State of New Mexico
Oil Conservation Division

Incident ID	NAPP2229845741
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: Kathy Purvis. Title: HSE Coordinator

Signature: Katherine Purvis Date: 01/03/2023

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

OCD Only

Received by: Jocelyn Harimon Date: 01/03/2023

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: Robert Hamlet Date: 4/10/2023

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced

December 20, 2022

NMOCD District 2
Mike Bratcher
Artesia, NM 88210

Bureau of Land Management
Crisha Morgan
Carlsbad Field Office

Re: Site Assessment, Liner Cleaning, Liner Inspection, and Closure Report
Empire St. SWD 15 #1
API No. 30-015-39771
GPS: Latitude 32.8343163 Longitude -104.06665
UL "K", Sec. 15, T17S, R29E
Eddy County, NM
NMOCD Ref. No. NAPP2229845741

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a site assessment, conduct a liner inspection, and write a closure report for the release site known as the Empire St. SWD 15 #1 (Empire). Details of the release are summarized below:

Release Details			
Type of Release:	Produced Water/Crude Oil	**Volume of Release:**	27 bbls
		Volume Recovered:	25 bbls
Source of Release:	Header	**Date of Release:**	10/24/22
Was Immediate Notice Given?	Yes	**If, Yes, to Whom?**	NMOCD, Mike Bratcher
Was a Watercourse Reached?	No	**If Yes, Volume Impacting Watercourse:**	N/A
Surface Owner:	State	**Mineral Owner:**	
The check valve on the wellhead failed, allowing pressure from the well to come back through the pump back flowing to the header where it created a leak.			

Topographical and Aerial Maps are provided in Figures #2 and #4. A copy of the Initial Release Notification and Corrective Action (NMOCD Form C-141) can be found in Appendix C.

REGULATORY FRAMEWORK

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

Site Characteristics	
Approximate Depth to Groundwater	**<50'**
Within 330 ft. of any continuously flowing or significant watercourse?	**NO**
Within 200 ft. of any lakebed, sinkhole, or playa lake?	**NO**
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	**NO**
Within 500 ft. of a spring, or private, domestic fresh water well?	**NO**
Within 1000 ft. of any fresh water well?	**NO**
Within the incorporated municipal boundaries or within a municipal well field?	**NO**
Within 300 ft. of a wetland?	**NO**
Within the area overlying a subsurface mine?	**NO**
Within an unstable area such as Karst?	**NO**
Within a 100-year floodplain?	**NO**

A search of the groundwater database maintained by the New Mexico Office of the State Engineer (NMOSE) was conducted to determine the average groundwater depth within one (1) Mile radius of the Release Site and identify any registered water wells within ½ Mile of the Release Site. The data initially found on the State Engineers website showed no water data within a ½ mile radius.

Depth to groundwater information is provided in Appendix A.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation- and is made up of Older alluvial deposits of upland plains and piedmont areas, and calcic soils and eolian cover sediments of High Plains region (middle to lower Pleistocene)—Includes scattered lacustrine, playa, and alluvial deposits of the Tahoka, Double Tanks, Tule, Blackwater Draw, and Gatuña Formations, the latter of which may be Pliocene at base; outcrops, however, are basically of Quaternary deposits (QOA). According to the United States Department of Agriculture Natural Resources Conservation Service, the soil in this area is made up of 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 around the Empire (Figure #3).

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

TABLE I
CLOSURE CRITERIA FOR SOILS IMPACTED BY A RELEASE

	Constituent	Method	Limit
<50 Feet	Chloride	EPA 300.0	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

INITIAL SITE ASSESSMENT

Paragon dispatched a tech to conduct an initial assessment to determine what was needed to draw this incident to closure. Upon arrival, it was determined that the liner needed to be cleaned. No evidence was found that the spill breached the containment. The Liner was cleaned utilizing a degreaser and a steam power washer. It was then determined that nothing else was needed here, and we could move toward closure.

An email notification was sent to the OCD, notifying them that we would be conducting a liner inspection on 12/20/22. A copy of the email notification can be found in Appendix C.

During the Liner Inspection, it was determined that it had the integrity to hold fluids. A copy of the liner inspection can be found in Appendix D.

REMEDIATION ACTIVITIES

On October 24, 2022, Spur mobilized a vacuum truck to recover the produced water. After cleaning the liner and performing the inspection, it was determined that no further remediation was needed.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2229845741, 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 contact Tristan Jones by phone at (575)318-6841 or email at tristan@paragonenvironmental.net.

