

<b>Spill Volume(Bbls) Calculator</b>		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
<u>50.000</u>	<u>38.000</u>	<u>0.750</u>
Cubic Feet Impacted		<u>118.750</u>
Barrels		<u>21.15</u>
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		<u>21.15</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released	21.20000	

<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)	50
Width (ft)	38
Depth (in)	0.750









April 8, 2024

NMOCD District 2  
Mike Bratcher  
Artesia, NM 88210

Bureau of Land Management  
Crisha Morgan  
Carlsbad Field Office

**Re: Site Assessment and Closure Report**  
**BKU 13A Battery**  
**API No. 30-015-02971**  
**GPS: Latitude 32.8364334 Longitude -104.0220566**  
**UL "H", Sec. 13, T17S, R29E**  
**Eddy County, NM**  
**NMOCD Ref. No. NAPP2222751098**

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment, conduct remediation activities and write a closure report for the release site known as the BKU 13A Battery (BKU). Details of the release are summarized below:

Release Details			
Type of Release:	Produced Water	Volume of Release:	21 bbls
		Volume Recovered:	20 bbls
Source of Release:	Pump	Date of Release:	08/15/22
Was Immediate Notice Given?	No	If, Yes, to Whom?	Mike Bratcher, NMOCD
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	Federal	Mineral Owner:	Federal
Corroded threads and vibration caused 4x2 swage to break off the suction of the pump.			

Topographical and Aerial Maps are provided in Figures #2 and #4.

## 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:

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

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 Eolian and piedmont deposits (Holocene to middle Pleistocene)— Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (QEP). The soil in this area is made up of Kermit-Berino Fine Sands, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are both excessively-drained and well-drained. There is NOT a high potential for karst geology to be present around the BKU (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 October 24, 2022, Paragon conducted a site assessment. Upon arrival, we found that it was a poly-lined containment with dirt and gravel on top. There was no evidence fluids had breached the containment, so no soil samples were obtained.

A Site Map is provided in Figure #1.

### REMEDATION ACTIVITIES

On March 13, 2024, Paragon mobilized personnel and equipment to conduct remedial activities. Based on the site characteristics and field observations made during the site assessment, the following details the remedial activities we conducted to advance the Release Site toward an NMOCD-approved site closure.

- We utilized a hand crew and bobcat to remove all the contaminated dirt out of the containment and onto a temporary liner.
- The area measured approximately 2,924 S/F, and we removed app. 55 C/Y of material.
- Once the dirt was removed, we hauled all of it off to Lea Land.
- The liner was then cleaned in preparation for the liner inspection.
- A liner inspection was scheduled and conducted to ensure the liner was intact. The liner notification and inspection report is included in Appendix C.

### CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2222751098, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

If you have any questions or need additional information, please contact Tristan Jones by phone at (575)318-6841 or email at [tristan@paragonenvironmental.net](mailto: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 – Liner Notification, Liner inspection, & Photographic Documentation





Figures:


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

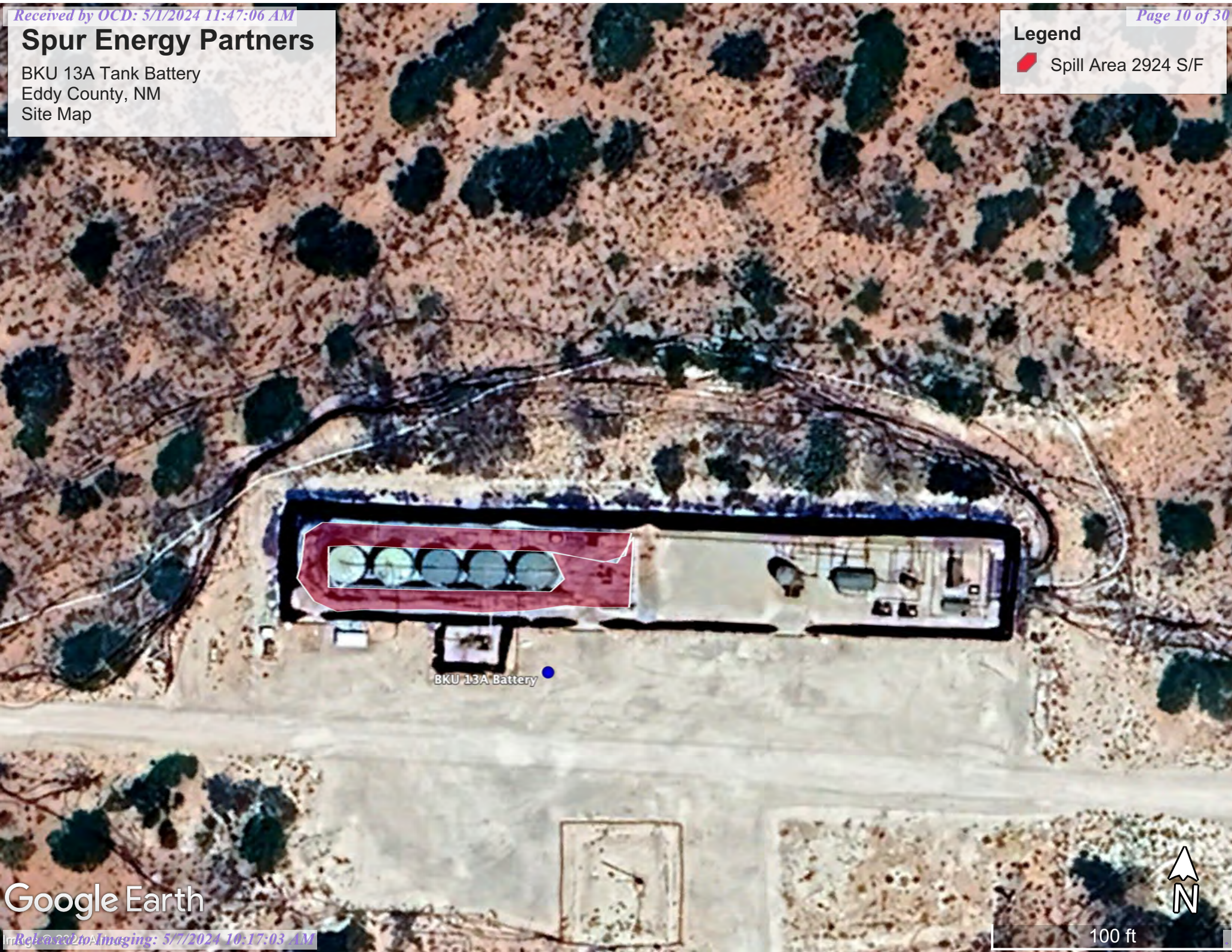


# Spur Energy Partners

BKU 13A Tank Battery  
Eddy County, NM  
Site Map

## Legend

 Spill Area 2924 S/F



BKU 13A Battery



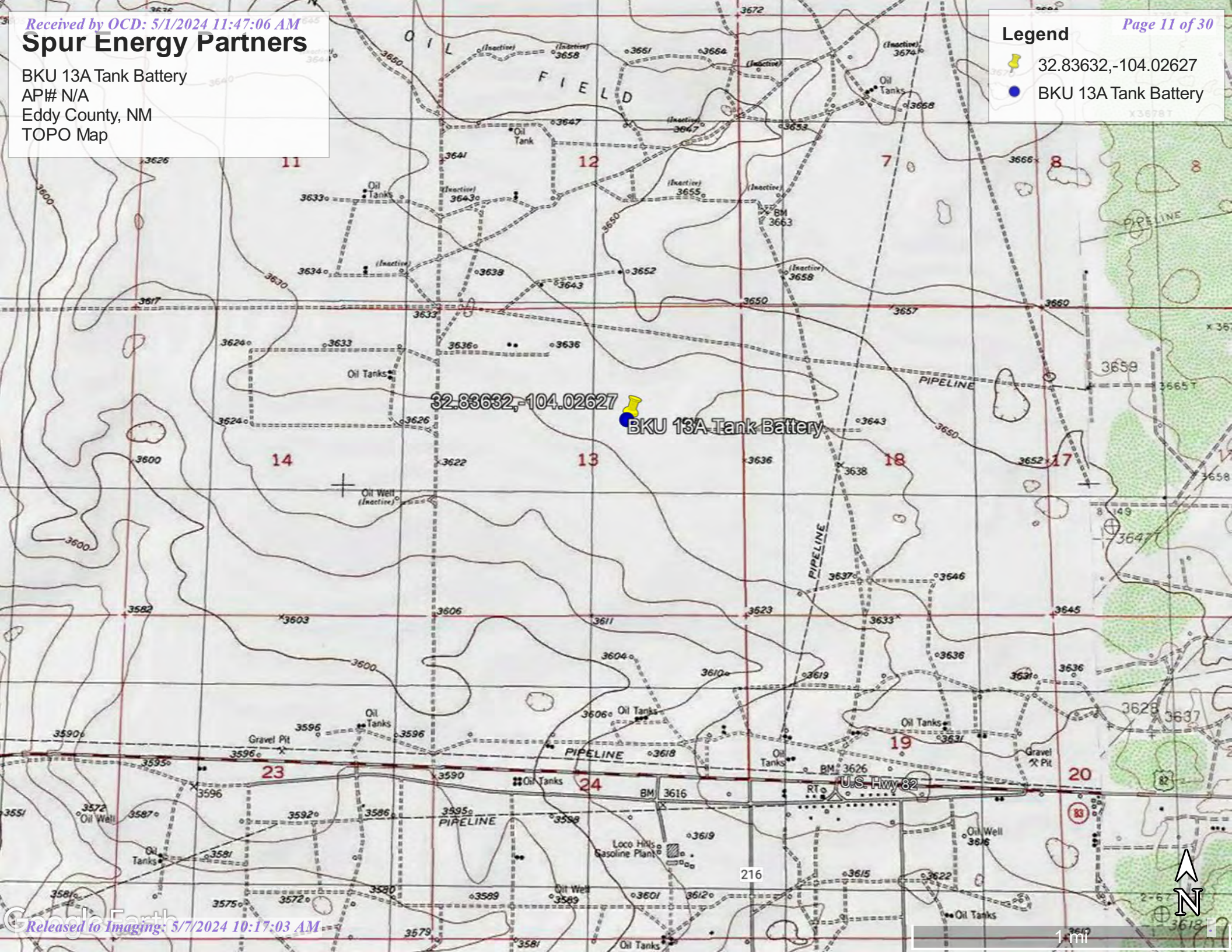
100 ft

Google Earth



BKU 13A Tank Battery  
API# N/A  
Eddy County, NM  
TOPO Map

## BKU 13A Tank Battery








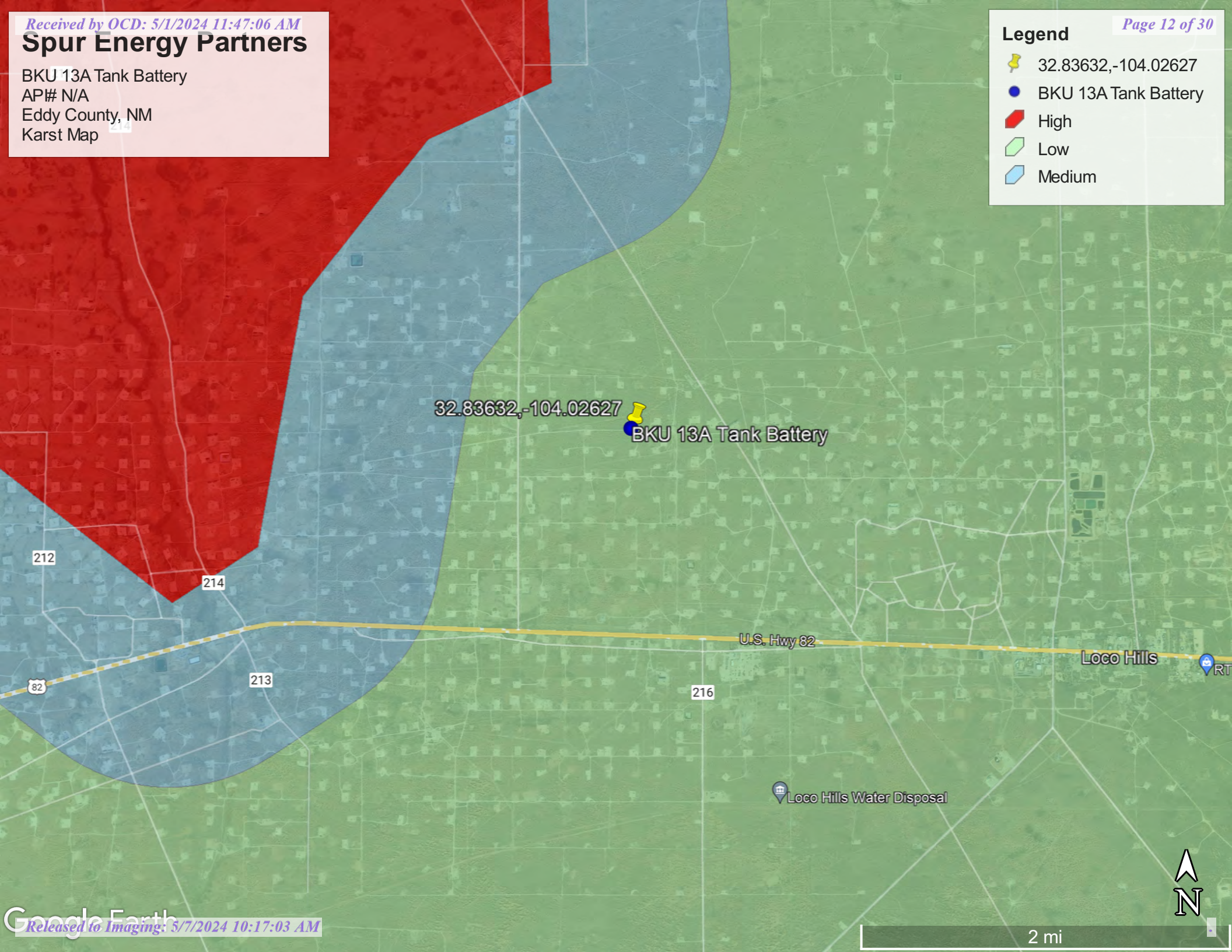


# Spur Energy Partners

BKU 13A Tank Battery  
AP# N/A  
Eddy County, NM  
Karst Map

## Legend

-  32.83632,-104.02627
-  BKU 13A Tank Battery
-  High
-  Low
-  Medium





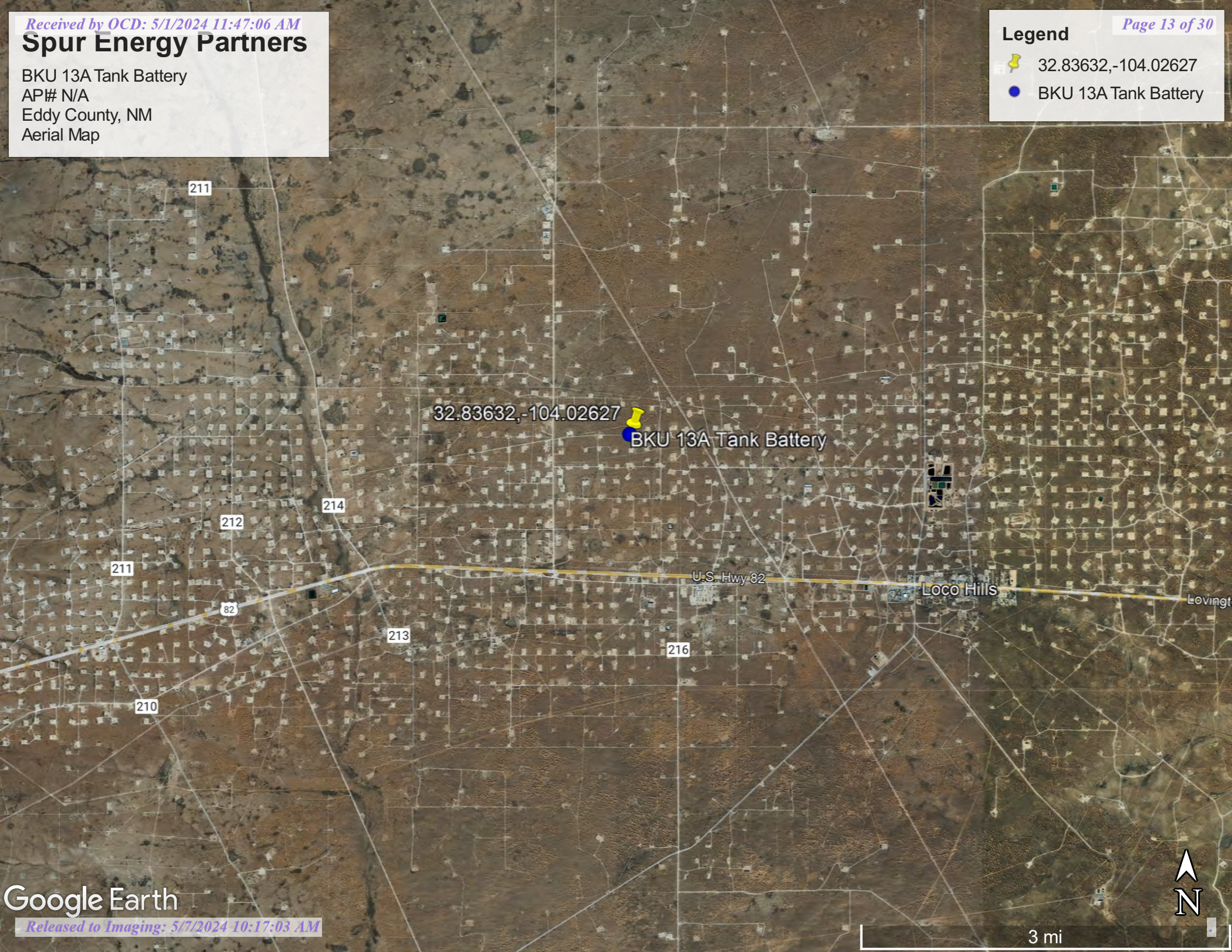


# Spur Energy Partners

BKU 13A Tank Battery  
AP# N/A  
Eddy County, NM  
Aerial Map

## Legend

-  32.83632,-104.02627
-  BKU 13A Tank Battery







Appendix A  
Referenced Water Data:

New Mexico State of Engineers Office



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

No records found.

UTMNAD83 Radius Search (in meters):

Easting (X): 591131.45      Northing (Y): 3633561      Radius: 1600

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.

10/19/22 8:34 AM

WATER COLUMN/ AVERAGE  
DEPTH TO WATER



Appendix B  
Soil Survey:

U.S.D.A.

FEMA Flood Map



Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

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## Eddy Area, New Mexico

### KM—Kermit-Berino fine sands, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w4q

*Elevation:* 3,100 to 4,200 feet

*Mean annual precipitation:* 10 to 14 inches

*Mean annual air temperature:* 60 to 64 degrees F

*Frost-free period:* 190 to 230 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Kermit and similar soils:* 50 percent

*Berino and similar soils:* 35 percent

*Minor components:* 15 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Kermit

##### Setting

*Landform:* Plains, alluvial fans

*Landform position (three-dimensional):* Talf, rise

*Down-slope shape:* Convex, linear

*Across-slope shape:* Linear

*Parent material:* Mixed alluvium and/or eolian sands

##### Typical profile

*H1 - 0 to 7 inches:* fine sand

*H2 - 7 to 60 inches:* fine sand

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* More than 80 inches

*Drainage class:* Excessively drained

*Runoff class:* Negligible

*Capacity of the most limiting layer to transmit water (Ksat):* Very high (20.00 in/hr)

*Depth to water table:* More than 80 inches

*Frequency of flooding:* None

*Frequency of ponding:* None

*Maximum salinity:* Nonsaline (0.0 to 1.0 mmhos/cm)

*Sodium adsorption ratio, maximum:* 1.0

*Available water supply, 0 to 60 inches:* Low (about 3.1 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

*Land capability classification (nonirrigated):* 7e

*Hydrologic Soil Group:* A

*Ecological site:* R070BD005NM - Deep Sand

*Hydric soil rating:* No

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

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## Description of Berino

### Setting

*Landform:* Plains, fan piedmonts  
*Landform position (three-dimensional):* Riser  
*Down-slope shape:* Convex  
*Across-slope shape:* Linear  
*Parent material:* Mixed alluvium and/or eolian sands

### Typical profile

*H1 - 0 to 17 inches:* fine sand  
*H2 - 17 to 50 inches:* fine sandy loam  
*H3 - 50 to 58 inches:* loamy sand

