State of New Mexico
Oil Conservation Division

| | |
|---|---|
| Incident ID | NAPP2229739197 |
| 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: 2/13/2023

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

**OCD Only**

Received by: Jocelyn Harimon Date: 02/13/2023

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: 6/14/2023

Printed Name: Robert Hamlet Title: Environmental Specialist - Advanced

Febuary 13, 2023

NMOCD District 2
Mike Bratcher
Artesia, NM 88210

Bureau of Land Management
Crisha Morgan
Carlsbad Field Office

**Re: Site Assessment, Liner Inspection, and Closure Report**
**Patton 5 Fee #8H**
**API No. 30-015-39641**
**GPS: Latitude 32.6839372 Longitude -104.4120317**
**UL "M", Sec. 05, T19S, R26E**
**Eddy County, NM**
**NMOCD Ref. No. NAPP2229739197**

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 Patton 5 Fee #8H. Details of the release are summarized below:

| Release Details | | | |
|---|---|---|---|
| **Type of Release:** | Produced Water/ Crude Oil | **Volume of Release:** | 20 bbls |
| | | **Volume Recovered:** | 19 bbls |
| **Source of Release:** | Separator | **Date of Release:** | 10/22/22 |
| **Was Immediate Notice Given?** | No | **If, Yes, to Whom?** | N/A |
| **Was a Watercourse Reached?** | No | **If Yes, Volume Impacting Watercourse:** | N/A |
| **Surface Owner:** | Private | **Mineral Owner:** | Federal |
| At the battery coming into the heater treater, a hole developed before the dump on the two phase separator due to internal corrosion. An estimated 20 bbl spill of oil and PW, along with rainwater. All fluids stayed inside the lined containment. The wells were shut down to isolate the line in order for repairs to be made. | | | |

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 there was water data at depths greater than 100 ft 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 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 Pima Silt Loam, with 0 to 1 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are well-drained. There is NOT a high potential for karst geology to be present around the Patton 5 Fee #8H (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

On November 10th, 2022, Paragon mobilized a tech to go and assess the Patton. Staining inside of the containment was noticed, and all standing fluids had been removed.

## REMEDIATION ACTIVITIES

On November 14th, Paragon sent out a crew with a steamer and a vac truck to go clean the containment. We used a mixture of pressure, heat, and degreaser to clean up the staining.

On December 15, 2022, Paragon sent email notification to the NMOCD that we would conduct a liner inspection on December 20, 2022. While conducting the inspection, there were no holes or tears, and had the integrity to contain a spill. The Photographic Documentation and Liner Inspection sheet can be found in Appendix D.

## CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2229739197, 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.

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, Email Notification, and Liner Inspection

Figures:

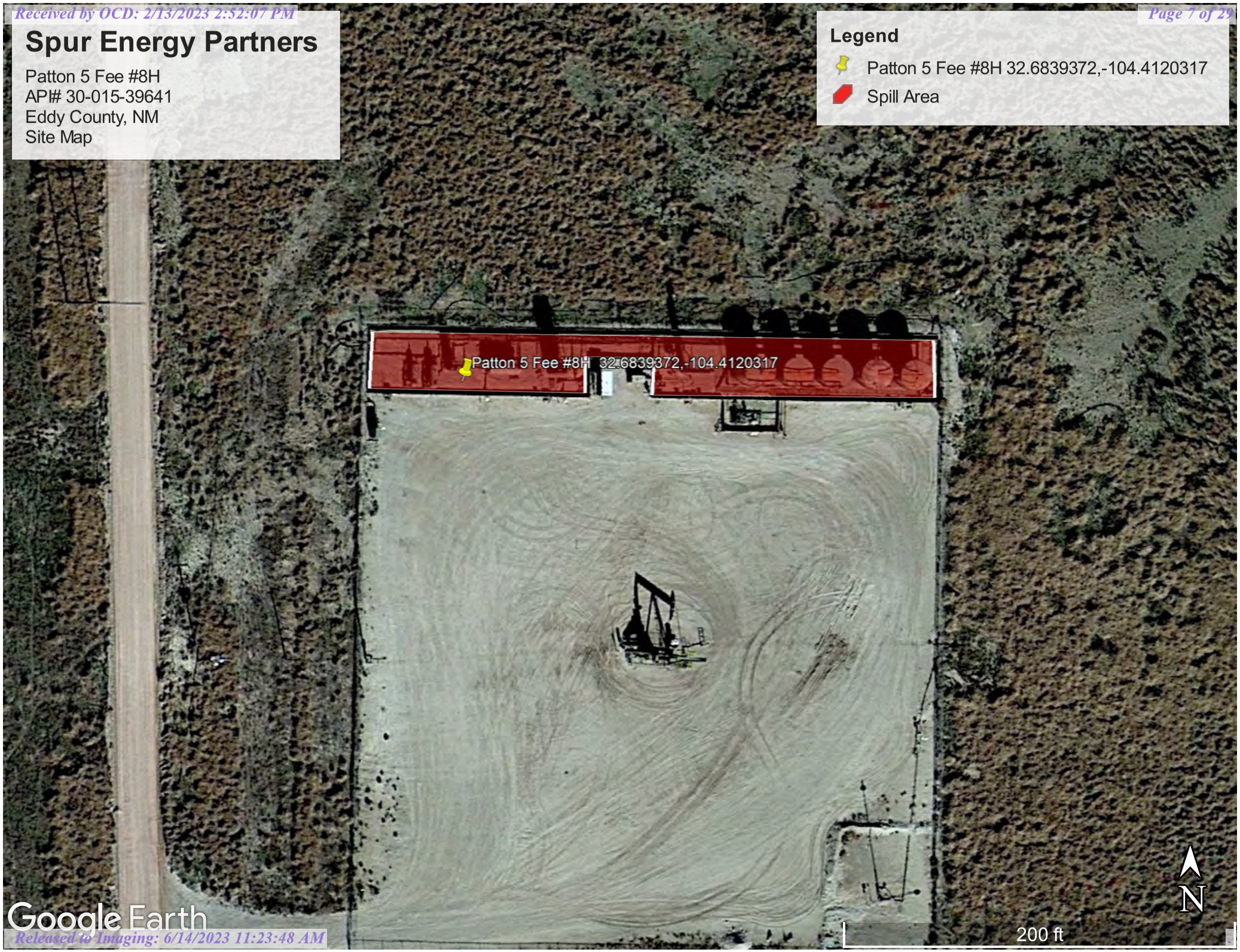
1-Site Map
2- Topo Map
3- Karst Map
4- Aerial Map

