

<b>Spill Volume(Bbls) Calculator</b>		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
85.000	50.000	1.000
Cubic Feet Impacted		354.167
Barrels		63.08
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		63.08
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		63.10000

<b>Instructions</b>
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)

<b>Measurements</b>	
Length (ft)	85
Width (ft)	50
Depth (in)	1.000









2617 W. Marland  
Hobbs, NM 88240  
Office: (575) 964-2880

**April 5, 2024**

**Kathy Purvis**

Spur Energy Partners, LLC  
9655 Katy Freeway  
Suite 500  
Houston, TX 77024

**RE: Spur Energy Partners, LLC  
Conoco 8 St 4 Tank Battery  
NMOCD Reference No. nAPP2231844500  
UL/ O Sec. 8, T17S, R29E  
API No. 30-015-39882  
GPS: 32.8452, -104.0935**

Mrs. Purvis,

Etech Environmental & Safety Solutions (Etech), on behalf of Spur Energy Partners, LLC, has prepared this *Amended Remediation and Liner Inspection Summary* for the release at the Conoco 8 St 4 Tank Battery location. The site is located approximately 17 miles east of Artesia, NM, in Unit Letter O, Section 8, Township 17 South, Range 29 East. The GPS coordinates of the site are: 32.8452, -104.0935. A "Site Location Map" is provided as Attachment #1.

On April 13, 2023, Etech commenced remediation activities at the site. Impacted gravel from within the lined, approximately 5,800 square-foot secondary containment was removed. After the removal of all contaminated material, Etech personnel performed a walk-down of the entire liner while re-installing clean material. The liner was inspected before the placement of the clean material, and photographs were taken during the installation of the clean material.

A closure request was previously submitted to the NMOCD and subsequently rejected for the following reasons: affected material was not removed before inspection, and a scaled diagram showing exactly what area was impacted by the release was not included. However, all impacted material was removed before inspection to clearly verify liner integrity. Each portion of the liner was free of material before being inspected. The photographs are indicative of post liner inspection where clean material had begun to be installed. A "Scaled Site Map" is included as Attachment 4.

Beginning on March 4, 2024, Etech performed an additional liner inspection. All material was removed from the liner and stockpiled prior to inspecting the liner. Additional photographs were taken to show the liner inspection was done without having any material present. After inspection and verification of liner integrity, the previously removed material was placed back on the liner.

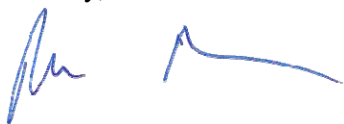
Based on observations made by Etech personnel during the course of inspection activities, it was determined that the integrity of the liner is adequate, and the liner is performing as intended. The attached photographs of the liner show the integrity of the liner has not been compromised. Therefore, Etech believes no further action is necessary at this time. A "Liner Integrity Inspection Report" is provided as Attachment 2. A "Photographic Log" is provided as Attachment 3.

During the course of remediation activities, approximately 12 cubic yards of impacted gravel was removed and transported to an NMOCD-permitted surface waste facility for disposal.

Based on the demonstrated integrity of the exposed liner in the affected area and field activities conducted to date, Etech recommends Spur Energy Partners, LLC, provide copies of this *Amended Remediation and Liner Inspection Summary* to the appropriate agencies and request closure be granted to the Conoco 8 St 4 Tank Battery Site.

Please contact me if you have any questions or wish to discuss the site.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Robbie Runnels', with a stylized flourish at the end.

