



October 14, 2025

NMOCD District 2
 Mike Bratcher
 Artesia, NM 88210

**Re: Site Assessment and Closure Report
 Halberd North St Com TB
 GPS: Latitude 32.81204 Longitude -104.15424
 UL "D", Sec. 26, T17S, R28E
 Eddy County, NM
 NMOCD Ref. No. NAPP2514729654**

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 Halberd North St Com TB (Halberd). Details of the release are summarized below:

| Release Details | | | |
|---|------------------|--|--------------|
| Type of Release: | Crude Oil | Volume of Release: | 30 bbls |
| | | Volume Recovered: | 30 bbls |
| Source of Release: | Circulating Pump | Date of Release: | 05/21/25 |
| Was Immediate Notice Given? | Yes | If, Yes, to Whom? | NMOCD Portal |
| Was a Watercourse Reached? | No | If Yes, Volume Impacting Watercourse: | N/A |
| Surface Owner: | State | Mineral Owner: | State |
| The circulating pump nipple snapped off releasing oil into the lined containment. | | | |

Topo and Wetlands Maps are provided in Figures #2 and #4.

REGULATORY FRAMEWORK & SITE CHARACTERIZATION

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:

- Depth to Groundwater in the affected area 75-100'
- Method to determine DTW NM OSE- RA-13054-POD1
- Did the release impact groundwater or surface water NO

Depth to groundwater information is provided in Appendix A.

What are the minimum distances between the closest lateral extents of the release and the following surface areas:

- A continuously flowing watercourse or any other significant watercourse- ½-1 miles
- Any lakebed, sinkhole, or playa lake- 500-1000 Feet
- An occupied permanent residence, school, hospital, institution, or church- >5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes- 1164 ft
- Any other fresh water well or spring- 1/2-1 mi
- Incorporated municipal boundaries or a defined municipal fresh water well field- 1-5 mi
- A wetland- 746 ft
- A subsurface mine- >5 mi
- An (non-karst) unstable area- 1-5 mi
- Categorize the risk of this well/site being in a karst area geology- Low
- A 100-year floodplain- 1-5 mi
- Did the release impact areas not on an exploration, development, production, or storage site- No

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation- and is made up of older alluvial deposits of upland plains and piedmont areas, and calcic soils and eolian cover sediments of the High Plains region (middle to lower Pleistocene)- Includes scattered lacustrine playa, and alluvial deposits of the Tahoka, Double Tanks, Tule, Blackwater Draw, and Gatuna Formations, the latter of which may be Pliocene at base; outcrops, however, are basically of quaternary deposits (QOA). The soil in this area is made up of Largo-Stony land complex with 0 to 25 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are well-drained. There is not a high potential for karst geology to be present around the Halberd (Figure #3).

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

INITIAL SITE ASSESSMENT

On June 16, 2025, Paragon visited the Halberd and conducted an initial site assessment. During the initial site assessment, the liner and surrounding area were visually inspected, and it was determined that the release had not breached the lined containment and that the liner's integrity remained intact.

A Site Map is provided in Figure #1.

REMEDIATION ACTIVITIES

On July 23, 2025, Paragon mobilized personnel and equipment to clean the liner. The remediation consisted of the following:

The stained area measured approximately 1500 s/f. We sprayed degreaser, followed by heated water to power wash the liner clean. A vac truck was on site, sucking up the fluids as the crew sprayed the liner down and used a squeegee to move the fluids to the vac truck.

On July 23, 2025, Paragon submitted a liner inspection for July 28, 2025. The liner inspection is attached in Appendix C.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2514729654, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

If you have any questions or need additional information, please get in touch with Tristan Jones by phone at (575)318-6841 or email at tristan@paragonenvironmental.net.