### Properties and qualities

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* More than 80 inches  
*Drainage class:* Well drained  
*Runoff class:* Low  
*Capacity of the most limiting layer to transmit water (Ksat):* Moderately high to high (0.60 to 2.00 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 40 percent  
*Maximum salinity:* Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Moderate (about 7.2 inches)

### Interpretive groups

*Land capability classification (irrigated):* 4e  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* B  
*Ecological site:* R070BD003NM - Loamy Sand  
*Hydric soil rating:* No

## Minor Components

### Active dune land

*Percent of map unit:* 15 percent  
*Hydric soil rating:* No

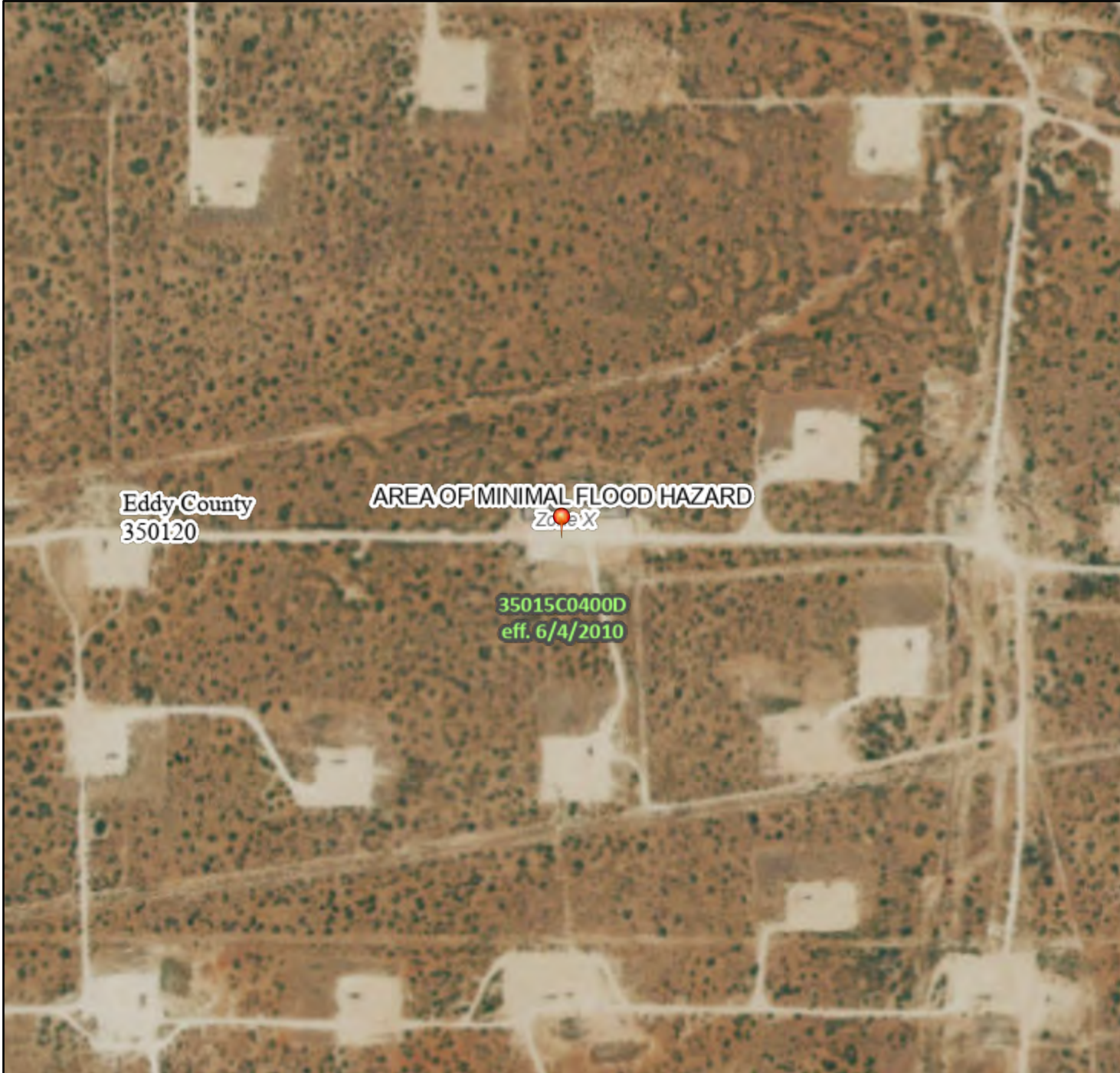
## Data Source Information

Soil Survey Area: Eddy Area, New Mexico  
Survey Area Data: Version 18, Sep 8, 2022

