



PREPARED BY:
PIMA ENVIRONMENTAL SERVICES, LLC

PREPARED FOR:
Spur Energy

Burch Keely Unit 18B Battery

Incident ID NAPP2511132829

Liner Inspection and Closure Report

July 14, 2025

FACILITY NAME	Burch Keely Unit 18B Battery
DATE OF RELEASE	4/14/2025
INCIDENT NO.	NAPP2511132829



Pima Environmental Services
5614 N. Lovington Highway
Hobbs, NM 88240
575-964-7740

Site Characterization	
DTGW What is the shallowest DTGW beneath the area affected by the release in ft below ground surface (ft bgs)	Between 75 and 100 ft.
GW Depth Determination What method was used to determine the DTGW?	NM OSE iWaters Database Search
Ground or Surface Water Impacted Did this release impact GW or Surface Water?	No
What is the min. distance between the closest lateral extents of the release and the following surace areas?	
Distance to Watercourse A continuously flowing watercourse or any other significant watercourse?	> 5 mi.
Distance to Lakebed Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	> 5 mi.
Distance to Public An occupied permanent residence, school, hospital, institution, or church?	Between 1 mi. and 5 mi.
Distance to Private A spring or a private domestic FW well used by less than five households for domestic or stock watering purposes?	> 5 mi.
Distance to Fresh Water Any other FW well spring?	Between 1 mi. and 5 mi.
Within Municipal Boundaries Incorporated municipal boundaries or a defined municipal FW well field?	Between 1 mi. and 5 mi.
Distance to Wetland A wetland?	Between 1 mi. and 5 mi.
Overlying Subsurface Mine A subsurface mine?	> 5 mi.
Overlying (Non-Karst) Unstable Area An (non-karst) unstable area?	> 5 mi.
Risk of Karst Geology Categorize the risk of this well/site being in a karst geology?	Low
Distance to or Within 100 yr Floodplain A 100-year floodplain?	Between 1 mi. and 5 mi.
Areas NOT Other Site Did the release impact areas not on exploration, development, production, or storage site?	No
Remediation Plan	
Have the lateral and vertical extents of contamination been fully delineated?	Yes
Lined Containment Area Only Was this release entirely contained within a lined containment area?	Yes
Soil Containment Sampling	(EPA 300.00 or SM4500 Cl B?)
Chloride	0
Constituent Chloride (mg/kg)	(EPA SW-846 Method 8015M)?
TPH (GRO+DRO+MRO) Constituent TPH (mg/kg)	0
	(EPA SW-846 Method 8015M)?
GRO + DRO Constituent GRO-DRO (mg/kg)	0
	(EPA SW-846 Method 8021B or 8260B)?
BTEX Constituent BTEX (mg/kg)	0
	(EPA SW-846 Method 8021B or 8260B)?
Benzene Constituent Benzene (mg/kg)	0
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes competed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
Start of Remediation On what estimated date will remediation commence?	6/16/2025
Start of Sampling or Liner Inspection On what date will (or did) the final sampling or liner inspection occur?	6/19/2025
Finish of Remediation On what date will (or was) the remediation complete(d)?	6/19/2025
Surface Area (sq ft) To Be Reclaimed What is the estmated surface area (in sq ft) that will be reclaimed?	0
Surface Area (sq ft) To Be Remediated What is the estimated surface are (in sq ft) that will be remediated?	0
Volume (cu yd) To Be Remediated What is the estimated volume (in cubic yds) that will be remediated?	0
Remediation Plan (Cont.) Please answer all that apply	
Ex Situ Excavation Off-Site (Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc)?	Yes
Ex Situ Excavation On-Site (Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)?	No
In Situ Soil Vapor Extraction (SVE)?	No
In Situ Chemical Processing (In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)?	No
In Situ Biological Processing (In Situ) Biological processing (i.e. Microbes/Fertilizer, etc.)?	No
In Situ Physical Processing (In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)?	No
In Situ Ground Water Abatement GW Abatement pursuant to 19.15.30 NMAC?	No
Remediation Other Other (Non-listed remedial process)?	No
Deferral Request Only	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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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
Restored Areas For Production Use All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion?	Yes
Total Surface Area (sq ft) Remediated What was the total surface area (sq ft) remediated?	4,000
Total Volume (cu yd) Remediated What was the total volume (cubic yards) remediated?	0
Reclaimed to Condition Prior Release All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four ft of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX and 10 mg/kg Benzene?	Yes
Total Surface Area (sq ft) Reclaimed What was the total surface area (in sq ft) reclaimed?	0
Remediation Summary Summarize any additional remedial activities not included by answers (above).	The lined containment was power-washed, and all standing fluids were recovered using a vacuum truck. Following remediation, a liner inspection was conducted, confirming that the containment liner maintained its integrity.



Pima Environmental Services
5614 N. Lovington Highway
Hobbs, NM 88240
575-964-7740

July 14, 2025

NMOCD District 2
811 S. First St
Artesia, NM, 88210

Bureau of Land Management
620 East Green Street
Carlsbad, NM 88220

RE: Liner Inspection and Closure Report
Burch Keely Unit 18B Battery
API No. N/A
GPS: Latitude 32.830600001 Longitude -104.00981
UL- J, Section 18, Township 17S, Range 30E
NMOCD Reference No. NAPP2511132829

Spur Energy Partners (Spur) has contracted Pima Environmental Services, LLC (Pima) to perform a liner inspection and prepare this closure report for the release of produced water and crude oil that happened on the Burch Keely Unit 18B Battery (BKU). An initial C-141 was submitted on April 21, 2025. This incident was assigned Incident ID NAPP2511132829, by the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

BKU is located approximately 1.88 miles northwest of Loco Hills, NM. This spill site is in Unit J, Section 18, Township 17S, Range 30E, Latitude 32.830600001 Longitude -104.00981, Eddy County, NM. A Location Map can be found in Figure 1.

Based on the well water data from the New Mexico Office of the State Engineer, the depth to the nearest groundwater in this vicinity measures 80 feet below grade surface (BGS), positioned roughly 1.45 miles away from the BKU, drilled on March 19, 2013. Conversely, as per the United States Geological Survey well water data, the nearest groundwater depth in this region is recorded at 24 feet BGS, situated approximately 8.64 miles away from the BKU, with the last gauge conducted on January 24, 2013. For detailed references to water surveys and the precise locations of water wells, please refer to Appendix A, inclusive of the relevant maps. Notably, BKU is situated within an area with a low potential for karst, as illustrated in Figure 3. Additionally, a comprehensive Topographic Map is available for reference in Figure 2.

