

# **SITE REMEDIATION AND CLOSURE REPORT**

## **REPORTABLE RELEASE**

### **Spur Energy Partners**

Holiday #1H Battery

GPS: Latitude 32.8023071 Longitude -104.2290268

Eddy County, NM

Incident ID No. NAPP2119633013

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 **Holiday #1H Battery** (Holiday).

**Site Coordinates:** Latitude: 32.8023071      Longitude: -104.2290268

**Unit:** UL D, Section 01, Township 20S, Range 25E

**Date of Spill:** 07/05/2021

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

**Comments:** Reportable release.  
Released: 38 bbls of Produced Water  
Recovered: 38 bbls of Produced Water

**Incident ID:** NAPP2119633013

**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 121 feet below grade 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 Reeves-Gypsum land complex, with 0 to 3 percent slopes. The drainage courses in this area are well-drained. There is a **high** potential for karst geology to be present in the area of the Holiday (Appendix B).

**Release Description and Assessment**

This release was caused by corrosion developing a hole in the equalizing load line. The release was contained in the falcon-lined containment. A vacuum truck was dispatched to aid in the recovery of the fluids and placed the recovered fluids back into the water tank. The line was repaired and put back into service.

### Site Assessment and Soil Sampling Results

On February 9, 2022, 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.

2-9-22 Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (High Karst Area)								
Sample Date 2-9-22		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
N. COMP.	0	ND	ND	ND	ND	ND	ND	16
E. COMP.	0	ND	ND	ND	ND	ND	ND	144
S. COMP.	0	ND	ND	ND	ND	ND	ND	32
W. COMP.	0	ND	ND	ND	ND	ND	ND	32

ND- Analyte Not Detected

The liner was cleaned prior to the inspection. The 48-hour notification was given to the state on 2-7-22, 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 can also be found in Appendix F.

### 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, NAPP2119633013, 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- Liner Inspection Notification and Form



Figures:

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

# Spur Energy Partners

Holiday #1H Battery  
API# 30-015-39769  
Eddy County, NM  
Site Map

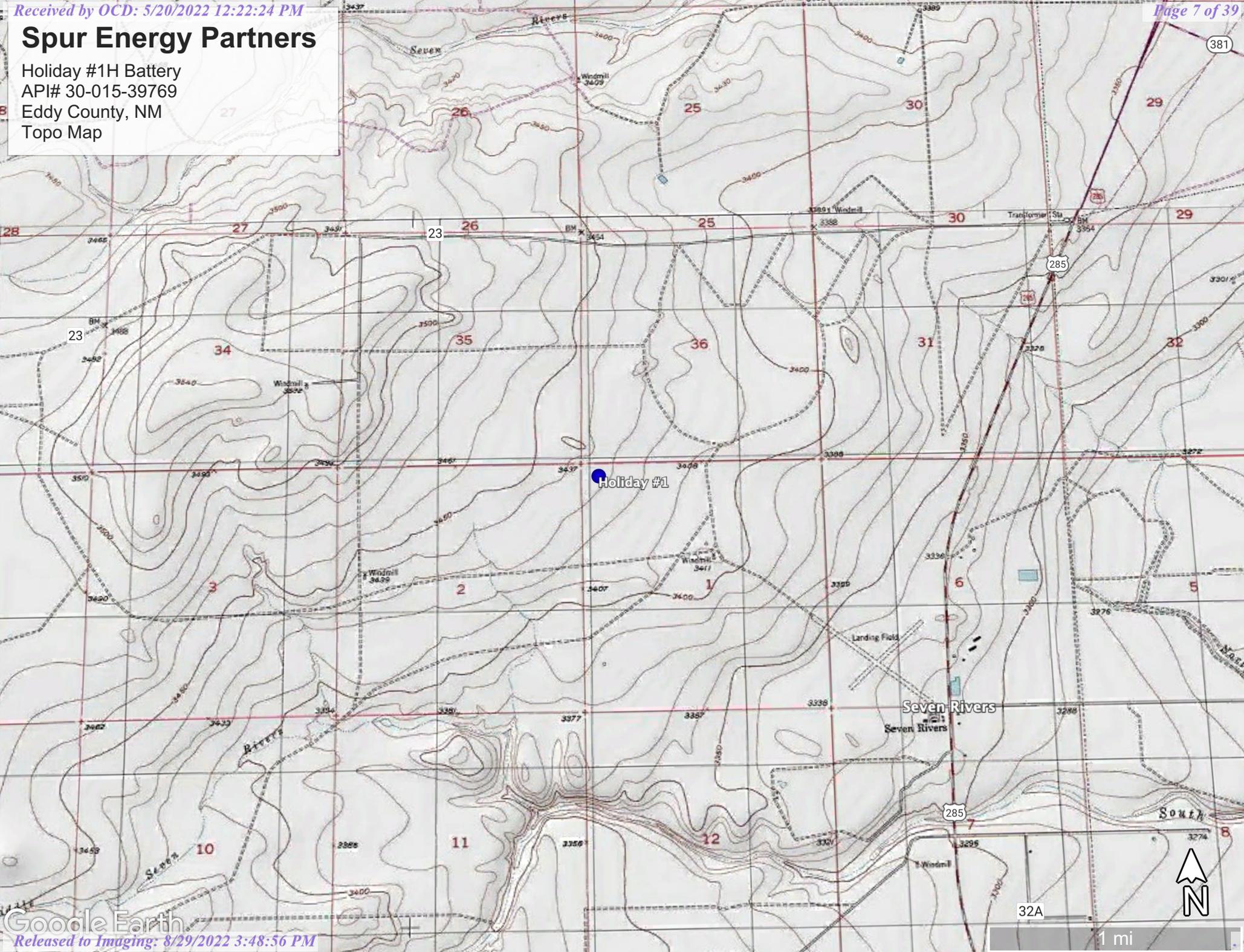
## Legend

- ⊙ Comp Samples
- Spill Area



# Spur Energy Partners

Holiday #1H Battery  
API# 30-015-39769  
Eddy County, NM  
Topo Map

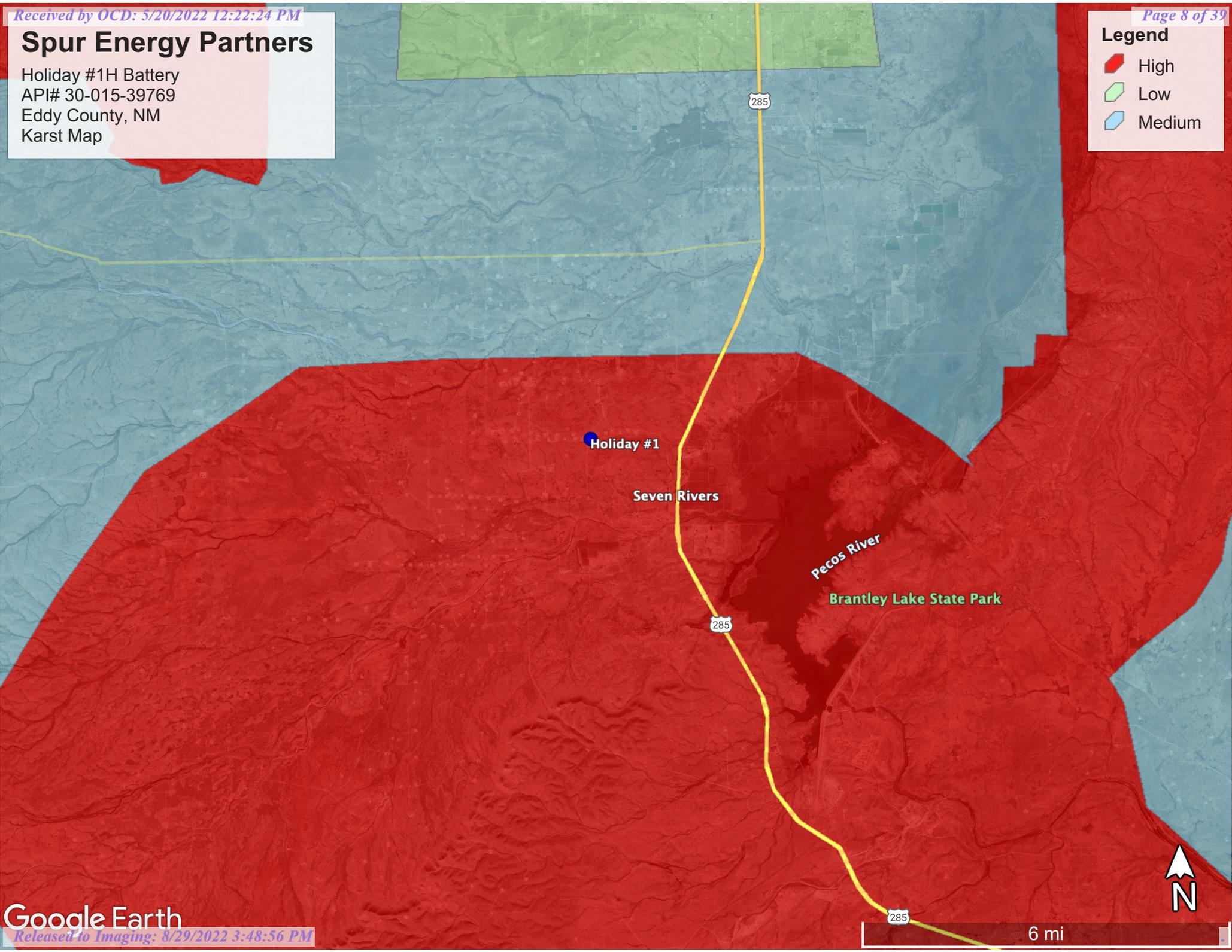


# Spur Energy Partners

Holiday #1H Battery  
API# 30-015-39769  
Eddy County, NM  
Karst Map

## Legend

-  High
-  Low
-  Medium



Holiday #1

Seven Rivers

Pecos River

Brantley Lake State Park

285

285

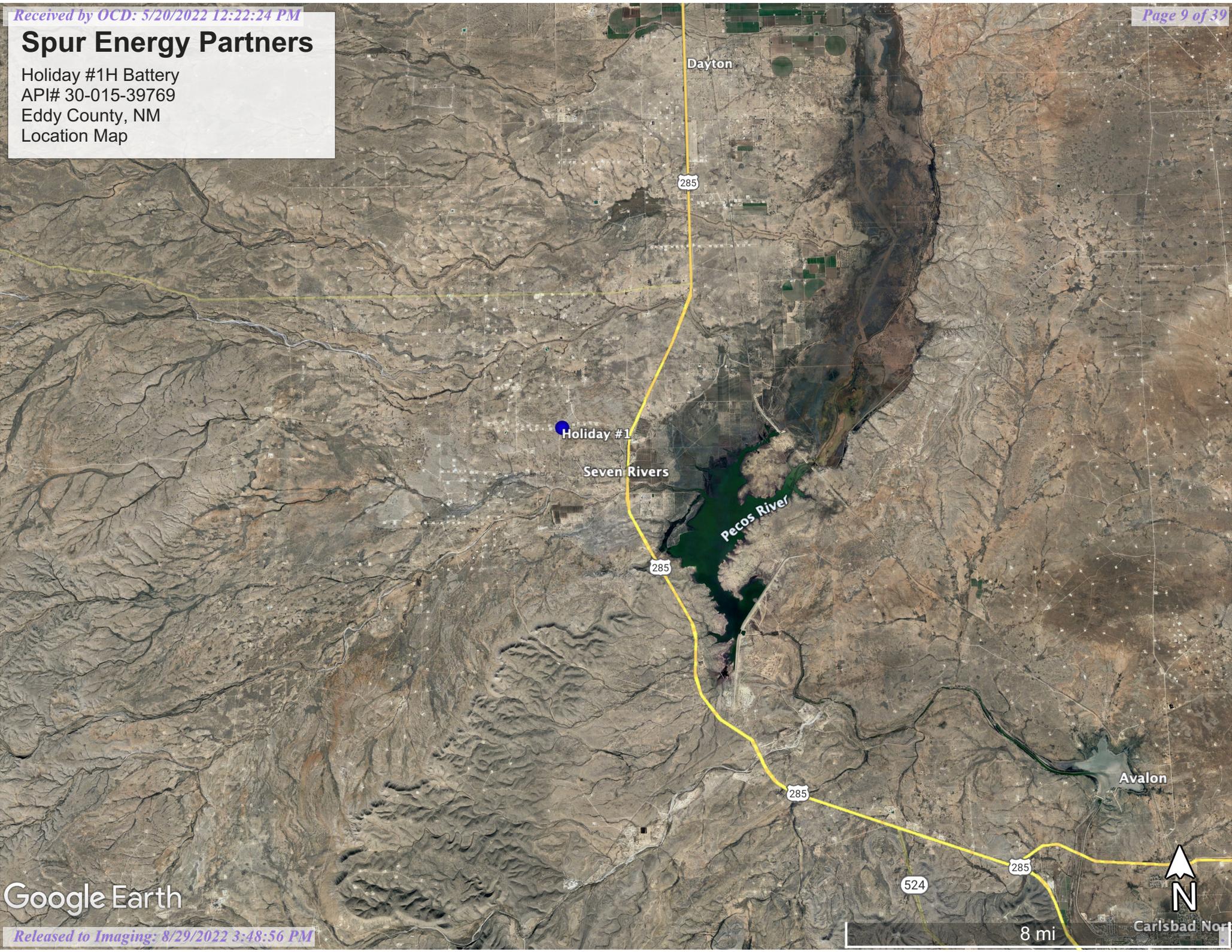
285



6 mi

# Spur Energy Partners

Holiday #1H Battery  
