



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

September 25th, 2023

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

RE: Liner Inspection and Closure Report
Pebble 8 7 State Com Tank Battery
API No. N/A
GPS: Latitude 32.85474 Longitude -103.68503
UL- B, Section 8, Township 17S, Range 33E
NMOCD Reference No. NAPP2324830573

Spur Energy Partners (Spur) has contracted Pima Environmental Services, LLC (Pima) to perform a liner inspection and prepare this closure report for the release of produced water and crude oil that occurred on the Pebble 8 7 State Com Tank Battery (Pebble). An initial C-141 was submitted on September 5th, 2023, and can be found in Appendix B. This incident was assigned Incident ID NAPP2324830573, by the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

The Pebble is located approximately four and a half (4.56) miles East of Maljamar, NM. This spill site is in Unit B, Section 8, Township 17S, Range 33E, Latitude 32.85474 Longitude -103.68503, Lea County, NM. A Location Map can be found in Figure 1.

Based upon New Mexico Office of the State Engineer well water data, depth to the nearest groundwater in this area is 145 feet below grade surface (BGS). According to the United States Geological Survey well water data, depth to the nearest groundwater in this area is greater than 170.24 feet BGS. See Appendix A for referenced water surveys. The Pebble is in a low karst area (Figure 3). A Topographic Map can be found in Figure 2.

Release Information

NAPP2324830573: On September 2, 2023, a pump failed causing a tank to overflow leading to a release of oil and produced water into the lined containment.

A Site Map can be found in Figure 4.

Site Assessment and Liner Inspection

From August 18-20 and 22, 2023, Pima personnel arrived at the Pebble to conduct a pressure washing event of the impacted area. The standing rainwater was removed using a hydro vacuum and the remaining contaminant was scrubbed and pressure washed. All liquids remained inside the lined containment.

On August 22nd after sending the 48-hour notification via email, Pima Environmental conducted a liner inspection at this location. We concluded that this liner and containment maintained its integrity and was able to retain the fluids. The liner inspection form and photographic documentation can be found in Appendix C.

Closure Request

After careful review, Pima requests that this incident NAPP2324830573 be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Sebastian Orozco at 619-721-4813 or sebastian@pimaoil.com.

Respectfully,

Sebastian Orozco

Sebastian Orozco
Project Manager
Pima Environmental Services, LLC

Attachments

Figures:

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

Appendices:

- Appendix A- Referenced Water Surveys
- Appendix B- C-141 Form & 48 Hour Notification
- Appendix C- Liner Inspection Form & Photographic Documentation



Pima Environmental Services

Figures:

1-Location Map

2-Topographic Map

3-Karst Map

4-Site Map

PEBBLE 8 7 STATE COM TB


SPUR ENERGY PARTNERS


API: N/A

LEA COUNTY, NM

LOCATION MAP

Legend

 4.56 MILES


 PEBBLE 8 7 STATE COM TB

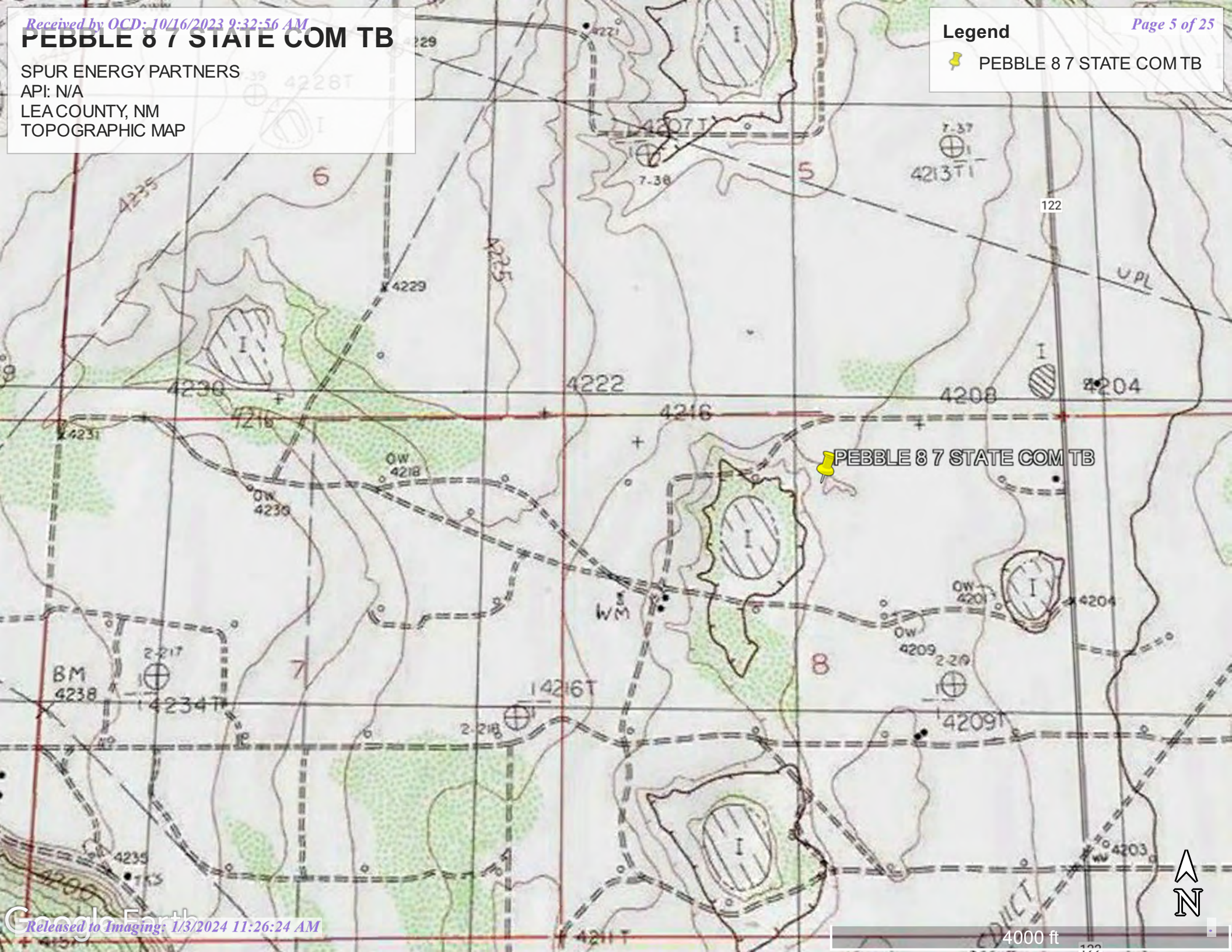


PEBBLE 8 7 STATE COM TB

SPUR ENERGY PARTNERS
API: N/A
LEA COUNTY, NM
TOPOGRAPHIC MAP

Legend

 PEBBLE 8 7 STATE COM TB

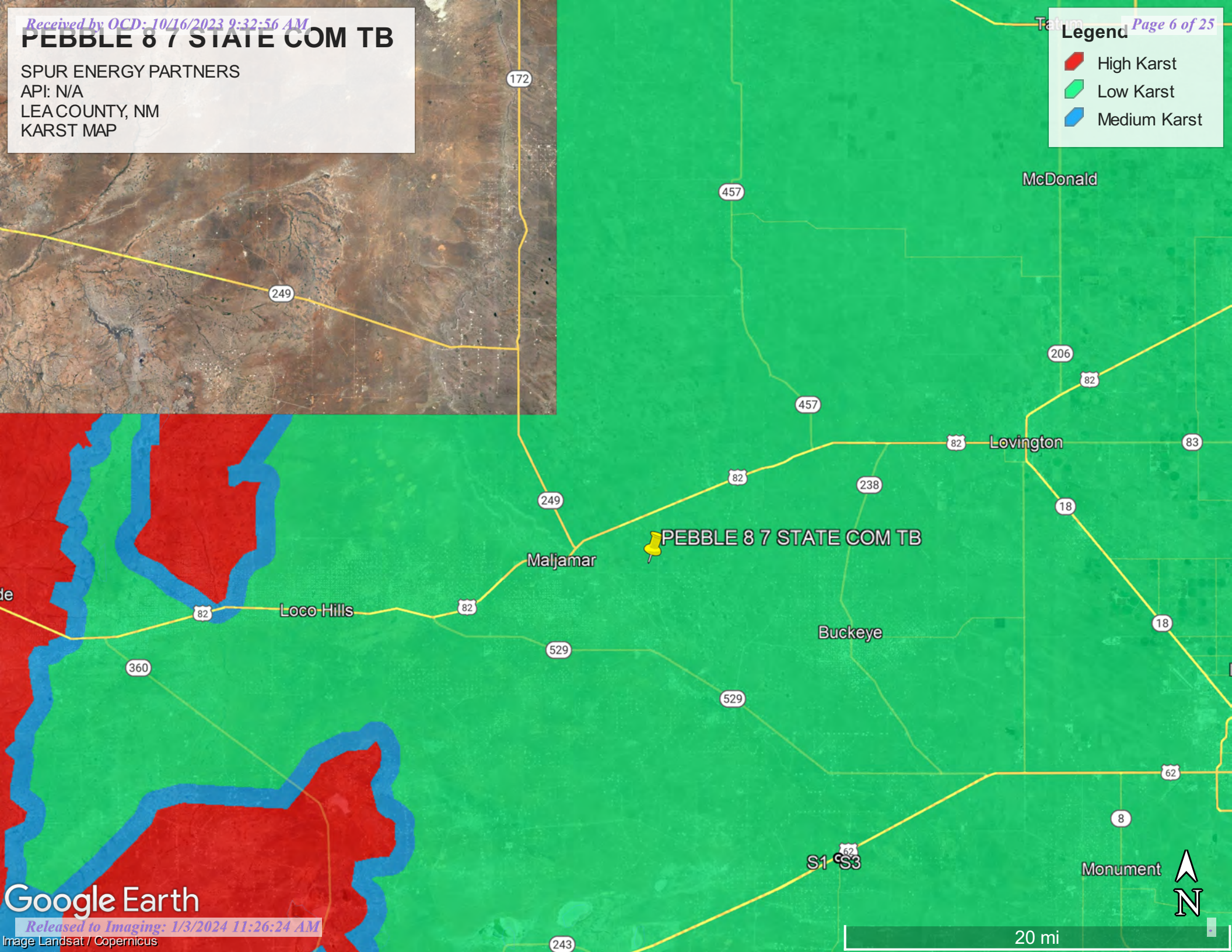


PEBBLE 8 7 STATE COM TB

SPUR ENERGY PARTNERS
API: N/A
LEA COUNTY, NM
KARST MAP

Legend

- High Karst
- Low Karst
- Medium Karst




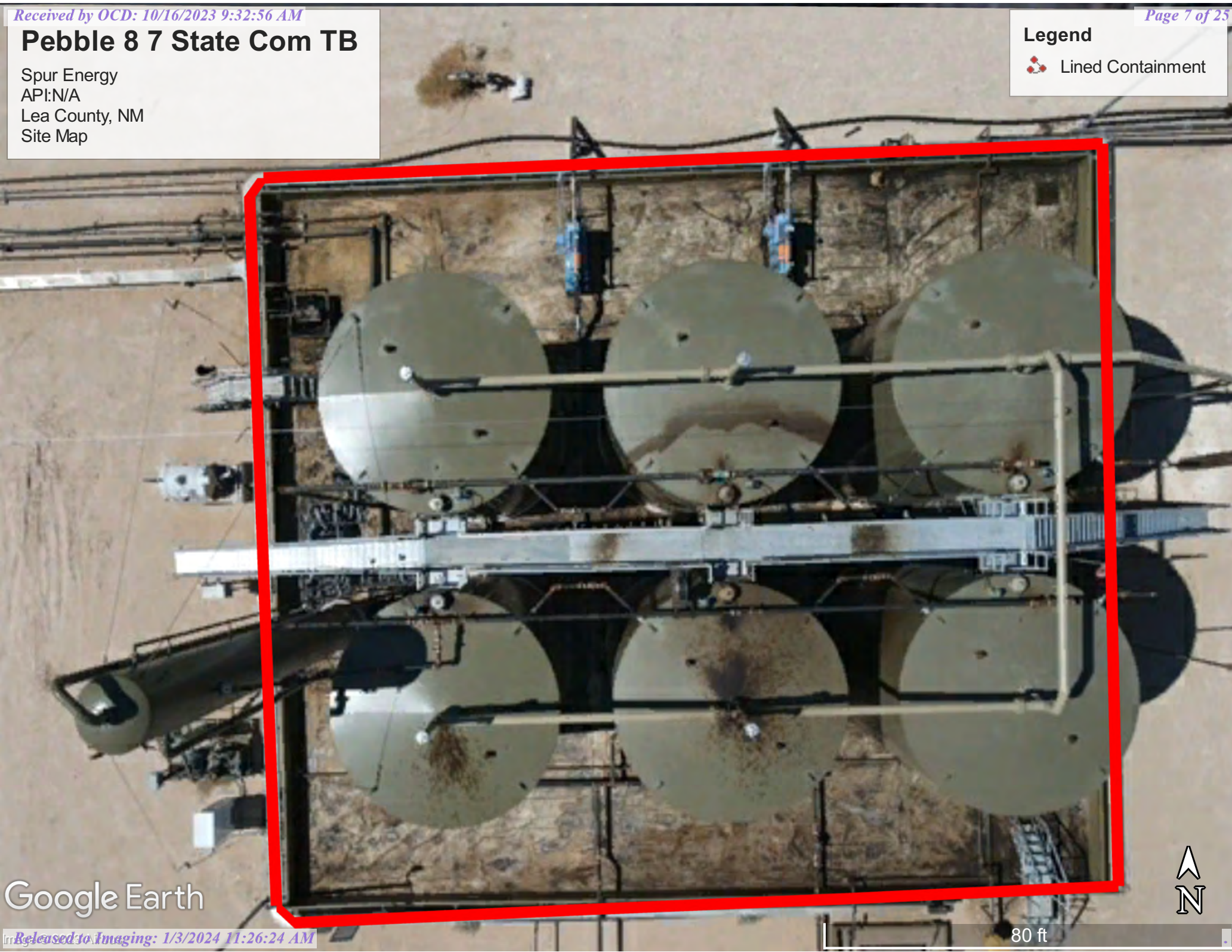
Google Earth

Pebble 8 7 State Com TB

Spur Energy
API:N/A
Lea County, NM
Site Map

Legend

 Lined Containment



Google Earth



Pima Environmental Services

Appendix A

Water Surveys:

OSE

USGS

Surface Water Map



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	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
L 01391 POD8		L	LE	2	2	1	08	17S	33E	622915	3636122	216	274	145	129