Release Information

NAPP2511132829: On April 14, 2025, corrosion of a dump line nipple resulted in the release of an estimated 19 barrels of produced water and 2 barrels of crude oil into a lined containment area. Spur personnel responded promptly and successfully recovered all 19 barrels of produced water and 1 barrel of crude oil, resulting in a net loss of 1 barrel of crude oil. The lined containment area spans approximately 4,000 square feet.

A Site Map can be found in Figure 4.

Site Assessment and Liner Inspection

On June 16, 2025, Spur personnel submitted a notification for a liner inspection, adhering to the necessary 48-hour notice period. The details of the 48-hour notification can be referenced in Appendix C.

On June 19, 2025, Pima Environmental conducted a thorough inspection of the lined containment area. The evaluation process included cleaning the liner with a power washer and using a vacuum truck to ensure the complete removal of any residual fluids. The inspection confirmed that the system remained intact and successfully retained all fluids. As a result, the liner was deemed functional, preventing any further environmental impact. A detailed report, including photographic evidence, is provided in Appendices C and D.

Closure Request

After careful review, Pima requests that this incident nAPP2511132829 be closed. Spur has complied with the applicable closure requirements.

For questions or additional information, please feel free to contact:

Spur Energy – Katherine Purvis at 575-441-8619 or katherine.purvis@spurenergy.com

Pima Environmental Services – Sebastian Orozco at 619-721-4813 or Sebastian@pimaoil.com.

Attachments

Figures:

- 1- Location Map
- 2- Topographic Map
- 3- Karst Map
- 4- Site Map

Appendices:

Appendix A- Referenced Water Surveys

Appendix B- Soil Survey, Geological Data, FEMA Flood Map, Wetland Map

Appendix C- 48 Hour Notification and Liner Inspection Form

Appendix D- Photographic Documentation

Figures:

Figure 1- Location Map

Figure 2- Topographic Map



Figure 3- Karst Map

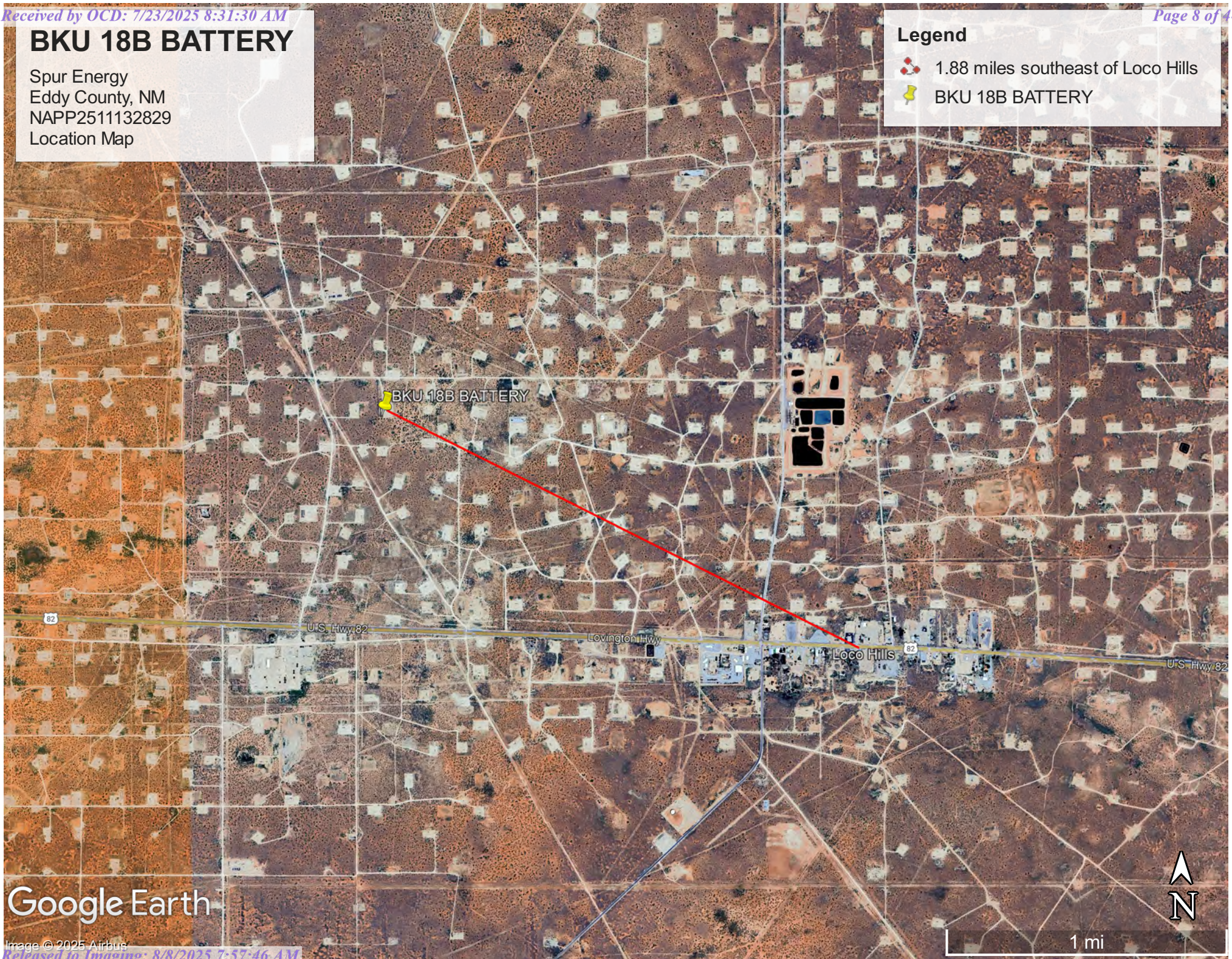
Figure 4- Site Map

BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
Location Map

Legend

-  1.88 miles southeast of Loco Hills
-  BKU 18B BATTERY




Google Earth


Image © 2025 Airbus

BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
Topographic Map

Legend

 BKU 18B BATTERY

 BKU 18B BATTERY

U.S. Hwy 82

Loco Hills

Livingston Hwy

82

Google Earth

Image © 2025 Airbus








6 mi

BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
Karst Map

Legend

-  BKU 18B BATTERY
-  High Karst
-  Low Karst
-  Medium Karst

 BKU 18B BATTERY

U.S. Hwy 82

Loco Hills

Lovington

Google Earth

Image © 2025 Airbus



2 mi

Appendix A


Water Surveys:

