

SITE REMEDIATION AND CLOSURE REPORT

REPORTABLE RELEASE

Spur Energy Partners

Bradley 8 Fee #3H

GPS: Latitude 32.6683922 Longitude -104.4028473

Eddy County, NM

Incident ID No. NAPP2113930112

Prepared by:



Paragon Environmental LLC

225 Billy Walker Rd

Hobbs, NM 88240

903-522-0833

General Information

This report was prepared by Paragon Environmental LLC (Paragon) in response to the release for Spur Energy Partners (Spur) at the **Bradley 8 Fee #3H** (Bradley).

Site Coordinates: Latitude: 32.6683922 Longitude: -104.4028473

Unit: UL O, Section 08, Township 19S, Range 26E

Date of Spill: 04/05/2021

Type of Spill: ☒ Crude Oil ☒ Produced Water ☐ Condensate ☐ Other (Specify):

Comments: Reportable release.

Released: 1 bbls of Oil and 9 bbls of Produced Water

Recovered: 1 bbls of Oil and 8 bbls of Produced Water

Incident ID: NAPP2113930112

Depth to Groundwater

According to the New Mexico State of Engineers Office, the nearest water data is less than 1/2 miles away and is 132 feet below ground surface (BGS). See Appendix A for details.

Soil Survey

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). According to the United States Department of Agriculture Natural Resources Conservation Service soil survey, the soil in this area is comprised of the Reagan-Upton association, 0 to 9 percent slopes. The drainage courses in this area are well-drained. There is low potential for karst geology to be present in the area of the Bradley (Appendix B).

Release Description and Assessment

This release was caused by corrosion on a T fitting. The release impacted the well pad and was contained in the falcon-lined containment. A vacuum truck was dispatched to aid in the recovery of the fluids.

Site Assessment and Soil Sampling Results

On December 15, 2021, Paragon sent an Environmental Technician to the site to conduct a Liner inspection and to obtain soil samples. The results of this sampling event are in the following data table and all the laboratory results can be found in Appendix E.

12-15-21 Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100')								
Sample Date 12-15-21		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg	Combined Closure Criteria ≤ 1,000 mg/kg			Closure Criteria ≤ 2,500 mg/kg	Closure Criteria ≤ 20,000 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
N. Comp.	0-6	ND	ND	ND	96	ND	96	80
W. Comp.	0-6	ND	ND	ND	40.3	ND	40.3	1810
S. Comp.	0-6	ND	ND	ND	ND	ND	ND	1800

ND- Analyte Not Detected

The liner was cleaned by another service company prior to the inspection. The 48-hour notification was given to the state on 2-13-22, see Appendix F. During the inspection, there were no obvious rips or tears in the liner to make me believe that the liner needs any repair or has lost the integrity to contain any spilled fluids. The liner report is on the following inspection sheet.



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners

Site: Bradley 8 Fee #3H

Lat/Long: 32.6683922, -104.4028473

NMOCD Incident ID

& Incident Date: NAPP 2113930112 5-13-2021

2-Day Notification

Sent: 12-13-21 at 1:21 pm

Inspection Date: 12-15-21

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: Travis Collins

Inspector Signature: Travis Collins

Remediation Activity Summary

Based on the Liner Inspection and the composite sample results being below closure criteria no remediation is needed for this incident.

Closure Request

After careful review, Paragon respectfully requests that the incident, NAPP2113930112, be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Wayne Brunt at 903-522-0833

or wayne@paragonenvironmental.net.