# Spur Energy Partners

Patton 5 Fee #8H
API# 30-015-39641
Eddy County, NM
Site Map

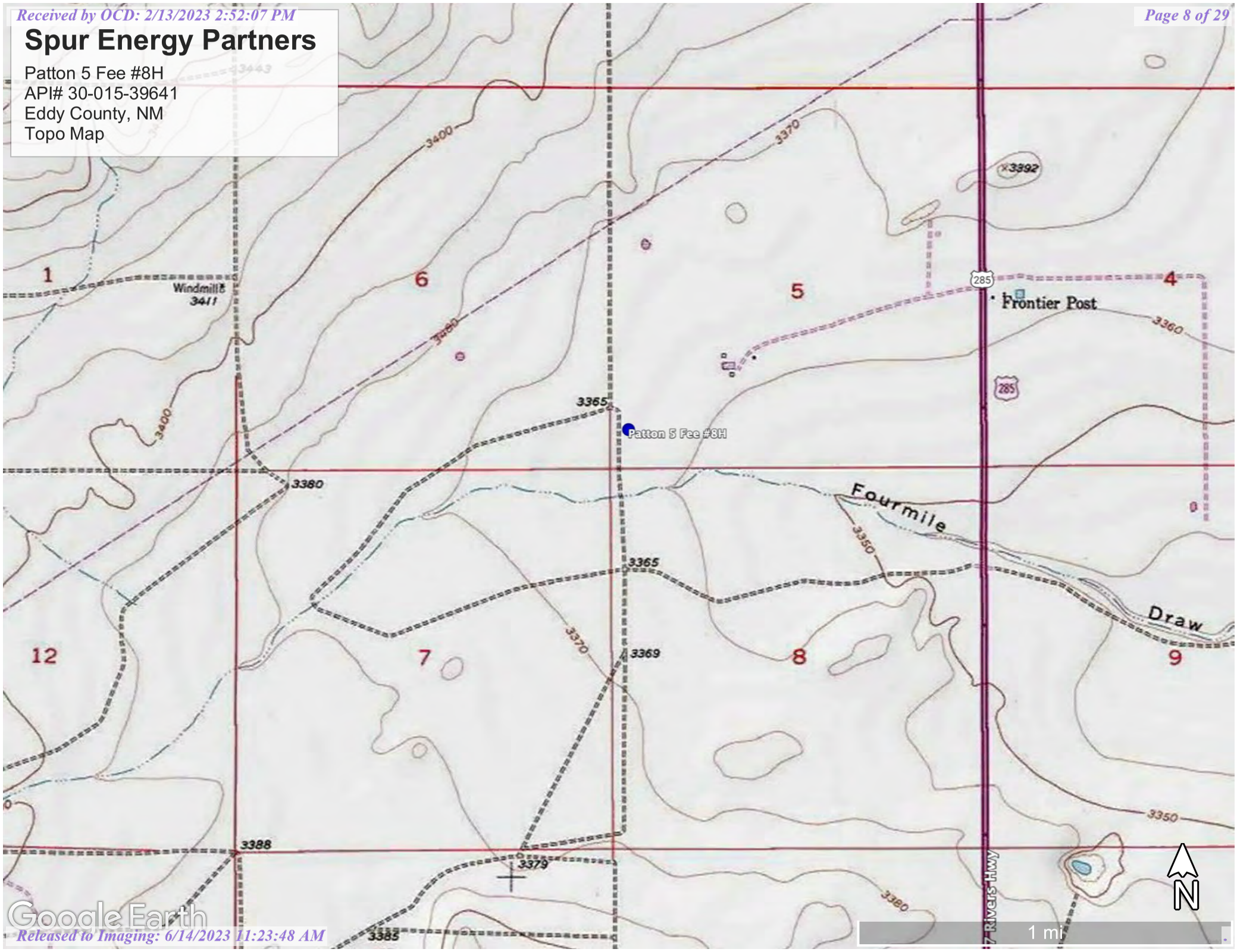
**Legend**

- Patton 5 Fee #8H 32.6839372,-104.4120317
- Spill Area



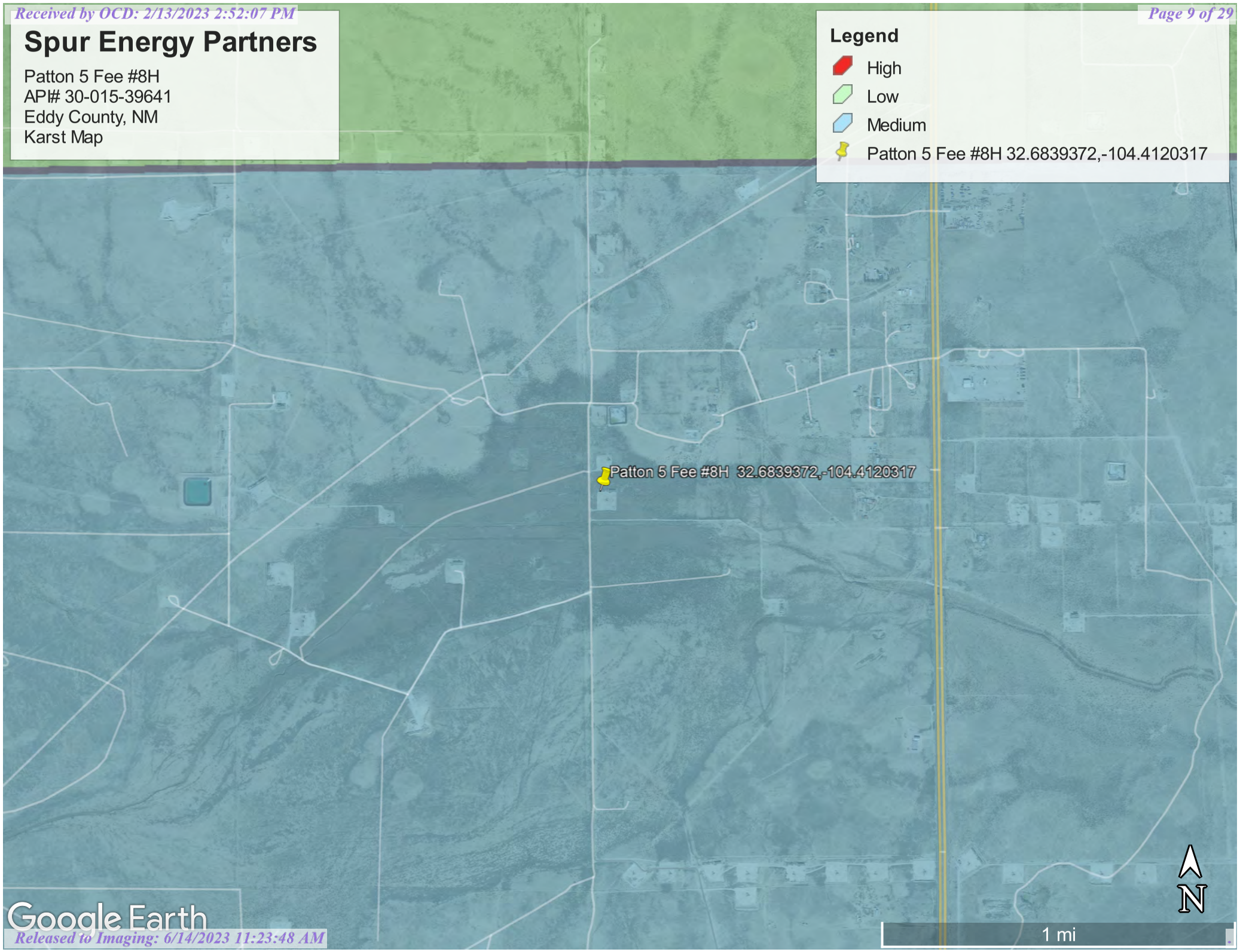
# Spur Energy Partners

Patton 5 Fee #8H
API# 30-015-39641
Eddy County, NM
Topo Map



# Spur Energy Partners

Patton 5 Fee #8H
API# 30-015-39641
Eddy County, NM
Karst Map

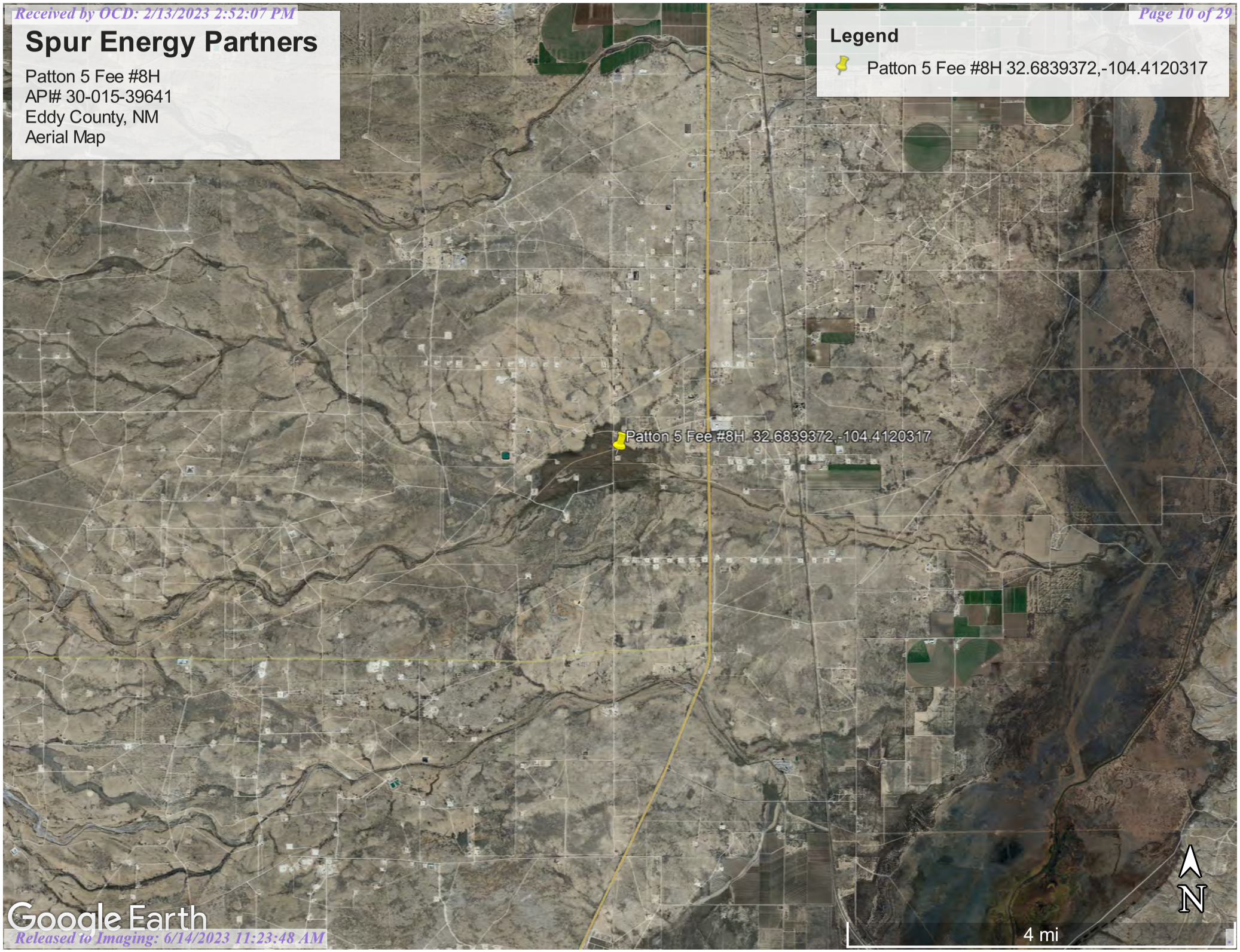


# Spur Energy Partners

Patton 5 Fee #8H
API# 30-015-39641
Eddy County, NM
Aerial Map

**Legend**

Patton 5 Fee #8H 32.6839372,-104.4120317



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 | Twn | Rng | X | Y | Distance | Depth Well | Depth Water | Water Column |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| RA 07954 | | RA | ED | 3 | 2 | 3 | 05 | 19S | 26E | 555566 | 3616763* | 572 | 290 | 175 | 115 |