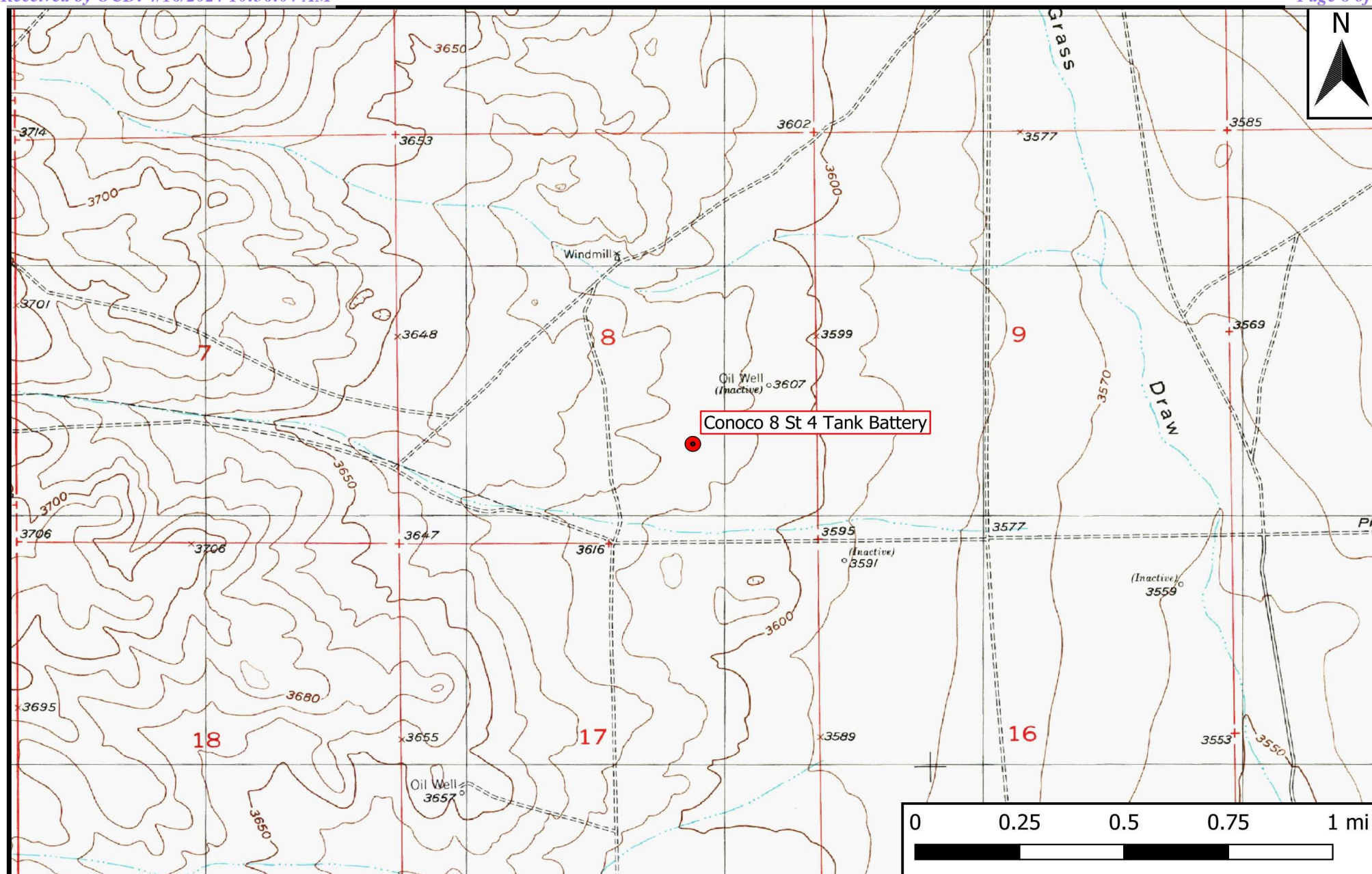
Robbie Runnels  
Project Manager  
Etech Environmental & Safety Solutions  
(432) 282-9143

Attachments:

- Attachment 1 - Site Location Map
- Attachment 2 - Liner Integrity Inspection Report
- Attachment 3 - Photographic Log
- Attachment 4 - Scaled Site Map
- Attachment 5 - Disposal Manifest
- Attachment 6 - Electronic C-141 Supplemental Documentation
- Attachment 7 - Correspondence

# **Attachment 1**

## **Site Location Map**



### Legend

 Site Location

## Attachment 1

## Site Location Map

Spur Energy Partners, LLC

### Conoco 8 St 4 Tank Battery

GPS: 32.8452, -104.0935

Eddy County

eTECH



Drafted: mag

Checked: jwl

Date: 7/6/23



## **Attachment 2**

# **Liner Integrity Inspection Report**



# Liner Integrity Inspection Report

Company: \_\_\_\_\_ Spur Energy \_\_\_\_\_ Site Name: \_\_\_\_\_ Conoco 8 State 4 Battery \_\_\_\_\_

Project #: \_\_\_\_\_ Inspection Tech: \_\_\_\_\_ Robbie Runnels \_\_\_\_\_ Date: \_\_\_\_\_ 3/4-3/6/2024 \_\_\_\_\_

## Visual Inspection

Type of Secondary Containment				Containment Status			
Earthen	<input checked="" type="checkbox"/>	Cement	<input type="checkbox"/>	Free Fluid	<input type="checkbox"/>	Traces of Leak Inside	<input type="checkbox"/>
Lined	<input checked="" type="checkbox"/>	Coated Fabrics/Laminates	<input type="checkbox"/>	Intermittent Pooling	<input type="checkbox"/>	Traces of Leak Outside	<input type="checkbox"/>
Steel	<input type="checkbox"/>	Other _____	<input type="checkbox"/>	Intact	<input type="checkbox"/>	Dry	<input type="checkbox"/>