Respectfully,



Tristan Jones
Project Manager
Paragon Environmental, LLC



Chris Jones
Environmental Professional
Paragon Environmental, LLC



Attachments

Figures:

- 1- Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Wetlands Map
- 5- Ground Water Map

Appendices:

- Appendix A – Referenced Water Surveys
- Appendix B – Soil Survey and FEMA Flood Map
- Appendix C – NMOCN Notification, Liner Inspection, & Photographic Documentation




Figures:

- 1- Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Wetlands Map
- 5- GW Map

Spur Energy Partners

Halberd North St Com TB
Eddy County, NM
Site Map

Legend

 Spill Area 1500 S/F

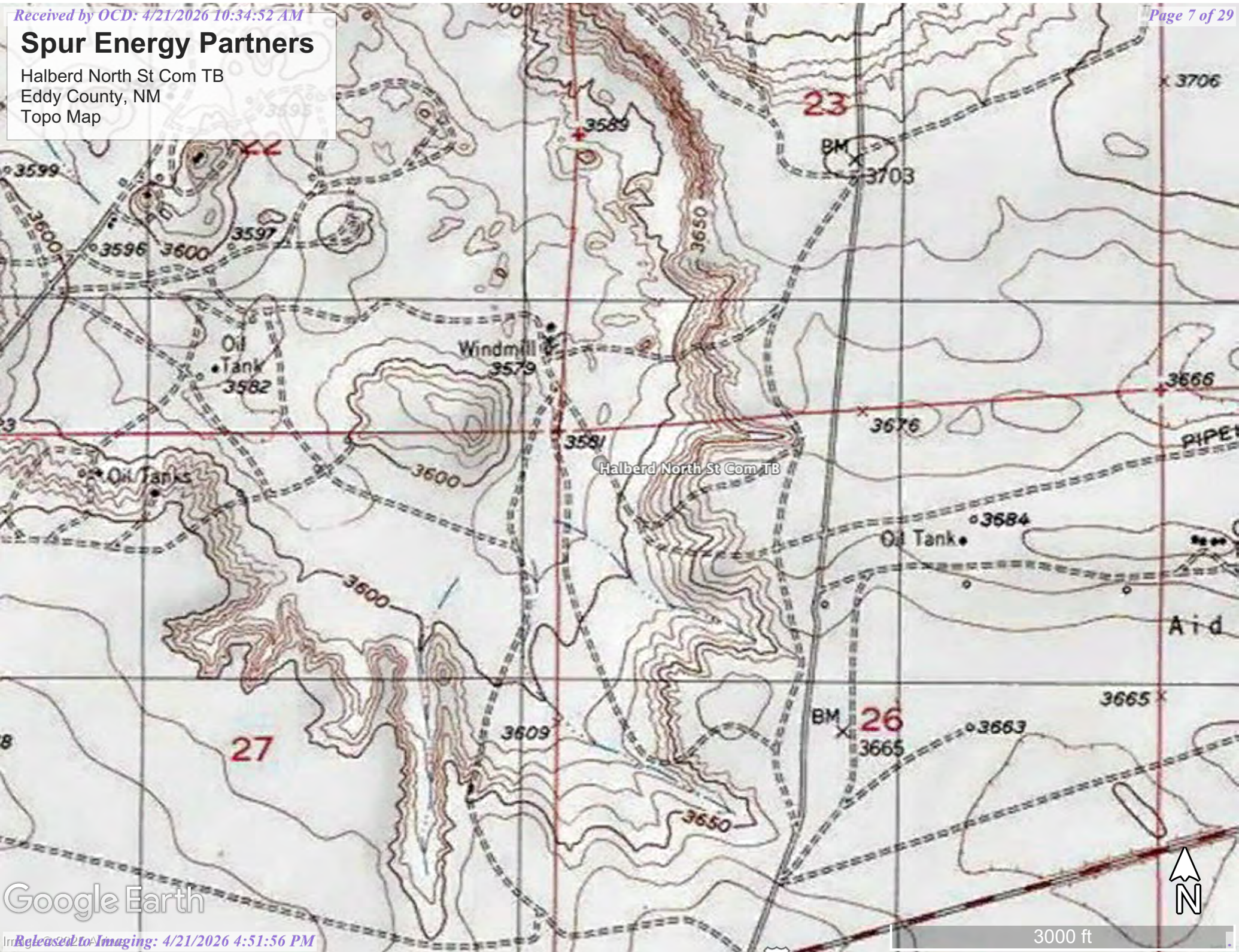
Halberd North St Com TB



80 ft

