/01/1982	02/23/1982	250		FELKINS, LARRY	882

**Record Count:** 10

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 620382.32

**Northing (Y):** 3613439.66

**Radius:** 10000

\*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.

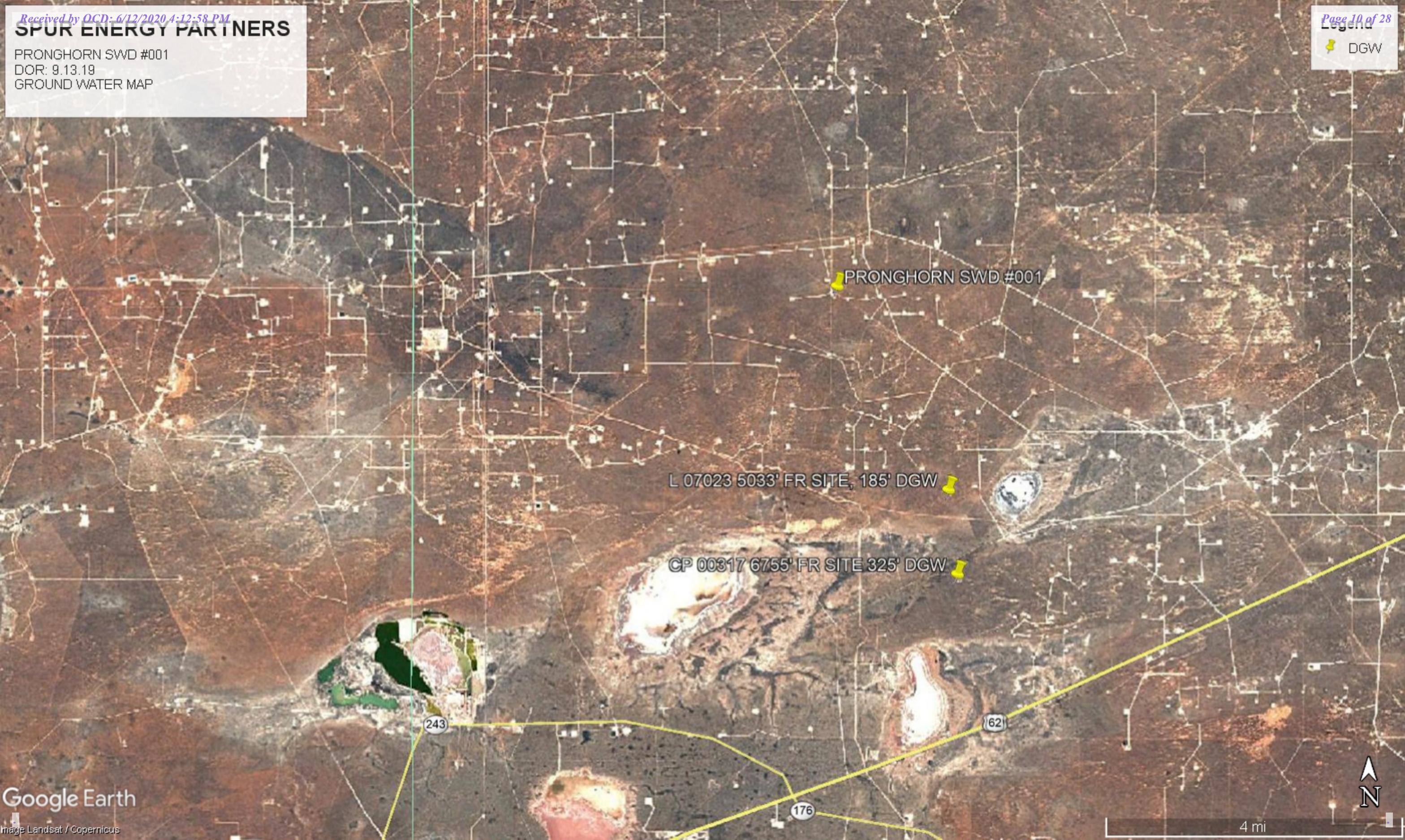
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WELLS WITH WELL LOG INFORMATION