## Observations

### Environmental Damage

Damage from animals or vegetation compromising liner integrity ☐

Discoloration, erosion, or chemical degradation of the liner ☐

Degradation from the storm water flow or erosion of containment ☐

### Comments

N/A

N/A

N/A

### Physical Damage

Cracks, holes, bulges, stains, chips, or seepages in the liner system ☐

Improper or deferred maintenance of the liner system ☐

Dike wall, foundation, or embankment movement, settlement, or deterioration compromising liner integrity ☐

Degradation of the liner system at penetrations (piping, supports, wells, foundations, pads, etc.) ☐

Damage to the liner system from equipment, vehicles, foot traffic, etc. ☐

Evidence of foundation movement, settlement, or deterioration ☐

### Comments \*Please take pictures of any type of damage (holes, etc.)

N/A

N/A

N/A

N/A

N/A

N/A

## **Attachment 3**

### **Photographic Log**

Photographic Log

<b>Photo Number:</b> #1	
<b>Photo Direction:</b> West	
<b>Photo Description:</b>  Spill Area	

<b>Photo Number:</b> #2	
<b>Photo Direction:</b> West	
<b>Photo Description:</b>  Exposed Liner	

Mar 7, 2024 at 12:31:36 PM  
+32.845290,-104.094152  
275° W  
Artesia NM 88210  
United States