Respectfully,

Tristan Jones
Project Coordinator
Paragon Environmental, LLC

Chris Jones
Environmental Professional
Paragon Environmental, LLC

Attachments

Figures:
1- Site Map
2- Topographic Map
3- Karst Map
4- Aerial Map

Appendices:
Appendix A – Referenced Water Surveys
Appendix B – Soil Survey and FEMA Flood Map
Appendix C – C-141
Appendix D – Photographic Documentation and Liner Inspection

Figures:

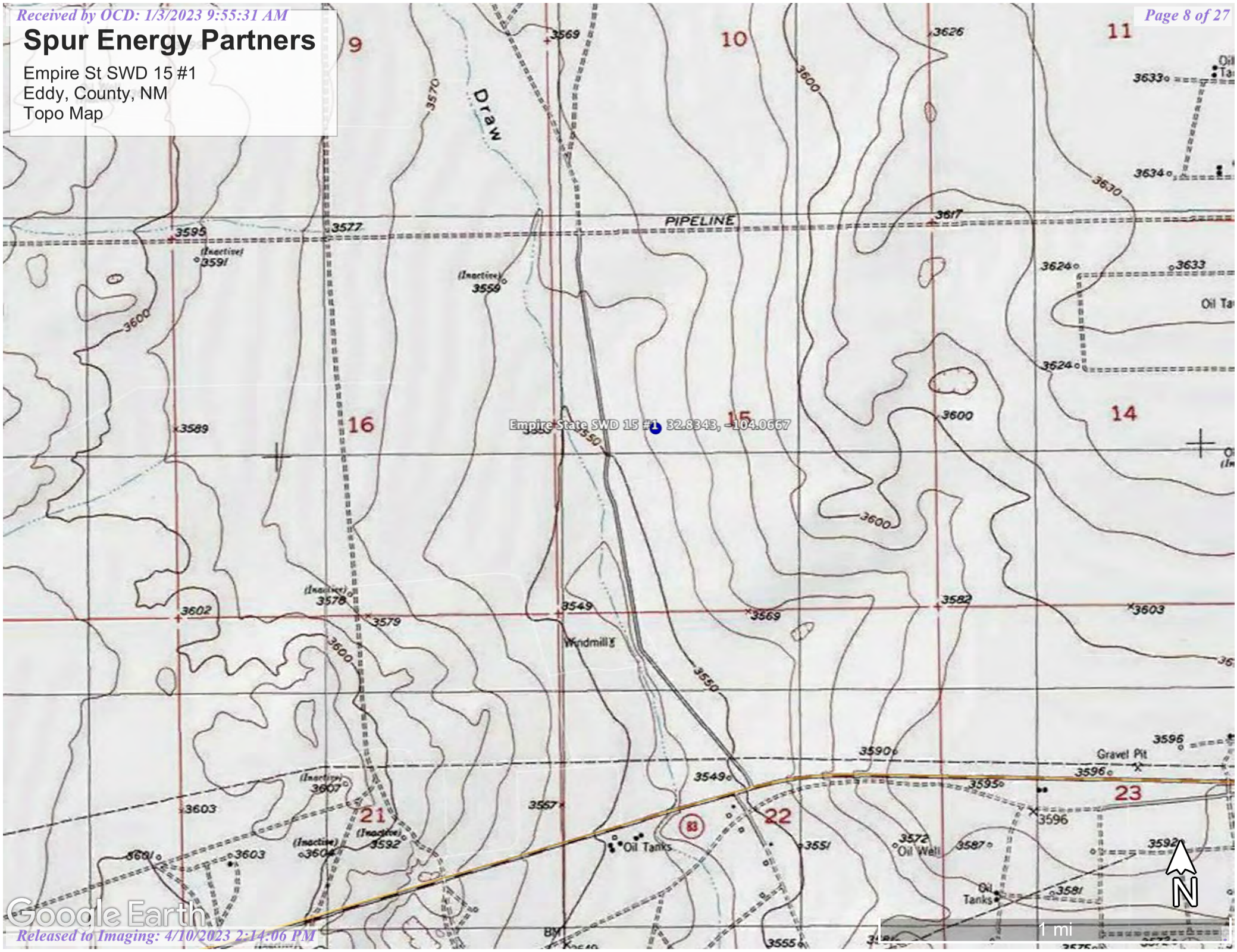
1-Site Map
2- Topo Map
3- Karst Map
4- Aerial Map