# SPUR ENERGY PARTNERS

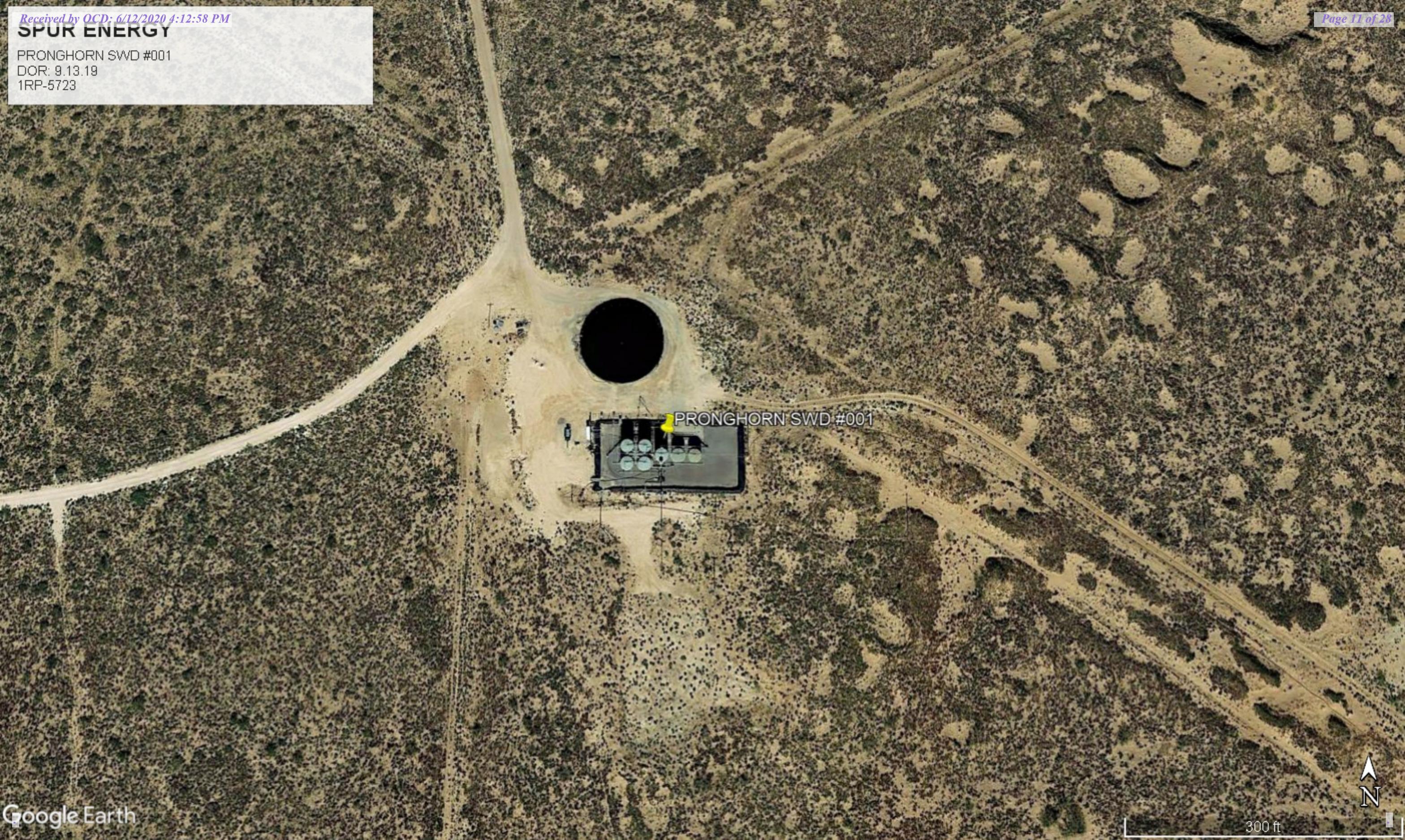
PRONGHORN SWD #001  
DOR: 9.13.19  
GROUND WATER MAP