Spur Energy Partners

Halberd North St Com TB
Eddy County, NM
Topo Map

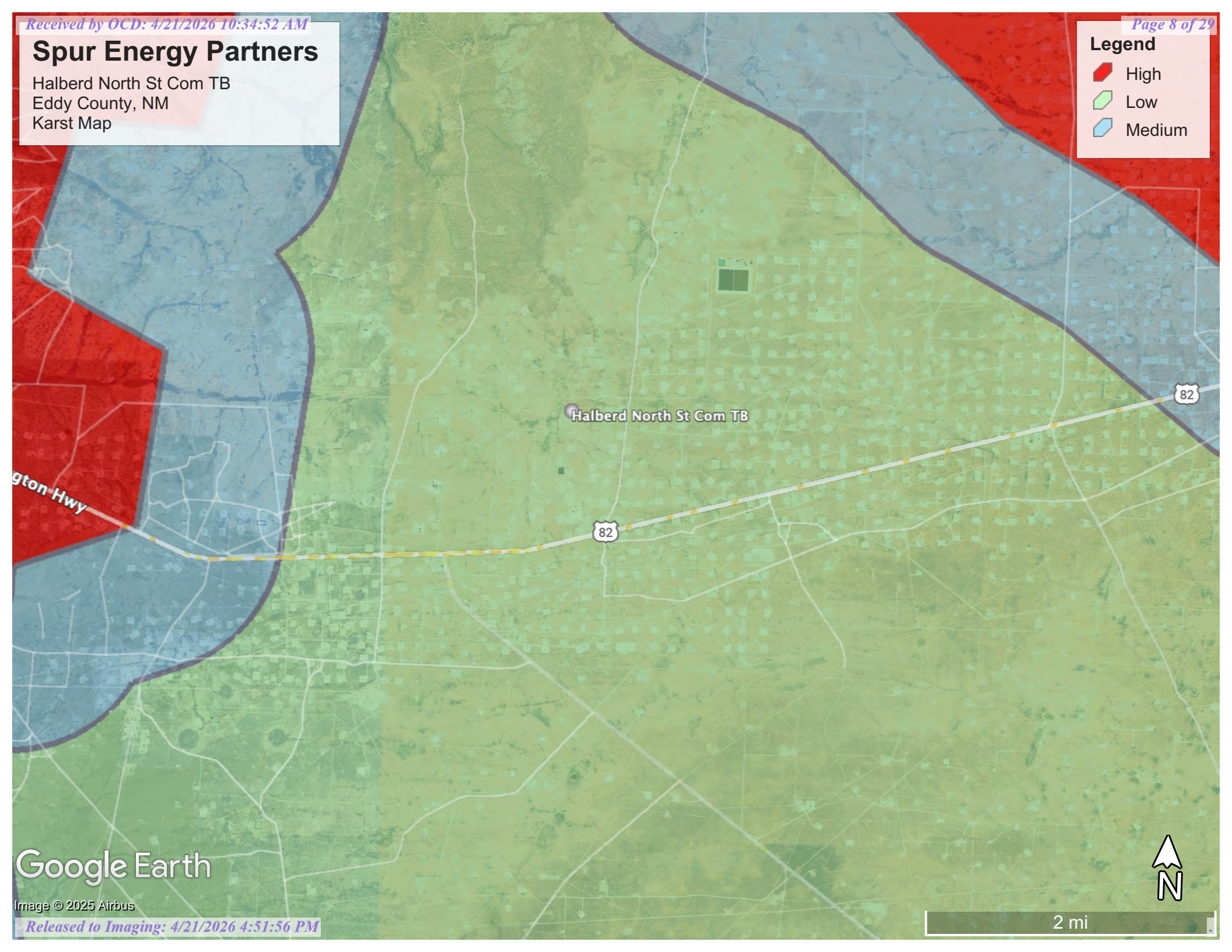


Spur Energy Partners

Halberd North St Com TB
Eddy County, NM
Karst Map

Legend

-  High
-  Low
-  Medium



gton Hwy

Halberd North St Com TB

82

82

Google Earth

Image © 2025 Airbus





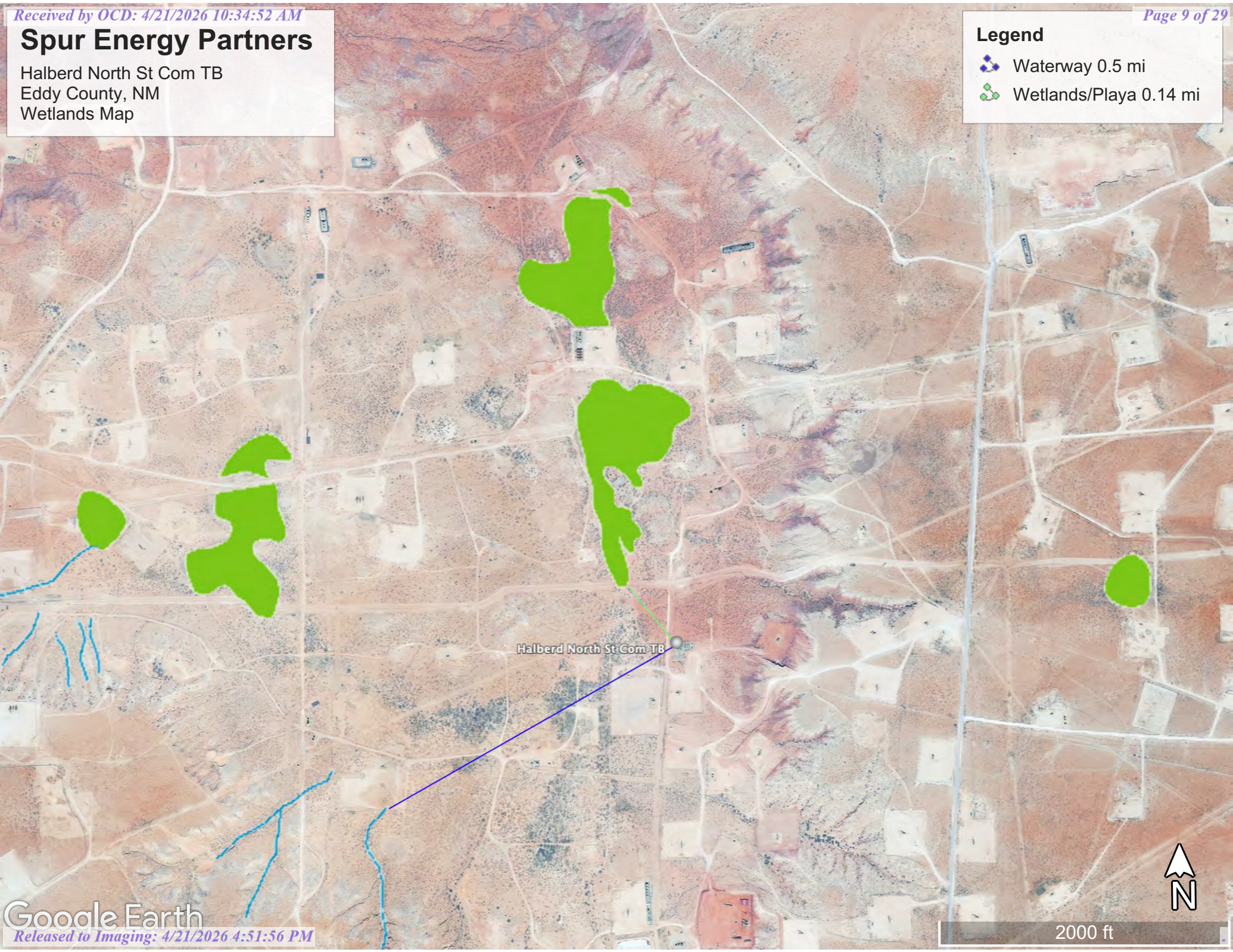
2 mi

Spur Energy Partners