L 01391 POD7		L	LE	2	2	2	08	17S	33E	623670	3636047	632	280	172	108
L 04038		L	LE		1	4	08	17S	33E	623226	3635124*	845	245	173	72
L 03528 S2		L	LE	1	3	3	09	17S	33E	623935	3634833*	1427	262	180	82
L 03749		L	LE		3	3	09	17S	33E	624036	3634734*	1568	230	160	70
L 02770 S		L	LE			4	07	17S	33E	621825	3634898*	1610	227	182	45
L 03598 S		L	LE	2	2	2	05	17S	33E	623690	3637642*	1811	272	160	112
L 03726		L	LE	1	2	2	18	17S	33E	621930	3634400*	1909	208	188	20
L 04524		L	LE				06	17S	33E	621387	3636896*	1909	100	90	10
L 04122		L	LE		2	3	07	17S	33E	621216	3635093*	2019	249	214	35
L 03528		L	LE	3	4	4	04	17S	33E	625120	3636261*	2098	265	158	107
L 02770		L	LE			2	18	17S	33E	621836	3634093*	2215	216	179	37
L 03622		L	LE				17	17S	33E	623053	3633703*	2246	226	180	46

Average Depth to Water: **167 feet**

Minimum Depth: **90 feet**

Maximum Depth: **214 feet**

Record Count: 13

UTMNAD83 Radius Search (in meters):

Easting (X): 623045

Northing (Y): 3635949.55

Radius: 2500



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[Contact USGS](#)
[Search USGS](#)

National Water Information System: Web Interface

USGS Water Resources

Data Category:


Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

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

Groundwater levels for the Nation

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

Search Results -- 1 sites found

site_no list =

- 325136103413201

Minimum number of levels = 1

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

USGS 325136103413201 17S.33E.06.42000

Available data for this site

Groundwater: Field measurements

GO

Lea County, New Mexico

Hydrologic Unit Code 13070007

Latitude 32°51'42", Longitude 103°41'45" NAD27

Land-surface elevation 4,224.10 feet above NGVD29

This well is completed in the High Plains aquifer (N100HGHPLN) national aquifer.

This well is completed in the Ogallala Formation (121OGLL) local aquifer.

