

Spill Volume(Bbls) Calculator*Inputs in blue, Outputs in red*

Length(Ft)	Width(Ft)	Depth(In)
65.000	43.000	1.000
Cubic Feet Impacted		232.917
Barrels		41.48
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		41.48
Saturation	Fluid present when squeezed	
Estimated Barrels Released		20.80000

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)	65
Width (ft)	43
Depth (in)	1.000









July 29th, 2025

NMOCD District 2
Mr. Mike Bratcher
Artesia, NM 88210

Re: Site Assessment, Remediation, and Closure Request
Bradley 8 Fee 3H Battery
API No. N/A
GPS: Latitude 32.66834 Longitude -104.40259
U/L "O," Sec. 08, T19S, R26E
Eddy County, NM
NMOCD Ref. No. nAPP2307228945

Paragon Environmental LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment and conduct remediation activities for the release site known as the Bradley 8 Fee 3H (Bradley). Details of the release are summarized below:

Release Details			
Type of Release:	Produced Water / Crude Oil	Volume of Release:	21 bbls
		Volume Recovered:	20 bbls
Source of Release:	Pipe	Date of Release:	03/12/2023
Was Immediate Notice Given?	No	If, Yes, to Whom?	N/A
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	Private	Mineral Owner:	Private
Corrosion of a 4 inch pipe fitting caused an oil and produced water mix to release into lined containment.			

Topographical 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 100-500'
- Method to determine DTW NM OSE
- 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- 1/2 mile-1 mile
- 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- 1/2-1 mi
- A subsurface mine- >5 mi
- An (non-karst) unstable area- >5 mi
- Categorize the risk of this well/site being in a karst area geology- Medium
- 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 Piedmont alluvial deposits (Holocene to lower Pleistocene)—Includes deposits of higher gradient tributaries bordering major stream valleys, alluvial veneers of the piedmont slope, and alluvial fans. May locally include uppermost Pliocene deposits (QP). The soil in this area is made up of Reagan-Upton Association, with 0 to 9 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage course in this area is well drained.

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

INITIAL SITE ASSESSMENT

On March 14th, 2023, Paragon went to the Bradley and conducted an initial site assessment. During the initial site assessment, it was determined that Paragon would perform a liner clean to remove all the contaminants from the liner.

A Site Map is provided in Figure #1.

REMEDIATION ACTIVITIES

Based on the analytical results, site characteristics, and field observations made during the site assessment, Paragon conducted the following remedial activities to advance the Release Site towards an NMOCD and BLM-approved closure:

- On March 15th, 2023, utilizing a power washer, a vacuum truck and a hand crew, Paragon was able to remove all the contamination from the containment. Upon finishing this we scheduled a liner inspection to close out the spill. We performed a liner inspection on July 28th, 2025, the results of this inspection concluded that the liner was in good condition and had the integrity to contain a spill.

Liner inspection attached in appendix D.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, nAPP2307228945, 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- Topographic Map
- 3- Karst Map
- 4- Wetlands Map

Appendices:

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





Figures:

- 1-Site Map
- 2- TOPO Map
- 3- Karst Map
- 4- Wetlands Map

Spur Energy Partners

Bradley 8 Fee 3H
API # 30-015-39812
Eddy County, NM
Site Map

Legend



-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H

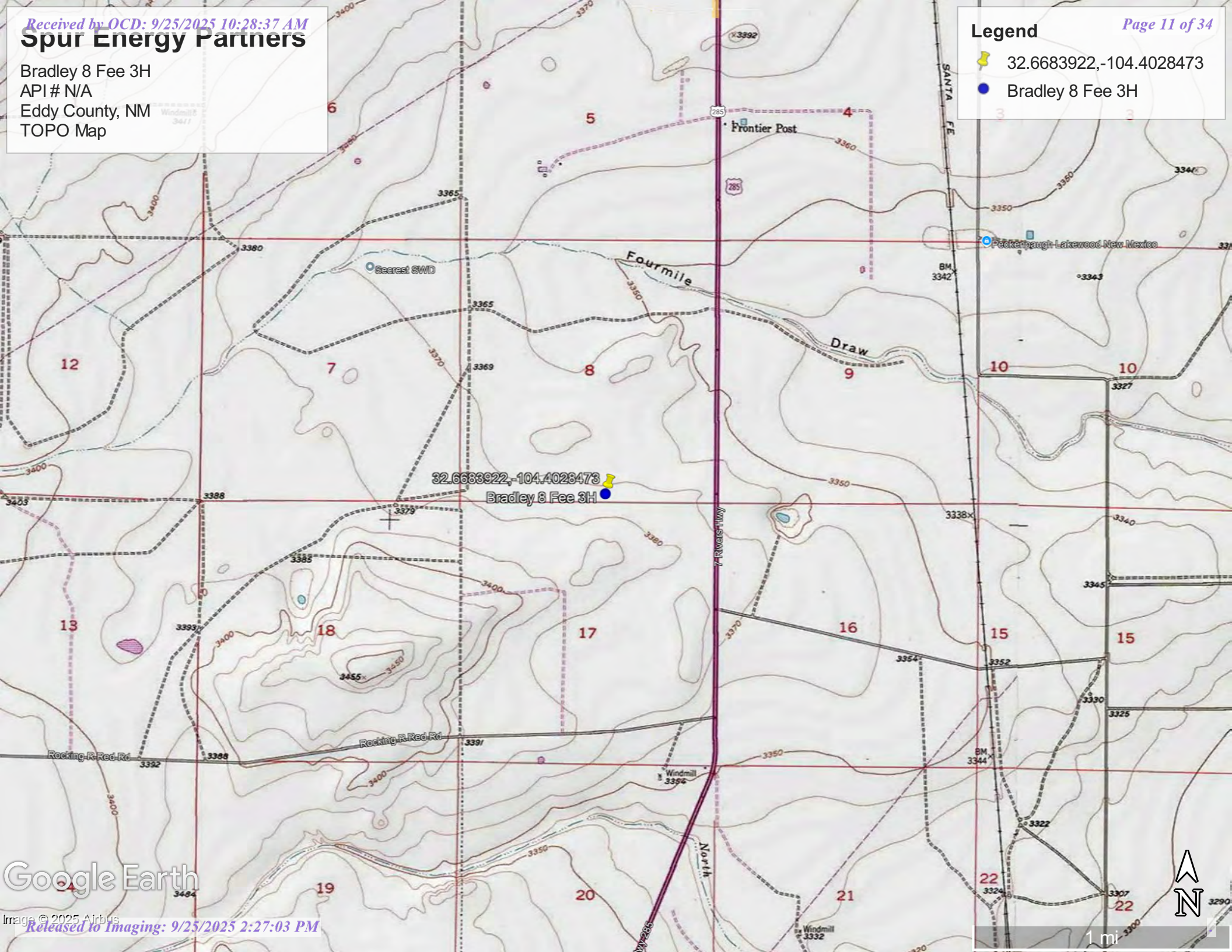


Spur Energy Partners

Bradley 8 Fee 3H
API # N/A
Eddy County, NM
TOPO Map

Legend

-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H



Spur Energy Partners

Bradley 8 Fee 3H
API # 30-015-39812
Eddy County, NM
Karst Map

Legend

-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H
-  High
-  Low
-  Medium

32.6683922,-104.4028473
Bradley 8 Fee 3H







2 mi

Spur Energy Partners

Bradley 8 Fee 3H
API # N/A
Eddy County, NM
Wetlands Map

Legend

-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H
-  Distance to waterway 0.84 mi
-  Distance to wetland 0.7 mi





Appendix A
Referenced Water Data:

New Mexico State of Engineers Office



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

(quarters are smallest to largest)

(In feet)

Average Depth to Water:	116 feet
Minimum Depth:	100 feet
Maximum Depth:	132 feet

UTMNAD83 Radius Search (in meters):

Radius: 1600

*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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WATER COLUMN/ AVERAGE DEPTH TO WATER



New Mexico Office of the State Engineer

Point of Diversion Summary

		(quarters are 1=NW 2=NE 3=SW 4=SE)				(quarters are smallest to largest)		(NAD83 UTM in meters)	
Well Tag	POD Number	Q64	Q16	Q4	Sec	Tws	Rng	X	Y
	RA 05037		1	2	17	19S	26E	556091	3614436*
<hr/>									
Driller License:	28	Driller Company:		SMITH, A.F.					
Driller Name:	SMITH, A.F.								
Drill Start Date:	09/14/1964	Drill Finish Date:		09/28/1964		Plug Date:			
Log File Date:	11/20/1964	PCW Rev Date:				Source:		Shallow	
Pump Type:		Pipe Discharge Size:				Estimated Yield:			
Casing Size:	7.00	Depth Well:		475 feet		Depth Water:		132 feet	
<hr/>									
Water Bearing Stratifications:		Top	Bottom	Description					
		150	232	Sandstone/Gravel/Conglomerate					
<hr/>									
Casing Perforations:		Top	Bottom						
		202	232						
<hr/>									

*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.