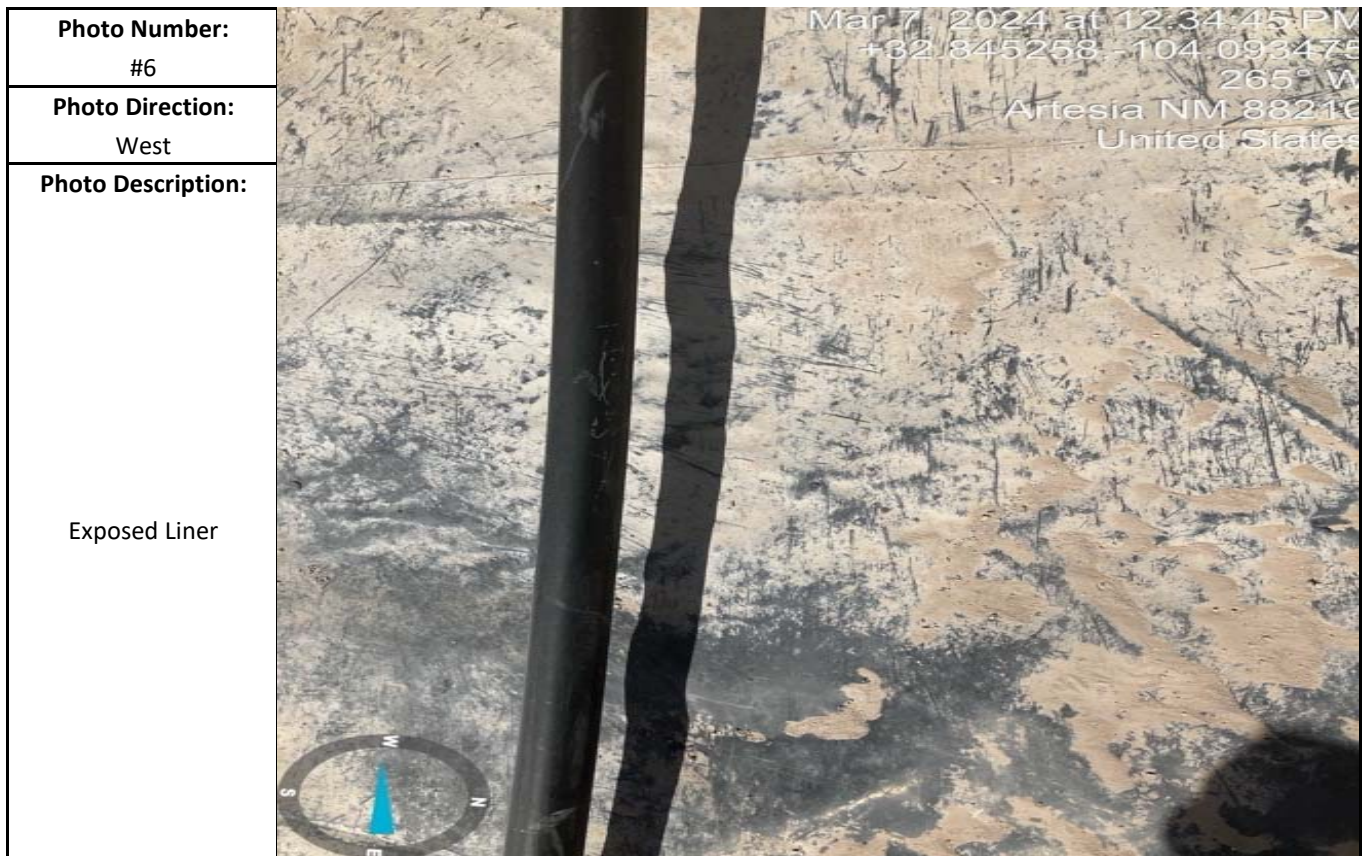
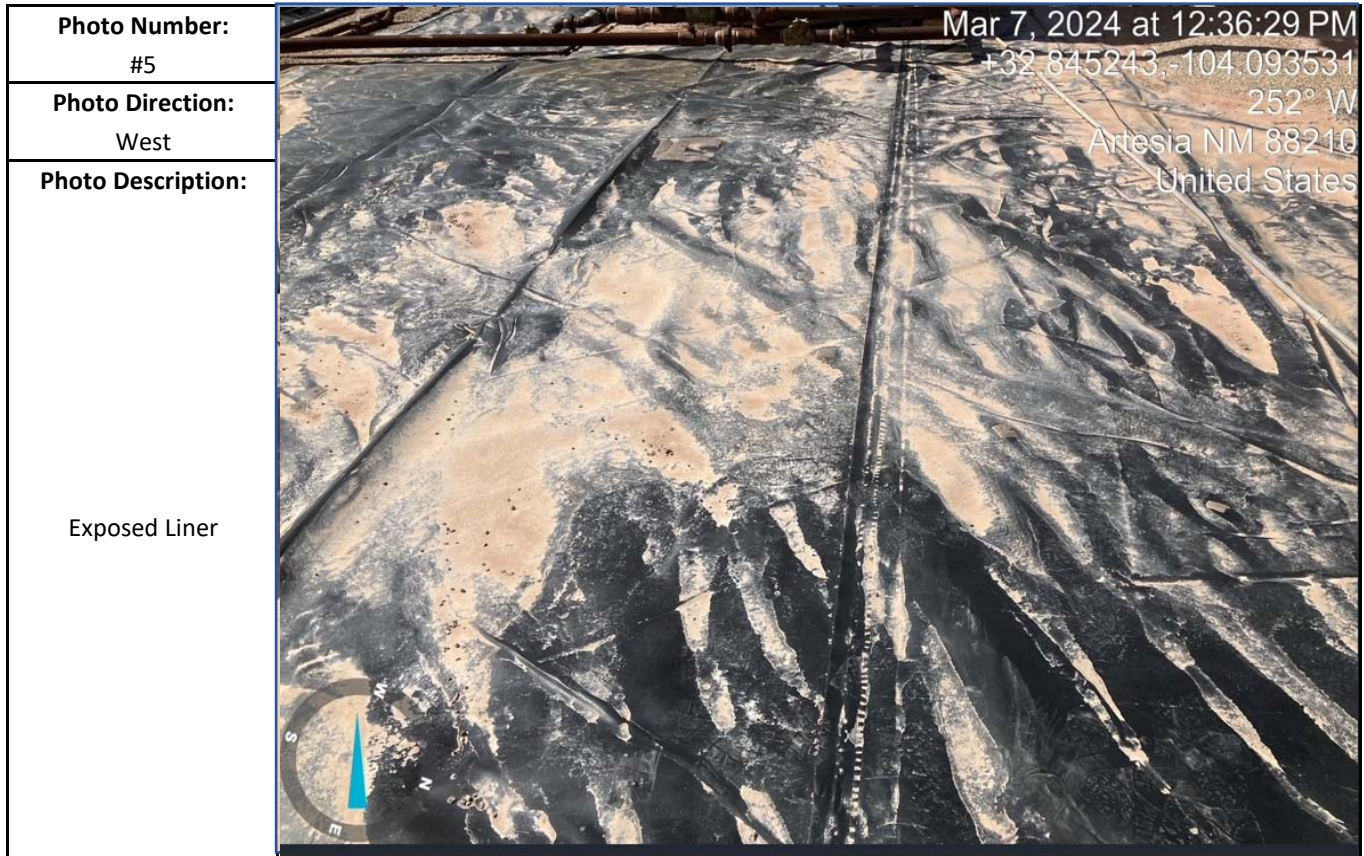


## Photographic Log





## Photographic Log



## **Attachment 4**

### **Scaled Site Map**





Google Earth

50 ft



Legend:



Impacted Area

**Attachment 4**

Scaled Site Map

Spur Energy Partners, LLC  
Conoco 8 St 4 Tank Battery  
GPS: 32.8452, -104.0935  
Eddy County