| RA 07066 | | RA | ED | 3 | 4 | 1 | 05 | 19S | 26E | 555561 | 3617166* | 881 | 202 | 100 | 102 |
| RA 07066 POD2 | | RA | ED | 4 | 4 | 1 | 05 | 19S | 26E | 555761 | 3617166* | 996 | 150 | | |
| RA 06588 | | RA | ED | 4 | 3 | 4 | 05 | 19S | 26E | 556173 | 3616360* | 1052 | 200 | | |
| RA 06986 | | RA | ED | | 1 | 4 | 05 | 19S | 26E | 556070 | 3616865* | 1055 | 195 | 165 | 30 |
| RA 07172 | | RA | ED | | 1 | 4 | 05 | 19S | 26E | 556070 | 3616865* | 1055 | 210 | 95 | 115 |
| RA 08557 | | RA | ED | 2 | 1 | 4 | 05 | 19S | 26E | 556169 | 3616964* | 1188 | 232 | 100 | 132 |
| RA 08567 | | RA | ED | 1 | 4 | 4 | 05 | 19S | 26E | 556376 | 3616561* | 1264 | 264 | 80 | 184 |
| RA 07165 | | RA | ED | | 3 | 2 | 05 | 19S | 26E | 556065 | 3617269* | 1281 | 193 | 110 | 83 |
| RA 07508 | | RA | ED | | 3 | 2 | 05 | 19S | 26E | 556065 | 3617269* | 1281 | 185 | 150 | 35 |
| RA 10133 | | RA | ED | | 3 | 2 | 05 | 19S | 26E | 556065 | 3617269* | 1281 | 177 | 138 | 39 |