Spur Energy

Empire State SWD 15 #1
API# N/A
Eddy County, NM
Site Map

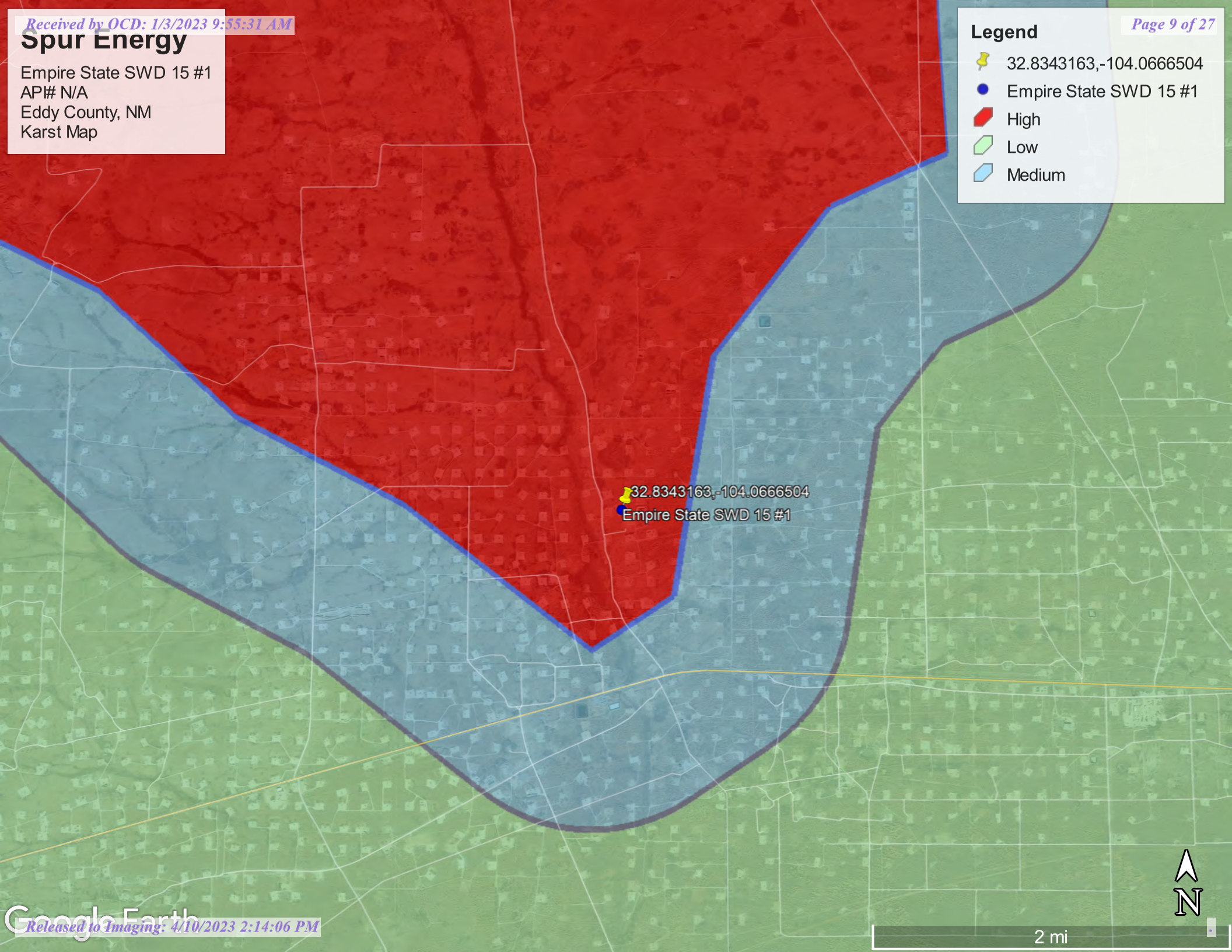
Spur Energy Partners

Empire St SWD 15 #1
Eddy, County, NM
Topo Map



Spur Energy

Empire State SWD 15 #1
API# N/A
Eddy County, NM
Karst Map

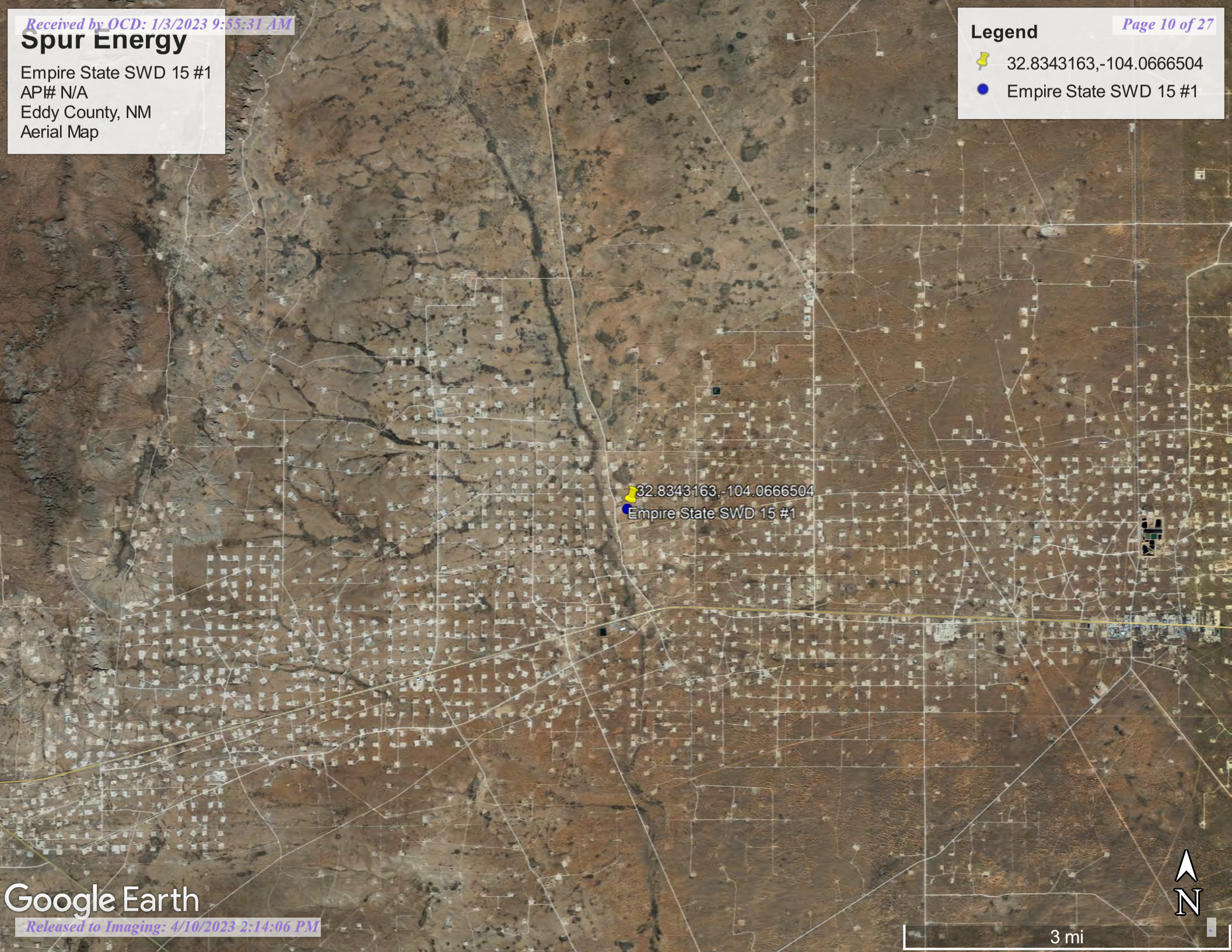


Spur Energy

Empire State SWD 15 #1
API# N/A
Eddy County, NM
Aerial Map

Legend

- 32.8343163,-104.0666504
- Empire State SWD 15 #1



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	Depth Well	Depth Water	Water Column
RA 11807 POD1		RA	ED	1	2	3	22	17S	29E	587360	3631585	1719	131	76	55

Average Depth to Water: **76 feet**

Minimum Depth: **76 feet**

Maximum Depth: **76 feet**

Record Count: 1

UTMNAD83 Radius Search (in meters):

Easting (X): 587354.868 **Northing (Y):** 3633304.814 **Radius:** 2500

12/22/22 3:28 PM

WATER COLUMN/ AVERAGE DEPTH TO WATER

Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

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, head slope, nose slope, crest
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)

Interpretive groups

Land capability classification (irrigated): 3s
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: B
Ecological site: R070BC007NM - 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, head slope, nose slope, crest
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: R070BC007NM - Loamy
Hydric soil rating: No

Reagan

Percent of map unit: 5 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Cottonwood

Percent of map unit: 5 percent
Ecological site: R070BC033NM - Salty Bottomland
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

FEMA

104°4'19"W 32°50'19"N

104°3'41"W 32°49'48"N

0 250 500 1,000 1,500 2,000 Feet 1:6,000

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

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
- Area of Undetermined Flood Hazard *Zone D*

GENERAL STRUCTURES
- Channel, Culvert, or Storm Sewer
- Levee, Dike, or Floodwall

OTHER FEATURES
- 20.2 Cross Sections with 1% Annual Chance
- 17.5 Water Surface Elevation
- Coastal Transect
- 513 Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