- OSE
- USGS
- Surface Water Map

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 Nbr	Q64	Q16	Q4	Sec	Tw	Rng	X	Y	Map
	RA 11914 POD1	NE	SE	NE	20	17S	30E	594801.1	3632002.2	

* UTM location was derived from PLSS - see Help

Driller License:	1682	Driller Company:	HUNGRY HORSE, LLC.
Driller Name:	JOHN NORRIS		
Drill Start Date:	2013-03-19	Drill Finish Date:	2013-03-19
Log File Date:	2013-04-09	PCW Rcv Date:	
		Source:	Shallow
Pump Type:		Pipe Discharge Size:	
		Estimated Yield:	
Casing Size:		Depth Well:	85
		Depth Water:	80

Water Bearing Stratifications:

Top	Bottom	Description
11	85	Sandstone/Gravel/Conglomerate

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.

BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
OSE Pod Map

Legend

- 1.45 miles
- BKU 18B BATTERY
- RA 11914 POD1

BKU 18B BATTERY

RA 11914 POD1

U.S. Hwy 89

Lexington Hwy

Loco Hills

Google Earth

Image © 2025 Airbus

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4000 ft





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National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for the Nation



Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

site_no list =

- 325448104071801

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

USGS 325448104071801 16S.28E.24.22423A

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°54'48", Longitude 104°07'18" NAD27

Land-surface elevation 3,568 feet above NGVD29

This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

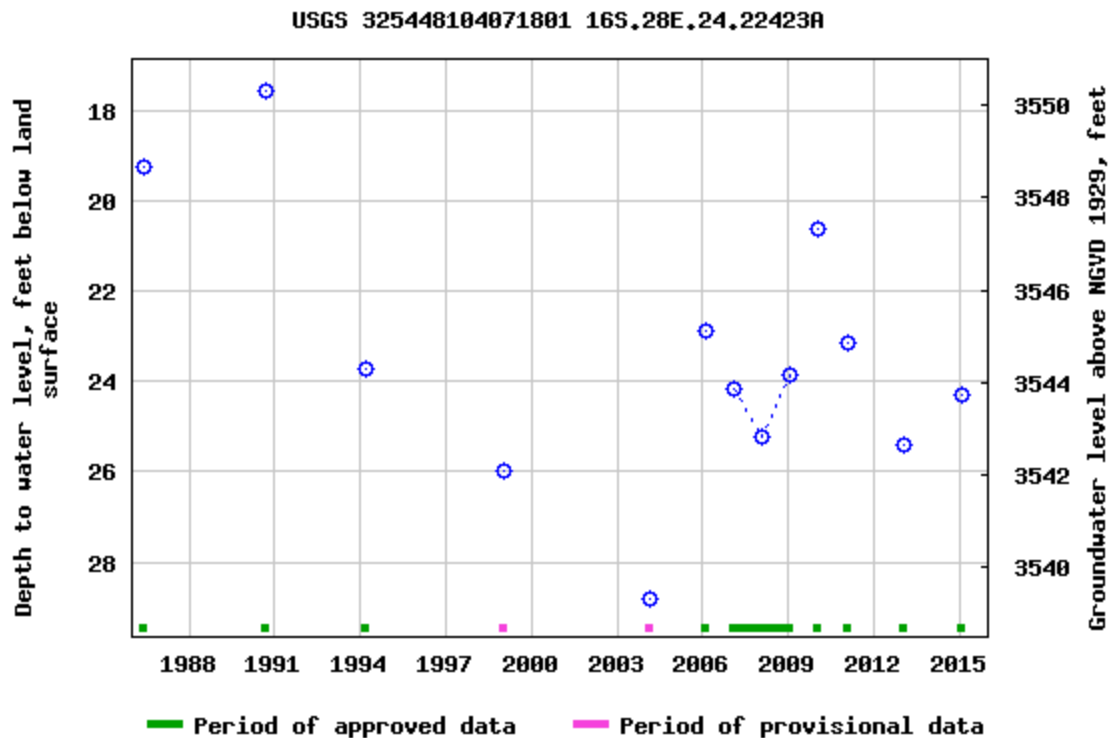
Output formats

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Breaks in the plot represent a gap of at least one year between field measurements.

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URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>

Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2025-04-21 18:35:08 EDT




0.61 0.43 nadww02



BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
USGS Map

Legend

-  8.64 miles
-  BKU 18B BATTERY
-  USGS 325448104071801

USGS 325448104071801

BKU 18B BATTERY

3 mi




Google Earth

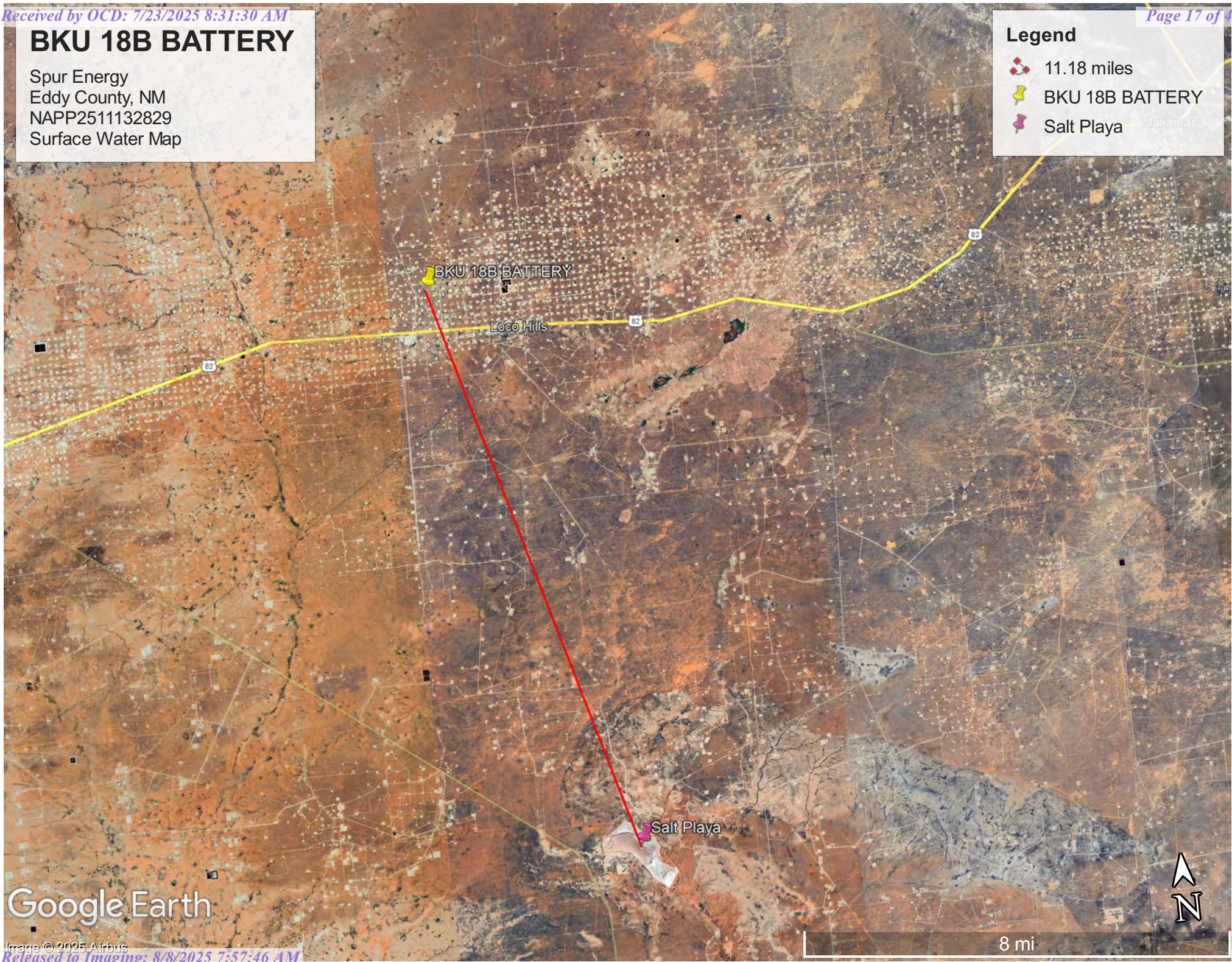
Image © 2025 Airbus

BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
Surface Water Map

Legend

-  11.18 miles
-  BKU 18B BATTERY
-  Salt Playa



Google Earth

Image © 2025 Airbus

Appendix B

- Soil Survey & Soil Maps
- Geological Data
- FEMA Flood Map
- Wetlands Map

Map Unit Description: Simona gravelly fine sandy loam, 0 to 3 percent slopes---Eddy Area,
New Mexico

Eddy Area, New Mexico

SG—Simona gravelly fine sandy loam, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5w

Elevation: 2,750 to 5,000 feet

Mean annual precipitation: 8 to 16 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 180 to 230 days

Farmland classification: Not prime farmland

Map Unit Composition

Simona and similar soils: 95 percent

Minor components: 5 percent

Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Simona

Setting

Landform: Plains, alluvial fans

Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 19 inches: gravelly fine sandy loam

H2 - 19 to 23 inches: indurated

Properties and qualities

Slope: 0 to 3 percent

Depth to restrictive feature: 7 to 20 inches to petrocalcic

Drainage class: Well drained

Runoff class: Very high

Capacity of the most limiting layer to transmit water (Ksat): Very low
to moderately low (0.00 to 0.06 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 15 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0
mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Very low (about 2.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: D

Ecological site: R070BD002NM - Shallow Sandy

Map Unit Description: Simona gravelly fine sandy loam, 0 to 3 percent slopes---Eddy Area,
New Mexico

Hydric soil rating: No

Minor Components

Simona

Percent of map unit: 4 percent

Ecological site: R070BD002NM - Shallow Sandy

Hydric soil rating: No

Playa

Percent of map unit: 1 percent

Landform: Playas

Landform position (three-dimensional): Talf

Down-slope shape: Concave, convex

Across-slope shape: Concave, linear

Ecological site: R070BC017NM - Bottomland

Hydric soil rating: Yes

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024

Soil Map—Eddy Area, New Mexico



Natural Resources
Conservation Service


Web Soil Survey
National Cooperative Soil Survey

4/21/2025
Page 1 of 3


Soil Map—Eddy Area, New Mexico

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

Water Features



Streams and Canals

Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

Background



Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.

Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Nov 12, 2022—Dec 2, 2022

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.



Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
SG	Simona gravelly fine sandy loam, 0 to 3 percent slopes	4.3	100.0%
Totals for Area of Interest		4.3	100.0%

(<https://www.usgs.gov/>)

Mineral Resources (<https://www.usgs.gov/energy-and-minerals/mineral-resources-program>)
/ Online Spatial Data (/) / Geology (/geology/) / by state (/geology/state/)
/ New Mexico (/geology/state/state.php?state=NM)

Eolian and piedmont deposits

XML (/geology/state/xml/NMQep;0) JSON (/geology/state/json/NMQep;0)

Shapefile (/geology/state/unit-shape.php?unit=NMQep;0)

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.

State	New Mexico (/geology/state/state.php?state=NM)
Name	Eolian and piedmont deposits
Geologic age	Holocene to middle Pleistocene
Lithologic constituents	Major Unconsolidated (Eolian) Interlayered eolian sands and piedmont-slope deposits
References	New Mexico Bureau of Geology and Mineral Resources, 2003, Geologic Map of New Mexico, scale 1:500,000 (includes some new polygons, faults, and attributes not in NM001 - heads up digitizing by JHorton).
NGMDB product	NGMDB product page for 22974 (https://ngmdb.usgs.gov/Prodesc/proddesc_22974.htm)
Counties	Chaves (/geology/state/fips-unit.php?code=f35005) - DeBaca (/geology/state/fips-unit.php?code=f35011) - Eddy (/geology/state/fips-unit.php?code=f35015) - Lea (/geology/state/fips-unit.php?code=f35025) - Roosevelt (/geology/state/fips-unit.php?code=f35041)

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BKU 18B BATTERY

Spur Energy
Eddy County, NM
NAPP2511132829
Geological Map

Legend

-  BKU 18B BATTERY
-  Eolian and piedmont deposits
-  Lacustrine and playa-lake deposits

