

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

| Length(Ft)                    | Width(Ft)                   | Depth(In)         |
|-------------------------------|-----------------------------|-------------------|
| 59.000                        | 35.000                      | 1.000             |
| Cubic Feet Impacted           |                             | 172.083           |
| Barrels                       |                             | 30.65             |
| Soil Type                     |                             | Lined Containment |
| Bbls Assuming 100% Saturation |                             | 30.65             |
| Saturation                    | Fluid present when squeezed |                   |
| Estimated Barrels Released    |                             | 15.40000          |

**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) | 59    |
| Width (ft)  | 35    |
| Depth (in)  | 1.000 |









July 29<sup>th</sup>, 2025

NMOCD District 2  
Mr. Mike Bratcher  
Artesia, NM 88210

**Re: Site Assessment, Remediation, and Closure Request**  
**Bradley 8 Fee 3H**  
**API No. N/A**  
**GPS: Latitude 32.66839 Longitude -104.40284**  
**U/L "O," Sec. 08, T19S, R26E**  
**Eddy County, NM**  
**NMOCD Ref. No. nAPP2100543121**

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

| Release Details  |                |  |            |
|--|----------------|--|------------|
| <b>Type of Release:</b>  | Produced Water | <b>Volume of Release:</b>                    | 15.5 bbls  |
|  |                | <b>Volume Recovered:</b>                     | 15 bbls    |
| <b>Source of Release:</b>  | Valve Failure  | <b>Date of Release:</b>                      | 12/28/2020 |
| <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>  | Private        | <b>Mineral Owner:</b>                        | Private    |
| A pin hole developed in a 4" valve causing a release into the lined containment. |                |  |            |

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

## REGULATORY FRAMEWORK & SITE CHARACTERIZATION

Surface impacts from unauthorized releases of fluids or gases are generally regulated by the New Mexico Oil Conservation Division (NMOCD) in accordance with 19.15.29 of the New Mexico Administrative Code (NMAC). 19.15.29 NMAC establishes reporting, site assessment/characterization, remediation, closure, variance, and enforcement procedures. Table I of 19.15.29.12 NMAC determines the closure criteria for soils impacted by a release based on depth to groundwater and the following characteristics:

- Depth to Groundwater in the affected area 100-500'
- Method to determine DTW NM OSE
- Did the release impact groundwater or surface water No

Depth to groundwater information is provided in Appendix A.

What are the minimum distances between the closest lateral extents of the release and the following surface areas:

- A Continuously flowing watercourse or any other significant watercourse- 1/2 mile-1 mile
- Any lakebed, sinkhole, or playa lake- 1-5 mi
- An occupied permanent residence, school, hospital, institution, or church- 1-5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes- 1-5 mi
- Any other fresh water well or spring- 1-5 mi
- Incorporated municipal boundaries or a defined municipal fresh water well field- 1-5 mi
- A wetland- 1/2-1 mi
- A subsurface mine- >5 mi
- An (non-karst) unstable area- >5 mi
- Categorize the risk of this well/site being in a karst area geology- Medium
- A 100-year floodplain- 1-5 mi
- Did the release impact areas not on an exploration, development, production, or storage site- No

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Piedmont alluvial deposits (Holocene to lower Pleistocene)—Includes deposits of higher gradient tributaries bordering major stream valleys, alluvial veneers of the piedmont slope, and alluvial fans. May locally include uppermost Pliocene deposits (QP). The soil in this area is made up of Reagan-Upton Association, with 0 to 9 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage course in this area is well drained.

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

### INITIAL SITE ASSESSMENT

On January 7<sup>th</sup>, 2021, Paragon went to the Bradley and conducted an initial site assessment. During the initial site assessment, it was determined that Paragon would perform a liner clean to remove all the contaminants from the liner.

A Site Map is provided in Figure #1.

### REMEDIATION ACTIVITIES

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

- On January 14<sup>th</sup> 2021, utilizing a power washer, a vacuum truck and a hand crew, Paragon was able to remove all the contamination from the containment. Upon finishing this we scheduled a liner inspection to close out the spill. We performed a liner inspection on July 28<sup>th</sup>, 2025, the results of this inspection concluded that the liner was in good condition and had the integrity to contain a spill.

Liner inspection attached in appendix D.