API# 30-015-39769  
Eddy County, NM  
Location Map



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	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">RA 10898 POD1</a>		RA	ED	2	1	3	01	20S	25E	552198	3607248*	874	810	121	689
<a href="#">RA 05458</a>		RA	ED		3	3	01	20S	25E	552101	3606747*	1358	500	95	405

Average Depth to Water: **108 feet**  
 Minimum Depth: **95 feet**  
 Maximum Depth: **121 feet**

Record Count: 2

UTMNAD83 Radius Search (in meters):

**Easting (X):** 552011.538      **Northing (Y):** 3608102.562      **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.

4/12/22 11:51 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 10898 POD1	2	1	3	01	20S	25E	552198	3607248*

<b>Driller License:</b>	331	<b>Driller Company:</b>	SBQ2, LLC DBA STEWART BROTHERS DRILLING CO.
<b>Driller Name:</b>			
<b>Drill Start Date:</b>	02/17/2006	<b>Drill Finish Date:</b>	03/08/2006
<b>Log File Date:</b>	03/27/2006	<b>PCW Rcv Date:</b>	
<b>Pump Type:</b>		<b>Source:</b>	Artesian
<b>Casing Size:</b>	8.63	<b>Estimated Yield:</b>	1000 GPM
		<b>Depth Well:</b>	810 feet
		<b>Depth Water:</b>	121 feet

<b>Water Bearing Stratifications:</b>	<b>Top</b>	<b>Bottom</b>	<b>Description</b>
	460	802	Limestone/Dolomite/Chalk

<b>Casing Perforations:</b>	<b>Top</b>	<b>Bottom</b>
	542	802

\*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.