 BKU 18B BATTERY

U.S. Hwy 82

Loco Hills

Livingston Hwy

Google Earth

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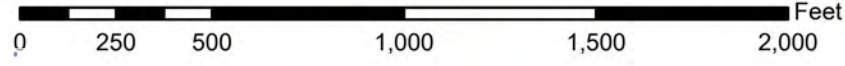
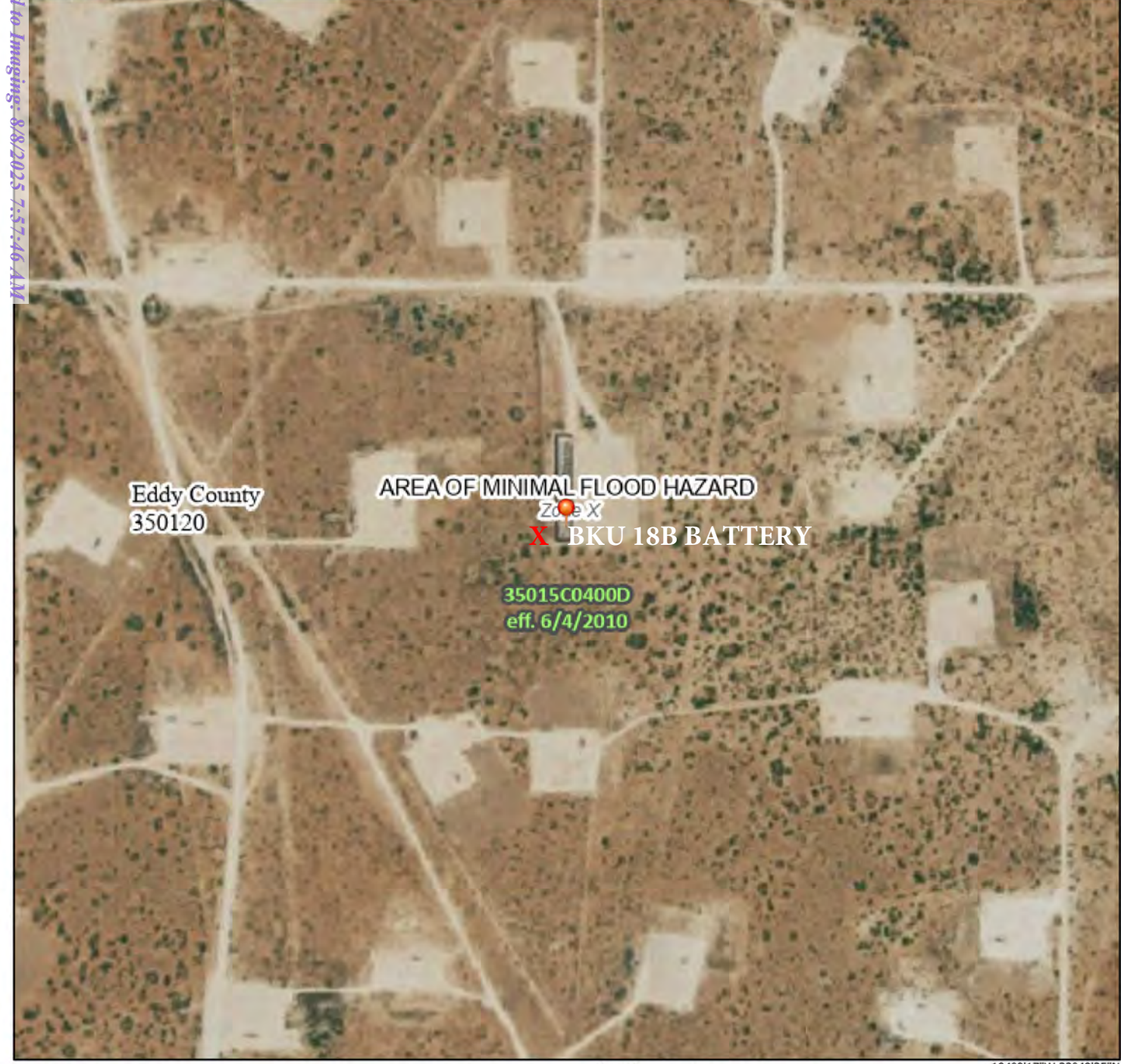
2 mi



National Flood Hazard Layer FIRMette



104°0'54"W 32°50'5"N



1:6,000

104°0'17"W 32°49'35"N

Basemap Imagery Source: USGS National Map 2023

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 Z |
| | | 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 X |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard Zone X |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard Zone D |
| | | Channel, Culvert, or Storm Sewer |
| OTHER FEATURES | | Levee, Dike, or Floodwall |
| | | 20.2 Cross Sections with 1% Annual Chance |
| | | 17.5 Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| 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.