### CLOSURE REQUEST

After careful review, Paragon requests that the incident, nAPP2100543121, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

If you have any questions or need additional information, please get in touch with Tristan Jones by phone at (575)318-6841 or email at [tristan@paragonenvironmental.net](mailto:tristan@paragonenvironmental.net).

Respectfully,



Tristan Jones  
Project Manager  
Paragon Environmental, LLC



Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



### Attachments

#### **Figures:**

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

#### **Appendices:**

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





Figures:



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



# Spur Energy Partners

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

## Legend

-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H





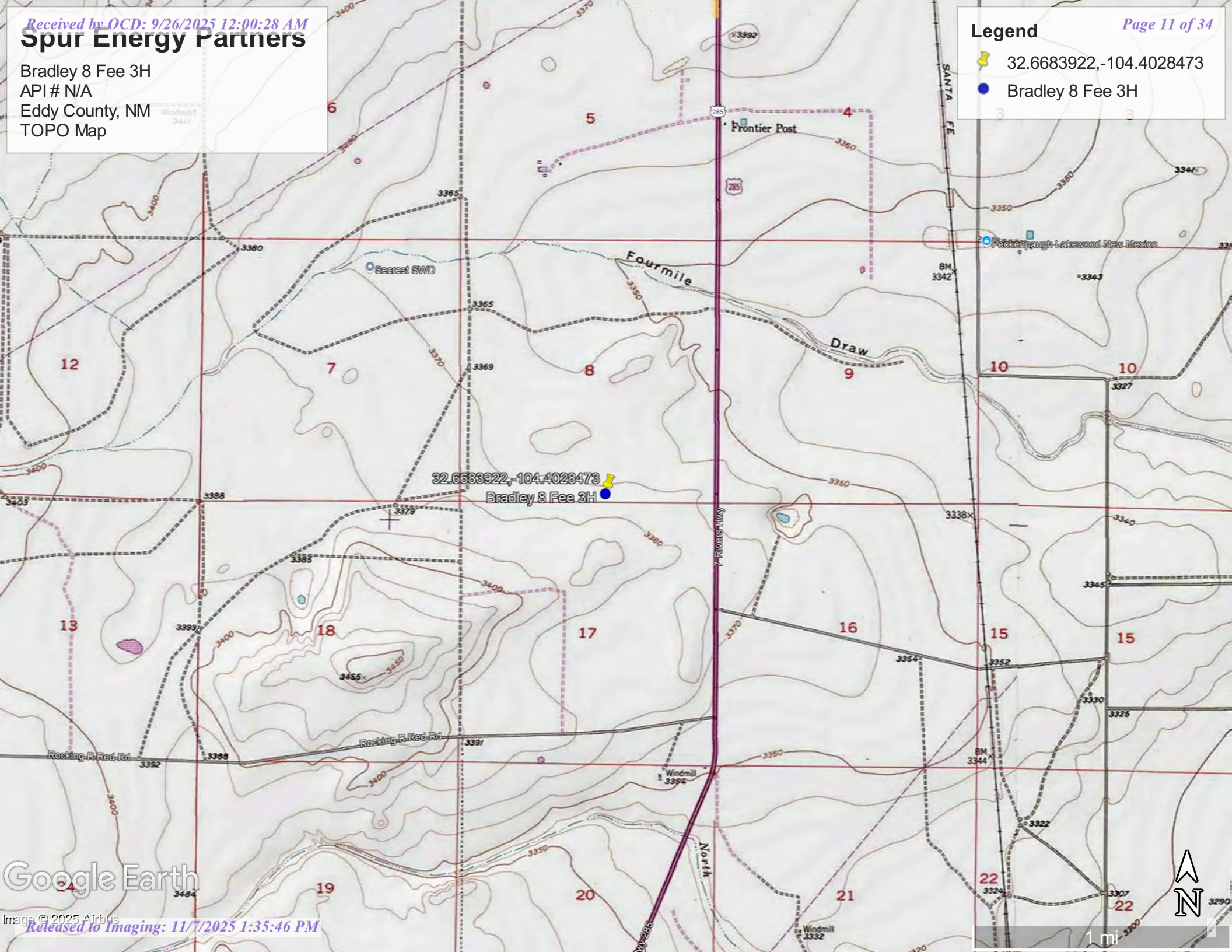


# Spur Energy Partners

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

## Legend

-  32.6683922,-104.4028473
-  Bradley 8 Fee 3H





# Spur Energy Partners

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

## Legend

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

32.6683922,-104.4028473  
Bradley 8 Fee 3H







2 mi



# Spur Energy Partners

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

## Legend

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







Appendix A  
Referenced Water Data:

New Mexico State of Engineers Office



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

(quarters are smallest to largest)

(NAD83 UTM in meters)

(In feet)

**POD Number**RA 05037RA 11018 POD1

Average Depth to Water:

**116 feet**

Minimum Depth:

**100 feet**

Maximum Depth:

**132 feet**

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 555992.687

**Northing (Y):** 3614682.883

**Radius:** 1600

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

1/9/23 11:39 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) |          |
| <b>Well Tag</b>                       | <b>POD Number</b> | <b>Q64</b>                         | <b>Q16</b>    | <b>Q4</b>                     | <b>Sec</b> | <b>Tws</b>                         | <b>Rng</b> | <b>X</b>              | <b>Y</b> |
|                                       | RA 05037          |                                    | 1             | 2                             | 17         | 19S                                | 26E        | 556091                | 3614436* |
| <hr/>                                 |                   |                                    |               |                               |            |                                    |            |                       |          |
| <b>Driller License:</b>               | 28                | <b>Driller Company:</b>            |               | SMITH, A.F.                   |            |                                    |            |                       |          |
| <b>Driller Name:</b>                  | SMITH, A.F.       |                                    |               |                               |            |                                    |            |                       |          |
| <b>Drill Start Date:</b>              | 09/14/1964        | <b>Drill Finish Date:</b>          |               | 09/28/1964                    |            | <b>Plug Date:</b>                  |            |                       |          |
| <b>Log File Date:</b>                 | 11/20/1964        | <b>PCW Rev Date:</b>               |               |                               |            | <b>Source:</b>                     |            | Shallow               |          |
| <b>Pump Type:</b>                     |                   | <b>Pipe Discharge Size:</b>        |               |                               |            | <b>Estimated Yield:</b>            |            |                       |          |
| <b>Casing Size:</b>                   | 7.00              | <b>Depth Well:</b>                 |               | 475 feet                      |            | <b>Depth Water:</b>                |            | 132 feet              |          |
| <hr/>                                 |                   |                                    |               |                               |            |                                    |            |                       |          |
| <b>Water Bearing Stratifications:</b> |                   | <b>Top</b>                         | <b>Bottom</b> | <b>Description</b>            |            |                                    |            |                       |          |
|                                       |                   | 150                                | 232           | Sandstone/Gravel/Conglomerate |            |                                    |            |                       |          |
| <hr/>                                 |                   |                                    |               |                               |            |                                    |            |                       |          |
| <b>Casing Perforations:</b>           |                   | <b>Top</b>                         | <b>Bottom</b> |                               |            |                                    |            |                       |          |
|                                       |                   | 202                                | 232           |                               |            |                                    |            |                       |          |
| <hr/>                                 |                   |                                    |               |                               |            |                                    |            |                       |          |

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

1/9/23 11:39 AM

POINT OF DIVERSION SUMMARY





Appendix B  
Soil Survey:

U.S.D.A.  
FEMA Flood Map

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

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## 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

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

### Description of Upton

#### Setting

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

#### Typical profile

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

#### Properties and qualities

*Slope:* 0 to 9 percent  
*Depth to restrictive feature:* 7 to 20 inches to petrocalcic  
*Drainage class:* Well drained  
*Runoff class:* High  
*Capacity of the most limiting layer to transmit water (Ksat):* Low to moderately high (0.01 to 0.60 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 75 percent  
*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Very low (about 1.4 inches)

#### Interpretive groups

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

### Minor Components

#### Atoka

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

#### Pima

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

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

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*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 18, Sep 8, 2022