1/9/23 11:39 AM

POINT OF DIVERSION SUMMARY



Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

RE—Reagan-Upton association, 0 to 9 percent slopes

Map Unit Setting

National map unit symbol: 1w5d

Elevation: 1,100 to 5,400 feet

Mean annual precipitation: 6 to 14 inches

Mean annual air temperature: 60 to 64 degrees F

Frost-free period: 180 to 240 days

Farmland classification: Farmland of statewide importance

Map Unit Composition

Reagan and similar soils: 70 percent

Upton and similar soils: 25 percent

Minor components: 5 percent

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

Description of Reagan

Setting

Landform: Fan remnants, alluvial fans

Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Alluvium and/or eolian deposits

Typical profile

H1 - 0 to 8 inches: loam

H2 - 8 to 60 inches: loam

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 moderately saline (2.0 to 8.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

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

Interpretive groups

Land capability classification (irrigated): 2e

Land capability classification (nonirrigated): 6e

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

Hydrologic Soil Group: B
Ecological site: R042CY153NM - Loamy
Hydric soil rating: No

Description of Upton

Setting

Landform: Ridges, fans
Landform position (three-dimensional): Side slope, rise
Down-slope shape: Convex
Across-slope shape: Convex
Parent material: Residuum weathered from limestone

Typical profile

H1 - 0 to 9 inches: gravelly loam
H2 - 9 to 13 inches: gravelly loam
H3 - 13 to 21 inches: cemented
H4 - 21 to 60 inches: very gravelly loam

Properties and qualities

Slope: 0 to 9 percent
Depth to restrictive feature: 7 to 20 inches to petrocalcic
Drainage class: Well drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat): Low to moderately high (0.01 to 0.60 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 75 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 1.4 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: D
Ecological site: R042CY159NM - Shallow Loamy
Hydric soil rating: No

Minor Components

Atoka

Percent of map unit: 3 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Pima

Percent of map unit: 2 percent
Ecological site: R070BC017NM - Bottomland

Map Unit Description: Reagan-Upton association, 0 to 9 percent slopes---Eddy Area, New Mexico

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 FIRMMette



104°24'29"W 32°40'21"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 Cross Sections with 1% Annual Chance Water Surface Elevation
		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 **1/9/2023 at 1:40 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

0 250 500 1,000 1,500 2,000 Feet 1:6,000

104°23'52"W 32°39'51"N



Appendix C:

NMOCD Notification

Photographic Documentation

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Liner Inspection (C-141L) Application

Submission Information

Submission ID:	488112	Districts:	Artesia
Operator:	[328947] Spur Energy Partners LLC	Counties:	Eddy
Description:	Spur Energy Partners LLC [328947] , BRADLEY 8 FEE 3H BATTERY , nAPP2307228945		
Status:	APPROVED		
Status Date:	07/23/2025		
References (0):			

Forms

This application type does not have attachments.

Questions

Prerequisites

Incident ID (n#)	nAPP2307228945
Incident Name	NAPP2307228945 BRADLEY 8 FEE 3H BATTERY @ 30-015-39812
Incident Type	Release Other
Incident Status	Initial C-141 Approved
Incident Well	[30-015-39812] BRADLEY 8 FEE #003H

Location of Release Source

Site Name	BRADLEY 8 FEE 3H BATTERY
Date Release Discovered	03/12/2023
Surface Owner	Private

Liner Inspection Event Information

Please answer all the questions in this group.

What is the liner inspection surface area in square feet	9,500
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/28/2025
Time liner inspection will commence	08:00 AM
<div>Warning: Notification can not be less than two business days prior to conducting liner inspection.</div>	
Please provide any information necessary for observers to liner inspection	tristan jones 575-318-6841
Please provide any information necessary for navigation to liner inspection site	32.66834,-104.40259

Searches Operator Data Hearing Fee Application

Comments

No comments found for this submission.

Conditions

Summary: *tristanjones (7/23/2025)*, 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.

