

Spill Volume(Bbls) Calculator		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
20.000	60.000	1.000
Cubic Feet Impacted		100.000
Barrels		17.81
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		17.81
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		17.90000

Instructions
1. Input spill measurements below. Length and width need to be input in feet and depth in inches.
2. Select a soil type from the drop down menu.
3. Select a saturation level from the drop down menu.
(For data gathering instructions see appendix tab)

Measurements	
Length (ft)	20
Width (ft)	60
Depth (in)	1.000









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

December 5, 2023

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

RE: Liner Inspection and Closure Report
Bradley 8 Fee Battery
API No. N/A
GPS: Latitude 32.66870 Longitude -104.40690
UL- N, Section 8, Township 19S, Range 26E
NMOCD Reference No. NAPP2331050245

Spur Energy Partners (Spur) has contracted Pima Environmental Services, LLC (Pima) to perform a liner inspection and prepare this closure report for the release of produced water that happened on the Bradley 8 Fee Battery (Bradley). An initial C-141 was submitted on November 6, 2023, and can be found in Appendix B. This incident was assigned Incident ID NAPP2331050245 by the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

The Bradley is located approximately twelve (12) miles southwest of Artesia, NM. This spill site is in Unit N, Section 8, Township 19S, Range 26E, Latitude 32.66870 Longitude -104.40690, Eddy County, NM. A Location Map can be found in Figure 1.

Based on the well water data from the New Mexico Office of the State Engineer, the depth to the nearest groundwater in this vicinity measures 132 feet below grade surface (BGS), positioned roughly 0.3 miles away from the Bradley, drilled on September 28, 1964. Conversely, as per the United States Geological Survey well water data, the nearest groundwater depth in this region is recorded at 87.20 feet BGS, situated approximately one mile away from the Bradley, with the last gauge conducted on February 3, 2005. For detailed references to water surveys and the precise locations of water wells, please refer to Appendix A, inclusive of the relevant maps. Notably, the Bradley is situated within a low karst area, as illustrated in Figure 3. Additionally, a comprehensive Topographic Map is available for reference in Figure 2.

Release Information

NAPP2331050245: On November 4, 2023, a section of piping, measuring four inches in diameter, which ran from the header to the separator, experienced a breach, resulting in the discharge of produced water into the lined containment area. This incident led to the release of an estimated 18 barrels of produced water into the lined containment. Subsequently, efforts were made to mitigate the spill, resulting in the recovery of approximately 18 barrels of produced water from the affected area.

A Site Map can be found in Figure 4.

Site Assessment and Liner Inspection

On November 16, 2023, the Pima personnel conducted a thorough cleaning of the lined containment by utilizing pressure washing techniques. Additionally, any remaining standing fluid was effectively removed using a vacuum truck.

On November 17, 2023, after sending the 48-hour notification via email, Pima Environmental conducted a liner inspection at this location. We concluded that this liner and containment maintained its integrity and was able to retain the fluids. The liner inspection form and photographic documentation can be found in Appendix C.

After careful review, Pima requests that this incident NAPP2331050245 be closed. Spur has complied with the applicable closure requirements.

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

Respectfully,

Sebastian Orozco

Sebastian Orozco
Project Manager
Pima Environmental Services, LLC

Attachments

Figures:

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

Appendices:

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



Pima Environmental Services

Figures:

1-Location Map

2-Topographic Map


3-Karst Map

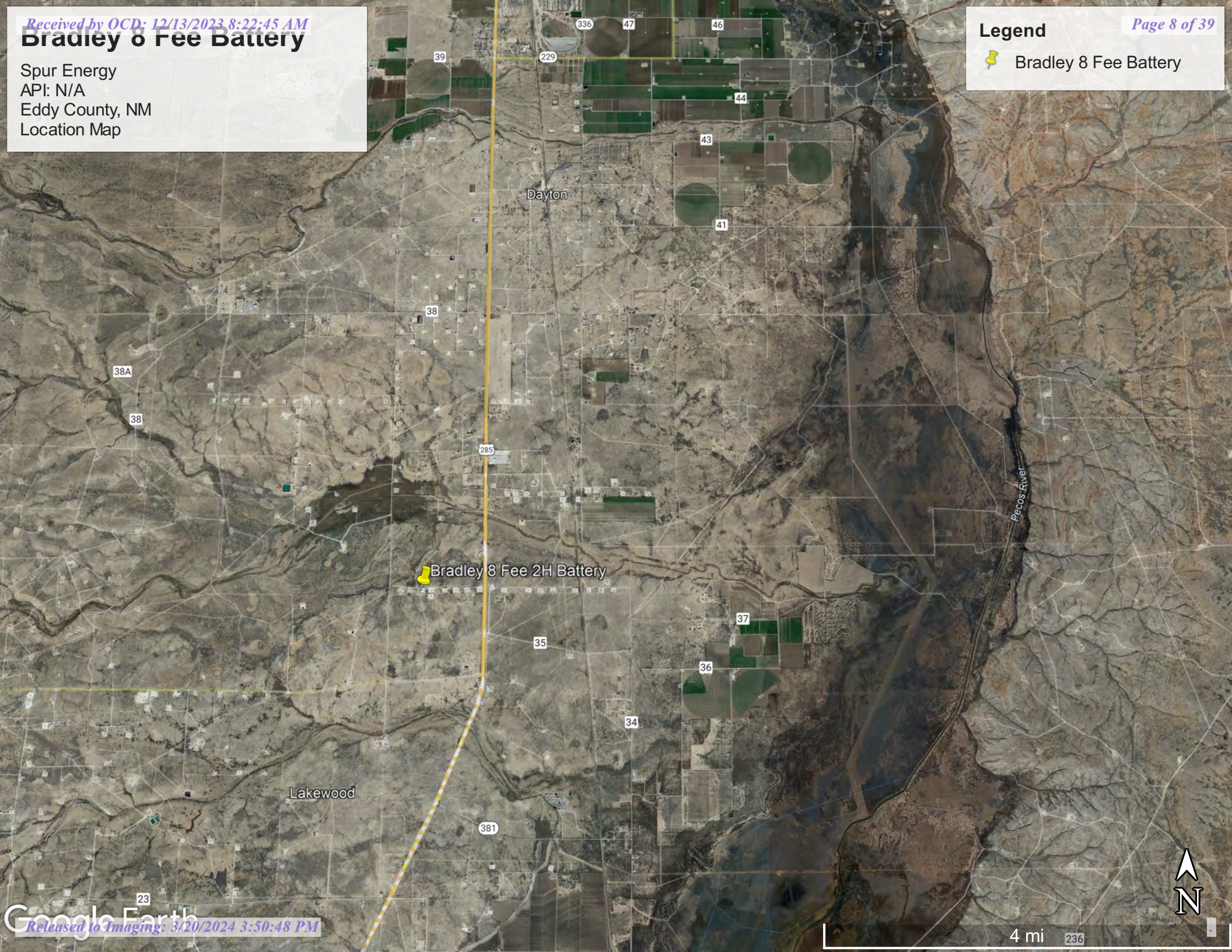
4-Site Map

Bradley 8 Fee Battery

Spur Energy
API: N/A
Eddy County, NM
Location Map

Legend


 Bradley 8 Fee Battery

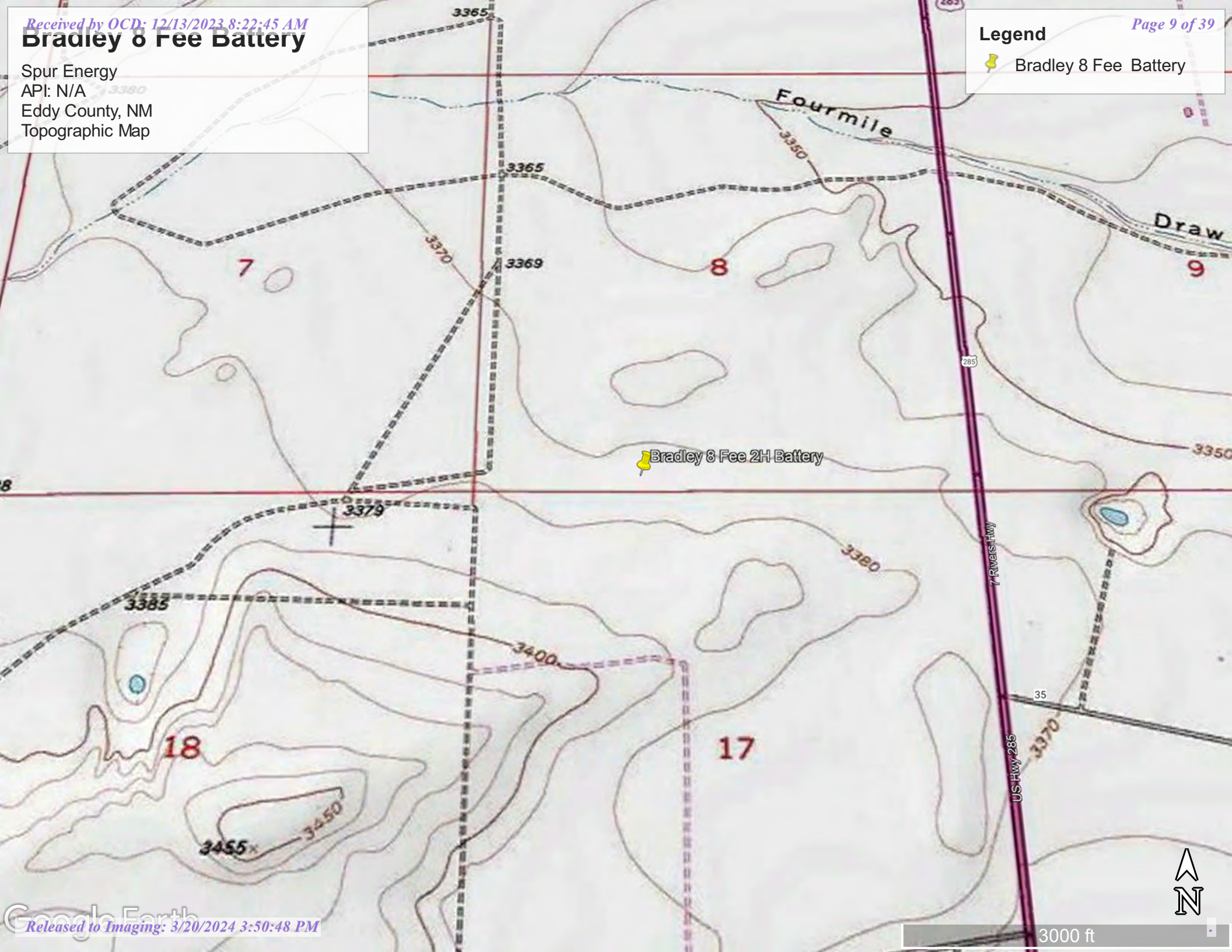


Bradley 8 Fee Battery

Spur Energy
API: N/A
Eddy County, NM
Topographic Map

Legend




 Bradley 8 Fee Battery

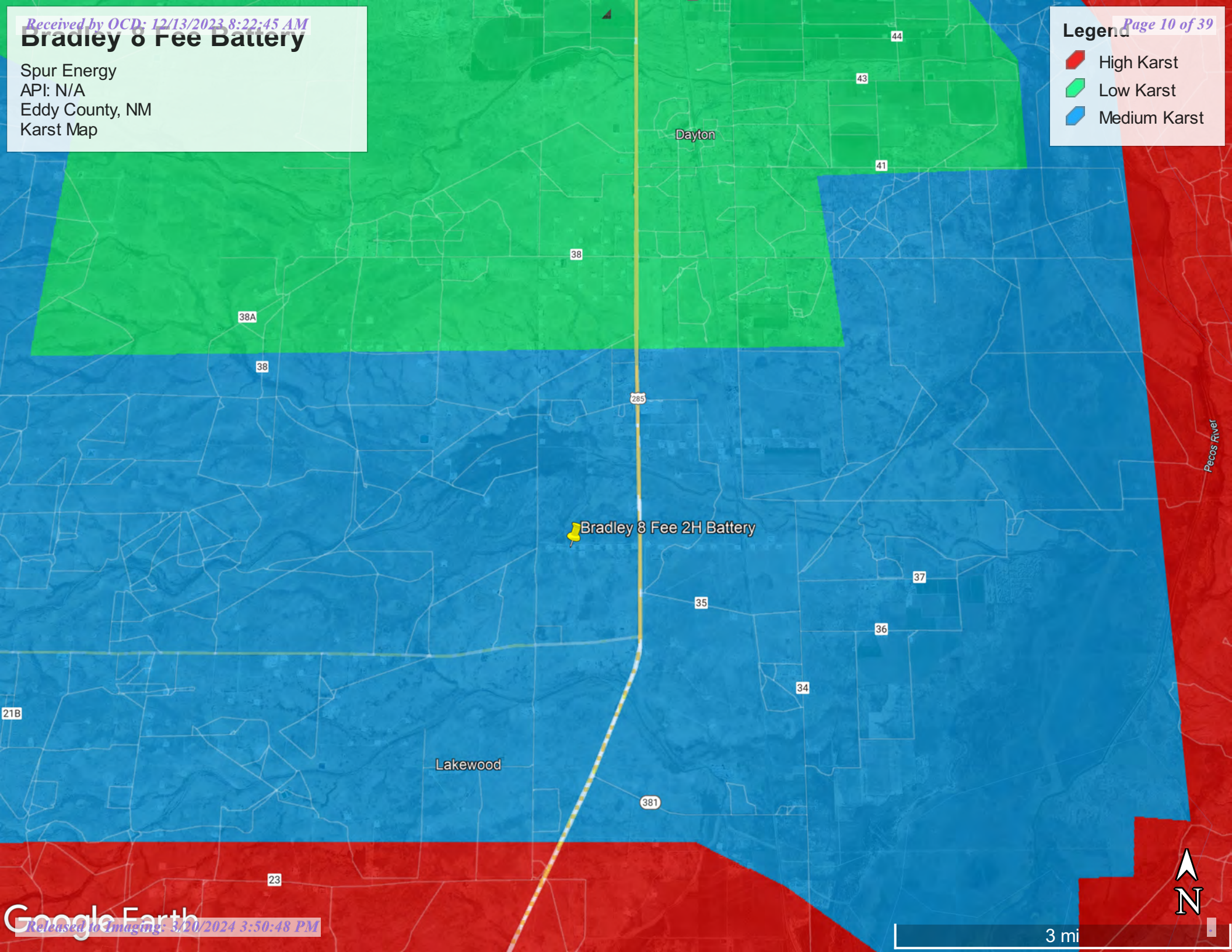


Bradley & Fee Battery

Spur Energy
API: N/A
Eddy County, NM
Karst Map

Legend



-  High Karst
-  Low Karst
-  Medium Karst




Bradley 8 Fee Battery

Spur Energy
API:30-015-39811
Eddy County, NM
Site Map

Legend

-  Bradley 8 Fee 2H Battery
-  Lined Containment



 Bradley 8 Fee 2H Battery





Pima Environmental Services

Appendix A

Water Surveys:

OSE

USGS

Surface Water Map

Wetlands Map



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(A CLW##### in the POD suffix indicates the POD has been replaced & no longer serves a water right file.)