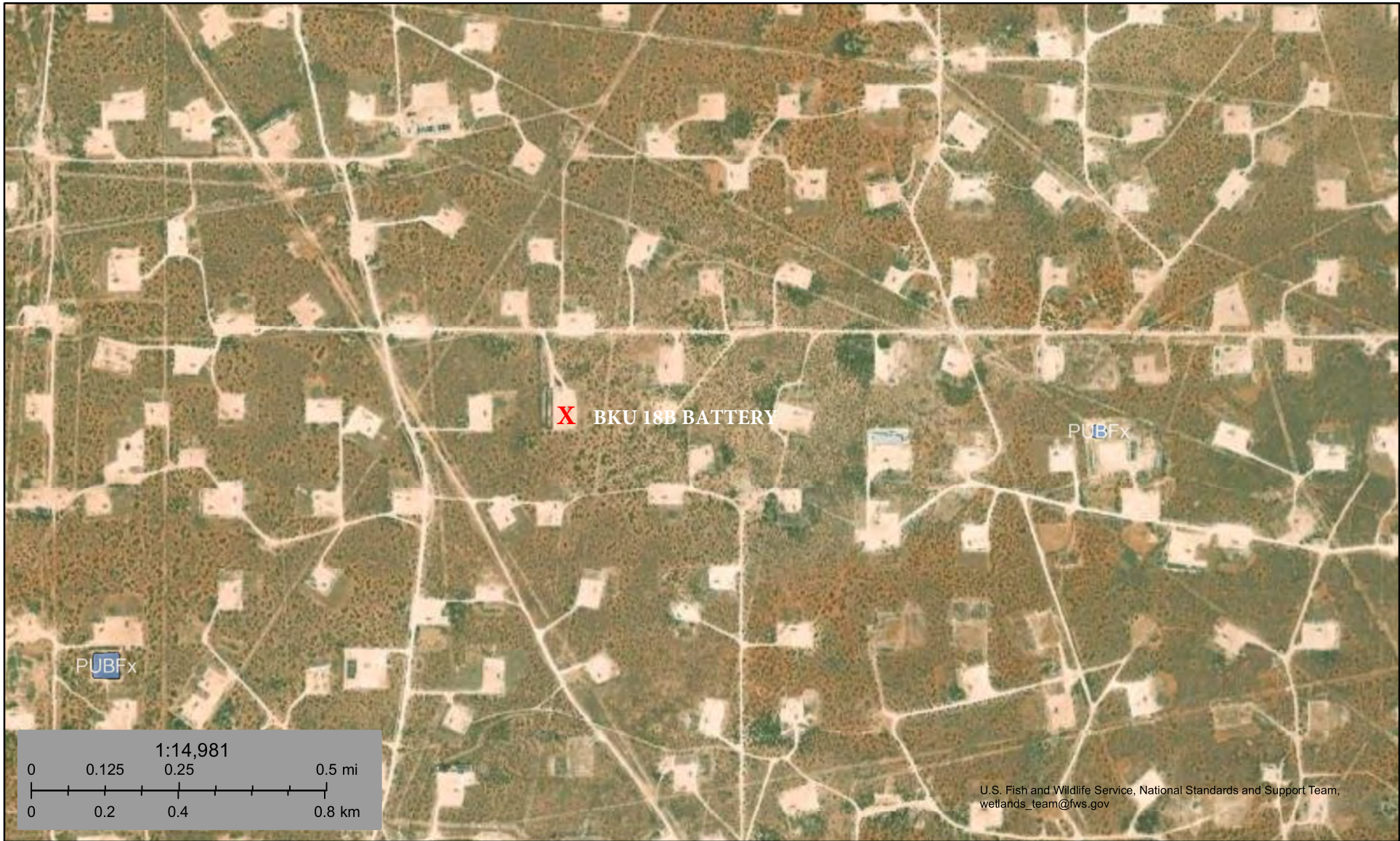
This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 4/21/2025 at 10:16 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.

Received by OCD: 7/23/2025 8:31:30 AM

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April 21, 2025

Wetlands

- | | | | | | |
|---|--------------------------------|---|-----------------------------------|---|----------|
|  | Estuarine and Marine Deepwater |  | Freshwater Emergent Wetland |  | Lake |
|  | Estuarine and Marine Wetland |  | Freshwater Forested/Shrub Wetland |  | Other |
|  | |  | Freshwater Pond |  | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Appendix C

- 48-Hour Notification
- Liner Inspection Form

Sebastian@pimaoil.com

From: OCDOnline@state.nm.us
Sent: Monday, June 16, 2025 6:41 PM
To: sebastian@pimaoil.com
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 475616

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

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2511132829.

The liner inspection is expected to take place:

When: 06/19/2025 @ 08:00

Where: J-18-17S-30E 0 FNL 0 FEL (32.830600001,-104.00981)

Additional Information: Andrew Franco
575-441-2028

Additional Instructions: 32.830665,-104.009861

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



Pima Environmental Services, LLC

Liner Inspection FormCompany Name: Spur EnergySite: Burch Keely Unit 18B BatteryLat/Long: 32.830600001,-104.00981NMOCD Incident ID
& Incident Date: NAPP2511132829 04/14/20252-Day Notification
Sent: via OCD portal 06/16/2025Inspection Date: 06/19/2025

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: Andrew Franco Inspector Signature: Andrew Franco

Appendix D

○ Photographic Documentation



PHOTOGRAPHIC DOCUMENTATION SITE

NAME: Burch Keely Unit 18B Battery

Initial Liner Inspection :



Site information sign.

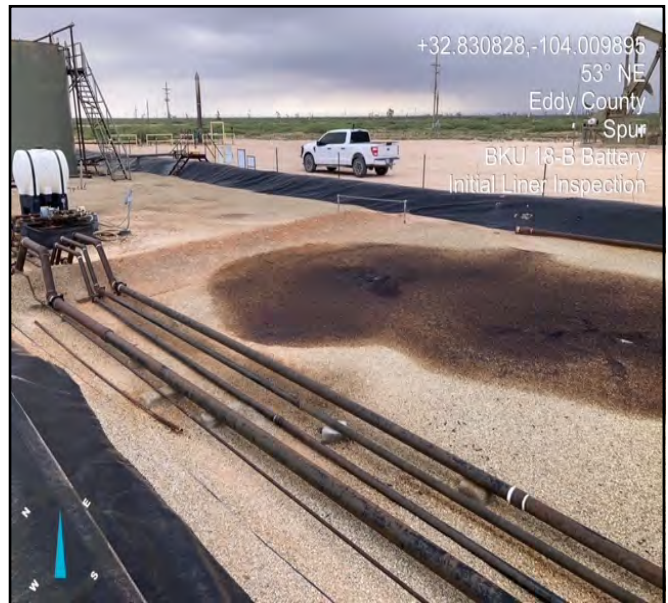


Photo of liner taken during initial liner inspection facing northeast.



Photo of liner taken during initial liner inspection facing east.

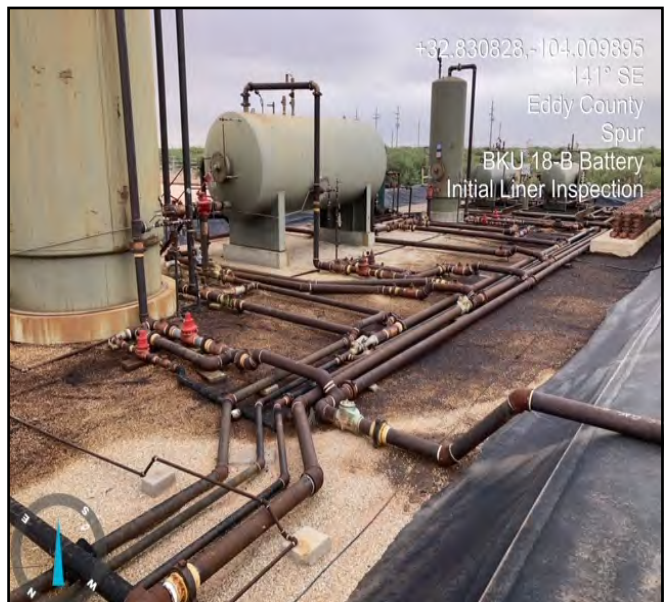


Photo of liner taken during initial liner inspection facing southeast.