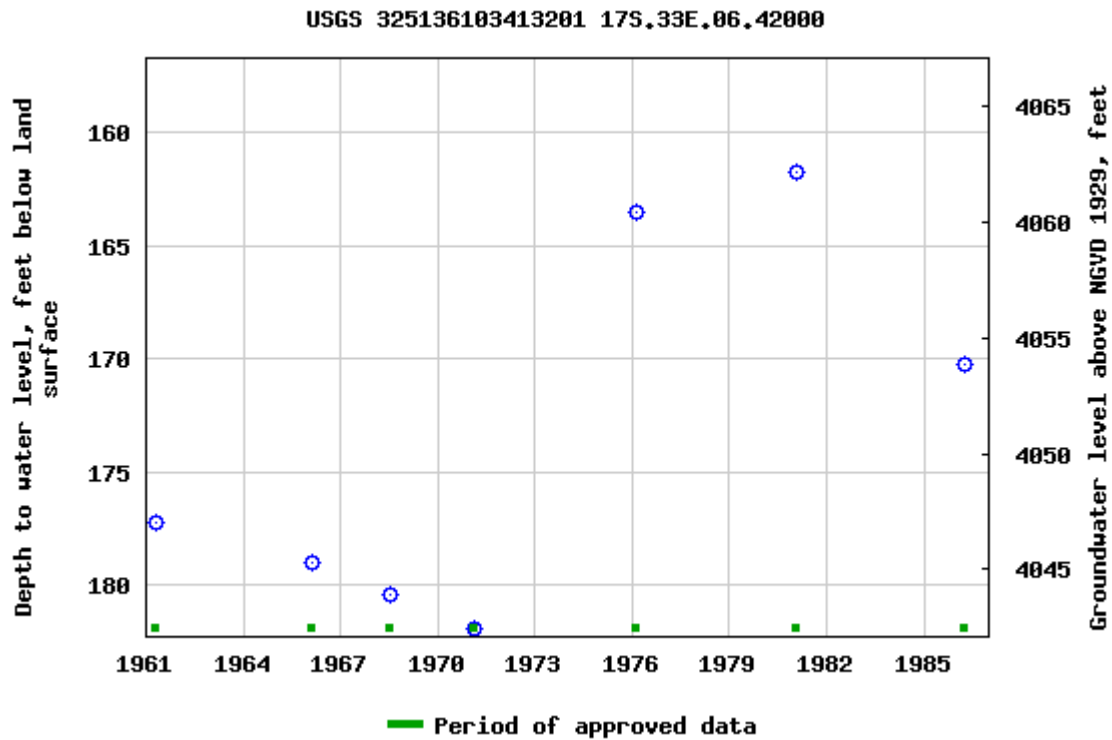
Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)



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

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Title: Groundwater for USA: Water Levels