Respectfully,

Wayne Brunt
Environmental Professional
Paragon Environmental LLC

Attachments

Figures:

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

Appendices:

- Appendix A- Referenced Water Data
- Appendix B- Soil Survey & FEMA Flood Map
- Appendix C- C-141
- Appendix D- Photographic Documentation
- Appendix E- Laboratory Results
- Appendix F- Emails



Figures:

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

Spur Energy

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

W Comp N Comp N Comp
W Comp S Comp
W Comp S Comp
S Comp

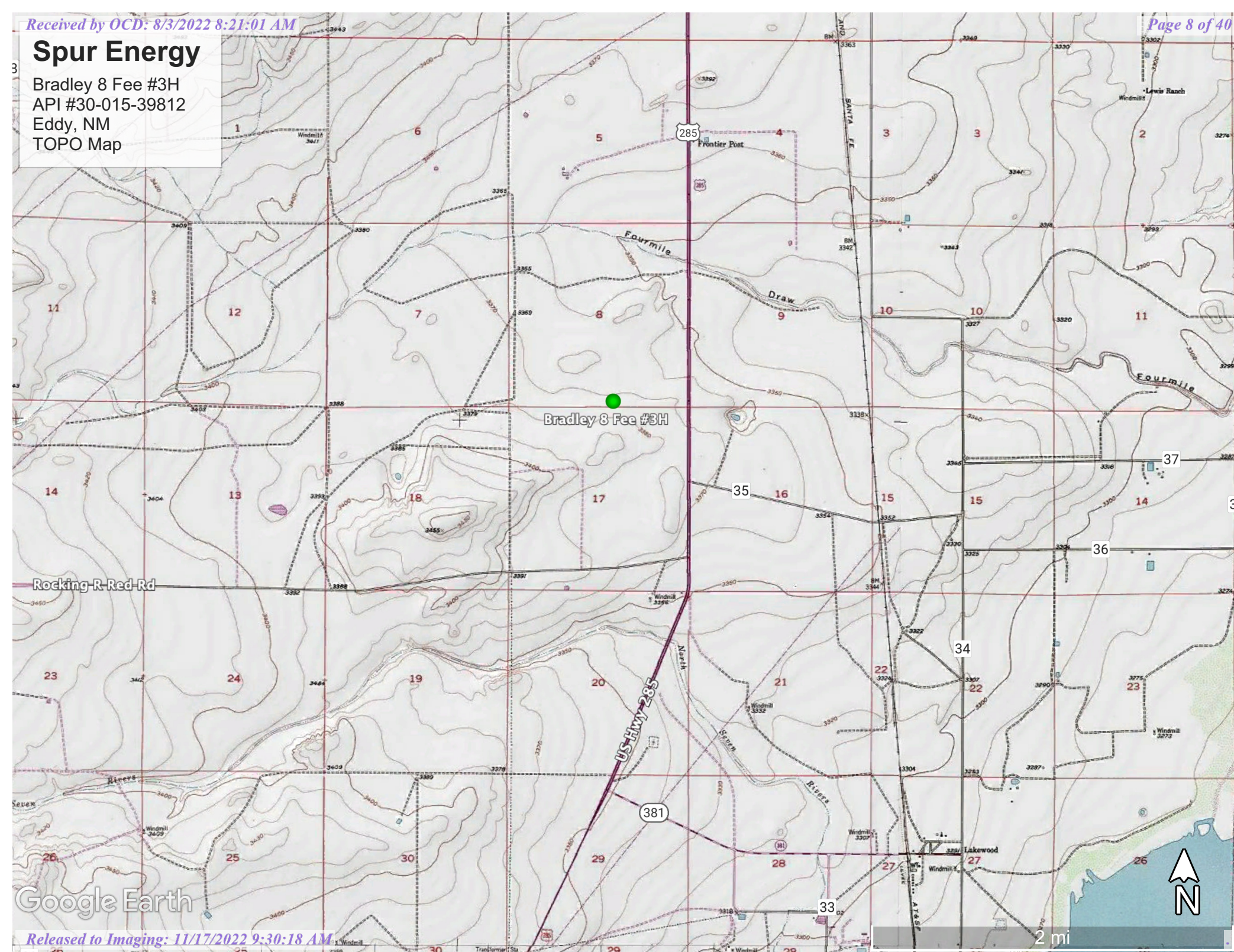
Bradley 8 Fee #3H



100 ft

Spur Energy

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



Spur Energy

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

Legend

- High
- Low
- Medium

Bradley 8 Fee #3H

23

285

37

36

34

381



2 mi

Google Earth

Spur Energy

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

Dayton

285

Bradley 8 Fee #3H

Seven Rivers

Pecos River



5 mi

Google Earth



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	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tw	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
RA 05037		RA	ED	1	2	17	19S		26E	556091	3614436*	265	475	132	343
RA 11018 POD1		RA	ED	3	4	2	17	19S	26E	556396	3613928*	855	260	100	160