Photo of liner taken during initial liner inspection facing northwest.

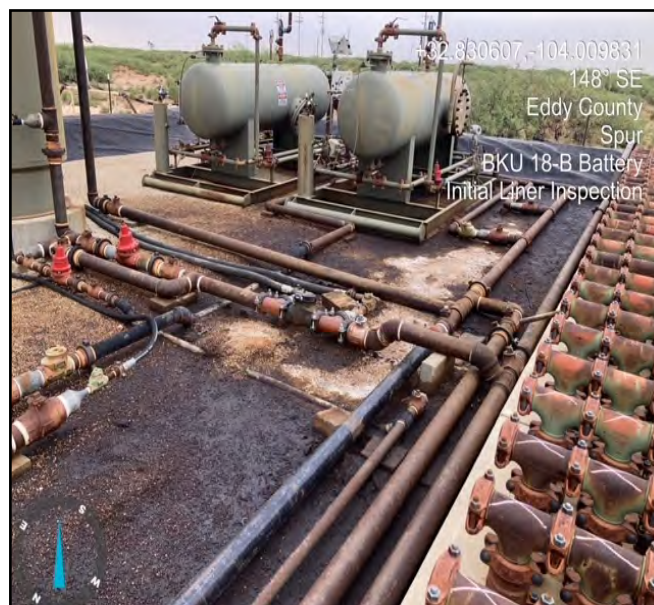


Photo of liner taken during initial liner inspection facing southeast.

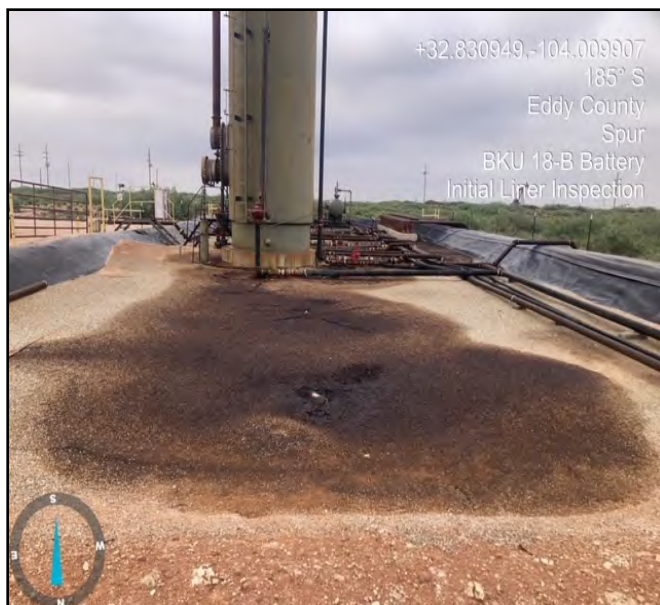


Photo of liner taken during initial liner inspection facing south.



Aerial photo taken during initial liner inspection.

PHOTOGRAPHIC DOCUMENTATION SITE

NAME: Burch Keely Unit 18B Battery

Gravel Removal :



Photograph taken prior to gravel removal, facing south.



Photograph taken prior to gravel removal, facing west.

PHOTOGRAPHIC DOCUMENTATION SITE

NAME: Burch Keely Unit 18B Battery

Pre- Powerwash Photos :

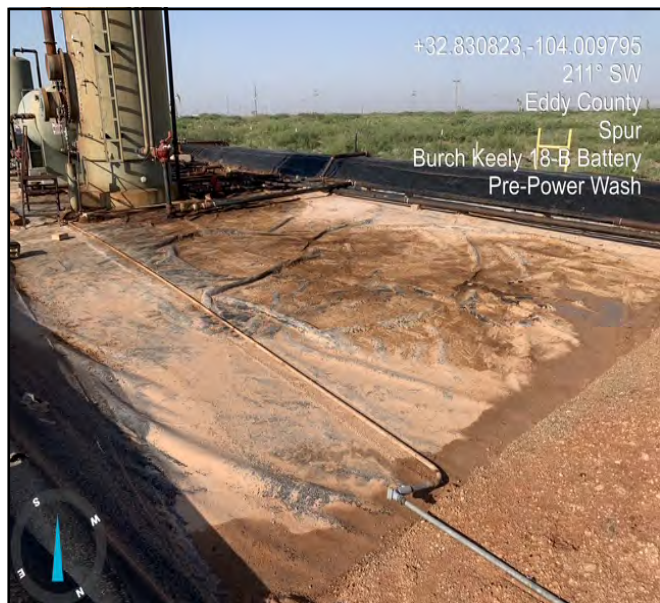


Photo of liner taken prior to power washing facing southwest.



Photo of liner taken prior to power washing facing northwest.



Photo of liner taken prior to power washing facing southeast.



Aerial photo prior to powerwash.

PHOTOGRAPHIC DOCUMENTATION SITE

NAME: Burch Keely Unit 18B Battery

Post Powerwash/ Liner Inspection :

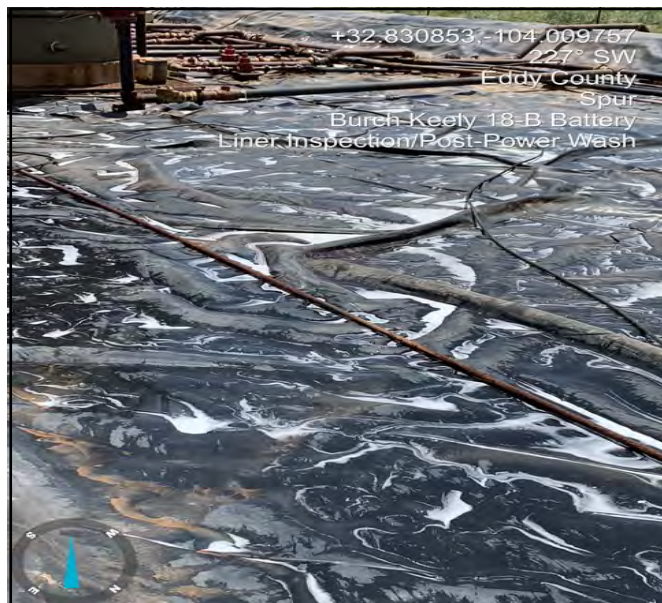


Photo of liner taken prior to power washing facing southwest.