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



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



Page Last Modified: 2023-09-25 15:23:58 EDT

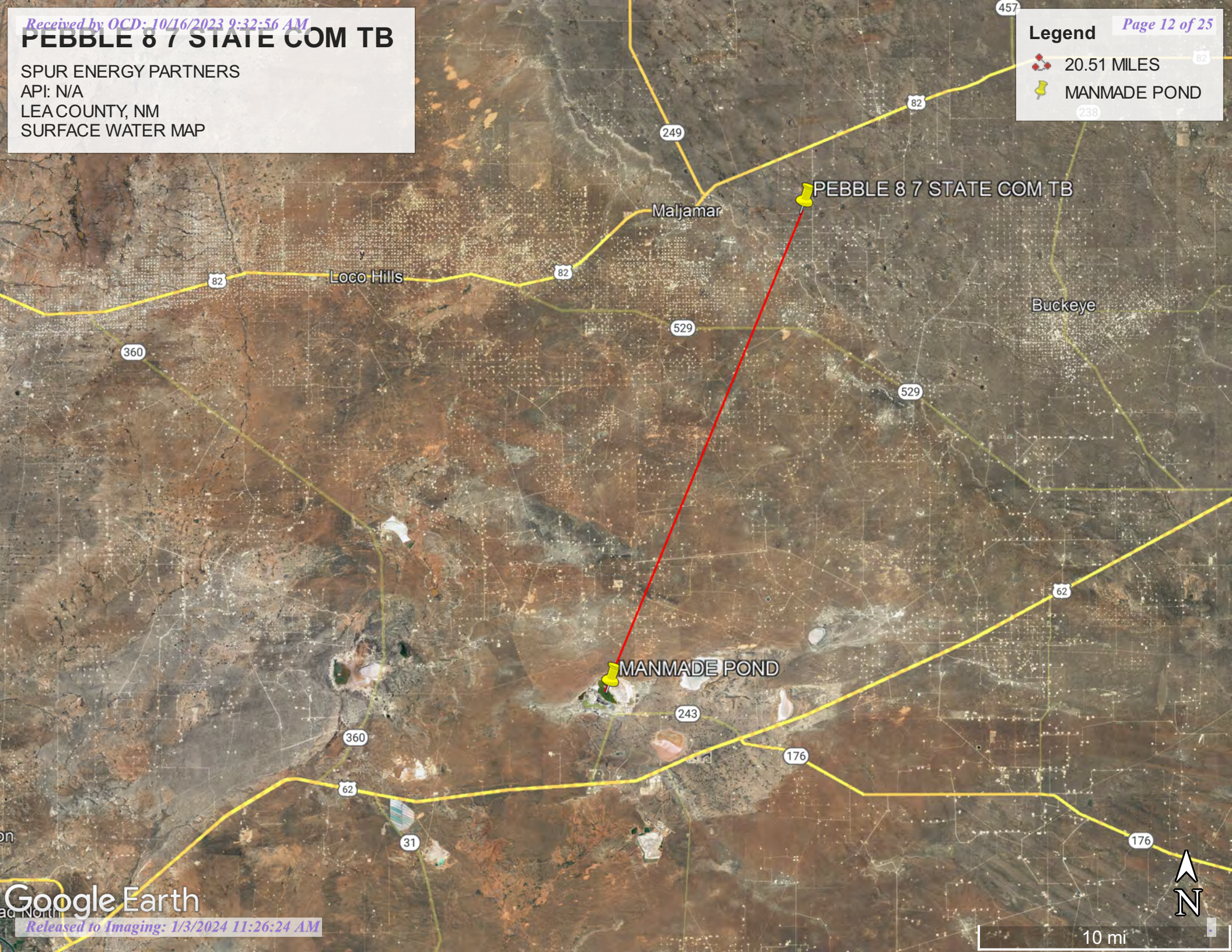
0.6 0.53 nadww02

PEBBLE 8 7 STATE COM TB

SPUR ENERGY PARTNERS
API: N/A
LEA COUNTY, NM
SURFACE WATER MAP

Legend

-  20.51 MILES
-  MANMADE POND





Pima Environmental Services

Appendix C

C-141 Form

48-Hour Notification

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	nAPP2324830573
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Spur Energy Partners LLC	OGRID	328947
Contact Name	Katherine Purvis	Contact Telephone	(575) 441-8619
Contact email	katherine.purvis@spurenergy.com	Incident # (assigned by OCD)	nAPP2324830573
Contact mailing address	9655 Katy Freeway; Houston, TX 77024		

Location of Release Source

Latitude 32.85474 Longitude -103.68503
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	PEBBLE 8 7 STATE COM TANK BATTERY	Site Type	BATTERY
Date Release Discovered	09/02/2023	API# (if applicable)	N/A

Unit Letter	Section	Township	Range	County
B	8	17S	33E	LEA

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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 20 BBLS	Volume Recovered (bbls) 19 BBLS
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 25 BBLS	Volume Recovered (bbls) 24 BBLS
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" 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

PUMP FAILURE CAUSED A TANK TO OVERFLOW RELEASING OIL AND PRODUCED WATER INTO LINED CONTAINMENT

Incident ID	nAPP2324830573
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? THE RELEASE IS GREATER THAN 25 BBLS.
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? YES, BY KATHY PURVIS OF SPUR ENERGY VIA NOR SUBMISSION TO THE NMOCD PERMITTING PORTAL ON 09/05/2023	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" 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: N/A	
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: Kathy Purvis	Title: EHS Coordinator
Signature: <u>Kathy Purvis</u>	Date: 09/05/2023
email: katherine.purvis@spurenergy.com	Telephone: (575) 441-8619
<u>OCD Only</u>	
Received by: _____	Date: _____

Incident ID	nAPP2324830573
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?	<u>145</u> (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 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.