**eTECH**

**Environmental & Safety Solutions, Inc.**



Drafted:

Checked: jwl

Date:

2/7/24



## **Attachment 5**

### **Disposal Manifest**

## TRANSPORTER'S MANIFEST

SHIPPERS FACILITY NAME AND ADDRESS:

Spur Energy Partners, LLC  
9655 Katy Freeway  
Suite 500  
Houston, TX 77024

LOCATION OF MATERIAL:

Site: Conoco 8 St 4 Tank Battery  
Legals: UL/ O Sec 8 T17S - R29E  
Location: Eddy County, New Mexico  
API/NMOCD: 30-015-39882

TRANSPORTERS NAME AND ADDRESS:

ETech Environmental  
2617 W. Marland  
Hobbs, NM 88240

DESCRIPTION OF WASTE:

E&amp;P Exempt

VOLUME: 12yLoad #1

2

3

4

5

Volume12yDriverEJDisposalFACILITY CONTACT:

Kathy Purvis  
9655 Katy Freeway  
Suite 500  
Houston, TX 77024

Signature Zach Conder for Kathy Purvis

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

NAME OF TRANSPORTER: (DRIVER)

ETech Environmental

Name: Emilio JaramilloSignature: EDate: 4.18.23DISPOSAL SITE:

Lea Land, Inc.  
6387 Hobbs Hwy  
Carlsbad, NM 88220

Signature: MsanchezDate: 4/18/23

Direct Bill:  
Care Of:

Spur Energy Partners, LLC  
Kathy Purvis

# LEA LAND DISPOSAL SITE NEW MEXICO

MILE MARKER #64 US HWY 62/180 • 30 MILES EAST OF CARLSBAD, NM • PHONE (575) 887-4048

## LEA LAND, LLC

1300 WEST MAIN STREET • OKLAHOMA CITY, OK 73106 • PHONE (405) 236-4257

### NON-HAZARDOUS WASTE MANIFEST

NO **178109**

1. PAGE \_\_\_ OF \_\_\_

2. TRAILER NO. **128**

G E N E R A T O R	3. COMPANY NAME <b>Spur Energy</b>		4. ADDRESS <b>9855 KATY FREEWAY SUITE 500</b>		5. PICK-UP DATE <b>4/18/2023</b>		
	PHONE NO. <b>(833) 930-8502</b>		CITY <b>Houston</b>	STATE <b>Tx.</b>	ZIP <b>77024</b>	6. TNRCC I.D. NO.	
	7. NAME OR DESCRIPTION OF WASTE SHIPPED:			8. CONTAINERS No. Type	9. TOTAL QUANTITY	10. UNIT Wt/Vol.	11. TEXAS WASTE ID #
	a. <b>Non-Regulated, Non Hazardous Waste</b>			<b>1</b>	<b>CM</b>		
T R A N S P O R T E R S	b.						
	c.						
	d. <b>WT: 25580</b>						
	12. COMMENTS OR SPECIAL INSTRUCTIONS: <b>CONOCO 8 ST 4 TANK BATTERY</b>			13. WASTE PROFILE NO.			
D I S P O S I T O R S	14. <b>IN CASE OF EMERGENCY OR SPILL, CONTACT</b>						
	NAME <b>JOE ONTIVEROS</b>		PHONE NO. <b>575-887-4048</b>		24-HOUR EMERGENCY NO.		
	15. <b>GENERATOR'S CERTIFICATION:</b> I Hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations, including applicable state regulations, and are the same materials previously approved by LEA LAND, LLC						
	PRINTED/TYPED NAME <b>CO. MAN: KATY PURVIS</b>			SIGNATURE			DATE
D I S P O S I T O R S	16. <b>TRANSPORTER (1)</b>			17. <b>TRANSPORTER (2)</b>			
	NAME: <b>ETECH ENVIRONMENTAL</b>			NAME:			
	TEXAS I.D. NO.			TEXAS I.D. NO.			
	IN CASE OF EMERGENCY CONTACT: <b>KATY PURVIS</b>			IN CASE OF EMERGENCY CONTACT:			
D I S P O S I T O R S	EMERGENCY PHONE: <b>(432) 466-4450</b>			EMERGENCY PHONE:			
	18. <b>TRANSPORTER (1):</b> Acknowledgment of receipt of material			19. <b>TRANSPORTER (2):</b> Acknowledgment of receipt of material			
	PRINTED/TYPED NAME <b>X</b>			PRINTED/TYPED NAME			
	SIGNATURE <b>X</b> DATE <b>4/18/2023</b>			SIGNATURE DATE			
D I S P O S I T O R S	Lea Land, LLC		ADDRESS: <b>Mile Marker 64, U.S. Hwy 62/180, 30 Miles East of Carlsbad, NM</b>		PHONE: <b>575-887-4048</b>		
	PERMIT NO. <b>WM-01-035 - New Mexico</b>		20. COMMENTS				
	21. <b>DISPOSAL FACILITY'S CERTIFICATION:</b> I Hereby certify that the above described wastes were delivered to this facility, that the facility is authorized and permitted to receive such wastes.						
	AUTHORIZED SIGNATURE <b>M Sanchez</b>		CELL NO. <b>2A</b>		DATE <b>4/18/2023</b>	TIME <b>9</b>	

6:56AM

Ramirez&sons Inc.