# National Flood Hazard Layer 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)<br><i>Zone A, V, A99</i>  |
|                             |  | With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i>   |
|                             |  | 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 <i>Zone X</i> |
|                             |  | Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>  |
|                             |  | Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i>  |
|                             |  | Area with Flood Risk due to Levee <i>Zone D</i>  |
|                             |  | Area of Minimal Flood Hazard <i>Zone X</i>   |
| OTHER AREAS                 |  | Effective LOMRs  |
|                             |  | Area of Undetermined Flood Hazard <i>Zone D</i>  |
| GENERAL STRUCTURES          |  | Channel, Culvert, or Storm Sewer   |
|                             |  | Levee, Dike, or Floodwall  |
| OTHER FEATURES              |  | 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation  |
|                             |  | 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation  |
|                             |  | Coastal Transect   |
|                             |  | Base Flood Elevation Line (BFE)  |
|                             |  | Limit of Study   |
|                             |  | Jurisdiction Boundary  |
|                             |  | Coastal Transect Baseline  |
| MAP PANELS                  |  | Digital Data Available   |
|                             |  | No Digital Data Available  |
|                             |  | Unmapped   |

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **1/9/2023 at 1:40 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



Appendix C:

NMOCD Notification

Photographic Documentation

OCD Permitting

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

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

Submission Information

|                 |  |            |         |
|-----------------|--|------------|---------|
| Submission ID:  | 488107   | Districts: | Artesia |
| Operator:       | [328947] Spur Energy Partners LLC  | Counties:  | Eddy    |
| Description:    | Spur Energy Partners LLC [328947]<br>, BRADLEY 8 FEE #003H<br>, nAPP2100543121 |            |         |
| Status:         | APPROVED   |            |         |
| Status Date:    | 07/23/2025   |            |         |
| References (0): |  |            |         |

Foms

This application type does not have attachments.

Questions

Prerequisites

|                  |   |
|------------------|---|
| Incident ID (n#) | nAPP2100543121                                    |
| Incident Name    | NAPP2100543121 BRADLEY 8 FEE #003H @ 30-015-39812 |
| Incident Type    | Produced Water Release                            |
| Incident Status  | Initial C-141 Approved                            |
| Incident Well    | [30-015-39812] BRADLEY 8 FEE #003H                |

Location of Release Source

|                         |                     |
|-------------------------|---------------------|
| Site Name               | BRADLEY 8 FEE #003H |
| Date Release Discovered | 12/28/2020          |
| Surface Owner           | Private             |

Liner Inspection Event Information

Please answer all the questions in this group.

|   |                            |
|---|----------------------------|
| What is the liner inspection surface area in square feet  | 9,500                      |
| Have all the impacted materials been removed from the liner   | Yes                        |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC       | 07/28/2025                 |
| Time liner inspection will commence   | 08:00 AM                   |
| <div>Warning: Notification can not be less than two business days prior to conducting liner inspection.</div> |                            |
| Please provide any information necessary for observers to liner inspection                                    | tristan jones 575-318-6841 |
| Please provide any information necessary for navigation to liner inspection site                              | 32.6683922,-104.4028473    |

Searches    Operator Data    Hearing Fee Application

Comments

No comments found for this submission.

Conditions

**Summary:**      *tristanjones (7/23/2025)*, Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.

Reasons

No reasons found for this submission.

Go Back





**Photographic Documentation  
Before**





Photographic Documentation  
Liner Inspection







Appendix D:  
Liner Inspection



Paragon Environmental LLC

**Liner Inspection Form**

Company Name: Spur Energy Partners \_\_\_\_\_

Site: Bradley 8 Fee 3H \_\_\_\_\_

Lat/Long: 32.66839,-104.40285 \_\_\_\_\_

NMOCD Incident ID  
& Incident Date: nAPP2100543121 & 12/28/2020 \_\_\_\_\_2-Day Notification  
Sent: 7/23/2025 \_\_\_\_\_

Inspection Date: 7/28/2025 \_\_\_\_\_

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

Other: \_\_\_\_\_

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

Comments: Liner is in good working condition. \_\_\_\_\_

Inspector Name: Tristan Jones \_\_\_\_\_ Inspector Signature: \_\_\_\_\_

A handwritten signature in black ink, appearing to read 'Tristan Jones', is written over a light blue circular stamp.