4/12/22 11:52 AM

POINT OF DIVERSION SUMMARY



Appendix B  
Soil Survey:

U.S.D.A.  
FEMA Flood Map

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

## Eddy Area, New Mexico

### RG—Reeves-Gypsum land complex, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w5f  
*Elevation:* 1,250 to 5,000 feet  
*Mean annual precipitation:* 10 to 25 inches  
*Mean annual air temperature:* 57 to 70 degrees F  
*Frost-free period:* 190 to 235 days  
*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Reeves and similar soils:* 55 percent  
*Gypsum land:* 30 percent  
*Minor components:* 15 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Reeves

##### Setting

*Landform:* Ridges, plains, hills  
*Landform position (two-dimensional):* Shoulder, backslope, footslope, toeslope  
*Landform position (three-dimensional):* Side slope, crest, nose slope, head slope  
*Down-slope shape:* Convex  
*Across-slope shape:* Linear  
*Parent material:* Residuum weathered from gypsum

##### Typical profile

*H1 - 0 to 8 inches:* loam  
*H2 - 8 to 32 inches:* clay loam  
*H3 - 32 to 60 inches:* gypsiferous material

##### Properties and qualities

*Slope:* 0 to 1 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Well drained  
*Runoff class:* High  
*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 25 percent  
*Gypsum, maximum content:* 80 percent  
*Maximum salinity:* Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 4.0  
*Available water supply, 0 to 60 inches:* Low (about 4.3 inches)

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

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### Interpretive groups

*Land capability classification (irrigated):* 3s  
*Land capability classification (nonirrigated):* 7s  
*Hydrologic Soil Group:* B  
*Ecological site:* R042XC007NM - Loamy  
*Hydric soil rating:* No

### Description of Gypsum Land

#### Setting

*Landform:* Ridges, plains, hills  
*Landform position (two-dimensional):* Shoulder, backslope, footslope, toeslope  
*Landform position (three-dimensional):* Side slope, crest, nose slope, head slope  
*Down-slope shape:* Convex  
*Across-slope shape:* Linear  
*Parent material:* Residuum weathered from gypsum

### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 8s  
*Hydric soil rating:* No

### Minor Components

#### Largo

*Percent of map unit:* 5 percent  
*Ecological site:* R042XC007NM - Loamy  
*Hydric soil rating:* No

#### Cottonwood

*Percent of map unit:* 5 percent  
*Ecological site:* R042XC033NM - Salty Bottomland  
*Hydric soil rating:* No

#### Reagan

*Percent of map unit:* 5 percent  
*Ecological site:* R042XC007NM - Loamy  
*Hydric soil rating:* No

