

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

| Length(Ft)                    | Width(Ft)                         | Depth(In)         |
|-------------------------------|-----------------------------------|-------------------|
| 58.000                        | 38.000                            | 0.250             |
| Cubic Feet Impacted           |                                   | 45.917            |
| Barrels                       |                                   | 8.18              |
| Soil Type                     |                                   | Lined Containment |
| Bbls Assuming 100% Saturation |                                   | 8.18              |
| Saturation                    | Fluid present with shovel/backhoe |                   |
| Estimated Barrels Released    |                                   | 8.20000           |

**Instructions**

1. Input spill measurements below. Length and width need to be input in feet and depth in inches.

2. Select a soil type from the drop down menu.

3. Select a saturation level from the drop down menu.

(For data gathering instructions see appendix tab)

**Measurements**

| Length (ft) | 58    |
|-------------|-------|
| Width (ft)  | 38    |
| Depth (in)  | 0.250 |









August 12, 2026

NMOCD District 2  
Mike Bratcher  
Artesia, NM 88210

Bureau of Land Management  
Crisha Morgan  
Carlsbad Field Office

**Re: Site Assessment, Remediation, and Closure Request**  
**Skelly Unit #968**  
**GPS: Latitude 32.83512 Longitude -103.86027**  
**UL "F", Sec. 15, T17S, R31E**  
**Eddy County, NM**  
**NMOCD Ref. No. nAPP2618737789**

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 Skelly Unit #968 (Skelly). Details of the release are summarized below:

| Release Details                                                                                          |                            |                                              |            |
|----------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------|------------|
| <b>Type of Release:</b>                                                                                  | Produced Water & Crude Oil | <b>Volume of Release:</b>                    | 8 bbls     |
|                                                                                                          |                            | <b>Volume Recovered:</b>                     | 8 bbls     |
| <b>Source of Release:</b>                                                                                | Fitting                    | <b>Date of Release:</b>                      | 07/05/2026 |
| <b>Was Immediate Notice Given?</b>                                                                       | No                         | <b>If, Yes, to Whom?</b>                     | N/A        |
| <b>Was a Watercourse Reached?</b>                                                                        | No                         | <b>If Yes, Volume Impacting Watercourse:</b> | N/A        |
| <b>Surface Owner:</b>                                                                                    | State                      | <b>Mineral Owner:</b>                        | Federal    |
| Corrosion of a PPL from the header to the heater treater released oil and PW into the lined containment. |                            |                                              |            |

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

## REGULATORY FRAMEWORK

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 75-100'
- 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 > 5 Mile
- Any lakebed, sinkhole, or playa lake 1/2-1 mi
- An occupied permanent residence, school, hospital, institution, or church >5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes >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 Low
- A 100-year floodplain 1/2-1 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 Eolian and piedmont deposits (Holocene to middle Pleistocene)—Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (QEP). The soil in this area is made up of Kermit-Berino Fine Sands, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are excessively-drained. There is NOT a high potential for karst geology to be present around the Skelly (Figure #3).

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

### INITIAL SITE ASSESSMENT

On July 6, 2023, Paragon conducted a site visit to evaluate the site. Upon arrival, we found that it was a poly-lined containment. There was no evidence that any fluids had breached the containment; therefore, no samples were taken.

A Site Map is provided in Figure #1.

### REMEDIATION ACTIVITIES

On July 7, 2024, Paragon mobilized personnel and equipment to conduct remedial activities. Based on the site characteristics and field observations made during the site assessment, the following details the remedial activities we conducted to advance the Release Site toward an NMOCD-approved site closure.

- We utilized a hand crew and cleaned the liner. We hand-dug the stained gravel out of the containment and hauled it to disposal. We then swept the liner and cleaned it with degreaser, a power washer, and a vac truck to capture the fluids. The contaminated area impacted measured approximately 1200 s/f.
- A liner inspection was scheduled on July 23, 2026, and conducted on July 27, 2026, to ensure the liner was intact. The liner inspection report is included in Appendix C.