Legend  
DGW



**SPUR ENERGY**

PRONGHORN SWD #001  
DOR: 9.13.19  
1RP-5723



PRONGHORN SWD #001

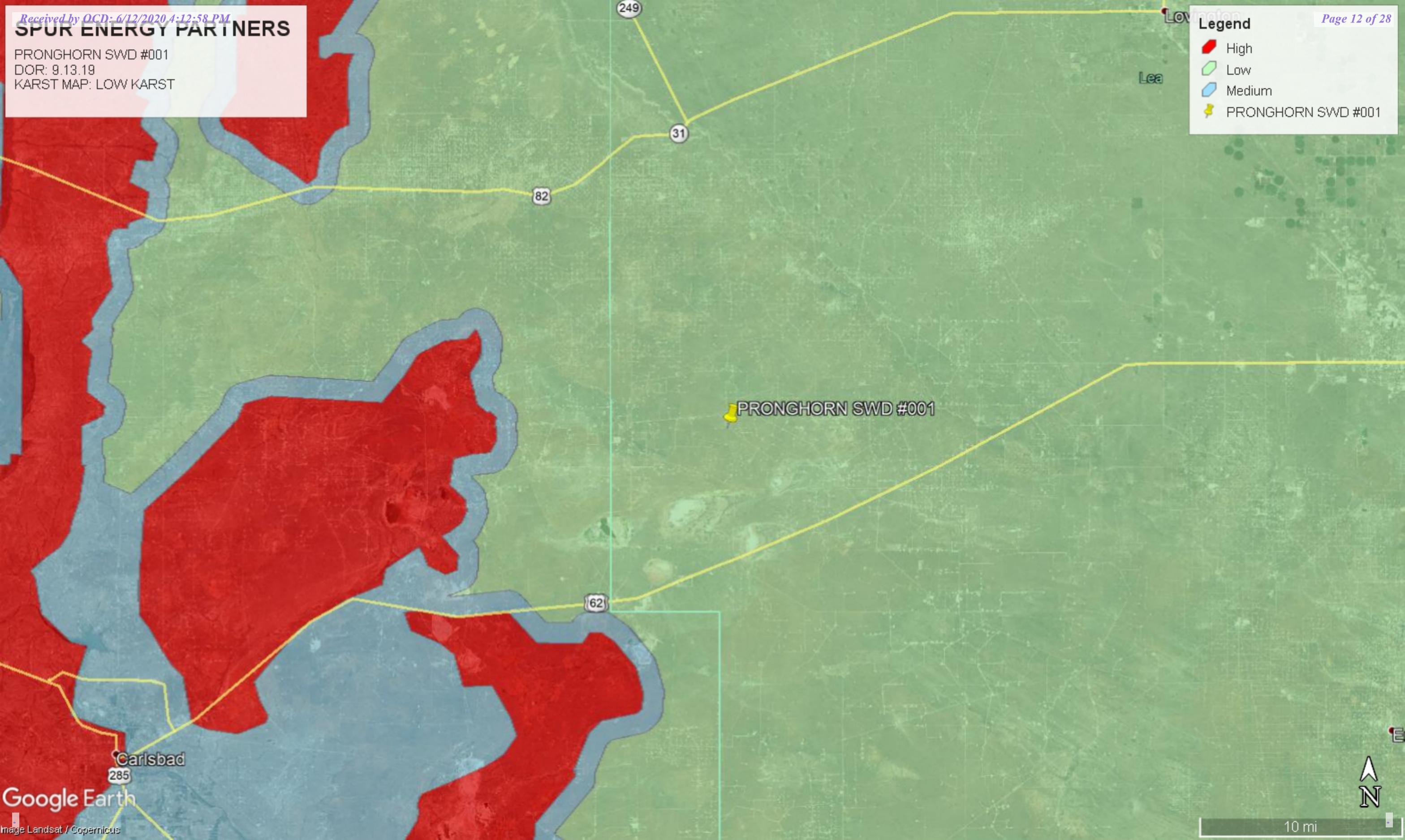


# SPUR ENERGY PARTNERS

PRONGHORN SWD #001  
DOR: 9.13.19  
KARST MAP: LOW KARST