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

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	POD Code	Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
RA 05037	RA	ED		1	2	17	19S	26E		556091	3614436*	533	475	132	343
RA 11018 POD1	RA	ED		3	4	2	17	19S	26E	556396	3613928*	1084	260	100	160
RA 06588	RA	ED		4	3	4	05	19S	26E	556173	3616360*	1764	200		
RA 09050	RA	ED		1	1	2	20	19S	26E	556001	3612916*	1809	160	105	55
RA 01343	RA	ED		2	1	1	18	19S	26E	553777	3614525*	1848	440	69	371
RA 06813	RA	CH		1	1	09	19S	26E		556883	3616056*	1865	171	97	74
RA 10262	RA	ED		2	2	2	19	19S	26E	554994	3612917*	1874	200	85	115
RA 07128	RA	ED		1	2	2	20	19S	26E	556404	3612913*	1937	134	100	34
RA 06129	RA	ED		4	4	05	19S	26E		556477	3616462*	1974	125	190	-65

Average Depth to Water: **109 feet**

Minimum Depth: **69 feet**

Maximum Depth: **190 feet**

Record Count: 9

UTMNAD83 Radius Search (in meters):

Easting (X): 555618.35

Northing (Y): 3614684.51

Radius: 2000




*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.

Bradley 8 Fee Battery

Spur Energy
AP#: N/A
Eddy County, NM
RA 05037 Pod Map

Legend

-  Bradley 8 Fee Battery
-  RA 05037
-  RA 05037- 0.31 of a mile





USGS Home
Contact USGS
Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category:
 Geographic Area:

Click to hide News Bulletins

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

Groundwater levels for the Nation

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

Search Results -- 1 sites found

site_no list =

- 323917104235201

Minimum number of levels = 1

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

USGS 323917104235201 19S.26E.20.22110

Available data for this site

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°39'17", Longitude 104°23'52" NAD27

Land-surface elevation 3,362 feet above NAVD88

The depth of the well is 110 feet below land surface.