TICKET NUMBER 3687

4-18-23

3404 N. Enterprise Dr.

HOBBS NM 88240

Delivery Com. ET

Po#OrJob Name. Conoco8

Sold To: ETech

53700 1b GROSS

25300 1b TARE

28400 1b NET

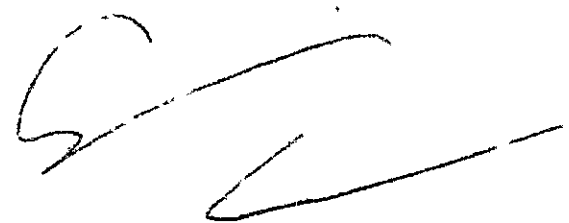
DRIVER IN/OUT Out

TRUCK # 128

PRODUCT 7023

14.20 TONS 3/8" MINUS

Weighmaster: AaronA



## **Attachment 6**

### **Electronic C-141 Supplemental Documentation**



## Electronic C-141 Supplemental Documentation

**Spur Energy Partners, LLC  
Conoco 8 St 4 Tank Battery**

#N/A

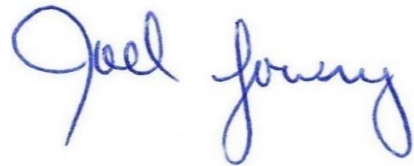
Unit Letter , Section , Township South, Range East  
Latitude 32.8452 North, Longitude 104.0935 West  
**NMOCD Reference No. nAPP2231844500**

Prepared By:

**Etech Environmental & Safety Solutions, Inc.**  
2617 W. Marland  
Hobbs, New Mexico 88240



Robbie Runnels



Joel W. Lowry



Midland • San Antonio • Lubbock • Hobbs • Lafayette

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SUPPLEMENTAL CLOSURE REQUEST ANSWERS.....	<b>5.0</b>

## 1.0 ELECTRONIC SAMPLING NOTIFICATION

Date of first excavation confirmation soil sample collection:	NA
Total area sampled (sq. ft.):	NA
Total number of excavation confirmation soil samples:	NA
Primary sample technician:	NA
Contact information of primary sample technician:	NA

### Driving directions to Site:

From the INT of US HWY 82 and CR 211, Go N on CR 211 2.3 miles. Go E 0.1 miles. Go SE to location.  
(32.84520, -104.09350)

*Email and/or verbal final sampling notifications may have previously been conducted. In order to submit an electronic C-141 Closure Report an electronic sampling notification containing the above information must be placed online in the NMOCD Portal.*



## 2.0 SUPPLEMENTAL SITE CHARACTERIZATION ANSWERS

**What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)?**

**Between 75 and 100 (ft.)**

*Please reference depth to groundwater information packet provided in the C-141 Closure Report*

**What method was used to determine the depth to groundwater?**

**Estimate or Other**

*Please reference depth to groundwater information packet provided in the C-141 Closure Report. It is possible that one or more methods were utilized to make a reasonable determination of probable depth to groundwater.*

**Did this release impact groundwater or surface water?**

**No**

*Please reference the attached C-141 Closure Report.*

**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?**

**> 5 (mi.)**

*Please reference Figure 1 in the attached C-141 Closure Report and/or the attached Figure.*

**Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?**

**1 to 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**An occupied permanent residence, school, hospital, institution or church?**

**> 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?**

**> 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**Any other fresh water well or spring?**

**> 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**Incorporated municipal boundaries or a defined municipal fresh water well field?**

**> 5 (mi.)**

*Please reference Figure 1 in the attached C-141 Closure Report and/or the attached Figure.*

**A wetland?**

**> 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**A subsurface mine?**

**> 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**A (non-karst) unstable area?**

**, overlying, or wi**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**Categorize the risk of this well/site being in a karst geology.**

**High**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**A 100-year floodplain**

**1 to 5 (mi.)**

*Please reference Figure 2 in the attached C-141 Closure Report and/or the attached Figure.*

**Did the release impact areas not on an exploration, development, production, or storage site?**

**No**

*Please reference Figure 3 in the attached C-141 Closure Report and/or the attached Figure.*

### 3.0 SUPPLEMENTAL REMEDIATION PLAN ANSWERS

Requesting a remediation plan approval with this submission?