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 12/20/2022 at 5:40 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:

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	NAPP2229845741
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party Spur Energy Partners	OGRID 328947
Contact Name Braidy Moulder	Contact Telephone 713-264-2517
Contact email bmoulder@spurepllc.com	Incident #
Contact mailing address 919 Milam Street Suite 2475 Houston, TX 77002	

Location of Release Source

Latitude 32.8343163 Longitude -104.066650
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Empire State SWD 15 #001	Site Type Production
Date Release Discovered 10/24/22	API# 30-015-39771

Unit Letter	Section	Township	Range	County
K	15	17S	29E	Eddy

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)

☒ Crude Oil	Volume Released 6.8 (bbls)	Volume Recovered 5 (bbls)
☒ Produced Water	Volume Released 20 (bbls)	Volume Recovered 20 (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released	Volume/Weight Recovered

Cause of Release

The check valve on the wellhead failed and let pressure from the well come back through the pump backflowing back to the header where it created a leak. An estimated 26.8 bbl spill of oil and PW. All fluids stayed inside the lined containment. The well was shut down to isolate the line in order for repairs to be made.

Form C-141
Page 2

State of New Mexico
Oil Conservation Division

Incident ID	NAPP2229845741
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☒ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release? 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)?	

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.
☒ The impacted area has been secured to protect human health and the environment.
☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not 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: Braidy Moulder
Title: HSE Manager

Signature: _____
Date:

email: bmoulder@spurenergy.com
Telephone: 713-264-2517

OCD Only

Received by: Jocelyn Harimon
Date: 11/09/2022

State of New Mexico
Oil Conservation Division

Form C-141

Incident ID	NAPP2229845741
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?	76 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ 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)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ 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?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

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

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

State of New Mexico
Oil Conservation Division

Incident ID	NAPP2229845741
District RP	
Facility ID	
Application ID	

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

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

Printed Name: Kathy Purvis. Title: HSE Coordinator

Signature: Katherine Purvis Date: 01/03/2023

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

OCD Only

Received by: Jocelyn Harimon Date: 01/03/2023

State of New Mexico
Oil Conservation Division

Incident ID	NAPP2229845741
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: Kathy Purvis. Title: HSE Coordinator

Signature: Katherine Purvis Date: 01/03/2023

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

OCD Only

Received by: Jocelyn Harimon Date: 01/03/2023

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: _____ Date: _____

Printed Name: _____ Title: _____

Appendix D:

Photographic Documentation

Email Notification

Liner Inspection

PARAGON ENVIRONMENTAL

Liner Inspection Photos

Gmail

Tristan Jones <tristan@paragonenvironmental.net>

Liner Inspections

1 message

Tristan Jones <tristan@paragonenvironmental.net> Thu, Dec 15, 2022 at 10:31 AM
To: mike.bratcher@state.nm.us, Robert.Hamlet@state.nm.us, Jennifer.Nobui@state.nm.us
Cc: Chris Jones <chris@paragonenvironmental.net>, katherine.purvis@spurenergy.com, bmoulder@spurenergy.com

All,

This is to inform you all that Paragon will be conducting liner inspections on behalf of Spur Energy Partners at the referenced on 12/20/22. We will begin these inspections at 8:00 AM and will be going in the following order. Feel free to call me so we can coordinate with you if you'd like to join us.

NAPP2224928619 - Arkansas St. 23 Tank Battery
NAPP2229739197 - Patton 5 Fee #8H
NAPP2229845741 / NAPP2222728274 / NAPP2118841297 - Empire State SWD 15 #1
NAPP2222751098 - BKU 13A Battery
NAPP2129931777 - Loco Hills SWD 34 #3
NAPP2111652890 - Puckett 13 Fed Com 35H Battery

Thank you,

Tristan Jones
Project Coordinator
1601 N. Turner Ste. 500
Hobbs, NM 88240
tristan@paragonenvironmental.net
575-318-6841

PARAGON ENVIRONMENTAL

Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy

Site: Empire St. SWD 15 #1

Lat/Long: 32.8343163,-104.06665

NMOCD Incident ID & Incident Date: NAPP2229845741 10-24-22 / NAPP2222728274 8-12-22 / NAPP2118841297 8-22-21

2-Day Notification Sent: 12/15/22

Inspection Date: 12/20/22

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: Tristan Jones Inspector Signature: tj

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 171560

CONDITIONS

Operator:	OGRID:
Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	328947
	Action Number: 171560
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your closure report and final C-141 for Incident #NAPP2229845741 EMPIRE STATE SWD 15 #001, thank you. This closure is approved.	4/10/2023