### CLOSURE REQUEST

After careful review, Paragon requests that the incident, nAPP2618737789, 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 Chris Jones by email at [chris@paragonenvironmental.net](mailto:chris@paragonenvironmental.net)

Respectfully,



Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



### Attachments

#### **Figures:**

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

#### **Appendices:**

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



Figures:

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

# Spur Energy Partners

Skelly Unit Fed #968  
API# 30-015-35816  
Eddy County, NM  
Site Map

## Legend

- Skelly Unit Fed #968 32.8354836,-103.860008
- Spill Area 1200 s/f

Skelly Unit Fed #968 32.8354836,-103.860008

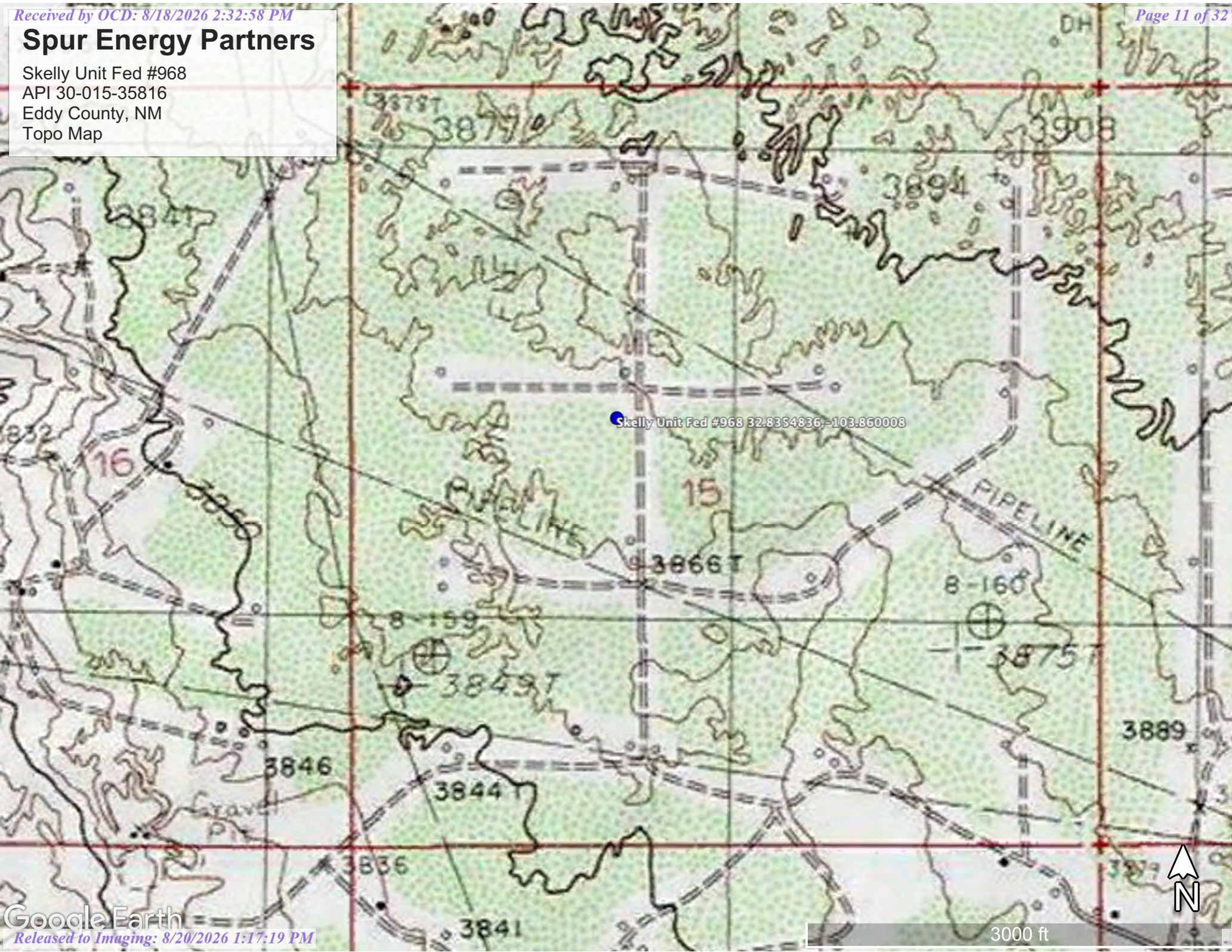


100 ft

Google Earth

# Spur Energy Partners

Skelly Unit Fed #968  
API 30-015-35816  
Eddy County, NM  
Topo Map

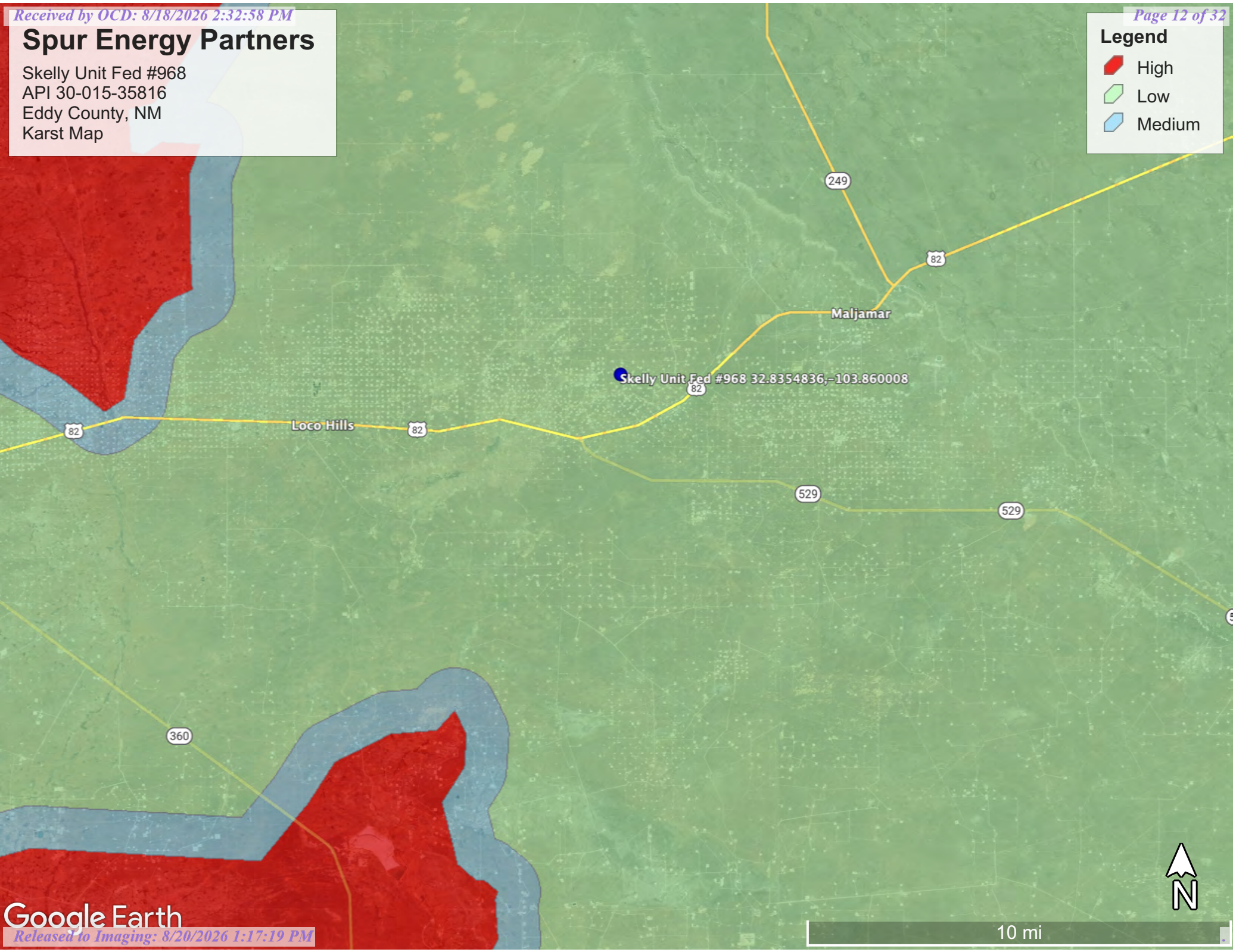


# Spur Energy Partners

Skelly Unit Fed #968  
API 30-015-35816  
Eddy County, NM  
Karst Map

## Legend

-  High
-  Low
-  Medium



# Spur Energy Partners

Skelly Unit Fed #968  
API# 30-015-35816  
Eddy County, NM  
Wetlands Map

## Legend

-  Waterway 0.7 mi
-  Wetlands 1.5 mi

Skelly Unit Fed #968 32.8354836, -103.860008

Google Earth

Image © 2026 Airbus

Image © 2026 CNES / Airbus

Released to Imaging: 8/20/2026 1:17:19 PM



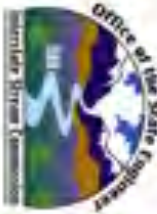
1 mi



## Appendix A:

### Referenced Water Data

New Mexico State of Engineers Office