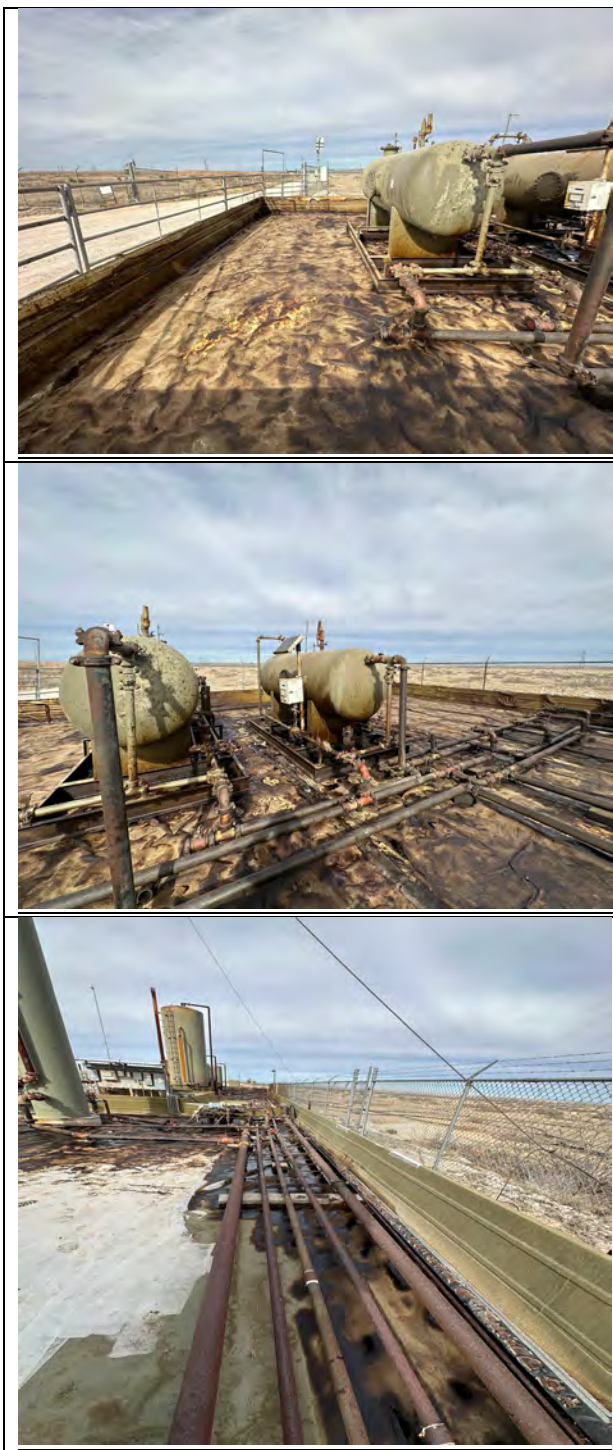
Reasons

No reasons found for this submission.

Go Back



**Photographic Documentation
Before**





Photographic Documentation
Liner Inspection





Appendix D:
Liner Inspection



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners _____

Site: Bradley 8 Fee 3H _____

Lat/Long: 32.66839,-104.40285 _____

NMOCD Incident ID
& Incident Date: nAPP2307228945 & 3/12/2023 _____2-Day Notification
Sent: 7/23/2025 _____

Inspection Date: 7/28/2025 _____

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: Liner is in good working condition. _____

Inspector Name: Tristan Jones _____ Inspector Signature: _____

A handwritten signature in black ink, appearing to read 'Tristan Jones', is written over the signature line.

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 509356

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 509356
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2307228945
Incident Name	NAPP2307228945 BRADLEY 8 FEE 3H BATTERY @ 30-015-39812
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-39812] BRADLEY 8 FEE #003H

Location of Release Source

Please answer all the questions in this group.

Site Name	BRADLEY 8 FEE 3H BATTERY
Date Release Discovered	03/12/2023
Surface Owner	Private

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 Fitting Crude Oil Released: 11 BBL Recovered: 10 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Fitting Produced Water Released: 10 BBL Recovered: 10 BBL Lost: 0 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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 4 inch pipe fitting caused an oil and produced water mix to release into lined containment

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QUESTIONS, Page 2

Action 509356

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 509356
	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: 09/25/2025
----------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------

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Phone: (505) 476-3441

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Santa Fe, NM 87505

QUESTIONS, Page 3

Action 509356

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	509356
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 ½ and 1 (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	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
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	03/14/2025
On what date will (or did) the final sampling or liner inspection occur	07/28/2025
On what date will (or was) the remediation complete(d)	03/15/2023
What is the estimated surface area (in square feet) that will be remediated	6500
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 509356

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 509356
	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	No
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: 09/25/2025
<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 509356

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	509356
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	488112
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	07/28/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	9500

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	6500
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	LINER WAS POWERWASHED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN LEAKS

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: 09/25/2025
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Santa Fe, NM 87505

CONDITIONS

Action 509356

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 509356
	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 #nAPP2307228945 BRADLEY 8 FEE 3H BATTERY, thank you. This Remediation Closure Report is approved.	9/25/2025