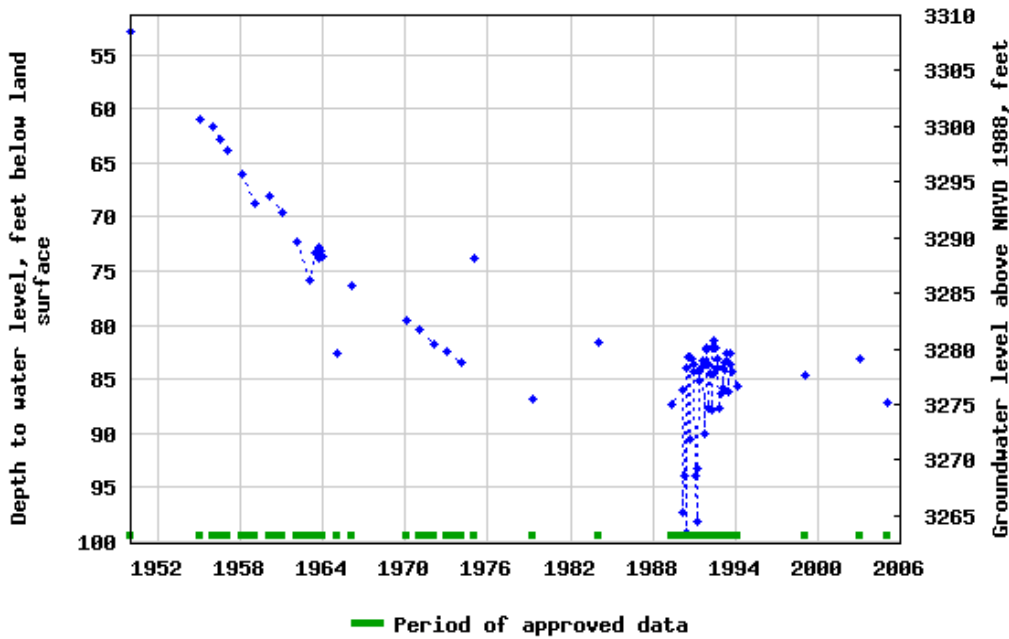
This well is completed in the Roswell Basin aquifer system (S400RSWLBS) national aquifer.

This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period

USGS 323917104235201 19S.26E.20.22110



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

[Download a presentation-quality graph](#)

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[U.S. Department of the Interior](#) | [U.S. Geological Survey](#)