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

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

(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                   | POD       |        | Q Q Q |    |   |    | Sec | Tws | Rng    | X       | Y                                                                                   | Distance | Depth | Well | Depth | Water | Column |
|------------------------------|-----------|--------|-------|----|---|----|-----|-----|--------|---------|-------------------------------------------------------------------------------------|----------|-------|------|-------|-------|--------|
|                              | Sub-basin | County | 64    | 16 | 4 |    |     |     |        |         |                                                                                     |          |       |      |       |       |        |
| <a href="#">L 14207 POD3</a> | L         | LE     | 2     | 3  | 3 | 31 | 16S | 37E | 606117 | 3636977 |  | 3403     | 240   | 96   | 144   |       |        |

Average Depth to Water: 96 feet

Minimum Depth: 96 feet

Maximum Depth: 96 feet

Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 606694.265

Northing (Y): 3633623.836

Radius: 5000

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.

8/5/22 12:14 PM

WATER COLUMN/ AVERAGE DEPTH TO  
WATER



Appendix B:

Soil Survey

U.S.D.A.

FEMA Flood Map

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

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## Eddy Area, New Mexico

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

#### Map Unit Setting

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

#### Map Unit Composition

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

#### Description of Kermit

##### Setting

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

##### Typical profile

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

##### Properties and qualities

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

##### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* A  
*Ecological site:* R042XC005NM - Deep Sand  
*Hydric soil rating:* No

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

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## Description of Berino

### Setting

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

### Typical profile

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

### Properties and qualities

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Well drained  
*Runoff class:* Low  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.60 to 2.00 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 40 percent  
*Maximum salinity:* Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Moderate (about 7.2 inches)

### Interpretive groups

*Land capability classification (irrigated):* 4e  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* B  
*Ecological site:* R042XC003NM - Loamy Sand  
*Hydric soil rating:* No