Photo of liner taken prior to power washing facing southwest.



Photo of liner taken prior to power washing facing north.



Photo of liner taken prior to power washing facing northeast.

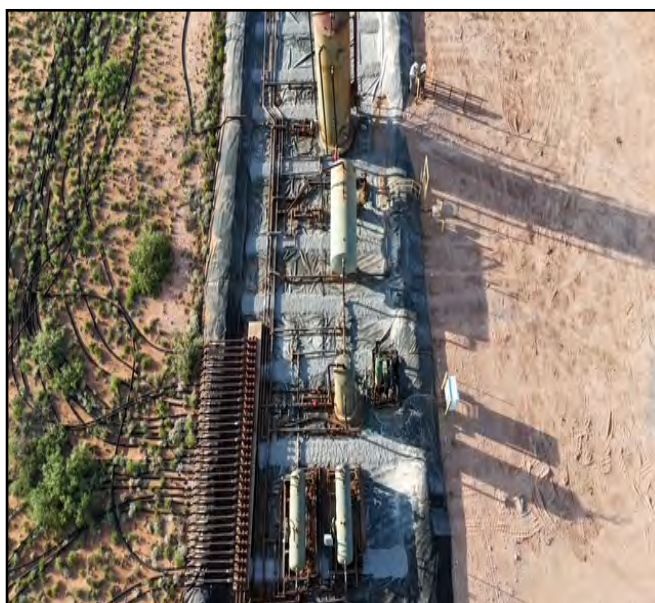
PHOTOGRAPHIC DOCUMENTATION SITE

NAME: Burch Keely Unit 18B Battery

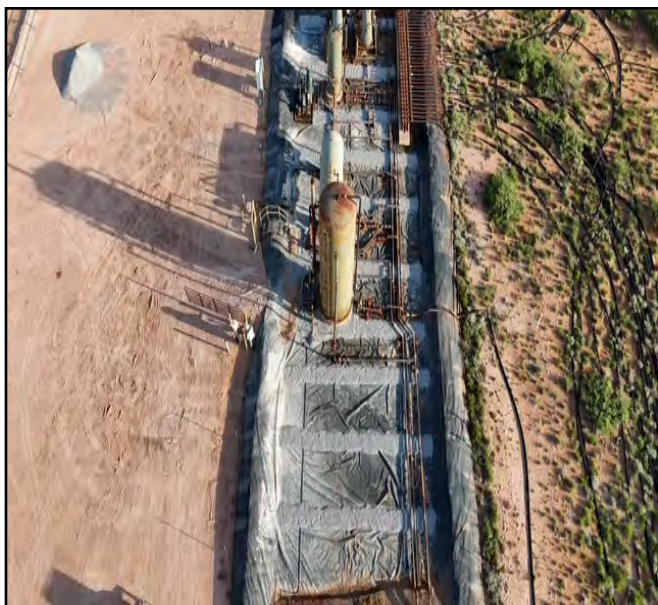
Aerial Photos :



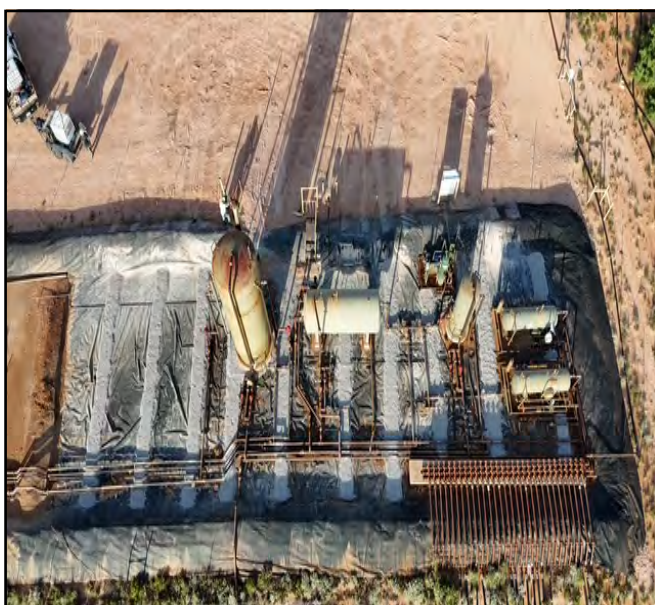
Aerial photo of location post power wash/
liner inspection.



Aerial photo of location post power wash/
liner inspection.



Aerial photo of location post
power wash/ liner inspection.



Aerial photo of location post power wash/
liner inspection.

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Phone: (505) 476-3441

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

QUESTIONS

Action 487871

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 487871
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2511132829
Incident Name	NAPP2511132829 BKU 18B BATTERY @ 0
Incident Type	Release Other
Incident Status	Remediation Closure Report Received

Location of Release Source*Please answer all the questions in this group.*

Site Name	BKU 18B BATTERY
Date Release Discovered	04/14/2025
Surface Owner	Federal

Incident Details*Please answer all the questions in this group.*

Incident Type	Release Other
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	Cause: Corrosion Dump Line Crude Oil Released: 2 BBL Recovered: 1 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Dump Line Produced Water Released: 19 BBL Recovered: 19 BBL Lost: 0 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)	CORROSION OF A DUMP LINE NIPPLE CAUSED A MIX OF OIL AND PW TO BE RELEASED INTO LINED CONTAINMENT

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QUESTIONS, Page 2

Action 487871

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
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	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	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>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.</i>	

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: 04/21/2025
--	---

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QUESTIONS, Page 3

Action 487871

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	487871
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 75 and 100 (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	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 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	Greater than 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 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 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	06/16/2025
On what date will (or did) the final sampling or liner inspection occur	06/19/2025
On what date will (or was) the remediation complete(d)	06/19/2025
What is the estimated surface area (in square feet) that will be remediated	4000
What is the estimated volume (in cubic yards) that will be remediated	0
<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 487871

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 487871
	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: 07/23/2025
<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>	

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Santa Fe, NM 87505

QUESTIONS, Page 6

Action 487871

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	487871
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	475616
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	06/19/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	4000

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	4000
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	AFFECTED MATERIAL INSIDE THE LINED CONTAINMENT WAS REMOVED, THE LINER WAS POWERWASHED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN FLUIDS

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: 07/23/2025
--	---

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CONDITIONS

Action 487871

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 487871
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	Liner inspection approved, release resolved. Restoration complete.	8/8/2025