Title: Groundwater for USA: Water Levels

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



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


Page Last Modified: 2023-10-17 13:59:29 EDT

0.63 0.54 nadww02

Bradley 8 Fee Battery

Spur Energy
AP#: N/A
Eddy County, NM
USGS Water Well Location Map

Legend

-  1 Mile
-  Bradley 8 Fee Battery
-  USGS 323917104235201



Bradley 8 Fee 2H Battery

M & R Trucking
7 Rivers Hwy

35




USGS 323917104235201

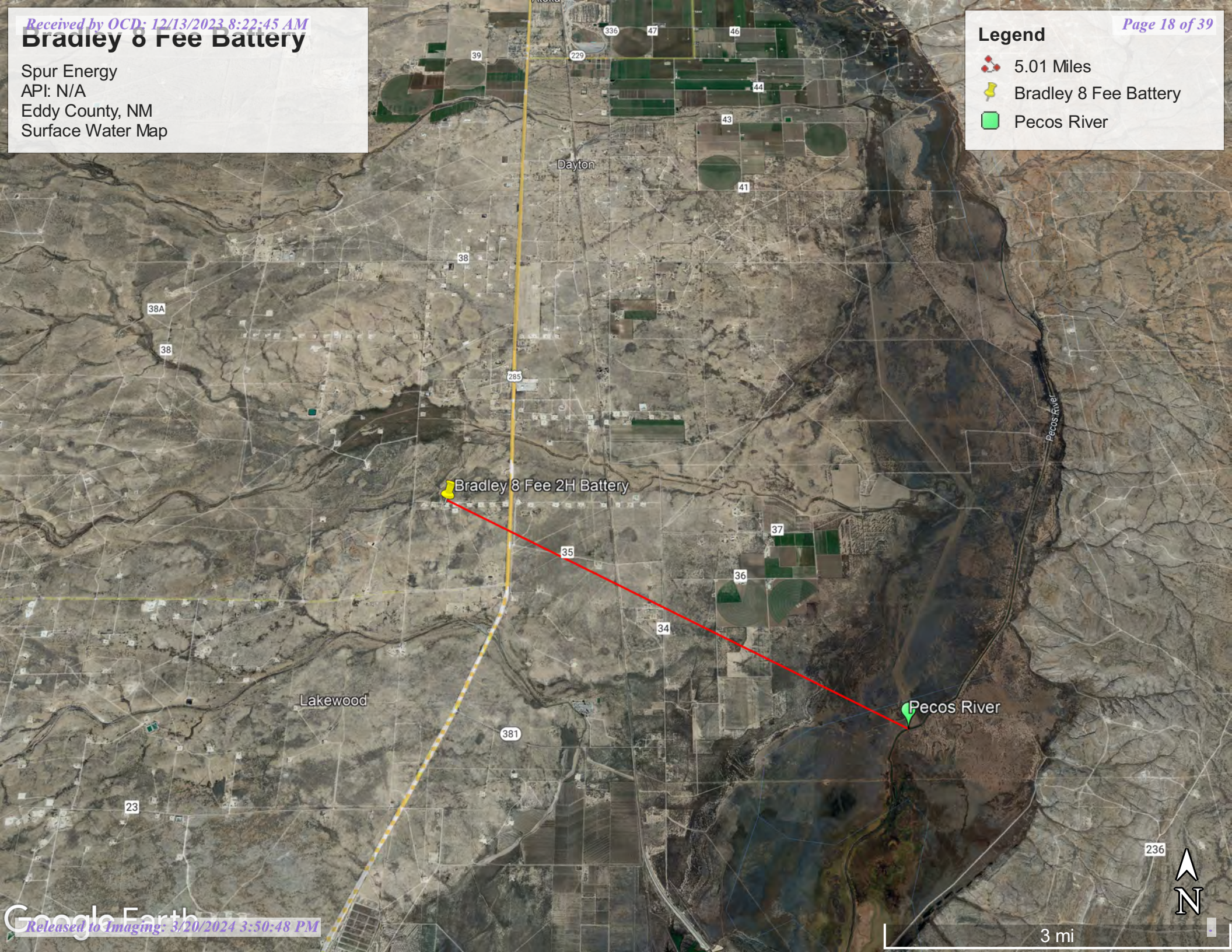


Bradley 8 Fee Battery

Spur Energy
API: N/A
Eddy County, NM
Surface Water Map

Legend

-  5.01 Miles
-  Bradley 8 Fee Battery
-  Pecos River



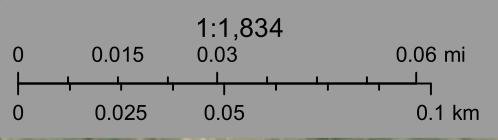
Bradley 8 Fee 2H Battery

Pecos River





Bradley 8 Fee Battery



U.S. Fish and Wildlife Service, National Standards and Support Team,
wetlands_team@fws.gov

December 5, 2023

Wetlands

- | | | |
|--------------------------------|-----------------------------------|----------|
| Estuarine and Marine Deepwater | Freshwater Emergent Wetland | Lake |
| Estuarine and Marine Wetland | Freshwater Forested/Shrub Wetland | Other |
| | Freshwater Pond | Riverine |

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMMette



104°24'43"W 32°40'22"N



1:6,000

104°24'6"W 32°39'51"N

Released to Imaging: 3/20/2024 3:30:48 PM

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		Area of Undetermined Flood Hazard Zone D
		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
MAP PANELS		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
		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 10/17/2023 at 2:13 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.



Pima Environmental Services

Appendix B

C-141 Form

48-Hour Notification

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	nAPP2331050245
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Spur Energy Partners LLC	OGRID	328947
Contact Name	Katherine Purvis	Contact Telephone	(575) 441-8619
Contact email	katherine.purvis@spurenergy.com	Incident # (assigned by OCD)	nAPP2331050245
Contact mailing address	9655 Katy Freeway; Houston, TX 77024		

Location of Release Source

Latitude 32.66870 Longitude -104.40690
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	BRADLEY 8 FEE BATTERY	Site Type	BATTERY
Date Release Discovered	11/04/2023	API# (if applicable)	N/A

Unit Letter	Section	Township	Range	County
N	8	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)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 18 BBLS	Volume Recovered (bbls) 18 BBLS
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

4" CROSS ON CIRCULATING LINE DEVELOPED A PINHOLE RELEASING PRODUCED WATER INTO LINED CONTAINMENT

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	nAPP2331050245
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 checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? N/A
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? N/A	

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why: N/A
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>Katherine Purvis</u> Title: <u>EHS Coordinator</u> Signature: <u><i>Katherine Purvis</i></u> Date: <u>11/06/2023</u> email: <u>katherine.purvis@spurenergy.com</u> Telephone: <u>(575) 441-8619</u>
<u>OCD Only</u> Received by: <u>Shelly Wells</u> Date: <u>11/6/2023</u>

Incident ID	NAPP2331050245
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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 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.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	NAPP2331050245
District RP	
Facility ID	
Application ID	

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

Printed Name: Katherine Purvis Title: EHS Coordinator

Signature: *Katherine Purvis* Date: 12/13/2023

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

OCD Only

Received by: _____ Date: _____

Incident ID	NAPP2331050245
District RP	
Facility ID	
Application ID	

Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

Closure Report Attachment Checklist: *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Katherine Purvis Title: EHS Coordinator
 Signature: *Katherine Purvis* Date: 12/13/2023
 email: Katherine.purvis@spurenergy.com Telephone: 575-441-8619

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: _____ Date: _____

Printed Name: _____ Title: _____

Sebastian@pimaoil.com

From: Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>
Sent: Friday, December 1, 2023 9:53 AM
To: sebastian@pimaoil.com
Cc: 'Gio PimaOil'; 'Lynsey Pima Oil'
Subject: Re: [EXTERNAL] Bradley 8 Fee Battery (NAPP2331050245) Variance Request

Good morning Sebastian,

Thank you for your correspondence. OCD is much appreciative of your candor and transparency. Your variance request is approved.