## Minor Components

### Active dune land

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

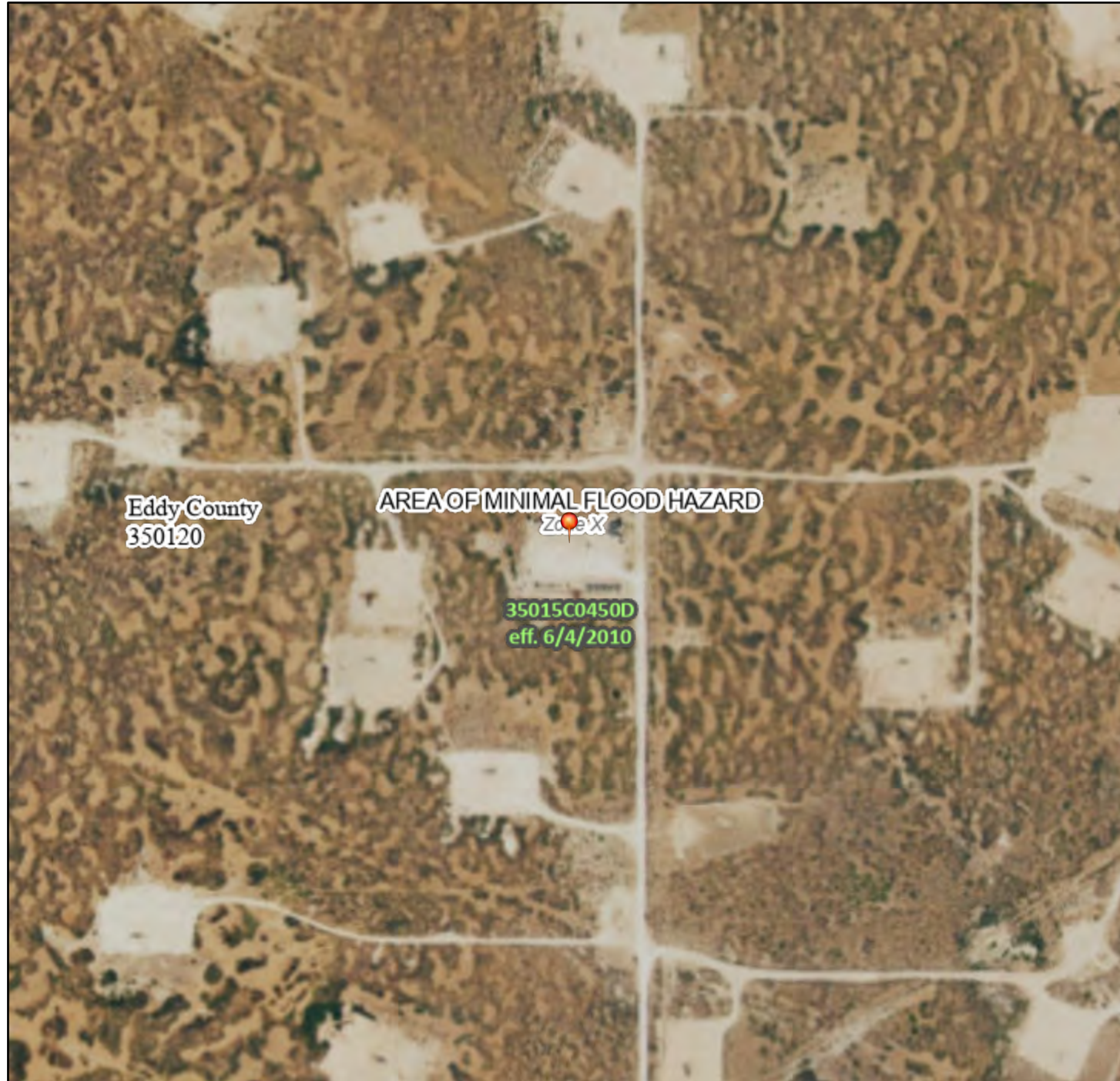
## Data Source Information

Soil Survey Area: Eddy Area, New Mexico  
Survey Area Data: Version 17, Sep 12, 2021

## National Flood Hazard Layer FIRMette



103°51'55"W 32°50'23"N



## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

|                             |  |                                                                                                                                                                   |
|-----------------------------|--|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| SPECIAL FLOOD HAZARD AREAS  |  | Without Base Flood Elevation (BFE)<br>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 **8/5/2022 at 2:16 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.



Appendix C:

NMOCD Notification

Liner Inspection

Photographic Documentation

Wednesday, July 29, 2026 at 1:24:28 PM Central Daylight Time

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**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 607184  
**Date:** Thursday, July 23, 2026 at 12:24:22 PM Central Daylight Time  
**From:** OCDOnline@emnrd.nm.gov  
**To:** chris@paragonenvironmental.net

To whom it may concern (c/o Chris Jones for Paragon Environmental LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2618737789.

The liner inspection is expected to take place:

**When:** 07/27/2026 @ 08:30

**Where:** F-15-17S-31E 0 FNL 0 FEL (32.83512,-103.86027)

**Additional Information:** Armando Fierro 575-942-1343

**Additional Instructions:** GPS: Latitude 32.83512 Longitude -103.86027

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

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

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

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



Paragon Environmental LLC

**Liner Inspection Form**

Company Name: Spur Energy Partners

Site: Skelly Unit #968

Lat/Long: 32.85883, -104.01932

NMOCD Incident ID  
& Incident Date: nAPP26187377892-Day Notification  
Sent: 7/23/26