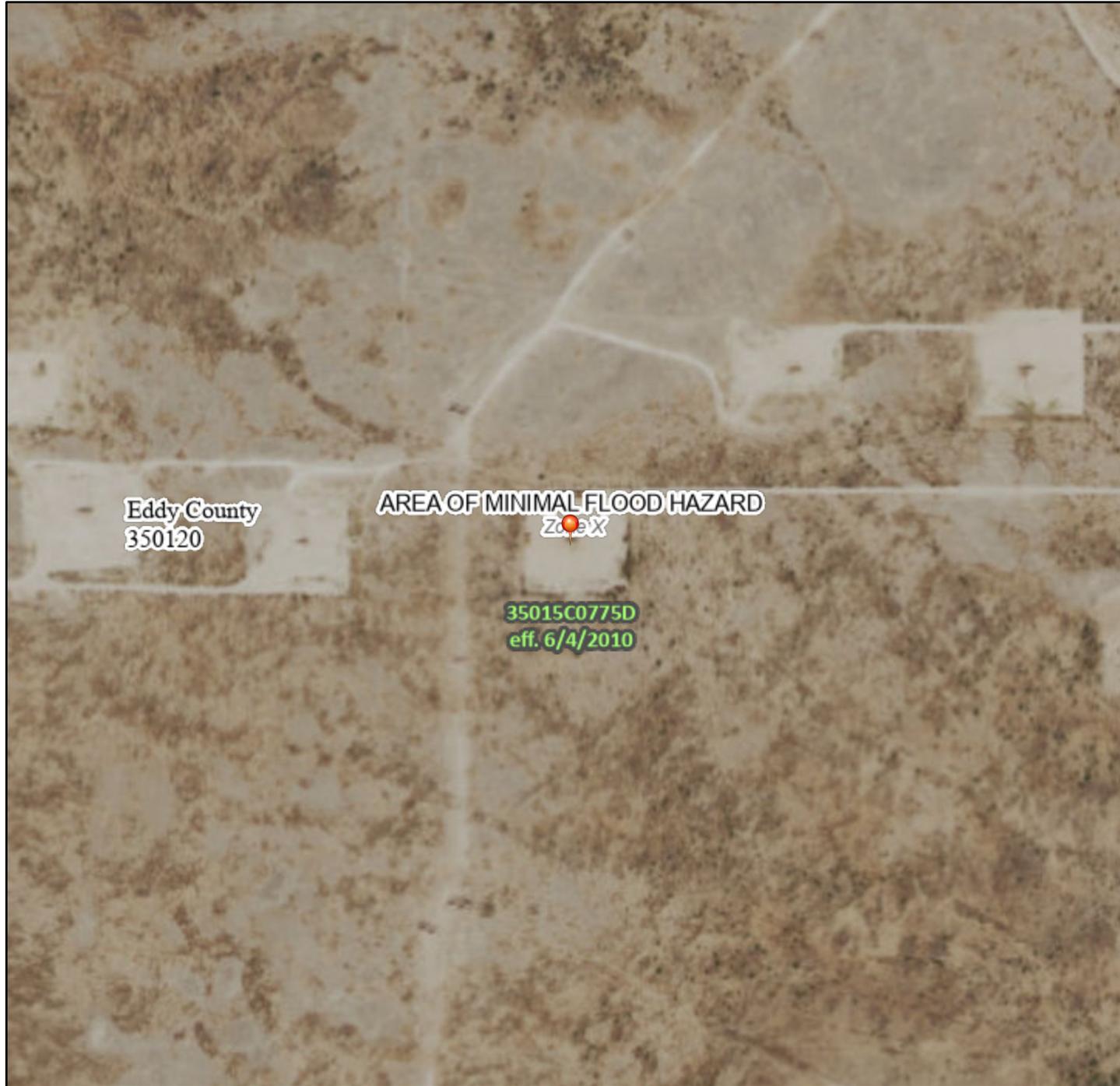
## Data Source Information

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

# National Flood Hazard Layer FIRMette



104°27'3"W 32°36'47"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		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall

OTHER FEATURES		Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Profile 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 3/24/2022 at 12:58 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

State of New Mexico  
Oil Conservation Division

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: <u><i>J. Roberts</i></u> Date: _____ email: _____ Telephone: _____
<b><u>OCD Only</u></b> Received by: <u>Ramona Marcus</u> Date: <u>10/4/2021</u>

<b>Spill Volume(Bbls) Calculator</b>		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
<u>64.000</u>	<u>32.000</u>	<u>1.250</u>
Cubic Feet Impacted		<u>213.333</u>
Barrels		<u>37.99</u>
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		<u>37.99</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released	38	

**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 53871

**CONDITIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 53871
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
marcus	None	10/4/2021

Form C-141  
Page 3

State of New Mexico  
Oil Conservation Division

Incident ID	NAPP2119633013
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?	121 (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 <b>not</b> 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 1/2-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.

Form C-141

State of New Mexico  
Oil Conservation Division

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Incident ID	NAPP2119633013
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: Braidy Moulder

Title: HSE Manager

Signature: Braidymoulder

Date: 4-12-22

email: [bmoulder@spurepllc.com](mailto:bmoulder@spurepllc.com)

Telephone: 713-264-2517

**OCD Only**

Received by: \_\_\_\_\_

Date: \_\_\_\_\_

Form C-141

State of New Mexico  
Oil Conservation Division

Page 5

Incident ID	NAPP2119633013
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: Braidy Moulder

Title: HSE Manager

Signature: Braidy Moulder

Date: 4-12-22

email: [bmoulder@spurepllc.com](mailto:bmoulder@spurepllc.com)