Average Depth to Water:														116 feet	
Minimum Depth:														100 feet	
Maximum Depth:														132 feet	

Record Count: 2

UTMNAD83 Radius Search (in meters):

Easting (X): 555992.569

Northing (Y): 3614682.759

Radius: 1500

*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.

12/17/21 10:05 AM

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	Tw	Rng	X	Y		
RA 11018	POD1	3	4	2	17	19S	26E	556396	3613928*		

Driller License:	1632	Driller Company:	HOPPER PUMP & DRILLING, INC.		
Driller Name:	CURRY, CALEB				
Drill Start Date:	08/08/2006	Drill Finish Date:	08/10/2006	Plug Date:	
Log File Date:	08/17/2006	PCW Rcv Date:		Source:	Shallow
Pump Type:		Pipe Discharge Size:		Estimated Yield:	4 GPM
Casing Size:	5.00	Depth Well:	260 feet	Depth Water:	100 feet

Water Bearing Stratifications:		Top	Bottom	Description
		100	130	Sandstone/Gravel/Conglomerate
Casing Perforations:		Top	Bottom	
		100	260	

*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.

12/17/21 10:06 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: R070DY153NM - 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: R070DY159NM - Shallow Loamy
Hydric soil rating: No

Minor Components

Atoka

Percent of map unit: 3 percent
Ecological site: R042XC007NM - Loamy
Hydric soil rating: No