Inspection Date: 7/27/26

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   |    |          |

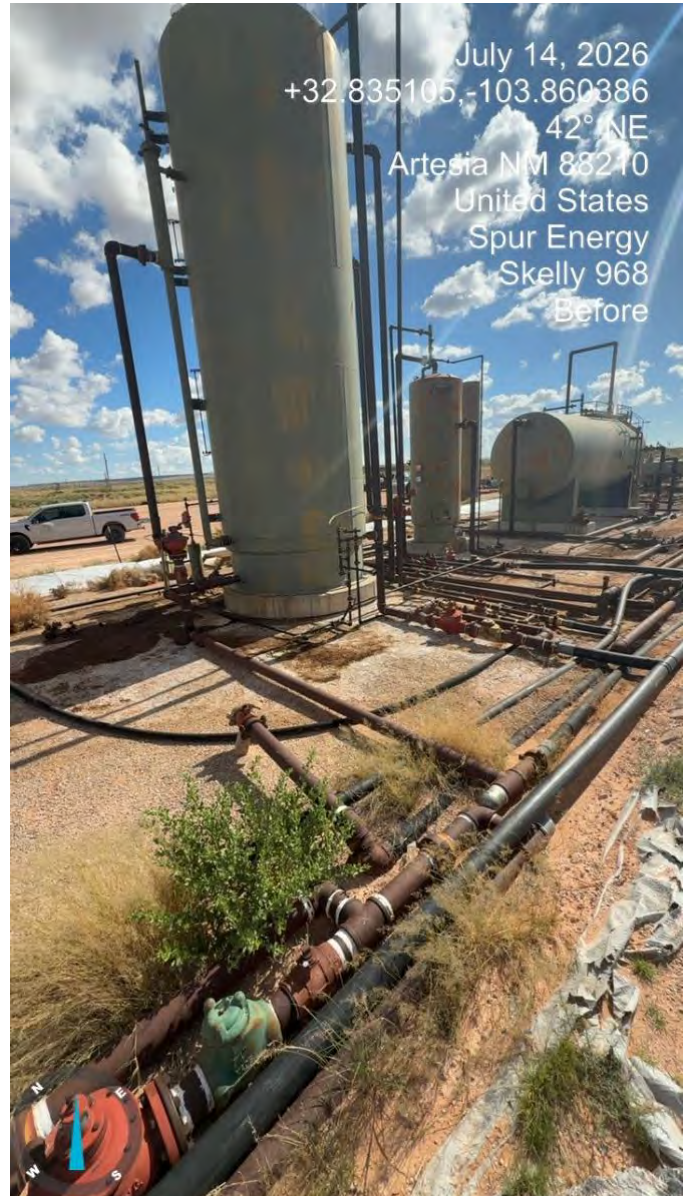
Comments: \_\_\_\_\_

Inspector Name: Armando Fierro

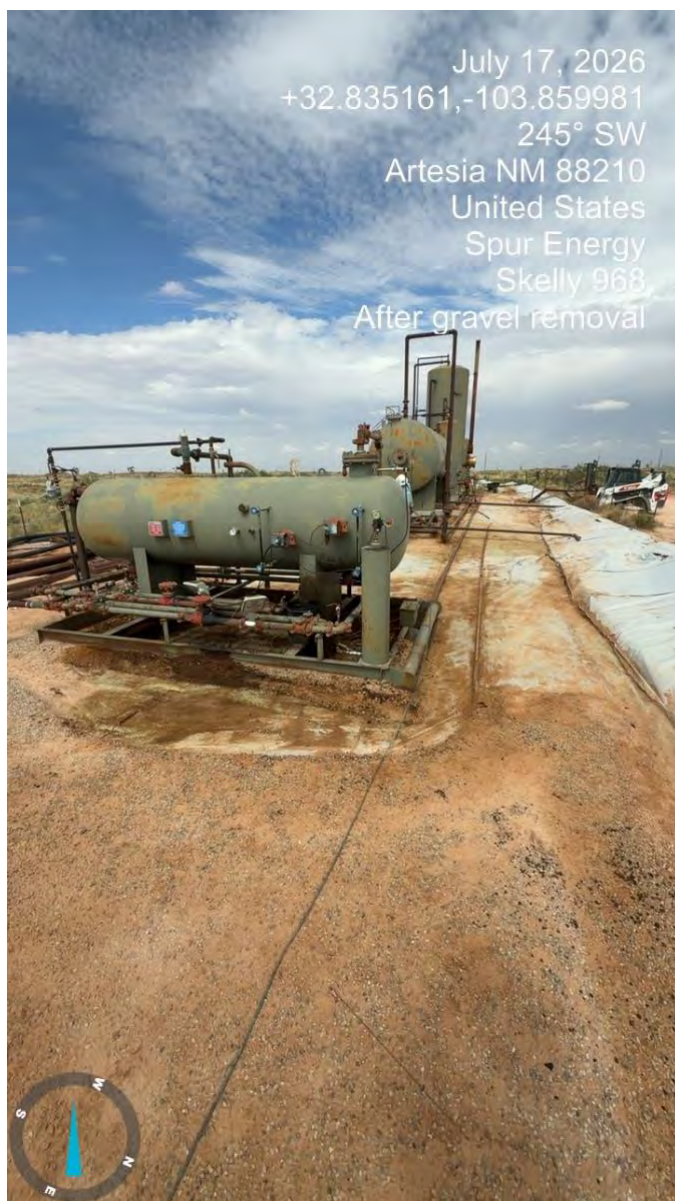
Date: 7/27/26



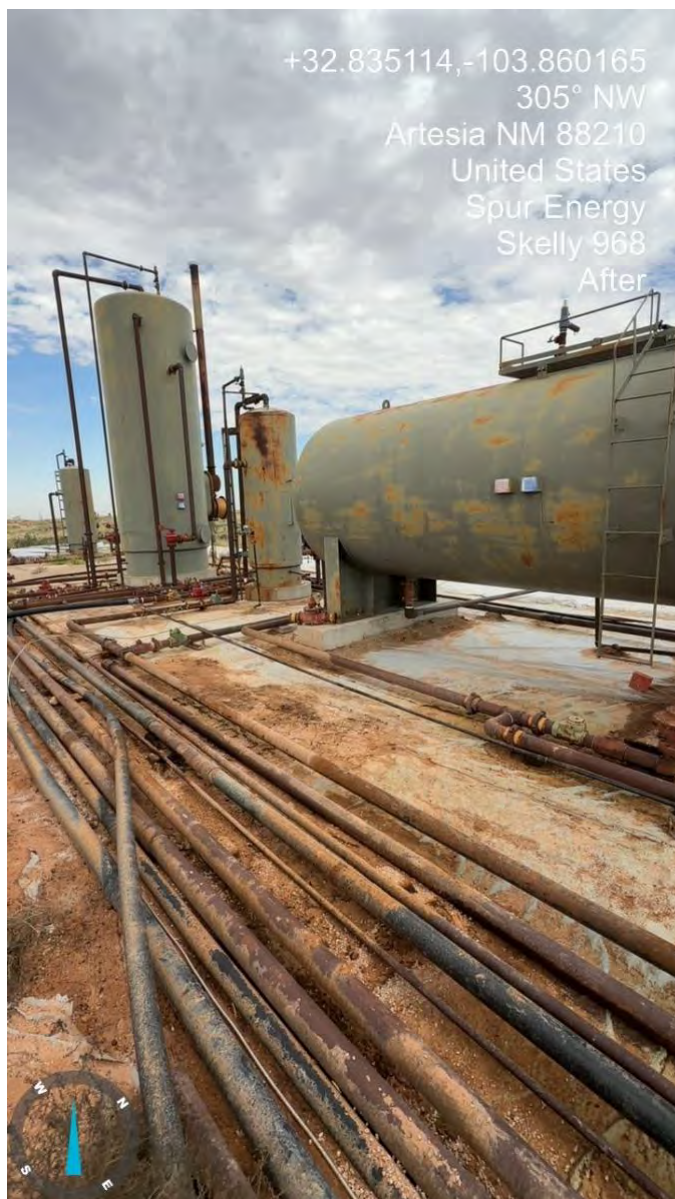
**Photographic Documentation  
Before**



During



Complete





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 615595

**QUESTIONS**

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| Prerequisites    |                                                   |
|------------------|---------------------------------------------------|
| Incident ID (n#) | nAPP2618737789                                    |
| Incident Name    | NAPP2618737789 SKELLY UNIT #968 TB @ F-15-17S-31E |
| Incident Type    | Release Other                                     |
| Incident Status  | Remediation Closure Report Received               |

**Location of Release Source**

Please answer all the questions in this group.

|                         |                     |
|-------------------------|---------------------|
| Site Name               | SKELLY UNIT #968 TB |
| Date Release Discovered | 07/05/2026          |
| 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   Pipeline (Any)   Crude Oil   Released: 1 BBL   Recovered: 1 BBL   Lost: 0 BBL.      |
| Produced Water Released (bbls) Details                                                                                                               | Cause: Corrosion   Pipeline (Any)   Produced Water   Released: 7 BBL   Recovered: 7 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 PPL FROM HEADER TO HEATER RELEASED OIL & PW INTO LINED CONTAINMENT                      |

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 2

Action 615595

**QUESTIONS (continued)**

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| <b>Nature and Volume of Release (continued)</b>                                                                                                                |                                                                                          |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------|
| Is this a gas only submission (i.e. only significant Mcf values reported)                                                                                      | <b>No, according to supplied volumes this does not appear to be a "gas only" report.</b> |
| Was this a major release as defined by Subsection A of 19.15.29.7 NMAC                                                                                         | <b>No</b>                                                                                |
| 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                                                                         | <b>True</b> |
| The impacted area has been secured to protect human health and the environment                                     | <b>True</b> |
| Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices | <b>True</b> |
| All free liquids and recoverable materials have been removed and managed appropriately                             | <b>True</b> |
| If all the actions described above have not been undertaken, explain why                                           | <b>N/A</b>  |