OCD understands the hectic schedules we all have and omissions and/or oversights do occur. However, please be conscience of the required notifications in future releases.

Please keep a copy of this communication for inclusion within the appropriate report submittal.

The OCD requires a copy of all correspondence relative to remedial activities be included in all proposals and/or final closure reports. Correspondence required to be included in reports may include, but not limited to, notifications for liner inspections, sample events, spill/release/fire, and request for time extensions or variances.

Thanks again. Have a great and safe day!

Regards,

Nelson Velez • Environmental Specialist - Adv
Environmental Bureau | EMNRD - Oil Conservation Division
1000 Rio Brazos Road | Aztec, NM 87410
(505) 469-6146 | nelson.velez@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>



From: sebastian@pimaoil.com <sebastian@pimaoil.com>
Sent: Thursday, November 30, 2023 12:03 PM
To: Velez, Nelson, EMNRD <Nelson.Velez@emnrd.nm.gov>
Cc: 'Gio PimaOil' <gio@pimaoil.com>; 'Lynsey Pima Oil' <lynsey@pimaoil.com>
Subject: [EXTERNAL] Bradley 8 Fee Battery (NAPP2331050245) Variance Request

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good morning Nelson,

Attached, please find the Liner Inspection 48-Hour notification for the Bradley 8 Fee 2H Battery (Incident Number: nAPP2328944050). Regrettably, I overlooked including the incident number for a second incident that overlaps the previously cleaned and inspected area. The additional incident number is (NAPP2331050245).

I sincerely apologize for the omission and kindly request your understanding. I am seeking approval to use the documentation provided in this email to cover both incident numbers. Your support and assistance in this matter would be greatly appreciated.

Thank you for your attention and prompt consideration.

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



Sebastian@pimaoil.com

From: Wells, Shelly, EMNRD <Shelly.Wells@emnrd.nm.gov>
Sent: Tuesday, November 14, 2023 1:35 PM
To: sebastian@pimaoil.com
Cc: 'Lynsey Pima Oil'; Hamlet, Robert, EMNRD; Bratcher, Michael, EMNRD
Subject: RE: [EXTERNAL] Bradley 8 Fee 2H (nAPP2328944050) - 48 Hour Notification

Good afternoon Sebastian,

The OCD has received your notification. Include a copy of this and all notifications in the remedial and/or closure reports to ensure the notifications are documented in the project file.

Thank you,

Shelly

Shelly Wells * Environmental Specialist-Advanced
Environmental Bureau
EMNRD-Oil Conservation Division
1220 S. St. Francis Drive | Santa Fe, NM 87505
(505)469-7520 | Shelly.Wells@emnrd.nm.gov
<http://www.emnrd.state.nm.us/OCD/>

From: sebastian@pimaoil.com <sebastian@pimaoil.com>
Sent: Tuesday, November 14, 2023 12:59 PM
To: Enviro, OCD, EMNRD <OCD.Enviro@emnrd.nm.gov>
Cc: 'Lynsey Pima Oil' <lynsey@pimaoil.com>
Subject: [EXTERNAL] Bradley 8 Fee 2H (nAPP2328944050) - 48 Hour Notification

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

Good afternoon,

Pima Environmental has scheduled a liner inspection at the Bradley 8 Fee 2H (nAPP2328944050) on November 17th, 2023. Our personnel will be on-site starting at 7 am. Thank you.

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





Pima Environmental Services

Appendix C

Liner Inspection Form

Photographic Documentation



Pima Environmental Services, LLC

Liner Inspection Form

Company Name: Spur Energy

Site: Bradley 8 Fee Battery

Lat/Long: 32.66870, -104.40690

NMOCD Incident ID & Incident Date: NAPP2331050245 11/20/2023

2-Day Notification Sent: via Email by Sebastian Orozco 11/14/2023

Inspection Date: 11/17/2023

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

Other: _____

Visualization	Yes	No	Comments
Is there a tear in the liner?		X	
Are there holes in the liner?		X	
Is the liner retaining any fluids?	X		The inspection images of the liner reveal residual fluid resulting from the remediation event involving power washing.
Does the liner have integrity to contain a leak?	X		