Pima

Percent of map unit: 2 percent
Ecological site: R042XC017NM - Bottomland

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

Hydric soil rating: No

Data Source Information

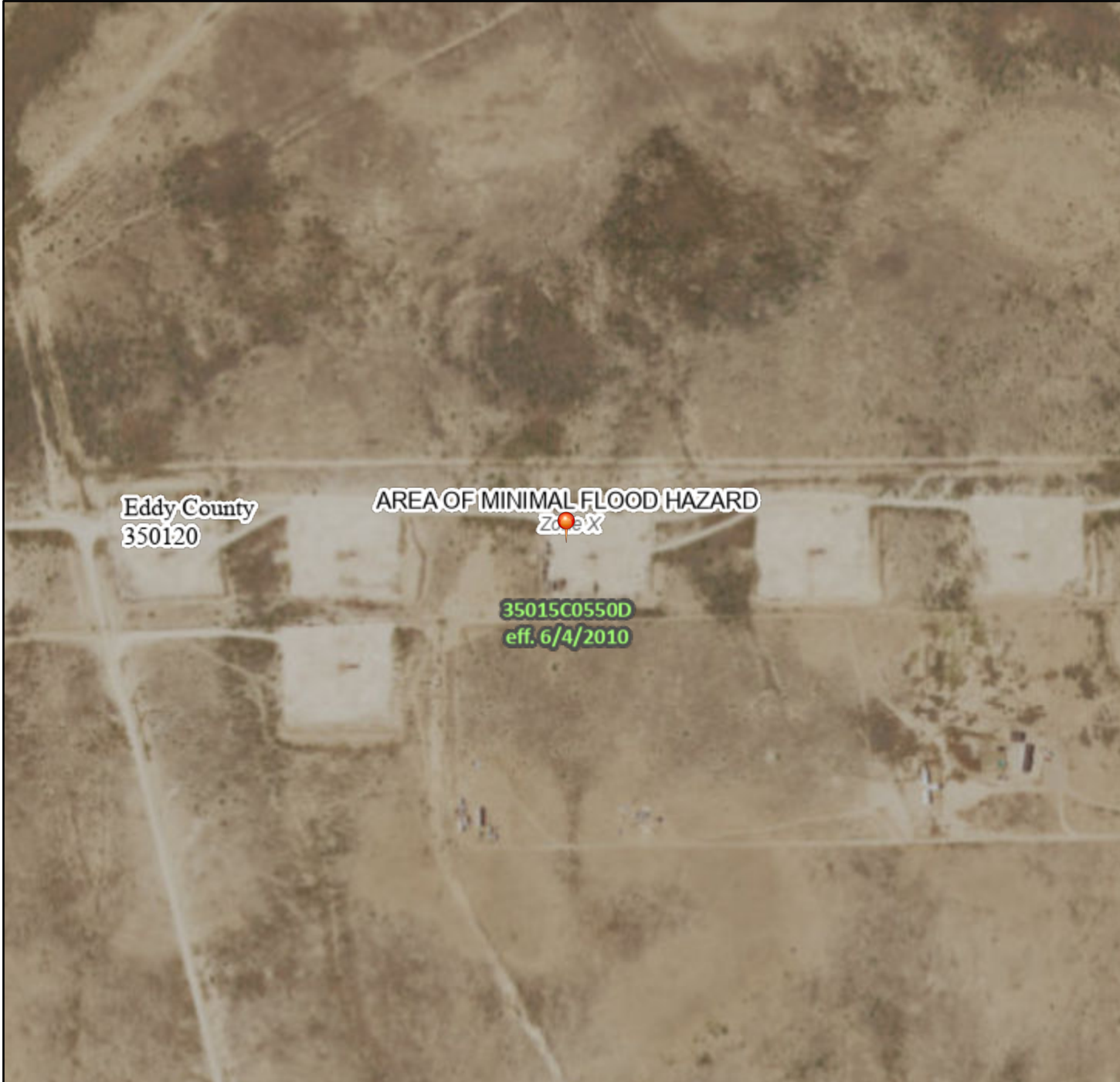
Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 17, Sep 12, 2021

National Flood Hazard Layer FIRMette



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
GENERAL STRUCTURES		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance 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
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 2/14/2022 at 6:05 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:

C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

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

Location of Release Source

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

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

Unit Letter	Section	Township	Range	County

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

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

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


Cause of Release

Incident ID	
District RP	
Facility ID	
Application ID	

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

Initial Response

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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: _____	Title: _____
Signature:  _____	Date: _____
email: _____	Telephone: _____
<u>OCD Only</u>	
Received by: <u>Ramona Marcus</u>	Date: <u>5/19/2021</u>

Bradley 8 Fee #003H Battery 5/13/2021								
ID	Length (Ft)	Width (Ft)	Area (Ft ²)	Depth (Ft)	Soil Type	Volume (Ft ³)		Volume (bbls)
Area #1	16	30	480	0.08	Liner	40.00		7
Area #2	50	13	650	0.17	Clay/Sand	16.25		3
Area #3								
Area #4								
Total Volume:				10	bbls			
Volume of Oil Released:				1	bbls			
Volume of Water Released:				9	bbls			
Volume of Oil Recovered:				1	bbls			
Volume of Water Recovered:				8	bbls			

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 28782

CONDITIONS OF APPROVAL

Operator: SPUR ENERGY PARTNERS LLC Suite 500 Houston, TX77024	9655 Katy Freeway	OGRID: 328947	Action Number: 28782	Action Type: C-141
OCD Reviewer rmarcus	Condition None			

State of New Mexico
Oil Conservation Division

Form C-141

Incident ID	NAPP2113930112
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	132 (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

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

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	NAPP2113930112
District RP	
Facility ID	
Application ID	

and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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

Printed Name: Chad Hensley.