| RA 06129 | | RA | ED | | 4 | 4 | 05 | 19S | 26E | 556477 | 3616462* | 1356 | 125 | 190 | -65 |
| RA 07239 | | RA | ED | | 2 | 4 | 05 | 19S | 26E | 556472 | 3616866* | 1428 | 191 | 100 | 91 |
| RA 12627 POD1 | | RA | ED | 1 | 2 | 4 | 05 | 19S | 26E | 556415 | 3617007 | 1428 | 220 | 100 | 120 |
| RA 08098 | | RA | ED | 3 | 1 | 2 | 05 | 19S | 26E | 555959 | 3617571* | 1438 | 215 | 100 | 115 |
| RA 08315 | | RA | ED | 3 | 1 | 2 | 05 | 19S | 26E | 555959 | 3617571* | 1438 | 195 | 100 | 95 |
| RA 12324 POD1 | | RA | ED | 3 | 4 | 2 | 05 | 19S | 26E | 556339 | 3617207 | 1459 | 235 | 135 | 100 |
| RA 04272 | | RA | ED | 2 | 4 | 4 | 05 | 19S | 26E | 556576 | 3616561* | 1463 | 102 | 58 | 44 |
| RA 07124 | | RA | CH | 4 | 2 | 4 | 05 | 19S | 26E | 556571 | 3616765* | 1494 | 133 | 94 | 39 |
| RA 07260 | | RA | ED | | 1 | 2 | 05 | 19S | 26E | 556060 | 3617672* | 1579 | 198 | 100 | 98 |