Yes

*Answer yes to this question if you are uploading a C-141 Workplan or a C-141 Closure (at-risk closure)*

Have the lateral and vertical extents of contamination been fully delineated?

Yes

*Please reference Figure 3 in the attached C-141 Report and/or the attached Figure.*

Was this release entirely contained within a lined containment area?

Yes

*Please reference Figure 3 in the attached C-141 Report and/or the attached Figure.*

Soil Contamination Sampling: (Provide the highest observable concentration for each, in mg/kg.)

Chloride (EPA 300.0 or SM4500 CL b)

NA

TPH (GRO + DRO +MRO) (EPA SW-846 Method 8015M)

NA

GRO+DRO (EPA SW-846 Method 8015M)

NA

BTEX (EPA SW-846 Method 8021B or 8260B)

NA

Benzene (EPA SW-846 Method 8021B or 8260B)

NA

*Please reference Table 1 in the attached C-141 Report and/or the attached Table 1.*

On what estimated date did, or will the remediation commence?

3/4/2024

On what date did, or will the final sampling or liner inspection occur?

3/4/2024

On what date will (or was) the remediation complete(d).

3/4/2024

*Please reference the attached C-141 Report and/or the attached Table 1.*

What is the estimated surface area (in sq. ft.) that will *eventually* be reclaimed?

NA

What is the estimated volume (in cy) that has or will *eventually* be reclaimed?

NA

What is the estimated surface area (in sq. ft.) that has or will be remediated?

5800

What is the estimated volume (in cy) that has or will be remediated?

12

*Please reference Figure 6 in the attached C-141 Report and/or the attached Figure.*

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

(Ex Situ) excavation and off-site disposal (i.e. dig and haul)

Yes

Which OCD approved facility will be used for off-site disposal?

Lea Land, Inc.

FEEM0112342028

#### 4.0 SUPPLEMENTAL DEFERRAL REQUEST ANSWERS (if applicable)

Are you requesting a deferral of remediation closure due date with the approval of this submission?	No
Have the lateral and vertical extents of contamination been fully delineated?	NA
Is the remaining contamination in areas immediately under or around production equipment where remediation could cause a major facility deconstruction?	NA
What is the remaining surface area (sq. ft.) that will still need to be remediated if a deferral is granted?	NA
What is the remaining volume ( cy) that will still need to be remediated if a deferral is granted?	NA
Enter the facility ID (f#) on which the deferral should be granted:	NA
Enter the API (30-) on which the deferral should be granted:	NA
Contamination does not cause an imminent risk to human health, the environmental or groundwater:	TRUE

## 5.0 SUPPLEMENTAL REMEDIATION CLOSURE REQUEST ANSWERS

*Not to be used if a deferral is being requested.*

**Requesting a remediation closure approval with this submission?**

Yes

*Note: an electronic sampling notification or electronic liner inspection notice before proceeding past this step.*

**Have the lateral and vertical extents of contamination been fully delineated?**

NA

**Was the release entirely contained within a lined containment area?**

Yes

*Note: you must have done an electronic sampling notification before proceeding past this step.*

**What was the total surface area (sq. ft.) remediated?**

5800

**What was the total volume (cy) remediated?**

12

**All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste containing earthen material with concentrations of less than 600 mg/kg chloride, 100 mg/kg TPH, 50 mg/kg BTEX and 10 mg/kg Benzene?**

Yes

**What was the total surface area (sq. ft.) reclaimed?**

NA

**What was the total volume (cy) reclaimed?**

NA

**Summarize any additional remediation activities not included by answers above?**

Liner was inspected and the integrity of the liner was not compromised. Impacted material was disposed of at an approved facility. Clean, non-impacted material replaced the impacted.

## **Attachment 7 Correspondence**

**Robbie Runnels**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, February 29, 2024 12:34 PM  
**To:** Robbie Runnels  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 319061

You don't often get email from ocdonline@state.nm.us. [Learn why this is important](#)

To whom it may concern (c/o Robbie Runnels for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2104859748.

The liner inspection is expected to take place:

**When:** 03/06/2024 @ 13:00

**Where:** J-08-17S-29E 0 FNL 0 FEL (32.8457031,-104.0937958)

**Additional Information:** Robbie Runnels 432-282-9143 robbie@etechenv.com

**Additional Instructions:** Starting from CR 211 (32.81204, -104.09830) go N 2.4 miles. Go E 0.1 miles, location to the SE (32.84520, -104.09350)

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

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

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive  
Santa Fe, NM 87505

**Robbie Runnels**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, February 29, 2024 12:32 PM  
**To:** Robbie Runnels  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 319057

You don't often get email from ocdonline@state.nm.us. [Learn why this is important](#)

To whom it may concern (c/o Robbie Runnels for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2104859748.