Incident ID	nAPP2324830573
District RP	
Facility ID	
Application ID	

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

Printed Name: Katherine Purvis

Title: EHS Coordinator

Signature: Katherine Purvis

Date: 10/16/2023

email: katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: Shelly Wells

Date: 10/16/2023

Incident ID	nAPP2324830573
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: Katherine Purvis Title: EHS Coordinator

Signature: Katherine Purvis Date: 10/16/2023

email: katherine.purvis@spurenergy.com Telephone: 575-441-8619

OCD Only

Received by: Shelly Wells Date: 10/16/2023

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: Scott Rodgers Date: 01/03/2024

Printed Name: Scott Rodgers Title: Environmental Specialist Adv.

Sebastian@pimaoil.com

From: sebastian@pimaoil.com
Sent: Tuesday, September 19, 2023 1:40 PM
To: ocd.enviro@emnrd.nm.gov
Cc: tom@pimaoil.com; 'Lynsey Coons'
Subject: Pebble 8 7 State Com Tank Battery (NAPP2324830573) - Liner Inspection 48 Hour Notification

Good afternoon,

Pima Environmental will be conducting a liner inspection at the Pebble 8 7 State Com Tank Battery (NAPP2324830573), on Friday September 22nd, 2023. Pima personnel will be on location roughly at 6 am. Thank you.

Respectfully,
Sebastian Orozco
Project Manager
5614 N Lovington Hwy,
Hobbs, NM 88240
Sebastian@pimaoil.com
619-721-4813 cell



Pima Environmental Services, LLC



Pima Environmental Services

Appendix D

Liner Inspection Form

Photographic Documentation



Pima Environmental Services, LLC

Liner Inspection FormCompany Name: Spur EnergySite: Pebble 8 7 State Com Tank BatteryLat/Long: 32.85474, -103.68503NMOCD Incident ID
& Incident Date: NAPP2324830573 9/02/20232-Day Notification
Sent: via Email by Sebastian Orozco 9/19/2023Inspection Date: 9/22/2023

Liner Type:	Earthen w/liner	Earthen no liner	Polystar
	Steel w/poly liner	Steel w/spray epoxy	No Liner

Other: _____

Visualization	Yes	No	Comments
Is there a tear in the liner?		X	
Are there holes in the liner?		X	
Is the liner retaining any fluids?		X	
Does the liner have integrity to contain a leak?	X		

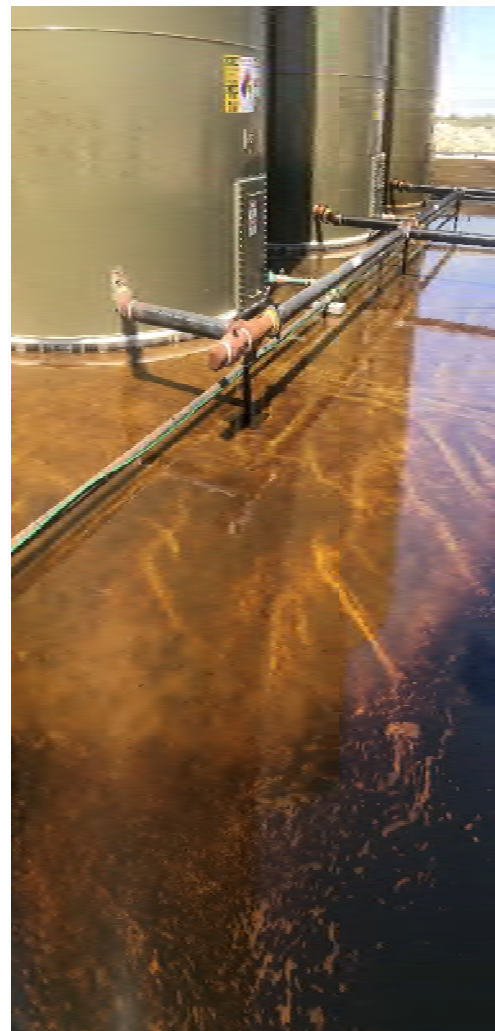
Comments: _____

Inspector Name: Andrew Franco Inspector Signature: Andrew Franco



**SITE PHOTOGRAPHS
SPUR ENERGY PARTNERS
Pebble 8 7 State Com TB**

Pre-Treatment:





Liner Inspection:





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 275889

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 275889
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	None	1/3/2024