Average Depth to Water: **116 feet**
Minimum Depth: **58 feet**
Maximum Depth: **190 feet**

**Record Count:** 20

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

**Easting (X):** 555121.705 **Northing (Y):** 3616401.342 **Radius:** 1600

***UTM location was derived from PLSS - see Help**

Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

# Eddy Area, New Mexico

## PM—Pima silt loam, 0 to 1 percent slopes

### Map Unit Setting

*National map unit symbol:* 1w56
*Elevation:* 600 to 4,200 feet
*Mean annual precipitation:* 8 to 25 inches
*Mean annual air temperature:* 60 to 70 degrees F
*Frost-free period:* 195 to 290 days
*Farmland classification:* Farmland of statewide importance

### Map Unit Composition

*Pima and similar soils:* 98 percent
*Minor components:* 2 percent
*Estimates are based on observations, descriptions, and transects of the mapunit.*

### Description of Pima

#### Setting

*Landform:* Flood plains, alluvial flats, alluvial fans
*Landform position (three-dimensional):* Talf, rise
*Down-slope shape:* Convex, linear
*Across-slope shape:* Linear, convex
*Parent material:* Alluvium

#### Typical profile

*H1 - 0 to 3 inches:* silt loam
*H2 - 3 to 60 inches:* silty clay loam

#### Properties and qualities

*Slope:* 0 to 1 percent
*Depth to restrictive feature:* More than 80 inches
*Drainage class:* Well drained
*Runoff class:* Medium
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high (0.20 to 0.60 in/hr)
*Depth to water table:* More than 80 inches
*Frequency of flooding:* RareNone
*Frequency of ponding:* None
*Calcium carbonate, maximum content:* 15 percent
*Maximum salinity:* Nonsaline to slightly saline (0.0 to 4.0 mmhos/cm)
*Sodium adsorption ratio, maximum:* 1.0
*Available water supply, 0 to 60 inches:* High (about 11.9 inches)

#### Interpretive groups

*Land capability classification (irrigated):* 1
*Land capability classification (nonirrigated):* 7c
*Hydrologic Soil Group:* C
*Ecological site:* R070BC017NM - Bottomland

*Hydric soil rating:* No

**Minor Components**

**Reagan**

*Percent of map unit:* 1 percent
*Ecological site:* R070BC007NM - Loamy
*Hydric soil rating:* No

**Dev**

*Percent of map unit:* 1 percent
*Ecological site:* R070BC017NM - 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°25'2"W 32°41'17"N


104°24'25"W 32°40'47"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 12/1/2022 at 10:44 AM 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 | NAPP2229739197 |
| 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<br>Houston, TX 77002 | |