Halberd North St Com TB
Eddy County, NM
Wetlands Map

Legend

-  Waterway 0.5 mi
-  Wetlands/Playa 0.14 mi




Halberd North St Com TB

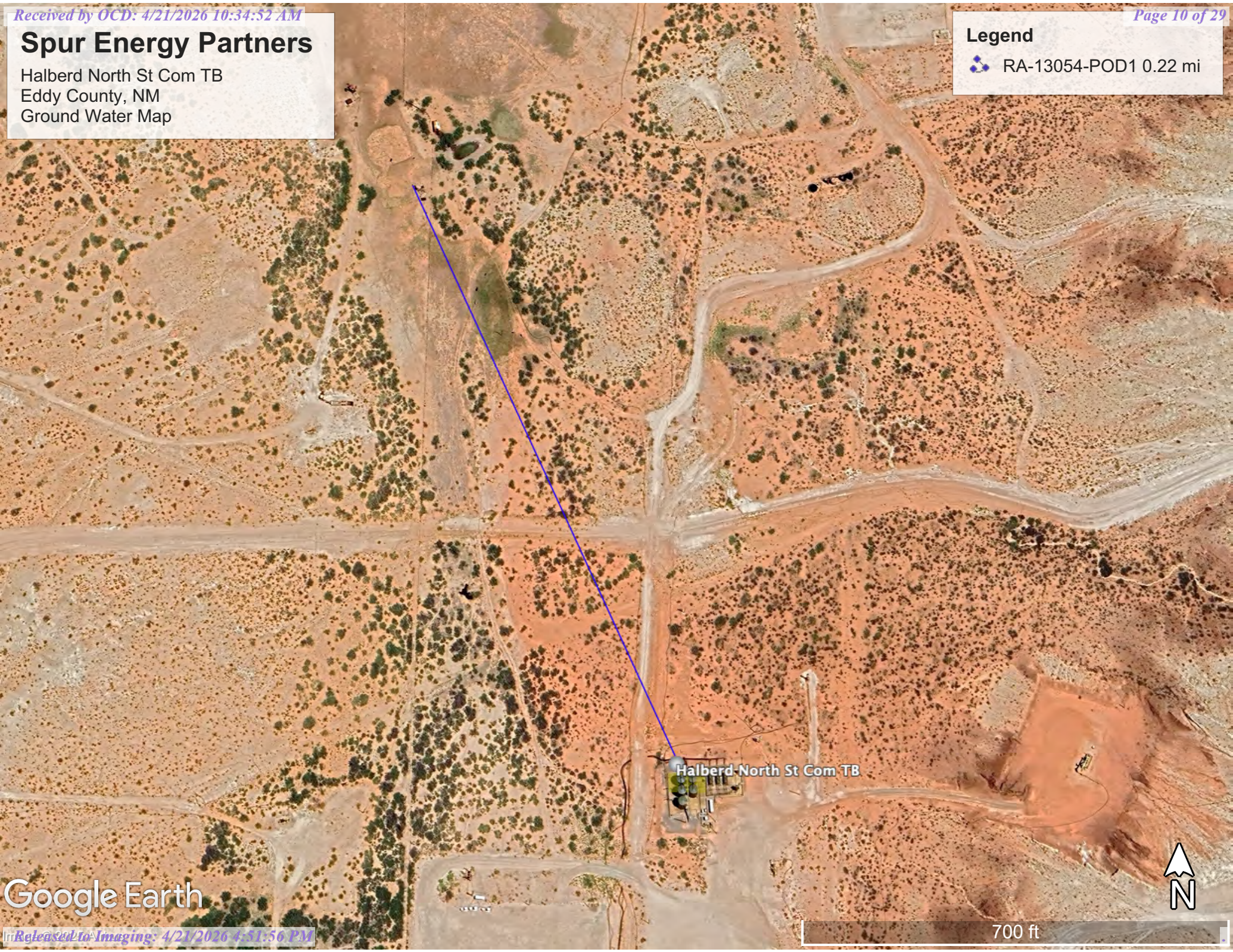


Spur Energy Partners

Halberd North St Com TB
Eddy County, NM
Ground Water Map

Legend

 RA-13054-POD1 0.22 mi



Halberd North St Com TB

Google Earth

700 ft





Appendix A:

Referenced Water Data

New Mexico State of Engineers Office

Water Right Summary



[get image list](#)

| | | | | | |
|-------------------------|--------------------------------|---------------------|-------|-------------------------|--|
| WR File Number: | RA 13054 | Subbasin: | RA | Cross Reference: | |
| Primary Purpose: | STK 72-12-1 LIVESTOCK WATERING | | | | |
| Primary Status: | EXP Expired | | | | |
| Total Acres: | | Subfile: | | Header: | |
| Total Diversion: | 0.000 | Cause/Case: | | | |
| Owner: | KEY LIVESTOCK LLC | Owner Class: | Owner | | |
| Contact: | GARY KEY | | | | |

Documents on File

(acre-feet per annum)

| Transaction Images | Trn # | Doc | File/Act | Status 1 | Status 2 | Transaction Desc. | From/To | Acres | Diversion | Consumptive |
|----------------------------|------------------------|-------|------------|----------|----------|-------------------|---------|-------|-----------|-------------|
| get images | 787881 | 72121 | 2021-05-20 | EXP | EXP | RA-13054 POD1 | T | | 3.000 | |

Current Points of Diversion

| POD Number | Well Tag | Source | Q64 | Q16 | Q4 | Sec | Tws | Rng | X | Y | Map | Other Location Desc |
|-------------------------------|----------|--------|-----|-----|----|-----|-----|-----|----------|-----------|-----|---------------------|
| RA 13054 POD1 | 20E8F | | NE | SE | SE | 22 | 17S | 28E | 579012.0 | 3631087.4 | | |

* 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.



Appendix B:

Soil Survey

U.S.D.A.

FEMA Flood Map

Map Unit Description: Largo-Stony land complex, 0 to 25 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

LN—Largo-Stony land complex, 0 to 25 percent slopes

Map Unit Setting

National map unit symbol: 1w50
Elevation: 2,000 to 5,700 feet
Mean annual precipitation: 6 to 14 inches
Mean annual air temperature: 57 to 70 degrees F
Frost-free period: 180 to 260 days
Farmland classification: Not prime farmland

Map Unit Composition

Largo and similar soils: 41 percent
Stony land: 40 percent
Minor components: 19 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Largo

Setting

Landform: Alluvial fans, plains
Landform position (three-dimensional): Talf, rise
Down-slope shape: Linear, convex
Across-slope shape: Linear
Parent material: Calcareous alluvium

Typical profile

H1 - 0 to 4 inches: loam
H2 - 4 to 47 inches: silt loam
H3 - 47 to 65 inches: loam

Properties and qualities

Slope: 1 to 5 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 (0.20 to 0.60 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 15 percent
Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)
Available water supply, 0 to 60 inches: High (about 10.0 inches)

Interpretive groups

Land capability classification (irrigated): 3e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B

Map Unit Description: Largo-Stony land complex, 0 to 25 percent slopes---Eddy Area, New Mexico

Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Minor Components

Simona

Percent of map unit: 7 percent
Ecological site: R070BD002NM - Shallow Sandy
Hydric soil rating: No

Pajarito

Percent of map unit: 6 percent
Ecological site: R070BD003NM - Loamy Sand
Hydric soil rating: No

Largo

Percent of map unit: 6 percent
Ecological site: R070BC017NM - Bottomland
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 21, Sep 9, 2025

National Flood Hazard Layer FIRMette



104°9'34"W 32°48'58"N



Eddy County
350120

AREA OF MINIMAL FLOOD HAZARD
Zone X

35015C0375D
eff. 6/4/2010

Legend

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

| | | |
|----------------------------|--|--|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE) Zone A, V, A99 |
| | | With BFE or Depth Zone AE, AO, AH, VE, AR |
| | | Regulatory Floodway |

| | | |
|-----------------------------|--|---|
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
| | | Future Conditions 1% Annual Chance Flood Hazard Zone X |
| | | Area with Reduced Flood Risk due to Levee. See Notes. Zone X |
| | | Area with Flood Risk due to Levee Zone D |

| | | |
|-------------|--|---|
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard Zone X |
| | | Effective LOMRs |
| | | Area of Undetermined Flood Hazard Zone D |

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

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

| | | |
|------------|--|---------------------------|
| 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 10/28/2025 at 5:59 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.