# National Flood Hazard Layer FIRMette



104°1'53"W 32°50'26"N



## Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
		NO SCREEN Area of Minimal Flood Hazard Zone X
OTHER AREAS		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 Water Surface Elevation
		17.5
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 10/19/2022 at 10:34 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:

Liner Inspection Notification

Liner Inspection

Photographic Documentation



Angel Pena <angel@paragonenvironmental.net>

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**The Oil Conservation Division (OCD) has accepted the application, Application ID: 324114**

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<OCDOnline@state.nm.us>

Mon, Mar 18 at 9:38 AM

To: <angel@paragonenvironmental.net>

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

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2222751098.

The liner inspection is expected to take place:

**When:** 03/20/2024 @ 10:00

**Where:** H-13-17S-29E 1980 FNL 735 FEL (32.8364334,-104.0220566)

**Additional Information:** Angel Pena  
575-605-0773

**Additional Instructions:** 32.8364,-104.0265

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](#)





Paragon Environmental LLC

**Liner Inspection Form**

Company Name: Spur Energy\_\_\_\_\_

Site: BKU 13A Battery\_\_\_\_\_

Lat/Long: 32.8364,-104.0265\_\_\_\_\_

NMOCD Incident ID  
& Incident Date: nAPP2222751098 8-15-22\_\_\_\_\_2-Day Notification  
Sent: 03/18/24\_\_\_\_\_

Inspection Date: 03/20/24\_\_\_\_\_

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		

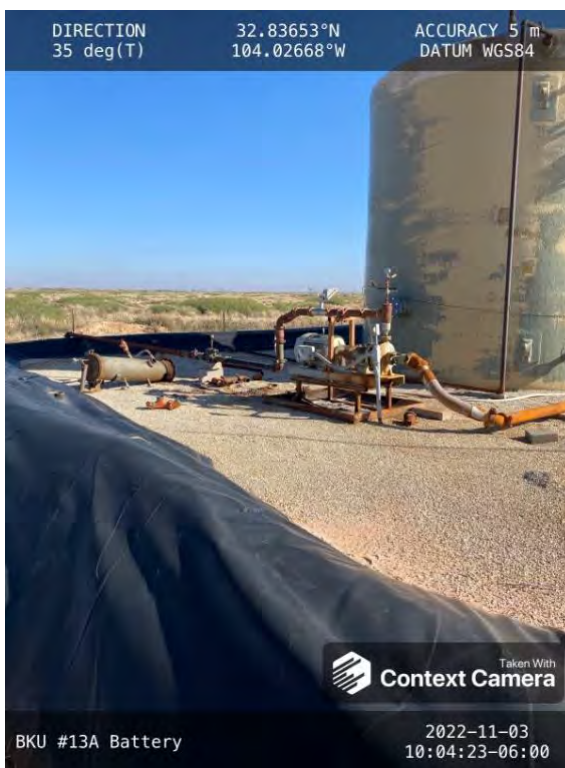
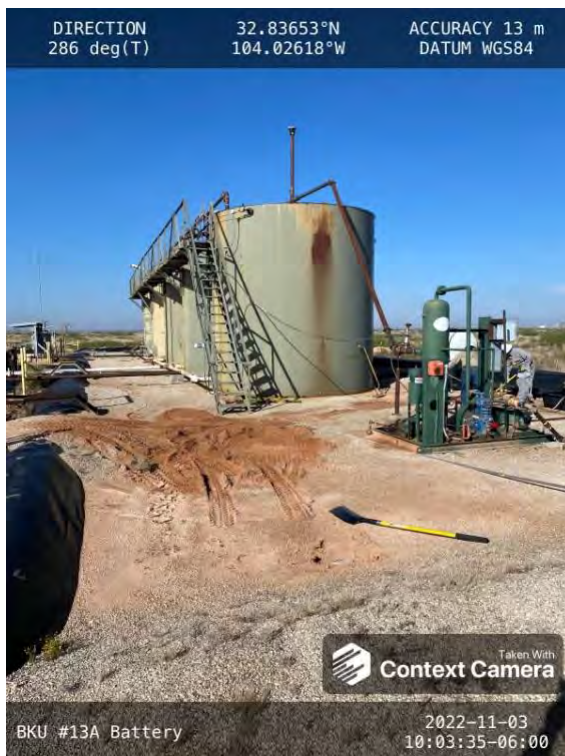
Comments: \_\_\_\_\_