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 509470

**QUESTIONS**

|   |   |
|---|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947  |
|   | Action Number:<br>509470  |
|   | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

|                      |   |
|----------------------|---|
| <b>Prerequisites</b> |   |
| Incident ID (n#)     | nAPP2100543121                                    |
| Incident Name        | NAPP2100543121 BRADLEY 8 FEE #003H @ 30-015-39812 |
| Incident Type        | Produced Water Release                            |
| Incident Status      | Remediation Closure Report Received               |
| Incident Well        | [30-015-39812] BRADLEY 8 FEE #003H                |

**Location of Release Source**

Please answer all the questions in this group.

|                         |                     |
|-------------------------|---------------------|
| Site Name               | BRADLEY 8 FEE #003H |
| Date Release Discovered | 12/28/2020          |
| Surface Owner           | Private             |

**Incident Details**

Please answer all the questions in this group.

|  |                        |
|--|------------------------|
| Incident Type  | Produced Water Release |
| 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  | Not answered.  |
| Produced Water Released (bbls) Details   | Cause: Other   Dump Valve   Produced Water   Released: 16 BBL   Recovered: 15 BBL   Lost: 1 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) | Not answered.  |

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 509470

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947  |
|   | Action Number:<br>509470  |
|   | 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: 09/25/2025 |
|--|---|

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**State of New Mexico**  
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**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 509470

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947  |
|   | Action Number:<br>509470  |
|   | 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 100 and 500 (ft.)      |
| What method was used to determine the depth to ground water  | NM OSE iWaters Database Search |
| Did this release impact groundwater or surface water   | No                             |
| <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  | Between ½ and 1 (mi.)          |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)  | Between 1 and 5 (mi.)          |
| An occupied permanent residence, school, hospital, institution, or church  | Between 1 and 5 (mi.)          |
| A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes  | Between 1 and 5 (mi.)          |
| Any other fresh water well or spring   | Between 1 and 5 (mi.)          |
| Incorporated municipal boundaries or a defined municipal fresh water well field  | Between 1 and 5 (mi.)          |
| A wetland  | Between ½ and 1 (mi.)          |
| A subsurface mine  | Greater than 5 (mi.)           |
| An (non-karst) unstable area   | Greater than 5 (mi.)           |
| Categorize the risk of this well / site being in a karst geology   | Medium                         |
| A 100-year floodplain  | Between 1 and 5 (mi.)          |
| Did the release impact areas not on an exploration, development, production, or storage site   | No                             |

|   |            |
|---|------------|
| <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  | 01/14/2021 |
| On what date will (or did) the final sampling or liner inspection occur   | 07/28/2025 |
| On what date will (or was) the remediation complete(d)  | 07/28/2025 |
| What is the estimated surface area (in square feet) that will be remediated   | 6500       |
| What is the estimated volume (in cubic yards) that will be remediated   | 0          |
| <i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>  |            |
| <i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i> |            |

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QUESTIONS, Page 4

Action 509470

**QUESTIONS (continued)**

|   |   |
|---|---|
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|   | Action Number:<br>509470  |
|   | 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  | No  |
| Is (or was) there a power wash of the lined containment area (to be) performed   | Yes   |
| OTHER (Non-listed remedial process)  | Not answered.   |
| <i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>   |   |
| I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. |   |
| I hereby agree and sign off to the above statement   | Name: Katherine Purvis<br>Title: EHS Coordinator<br>Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a><br>Date: 09/25/2025 |
| <i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>  |   |



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QUESTIONS, Page 6

Action 509470

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947  |
|   | Action Number:<br>509470  |
|   | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

| Liner Inspection Information  |            |
|---|------------|
| Last liner inspection notification (C-141L) recorded  | 488107     |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | 07/28/2025 |
| Was all the impacted materials removed from the liner   | Yes        |
| What was the liner inspection surface area in square feet   | 9500       |

| Remediation Closure Request  |   |
|--|---|
| <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   | Yes   |
| Have the lateral and vertical extents of contamination been fully delineated   | Yes   |
| Was this release entirely contained within a lined containment area  | Yes   |
| What was the total surface area (in square feet) remediated  | 6500  |
| What was the total volume (cubic yards) remediated   | 0   |
| Summarize any additional remediation activities not included by answers (above)  | LINER WAS POWERWASHED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN SPILLS   |
| <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   | Name: Katherine Purvis<br>Title: EHS Coordinator<br>Email: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a><br>Date: 09/25/2025 |

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CONDITIONS

Action 509470

CONDITIONS

|   |   |
|---|---|
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CONDITIONS

|            |  |                |
|------------|--|----------------|
| Created By | Condition  | Condition Date |
| rhamlet    | We have received your Remediation Closure Report for Incident #nAPP2100543121 BRADLEY 8 FEE #003H, thank you. This Remediation Closure Report is approved. | 11/7/2025      |