Released to Imaging: 4/21/2026 4:31:56 PM

1:6,000

104°8'57"W 32°48'28"N

Basemap Imagery Source: USGS National Map 2023



Appendix C:

NMOCD Notification

Liner Inspection

Photographic Documentation



OCD Permitting

Home > Operator Data > Action Status > Action Search Results > Action Status Item Details

[NOTIFY] Notification Of Liner Inspection (C-141L) Application

Submission Information

| | | | |
|-----------------|--|------------|---------|
| Submission ID: | 488100 | Districts: | Artesia |
| Operator: | [328947] Spur Energy Partners LLC | Counties: | Eddy |
| Description: | Spur Energy Partners LLC [328947] , HALBERD NORTH ST COM TB , nAPP2514729654 | | |
| Status: | Approved | | |
| Status Date: | 07/23/2025 | | |
| References (0): | | | |

Forms

This application type does not have attachments.

Questions

Prerequisites

| | |
|------------------|--|
| Incident ID (n#) | nAPP2514729654 |
| Incident Name | NAPP2514729654 HALBERD NORTH ST COM TB @ 0 |
| Incident Type | Oil Release |
| Incident Status | Initial C-141 Approved |

Location of Release Source

| | |
|-------------------------|-------------------------|
| Site Name | HALBERD NORTH ST COM TB |
| Date Release Discovered | 05/21/2025 |
| Surface Owner | State |

Liner Inspection Event Information

Please answer all the questions in this group.

| | |
|---|----------------------------|
| What is the liner inspection surface area in square feet | 8,000 |
| Have all the impacted materials been removed from the liner | Yes |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | 07/28/2025 |
| Time liner inspection will commence | 08:00 AM |
| Warning: Notification can not be less than two business days prior to conducting liner inspection. | |
| Please provide any information necessary for observers to liner inspection | tristan jones 575-318-6841 |
| Please provide any information necessary for navigation to liner inspection site | 32.81204,-104.15424 |

Acknowledgments

This submission type does not have acknowledgments, at this time.

Comments

No comments found for this submission.

Conditions

Summary: *tristanjones (7/23/2025)*, 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.

Reasons

No reasons found for this submission.

[Go Back](#)