Comments: _____

Inspector Name: Andrew Franco Inspector Signature: Andrew Franco

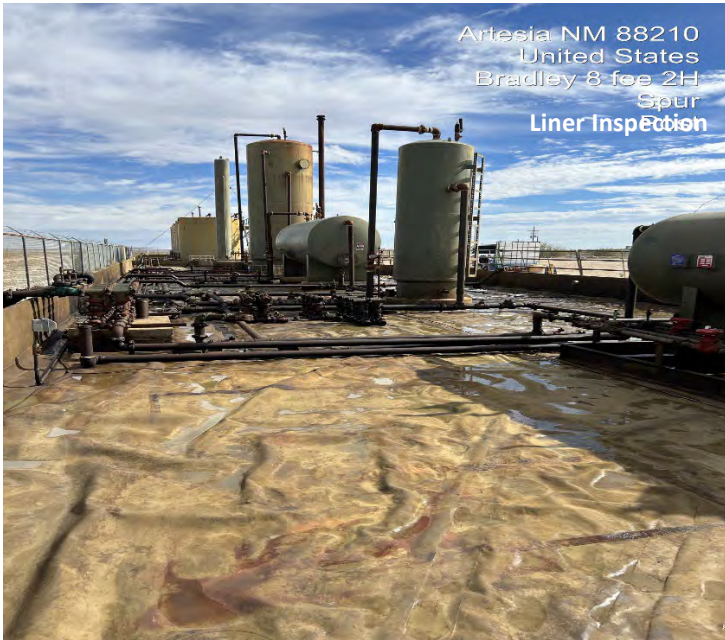


**SITE PHOTOGRAPHS
SPUR ENERGY PARTNERS**

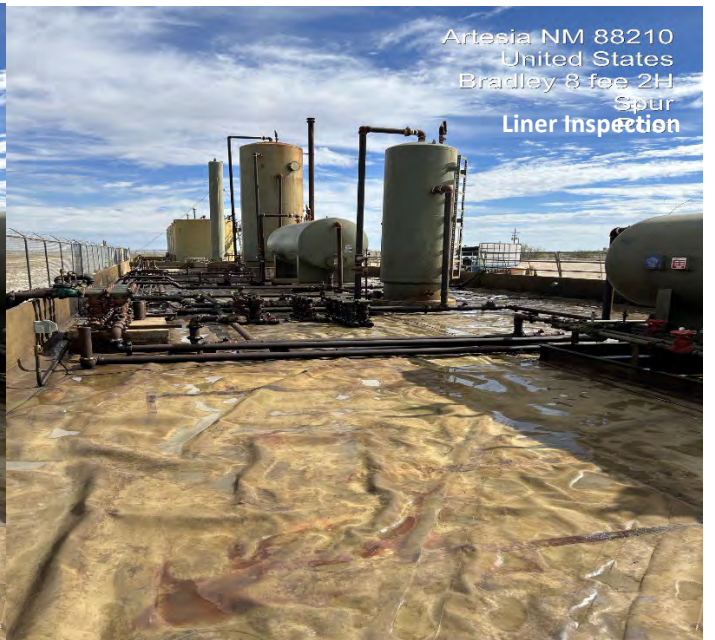
Bradley 8 Fee 2H

Liner Inspection





Artesia NM 88210
United States
Bradley 8 fee 2H
Spur
Liner Inspection



Artesia NM 88210
United States
Bradley 8 fee 2H
Spur
Liner Inspection



Artesia NM 88210
United States
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Spur
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Spur
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 Phone:(575) 748-1283 Fax:(575) 748-9720
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 1000 Rio Brazos Rd., Aztec, NM 87410
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District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS

Action 293950

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 293950
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2331050245
Incident Name	NAPP2331050245 BRADLEY 8 FEE BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source

Please answer all the questions in this group.

Site Name	BRADLEY 8 FEE BATTERY
Date Release Discovered	11/04/2023
Surface Owner	Private

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Fitting Produced Water Released: 18 BBL Recovered: 16 BBL Lost: 2 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	4" CROSS ON CIRCULATING LINE DEVELOPED A PINHOLE RELEASING PRODUCED WATER INTO LINED CONTAINMENT

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QUESTIONS, Page 2

Action 293950

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 293950
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	N/A

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 12/13/2023
--	--

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1625 N. French Dr., Hobbs, NM 88240
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QUESTIONS, Page 3

Action 293950

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	293950
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	11/16/2023
On what date will (or did) the final sampling or liner inspection occur	11/17/2023
On what date will (or was) the remediation complete(d)	11/17/2023
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 293950

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 293950
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	No
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	No

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 12/13/2023
--	--

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 293950

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 293950
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	293944
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/17/2023
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	4000

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	liner was pressure washed and inspected; it was intact and working properly

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 12/13/2023
--	--

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CONDITIONS

Action 293950

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 293950
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2331050245 BRADLEY 8 FEE BATTERY, thank you. This Remediation Closure Report is approved.	3/20/2024