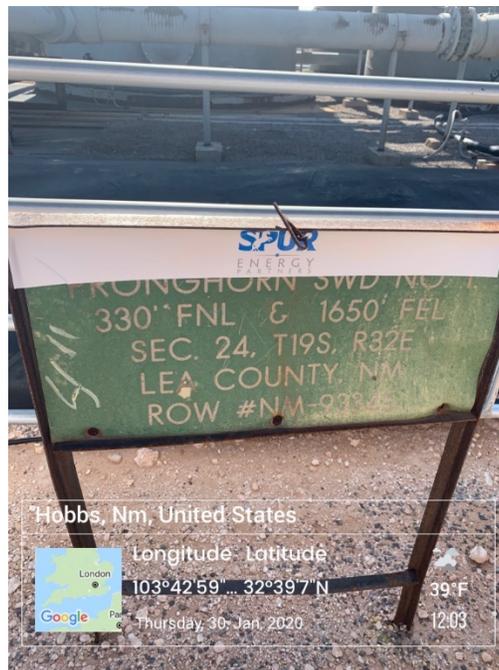
**Legend**

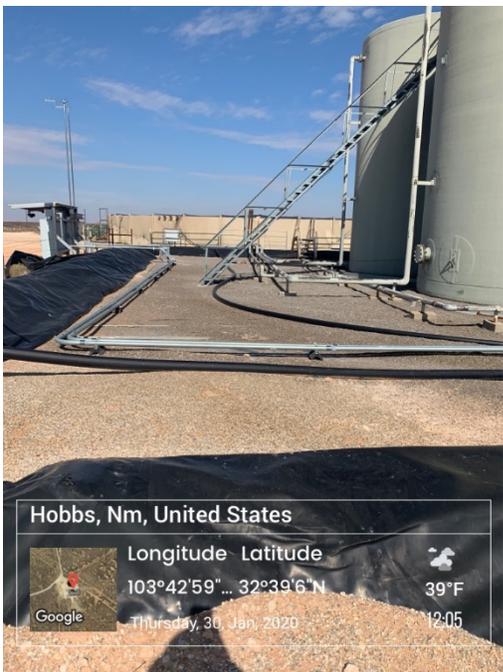
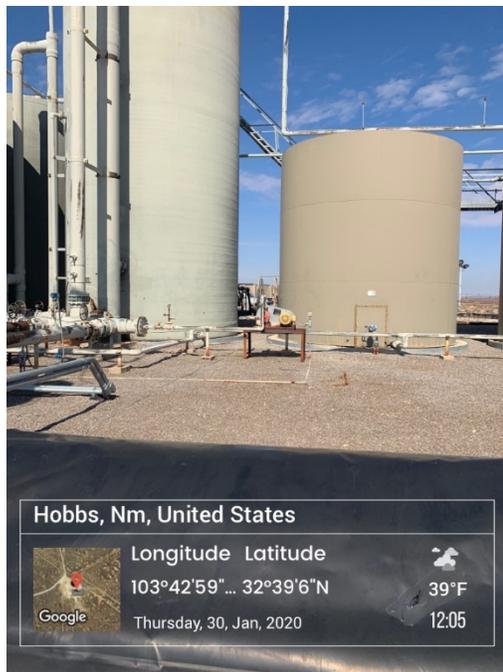
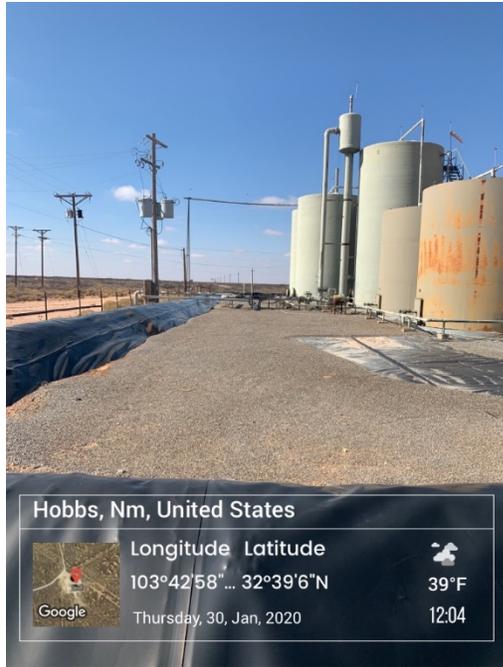
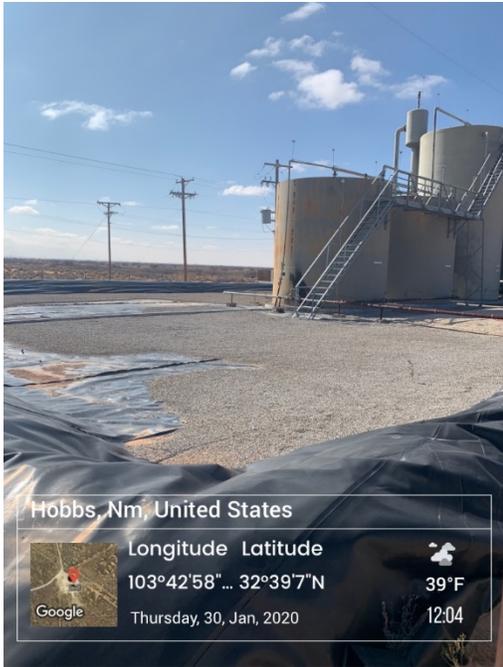
- High
- Low
- Medium
- PRONGHORN SWD #001