Telephone: 713-264-2517

**OCD Only**

Received by: \_\_\_\_\_

Date: \_\_\_\_\_

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: Jennifer Nobui

Date: 08/29/2022

Printed Name: Jennifer Nobui

Title: Environmental Specialist A



Appendix D:  
Photographic Documentation

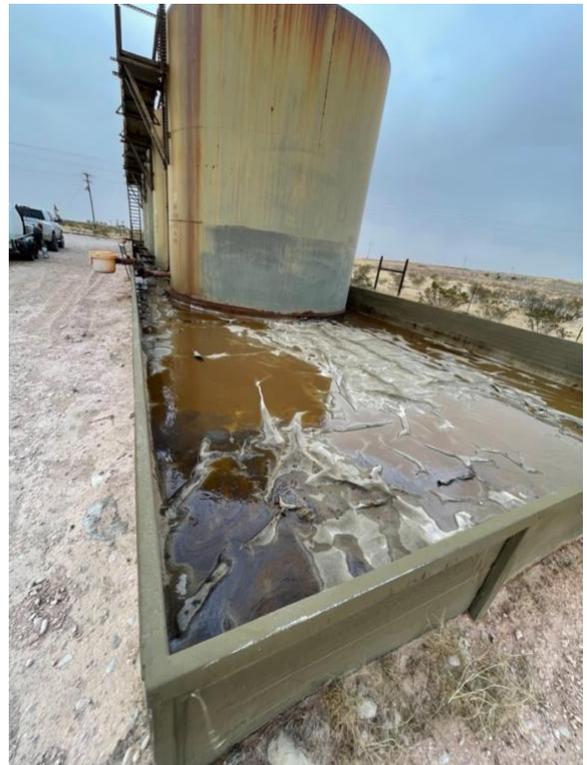
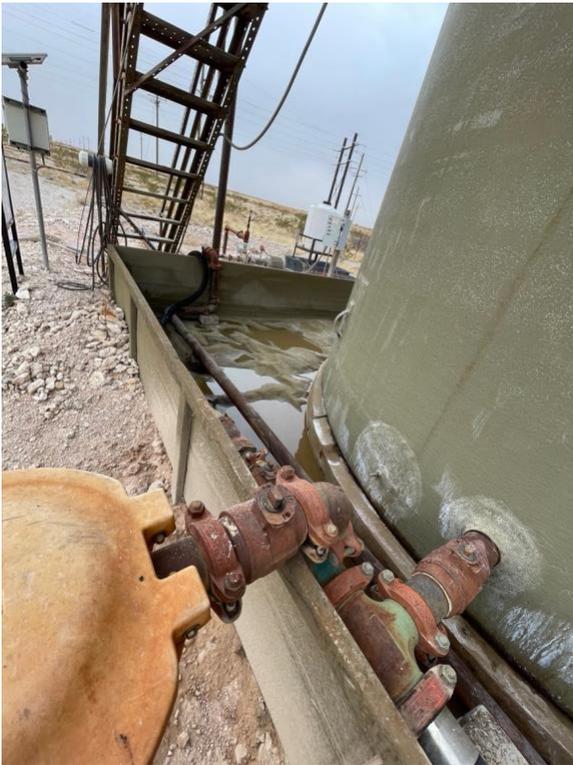


**Photographic Documentation**

**Liner Inspection Composite Samples From Around The Containment**



Cleaned & Completed





Appendix E:  
Laboratory Results



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

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February 15, 2022

CASON SPURLOCK  
PARAGON ENVIROMENTAL  
5002 CARRAIGE RD  
HOBBS, NM 88242

RE: HOLIDAY 1 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/11/22 10:05.

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](http://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, flowing style.

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: 02/11/2022  
 Reported: 02/15/2022  
 Project Name: HOLIDAY 1 BATTERY  
 Project Number: SPUR  
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: NORTH COMP (H220542-01)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 113 % 66.9-136

Surrogate: 1-Chlorooctadecane 128 % 59.5-142

Cardinal Laboratories

\*=Accredited Analyte

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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: 02/11/2022  
 Reported: 02/15/2022  
 Project Name: HOLIDAY 1 BATTERY  
 Project Number: SPUR  
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: EAST COMP (H220542-02)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	144	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 105 % 66.9-136