Title: HSE Coordinator

Signature: _____

Date: _____

email: chensley@spurenergy.com

Telephone: 346-339-1494

OCD Only

Received by: Jocelyn Harimon

Date: 08/03/2022

Incident ID	NAPP2113930112
District RP	
Facility ID	
Application ID	

Closure

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


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

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

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

Printed Name: Chad Hensley.

Title: HSE Coordinator

Signature: 

Date:

8/3/2022

email: chensley@spurenergy.com

Telephone: 346-339-1494

OCD Only

Received by: Jocelyn Harimon

Date: 11/17/2022

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: 

Date: 11/17/2022

Printed Name: Jocelyn Harimon

Title: Environmental Specialist

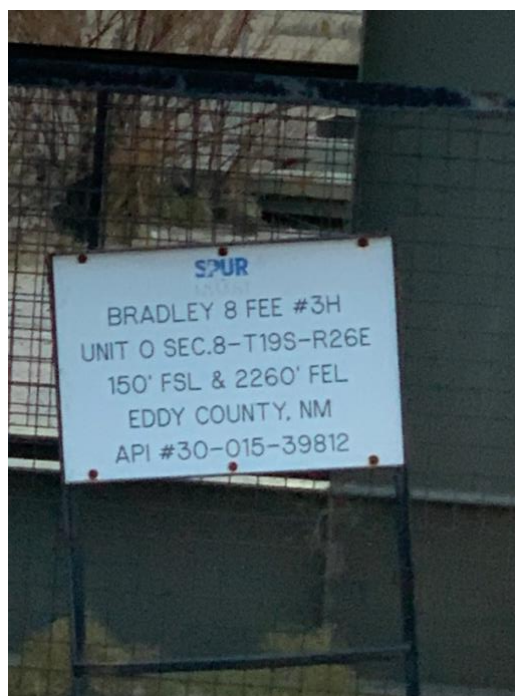


Appendix D:
Photographic Documentation



Photographic Documentation







Appendix E:
Laboratory Results



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

December 20, 2021

CASON SPURLOCK

PARAGON ENVIROMENTAL

5002 CARRAIGE RD

HOBBS, NM 88242

RE: BRADLEY 8 FEE 3H

Enclosed are the results of analyses for samples received by the laboratory on 12/16/21 16:40.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-21-14. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/qa/lab_accred_certif.html.

Cardinal Laboratories is accredited through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 12/16/2021
 Reported: 12/20/2021
 Project Name: BRADLEY 8 FEE 3H
 Project Number: NONE GIVEN
 Project Location: SPUR - EDDY CO NM

Sampling Date: 12/15/2021
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: N COMP (H213650-01)

BTX 8021B		mg / kg		Analyzed By: MS/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/18/2021	ND	1.97	98.7	2.00	8.75		
Toluene*	<0.050	0.050	12/18/2021	ND	1.96	98.2	2.00	9.13		
Ethylbenzene*	<0.050	0.050	12/18/2021	ND	1.95	97.6	2.00	8.88		
Total Xylenes*	<0.150	0.150	12/18/2021	ND	6.01	100	6.00	9.64		
Total BTX	<0.300	0.300	12/18/2021	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.3 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	80.0	16.0	12/17/2021	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/17/2021	ND	224	112	200	7.59	
DRO >C10-C28*	96.0	10.0	12/17/2021	ND	231	116	200	6.51	
EXT DRO >C28-C36	<10.0	10.0	12/17/2021	ND					

Surrogate: 1-Chlorooctane 84.6 % 62-130

Surrogate: 1-Chlorooctadecane 92.3 % 54.5-135

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 12/16/2021
 Reported: 12/20/2021
 Project Name: BRADLEY 8 FEE 3H
 Project Number: NONE GIVEN
 Project Location: SPUR - EDDY CO NM