**PRONGHORN SWD #001  
BEGINNING PHOTO PAGE**





# SPUR ENERGY PRONGHORN DURING PHOTOS



# SPUR ENERGY PRONGHORN DURING PHOTOS



# SPUR ENERGY PRONGHORN DURING PHOTOS



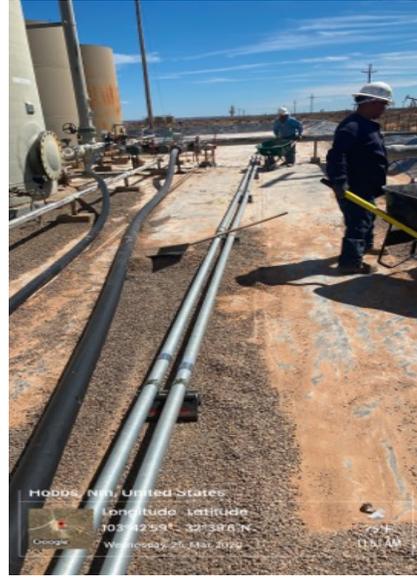
# SPUR ENERGY PRONGHORN DURING PHOTOS



# SPUR ENERGY PRONGHORN DURING PHOTOS



# SPUR ENERGY PRONGHORN DURING PHOTOS



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# SPUR ENERGY PRONGHORN DURING PHOTOS



# SPUR ENERGY PRONGHORN SWD #001 FINAL PHOTOS



# SPUR ENERGY PRONGHORN SWD #001 FINAL PHOTOS



Incident ID	NRM1927460517
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?	185' (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

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

State of New Mexico  
Oil Conservation Division

Incident ID	NRM1927460517
District RP	
Facility ID	
Application ID	

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

Printed Name: Natalie Gladden Title: Director of Environmental and Regulatory

Signature:  Date: 6/12/20

email: natalie@energystaffing.com Telephone: 575-390-6397

**OCD Only**

Received by: Cristina Eads Date: 06/12/2020

Incident ID	
District RP	
Facility ID	
Application ID	

## 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)

**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: Natalie Gladden Title: Director of Environmental & Regulatory

Signature: Natalie Gladden Date: 6/12/20

email: natalie@energystaffingllc.com Telephone: 575-390-6397

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

- Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	NRM1927460517
District RP	
Facility ID	
Application ID	

### Closure

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

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

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

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

Printed Name: Natalie Gladden Title: Director of Environmental and Regulatory

Signature:  Date: 6/12/20

email: natalie@energystaffingllc.com Telephone: 575-390-6397

**OCD Only**

Received by: Cristina Eads Date: 06/12/20

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: D E N I E D  Date: 08/14/2020

Printed Name: Cristina Eads Title: Environmental Specialist