## Location of Release Source

Latitude 32.6839372 Longitude -104.4120317
*(NAD 83 in decimal degrees to 5 decimal places)*

| | |
|---|---|
| Site Name Patton 5 Fee #8H | Site Type Production |
| Date Release Discovered 10/22/22 | API# 30-015-39641 |

| Unit Letter | Section | Township | Range | County |
|---|---|---|---|---|
| M | 05 | 19S | 26E | 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 5 (bbls) | Volume Recovered 5 (bbls) |
| ☒ Produced Water | Volume Released 15 (bbls) | Volume Recovered 14 (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

At the battery coming into the heater treater, a hole developed before the dump on the two phase separator due to internal corrosion. An estimated 20 bbl spill of oil and PW, along with rainwater. All fluids stayed inside the lined containment. The wells were shut down to isolate the line in order for repairs to be made.

State of New Mexico
Oil Conservation Division

| | |
|---|---|
| Incident ID | NAPP2229739197 |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---|---|
| Was this a major release as defined by 19.15.29.7(A) NMAC?<br>☐ Yes ☒ 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*

☒ 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 | NAPP2229739197 |
| 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? | <50' (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 | NAPP2229739197 |
| 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: 2/13/2023

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

**OCD Only**

Received by: Jocelyn Harimon Date: 02/13/2023

State of New Mexico
Oil Conservation Division

| | |
|---|---|
| Incident ID | NAPP2229739197 |
| 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: 2/13/2023

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

**OCD Only**

Received by: Jocelyn Harimon Date: 02/13/2023

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:

Email Notification

Liner Inspection

Photographic Documentation

**Monday, February 13, 2023 at 10:51:36 Mountain Standard Time**

**Subject:** Liner Inspections
**Date:** Thursday, December 15, 2022 at 10:31:40 AM Mountain Standard Time
**From:** Tristan Jones
**To:** mike.bratcher@state.nm.us, Robert.Hamlet@state.nm.us, Jennifer.Nobui@state.nm.us
**CC:** Chris Jones, 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 LLC

**Liner Inspection Form**

Company Name: Spur Energy

Site: Patton 5 Fee 8H

Lat/Long: 32.6839372,-104.4120317

NMOCD Incident ID & Incident Date: NAPP2229739197 - 10/22/22

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: _____

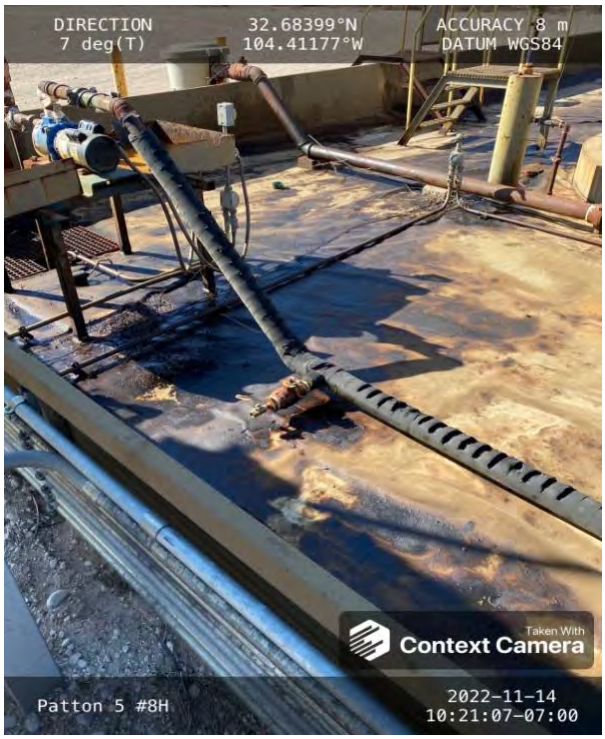
Inspector Name: Chris Jones Inspector Signature: Chris Jones

PARAGON ENVIRONMENTAL

## Photographic Documentation

### Before Remediation



PARAGON ENVIRONMENTAL

## Photographic Documentation

### During Remediation


PARAGON ENVIRONMENTAL

## Photographic Documentation

### Post Remediation




**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 185660

## CONDITIONS

| Operator: | OGRID: |
|---|---|
| Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | 328947 |
| | Action Number:<br>185660 |
| | Action Type:<br>[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 #NAPP2229739197 PATTON 5 FEE#8H, thank you. This closure is approved. | 6/14/2023 |