Inspector Name: Angel Pena



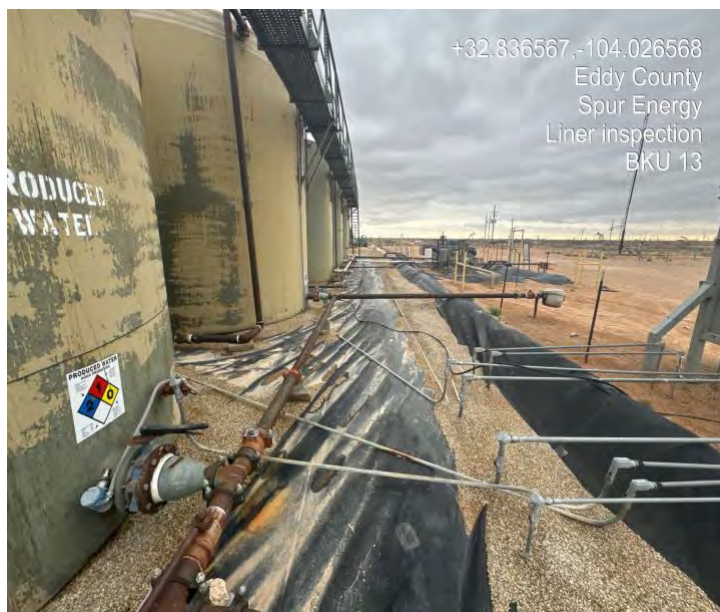
## Photographic Documentation

### Before





After





**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

QUESTIONS

Action 339590

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	339590
	Action Type:	
	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2222751098
Incident Name	NAPP2222751098 BKU 13A BATTERY @ 30-015-02971
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-02971] BURCH KEELY UNIT #013

Location of Release Source	
Please answer all the questions in this group.	
Site Name	BKU 13A BATTERY
Date Release Discovered	08/15/2022
Surface Owner	Federal

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   Pump   Produced Water   Released: 21 BBL   Recovered: 20 BBL   Lost: 1 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)	Lined containment

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 2

Action 339590

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	339590
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

**QUESTIONS**

<b>Nature and Volume of Release (continued)</b>	
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	Unavailable.
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.	

**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	Not answered.

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: 05/01/2024
--	--

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

QUESTIONS, Page 3

Action 339590

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	339590
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

**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 26 and 50 (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	Between ½ and 1 (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	Between ½ and 1 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between ½ and 1 (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between ½ and 1 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Between ½ and 1 (mi.)
An (non-karst) unstable area	Between ½ and 1 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
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**

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	03/13/2024
On what date will (or did) the final sampling or liner inspection occur	03/20/2024
On what date will (or was) the remediation complete(d)	03/18/2024
What is the estimated surface area (in square feet) that will be remediated	2924
What is the estimated volume (in cubic yards) that will be remediated	55
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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**District II**

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**District III**

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**District IV**

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**State of New Mexico**  
**Energy, Minerals and Natural Resources**  
**Oil Conservation Division**  
**1220 S. St Francis Dr.**  
**Santa Fe, NM 87505**

QUESTIONS, Page 4

Action 339590

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	339590
	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	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Not answered.

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: 05/01/2024
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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 339590

**QUESTIONS (continued)**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	339590
	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	324114
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	03/20/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	7750

**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	2924
What was the total volume (cubic yards) remediated	55
Summarize any additional remediation activities not included by answers (above)	liner inspected and has the ability to contain leaks

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: 05/01/2024
--	--

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CONDITIONS  
  
Action 339590

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 339590
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
crystal.walker	None	5/7/2024