Sampling Date: 12/15/2021
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: W COMP (H213650-02)

BTX 8021B		mg/kg		Analyzed By: MS/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	12/18/2021	ND	1.97	98.7	2.00	8.75		
Toluene*	<0.050	0.050	12/18/2021	ND	1.96	98.2	2.00	9.13		
Ethylbenzene*	<0.050	0.050	12/18/2021	ND	1.95	97.6	2.00	8.88		
Total Xylenes*	<0.150	0.150	12/18/2021	ND	6.01	100	6.00	9.64		
Total BTX	<0.300	0.300	12/18/2021	ND						

Surrogate: 4-Bromofluorobenzene (PID) 95.1 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1810	16.0	12/17/2021	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/17/2021	ND	224	112	200	7.59	
DRO >C10-C28*	40.3	10.0	12/17/2021	ND	231	116	200	6.51	
EXT DRO >C28-C36	<10.0	10.0	12/17/2021	ND					

Surrogate: 1-Chlorooctane 93.1 % 62-130

Surrogate: 1-Chlorooctadecane 99.1 % 54.5-135

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received: 12/16/2021
 Reported: 12/20/2021
 Project Name: BRADLEY 8 FEE 3H
 Project Number: NONE GIVEN
 Project Location: SPUR - EDDY CO NM

Sampling Date: 12/15/2021
 Sampling Type: Soil
 Sampling Condition: ** (See Notes)
 Sample Received By: Jodi Henson

Sample ID: S COMP (H213650-03)

BTX 8021B		mg/kg		Analyzed By: MS/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	12/18/2021	ND	1.97	98.7	2.00	8.75	
Toluene*	<0.050	0.050	12/18/2021	ND	1.96	98.2	2.00	9.13	
Ethylbenzene*	<0.050	0.050	12/18/2021	ND	1.95	97.6	2.00	8.88	
Total Xylenes*	<0.150	0.150	12/18/2021	ND	6.01	100	6.00	9.64	
Total BTX	<0.300	0.300	12/18/2021	ND					

Surrogate: 4-Bromofluorobenzene (PID) 95.6 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1800	16.0	12/17/2021	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/17/2021	ND	224	112	200	7.59	
DRO >C10-C28*	<10.0	10.0	12/17/2021	ND	231	116	200	6.51	
EXT DRO >C28-C36	<10.0	10.0	12/17/2021	ND					

Surrogate: 1-Chlorooctane 83.8 % 62-130

Surrogate: 1-Chlorooctadecane 87.6 % 54.5-135

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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A handwritten signature in black ink, appearing to read "Celey D. Keene".

Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]



Appendix F:
Email Notification



Cason Spurlock <cason@paragonenvironmental.net>

Spur- Bradley 8 Fee #3H

1 message

Cason <cason@paragonenvironmental.net>

Mon, Dec 13, 2021 at 12:21 PM

To: mike.bratcher@state.nm.us, chad.hensley@state.nm.us, robert.hamlet@state.nm.us

Cc: Braidy Moulder <boulder@spurepllc.com>, Dakota Neel <dneel@spurepllc.com>, Travis Collins <travis@paragonenvironmental.net>

Gentleman,

On behalf of Spur Energy, this is to inform you we will be conducting a liner inspection at the Bradley 8 Fee #3H for Incident NAPP2113930112. The inspection will be conducted on 12-15-21 at app 1pm. If you have any questions or would like to be present please advise.

--

Cason Spurlock
Paragon Environmental
5002 Carriage Rd
Hobbs, NM 88242

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720

District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720

District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

COMMENTS

Action 130963

COMMENTS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 130963
	Action Type: [C-141] Release Corrective Action (C-141)

COMMENTS

Created By	Comment	Comment Date
jharimon	SITE ASESSMENT - CLOSURE	8/3/2022

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 130963

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 130963
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jharimon	None	11/17/2022