*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<br>Title: EHS Coordinator<br>Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a><br>Date: 08/18/2026 |
|----------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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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, Page 3

Action 615595

**QUESTIONS (continued)**

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

|                                                                                                                                                                                                                                                      |                                |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------|
| <b>Site Characterization</b>                                                                                                                                                                                                                         |                                |
| <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                             |
| <b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>                                                                                                                             |                                |
| 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)                                                                                                                                                                    | Between ½ and 1 (mi.)          |
| An occupied permanent residence, school, hospital, institution, or church                                                                                                                                                                            | Greater than 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 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                                                                                                                                                                                     | Low                            |
| A 100-year floodplain                                                                                                                                                                                                                                | Between ½ and 1 (mi.)          |
| Did the release impact areas not on an exploration, development, production, or storage site                                                                                                                                                         | No                             |

|                                                                                                                                                                                                                                                                                                                                                                                       |            |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|
| <b>Remediation Plan</b>                                                                                                                                                                                                                                                                                                                                                               |            |
| <i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>                                                                                                                                                                                      |            |
| Requesting a remediation plan approval with this submission                                                                                                                                                                                                                                                                                                                           | Yes        |
| <i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>                                                                                                                                                                        |            |
| Have the lateral and vertical extents of contamination been fully delineated                                                                                                                                                                                                                                                                                                          | Yes        |
| Was this release entirely contained within a lined containment area                                                                                                                                                                                                                                                                                                                   | Yes        |
| <i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>                                                                        |            |
| On what estimated date will the remediation commence                                                                                                                                                                                                                                                                                                                                  | 07/07/2026 |
| On what date will (or did) the final sampling or liner inspection occur                                                                                                                                                                                                                                                                                                               | 07/27/2026 |
| On what date will (or was) the remediation complete(d)                                                                                                                                                                                                                                                                                                                                | 07/27/2026 |
| What is the estimated surface area (in square feet) that will be remediated                                                                                                                                                                                                                                                                                                           | 1200       |
| What is the estimated volume (in cubic yards) that will be remediated                                                                                                                                                                                                                                                                                                                 | 10         |
| <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 615595

**QUESTIONS (continued)**

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                     |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Remediation Plan (continued)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                     |
| <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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                     |
| <b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |                                                                                                                                                                     |
| <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<br>Title: EHS Coordinator<br>Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a><br>Date: 08/18/2026 |
| <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 6

Action 615595

**QUESTIONS (continued)**

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| <b>Liner Inspection Information</b>                                                                     |                   |
|---------------------------------------------------------------------------------------------------------|-------------------|
| Last liner inspection notification (C-141L) recorded                                                    | <b>607184</b>     |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | <b>07/27/2026</b> |
| Was all the impacted materials removed from the liner                                                   | <b>Yes</b>        |
| What was the liner inspection surface area in square feet                                               | <b>1200</b>       |

| <b>Remediation Closure Request</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                 |
| Requesting a remediation closure approval with this submission                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <b>Yes</b>                                                                                                                                                                                      |
| Have the lateral and vertical extents of contamination been fully delineated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Yes</b>                                                                                                                                                                                      |
| Was this release entirely contained within a lined containment area                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <b>Yes</b>                                                                                                                                                                                      |
| What was the total surface area (in square feet) remediated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>1200</b>                                                                                                                                                                                     |
| What was the total volume (cubic yards) remediated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>10</b>                                                                                                                                                                                       |
| Summarize any additional remediation activities not included by answers (above)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | <b>THE LINER WAS CLEANED BY REMOVING THE EXISTING GRAVEL, CLEANING IT WITH DEGREASER, AND POWERWASHING IT. THE LINER WAS THEN INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN RELEASES.</b>  |
| <i>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>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                 |
| 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                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>Name: Katherine Purvis</b><br><b>Title: EHS Coordinator</b><br><b>Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a></b><br><b>Date: 08/18/2026</b> |

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CONDITIONS

Action 615595

CONDITIONS

|                                                                                 |                                                                             |
|---------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947                                                            |
|                                                                                 | Action Number:<br>615595                                                    |
|                                                                                 | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

CONDITIONS

| Created By       | Condition                              | Condition Date |
|------------------|----------------------------------------|----------------|
| michael.buchanan | Liner inspection and closure approved. | 8/20/2026      |