The liner inspection is expected to take place:

**When:** 03/05/2024 @ 13:00

**Where:** J-08-17S-29E 0 FNL 0 FEL (32.8457031,-104.0937958)

**Additional Information:** Robbie Runnels 432-282-9143 robbie@etechenv.com

**Additional Instructions:** Starting from CR 211 (32.81204, -104.09830) go N 2.4 miles. Go E 0.1 miles, location to the SE (32.84520, -104.09350)

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

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

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive  
Santa Fe, NM 87505

**Robbie Runnels**

---

**From:** OCDOnline@state.nm.us  
**Sent:** Thursday, February 29, 2024 12:30 PM  
**To:** Robbie Runnels  
**Subject:** The Oil Conservation Division (OCD) has accepted the application, Application ID: 319050

You don't often get email from ocdonline@state.nm.us. [Learn why this is important](#)

To whom it may concern (c/o Robbie Runnels for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2308835013.

The liner inspection is expected to take place:

**When:** 03/04/2024 @ 13:00

**Where:** O-08-17S-29E 0 FNL 0 FEL (32.84521,-104.09351)

**Additional Information:** Robbie Runnels 432-282-9143 robbie@etechenv.com

**Additional Instructions:** Starting from CR 211 (32.81204, -104.09830) go N 2.4 miles. Go E 0.1 miles, location to the SE (32.84520, -104.09350)

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

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

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**

1220 South St. Francis Drive

Santa Fe, NM 87505



**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
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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

QUESTIONS  
  
Action 333864

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	333864
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2231844500
Incident Name	NAPP2231844500 CONOCO 8 STATE 4 TANK BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2202848442] Conoco 8 State Tank Battery

Location of Release Source	
Please answer all the questions in this group.	
Site Name	CONOCO 8 STATE 4 TANK BATTERY
Date Release Discovered	11/14/2022
Surface Owner	State

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: 63 BBL   Recovered: 40 BBL   Lost: 23 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	4" x 4" nipple failed due to corrosion

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QUESTIONS, Page 2

Action 333864

**QUESTIONS (continued)**

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**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
Is this a gas only submission (i.e. only significant Mcf values reported)	<b>No, according to supplied volumes this does not appear to be a "gas only" report.</b>
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	<b>Yes</b>
Reasons why this would be considered a submission for a notification of a major release	<b>From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.</b>
<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: <a href="mailto:katherine.purvis@spurenergy.com">katherine.purvis@spurenergy.com</a> Date: 04/16/2024
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Action 333864

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	333864
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**QUESTIONS****Site Characterization**

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.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 75 and 100 (ft.)
What method was used to determine the depth to ground water	Estimate or Other
Did this release impact groundwater or surface water	No
<b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	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	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Greater than 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Zero feet, overlying, or within area
Categorize the risk of this well / site being in a karst geology	High
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

**Remediation Plan**

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.

Requesting a remediation plan approval with this submission	Yes
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.	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
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.	
On what estimated date will the remediation commence	03/04/2024
On what date will (or did) the final sampling or liner inspection occur	03/04/2024
On what date will (or was) the remediation complete(d)	03/04/2024
What is the estimated surface area (in square feet) that will be remediated	5800
What is the estimated volume (in cubic yards) that will be remediated	12
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.	
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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Action 333864

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	333864
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Remediation Plan (continued)</b>	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
<b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>	
<i>(Select all answers below that apply.)</i>	
Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 04/16/2024
<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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Action 333864

**QUESTIONS (continued)**

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	Action Number:	333864
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Liner Inspection Information</b>	
Last liner inspection notification (C-141L) recorded	<b>316287</b>
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	<b>04/13/2023</b>
Was all the impacted materials removed from the liner	<b>Yes</b>
What was the liner inspection surface area in square feet	<b>5800</b>

**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	<b>Yes</b>
Have the lateral and vertical extents of contamination been fully delineated	<b>Yes</b>
Was this release entirely contained within a lined containment area	<b>Yes</b>
What was the total surface area (in square feet) remediated	<b>5800</b>
What was the total volume (cubic yards) remediated	<b>12</b>
Summarize any additional remediation activities not included by answers (above)	<b>CONTAMINATED MATERIAL WAS REMOVED AND LINER INSPECTED AGAIN LINER IN GOOD SHAPE</b>

*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: 04/16/2024
--	--

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CONDITIONS  
  
Action 333864

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 333864
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	4/17/2024