Surrogate: 1-Chlorooctadecane 117 % 59.5-142

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\*=Accredited Analyte

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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: 02/11/2022  
 Reported: 02/15/2022  
 Project Name: HOLIDAY 1 BATTERY  
 Project Number: SPUR  
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: SOUTH COMP (H220542-03)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 106 % 66.9-136

Surrogate: 1-Chlorooctadecane 120 % 59.5-142

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\*=Accredited Analyte

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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: 02/11/2022  
 Reported: 02/15/2022  
 Project Name: HOLIDAY 1 BATTERY  
 Project Number: SPUR  
 Project Location: SPUR - EDDY CO NM

Sampling Date: 02/09/2022  
 Sampling Type: Soil  
 Sampling Condition: \*\* (See Notes)  
 Sample Received By: Tamara Oldaker

**Sample ID: WEST COMP (H220542-04)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane 116 % 66.9-136

Surrogate: 1-Chlorooctadecane 133 % 59.5-142

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\*=Accredited Analyte

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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

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

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

**BILL TO**

**ANALYSIS REQUEST**

Company Name: Paragon Environmental  
 Project Manager: Cason Spurlock

P.O. #:

Address: 5002 Carriage Rd

Company: Spur

City: Hobbs

State: NM Zip: 88242

Attn: Dakota Neel

Phone #: 575-631-6977

Fax #:

Address:

Project #:

Project Owner:

City:

Project Name: Spur

State:

Zip:

Project Location: Holiday 1 Bakery

Phone #:

Sampler Name: Chris Jones

Fax #:

FOR LAB USE ONLY

MATRIX

PRESERV

SAMPLING

Lab I.D. Sample I.D.

H220542

1 North Camp.  
 2 East Camp.  
 3 South Camp.  
 4 West Camp.

(G)RAB OR (C)OMP.

# CONTAINERS

GROUNDWATER

WASTEWATER

SOIL

OIL

SLUDGE

OTHER :

ACID/BASE:

ICE / COOL

OTHER :

DATE

TIME

2-9-02 1000  
 1015  
 1030  
 1045

BTEX

TPH-EXT

Chlorides

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Relinquished By:

Date: 2-11-02

Received By:

*Jessica Collins*

Time: 1005

*Jessica Collins*

Phone Result:  Yes  No

Fax Result:  Yes  No

Add'l Phone #:   
 Add'l Fax #:   
 REMARKS:

Delivered By: (Circle One)

Sampler - UPS - Bus - Other:

20.12 C-0.52

Sample Condition  
 Cool Intact  Yes  No

CHECKED BY: (Initials)

20.12 C-0.52

19.66 #113

Sample Condition  
 Cool Intact  Yes  No

CHECKED BY: (Initials)

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



Appendix F:

Liner Inspection and Email Notification



Paragon Environmental LLC

**Liner Inspection Form**

Company Name: Spur Energy Partners

Site: Holiday #1H Battery

Lat/Long: 32.8023071, -104.2290268

NMOCD Incident ID & Incident Date: NAPP2119633013  
7-5-21

2-Day Notification Sent: 2-7-22

Inspection Date: 2-9-22

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



Cason Spurlock <cason@paragonenvironmental.net>

---

## Holiday #1 Battery

1 message

---

**Cason** <cason@paragonenvironmental.net>

Mon, Feb 7, 2022 at 5:57 AM

To: mike.bratcher@state.nm.us, robert.hamlet@state.nm.us, chad.hensley@state.nm.us, Braidy Moulder <boulder@spurepllc.com>, Dakota Neel <dneel@spurepllc.com>

Gentleman,

On behalf of Spur Energy, Paragon will be conducting a liner inspection at the referenced location. This inspection will be conducted in reference to incidents NAPP2119633013, NAPP2119561140, and NRM2026056833. We will be conducting this inspection on 2-9-22 at approximately 9 am. If you have any questions or care to join you can reach out and let me know.

--

Paragon Environmental  
225 Billy Walker Rd  
Hobbs, NM 88240

**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 109076

**CONDITIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 109076
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
jnobui	Closure Approved	8/29/2022