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners

Site: Halberd North St Com TB

Lat/Long: 32.81204, -104.15424

NMOCD Incident ID

& Incident Date: nAPP2514729654

2-Day Notification

Sent: 07/23/25

Inspection Date: 07/28/25

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: _____

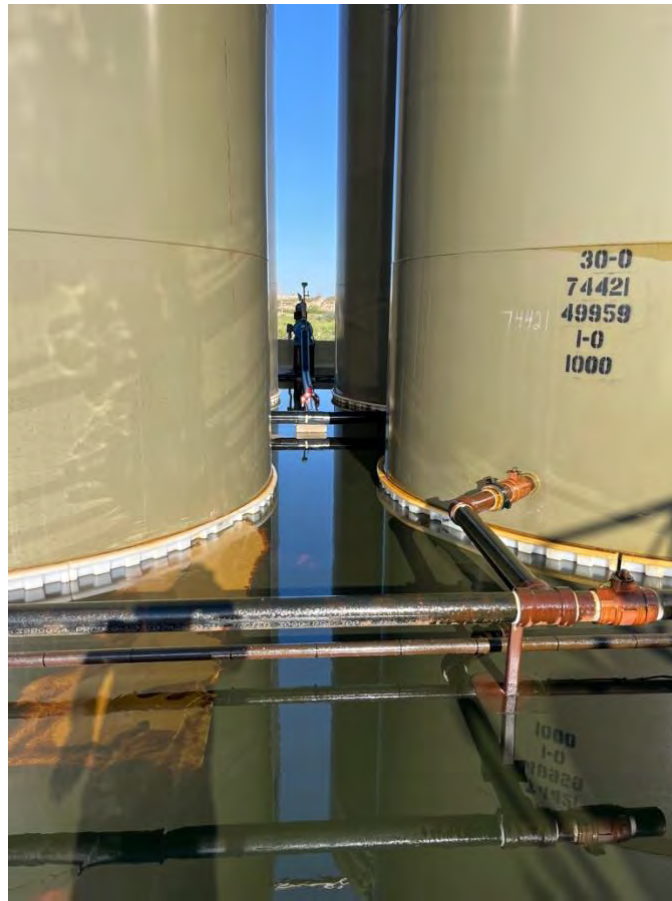
Inspector Name: Angel Pena

Date: 07/28/25



**Photographic Documentation
Incident Pics**





Completed and Liner Inspection



+32.811880,-104.154123
Eddy County
Spur Energy
Halberd 27 ST Com NTB
Liner inspection



+32.811888,-104.154389
Eddy County
Spur Energy
Halberd 27 ST Com NTB
Liner inspection



Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS

Action 577727

QUESTIONS

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| | |
|----------------------|--|
| Prerequisites | |
| Incident ID (n#) | nAPP2514729654 |
| Incident Name | NAPP2514729654 HALBERD NORTH ST COM TB @ FAPP2228731042 |
| Incident Type | Oil Release |
| Incident Status | Remediation Closure Report Received |
| Incident Facility | [fAPP2228731042] Halberd 27 State Com North Tank Battery |

| | |
|---|-------------------------|
| Location of Release Source | |
| <i>Please answer all the questions in this group.</i> | |
| Site Name | HALBERD NORTH ST COM TB |
| Date Release Discovered | 05/21/2025 |
| Surface Owner | Private |

| | |
|--|-------------|
| Incident Details | |
| <i>Please answer all the questions in this group.</i> | |
| Incident Type | Oil 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 | |
| <i>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.</i> | |
| Crude Oil Released (bbls) Details | Cause: Equipment Failure Fitting Crude Oil Released: 30 BBL Recovered: 30 BBL Lost: 0 BBL. |
| Produced Water Released (bbls) Details | Not answered. |
| 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) | CIRCULATING PUMP NIPPLE SNAPPED OFF RELEASING OIL INTO LINED CONTAINMENT |

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

**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 577727

QUESTIONS (continued)

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | 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 | Yes |
| Reasons why this would be considered a submission for a notification of a major release | From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more. |
| <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: 04/21/2026 |
|--|---|

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 3

Action 577727

QUESTIONS (continued)

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | 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 75 and 100 (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 ½ and 1 (mi.) |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark) | Between 500 and 1000 (ft.) |
| 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 1000 (ft.) and ½ (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 1 and 5 (mi.) |
| A wetland | Between 500 and 1000 (ft.) |
| 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 | Low |
| 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 |
| <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 | 07/23/2025 |
| On what date will (or did) the final sampling or liner inspection occur | 07/28/2025 |
| On what date will (or was) the remediation complete(d) | 07/23/2025 |
| What is the estimated surface area (in square feet) that will be remediated | 1500 |
| What is the estimated volume (in cubic yards) that will be remediated | 0 |

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.

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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 577727

QUESTIONS (continued)

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| | |
|--|---|
| Remediation Plan (continued) | |
| <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> | |
| This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants: | |
| <i>(Select all answers below that apply.)</i> | |
| 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) | 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: 04/21/2026 |
| <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> | |

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 6

Action 577727

QUESTIONS (continued)

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

QUESTIONS

| | |
|---|-------------------|
| Liner Inspection Information | |
| Last liner inspection notification (C-141L) recorded | 488100 |
| Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC | 07/28/2025 |
| Was all the impacted materials removed from the liner | Yes |
| What was the liner inspection surface area in square feet | 8000 |

| | |
|---|--|
| Remediation Closure Request | |
| <i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i> | |
| 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 | 1500 |
| What was the total volume (cubic yards) remediated | 0 |
| Summarize any additional remediation activities not included by answers (above) | THE LINED CONTAINMENT WAS POWERWASHED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN RELEASES |

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: 04/21/2026 |
|--|---|

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

CONDITIONS

Action 577727

CONDITIONS

| | |
|---|---|
| Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024 | OGRID: 328947 |
| | Action Number: 577727 |
| | Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

CONDITIONS

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| scwells | None | 4/21/2026 |