

Spill Volume(Bbls) Calculator*Inputs in blue, Outputs in red*

Length(Ft)	Width(Ft)	Depth(In)
<u>100.000</u>	<u>40.000</u>	<u>2.600</u>
Cubic Feet Impacted		<u>866.667</u>
Barrels		<u>154.35</u>
Soil Type		Lined Containment
Bbls Assuming 100% Saturation		<u>154.35</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		154.40000

Instructions

1. Input spill measurements below. Length and width need to be input in feet and depth in inches.
2. Select a soil type from the drop down menu.
3. Select a saturation level from the drop down menu.

(For data gathering instructions see appendix tab)

Measurements

Length (ft)	100
Width (ft)	40
Depth (in)	2.600









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

December 5, 2023

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

RE: Liner Inspection and Closure Report
Bradley 8 Fee 2H Battery
API No. 30-015-39811
GPS: Latitude 32.66842 Longitude -104.40683
UL- N, Section 8, Township 19S, Range 26E
NMOCD Reference No. NAPP2328944050

Spur Energy Partners (Spur) has contracted Pima Environmental Services, LLC (Pima) to perform a liner inspection and prepare this closure report for the release of produced water and crude oil that happened on the Bradley 8 Fee 2H Battery (Bradley). An initial C-141 was submitted on October 16, 2023, and can be found in Appendix B. This incident was assigned Incident ID NAPP2328944050, by the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

The Bradley is located approximately twelve (12) miles southwest of Artesia, NM. This spill site is in Unit N, Section 8, Township 19S, Range 26E, Latitude 32.66842 Longitude -104.40683, Eddy County, NM. A Location Map can be found in Figure 1.

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

Release Information

NAPP2328944050: On October 16, 2023, a section of piping, measuring four inches in diameter, which ran from the header to the separator, experienced a breach, resulting in the discharge of oil and produced water into the lined containment area. This incident led to the release of an estimated 55 barrels of crude oil and 100 barrels of produced water into the lined containment. Subsequently, efforts were made to mitigate the spill, resulting in the recovery of approximately 54 barrels of crude oil and 99 barrels of produced water from the affected area. The remaining two barrels of produced water and crude oil were effectively retrieved during the power washing of the lined containment.

A Site Map can be found in Figure 4.

Site Assessment and Liner Inspection

On November 13, 2023, the Pima personnel conducted a thorough cleaning of the lined containment by utilizing pressure washing techniques. Additionally, any remaining standing fluid was effectively removed using a vacuum truck.

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

Closure Request

After careful review, Pima requests that this incident NAPP2328944050 be closed. Spur has complied with the applicable closure requirements.

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

Respectfully,

Sebastian Orozco

Sebastian Orozco
Project Manager
Pima Environmental Services, LLC

Attachments

Figures:

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

Appendices:

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



Pima Environmental Services

Figures:

1-Location Map

2-Topographic Map

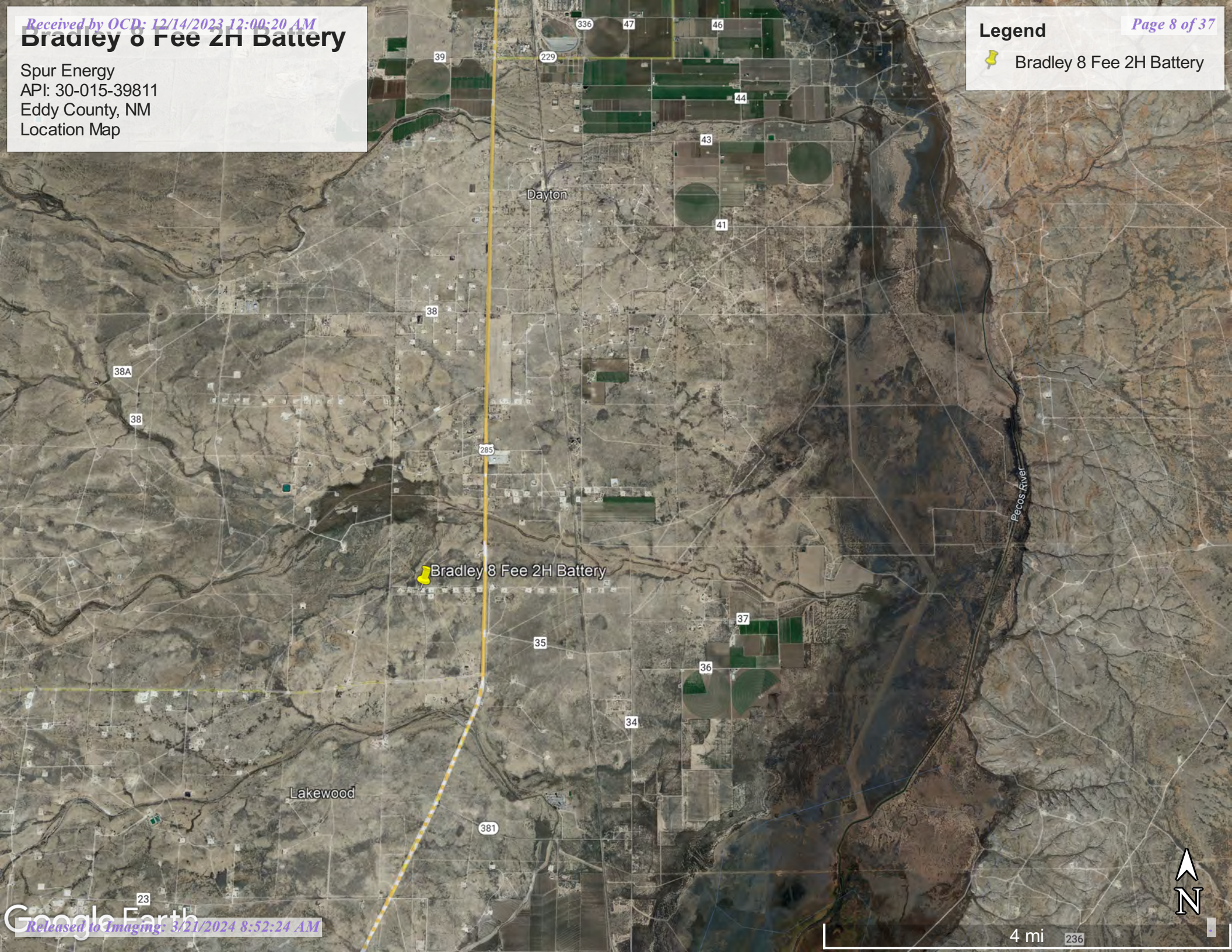
3-Karst Map

4-Site Map

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

Legend

 Bradley 8 Fee 2H Battery

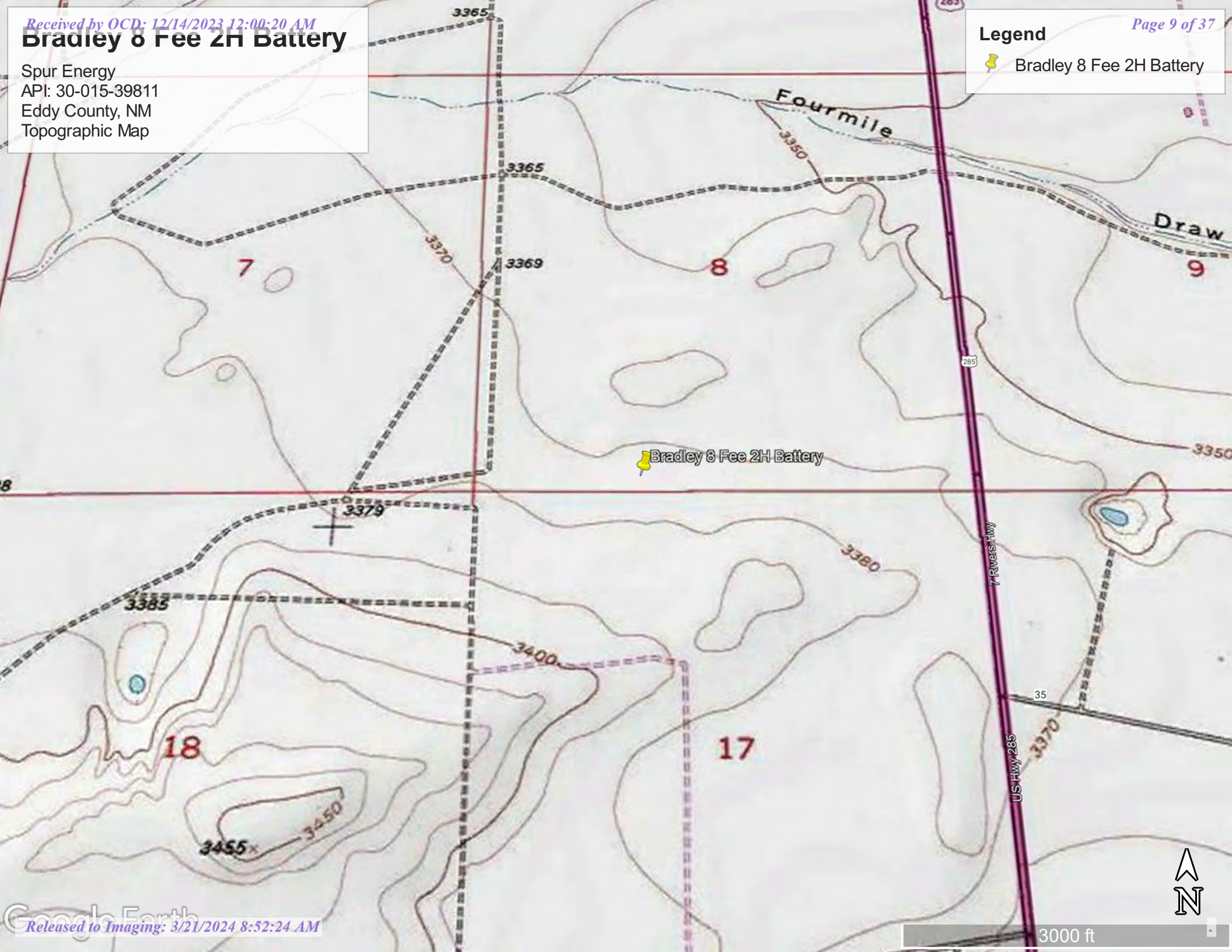


Bradley 8 Fee 2H Battery

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

Legend

 Bradley 8 Fee 2H Battery

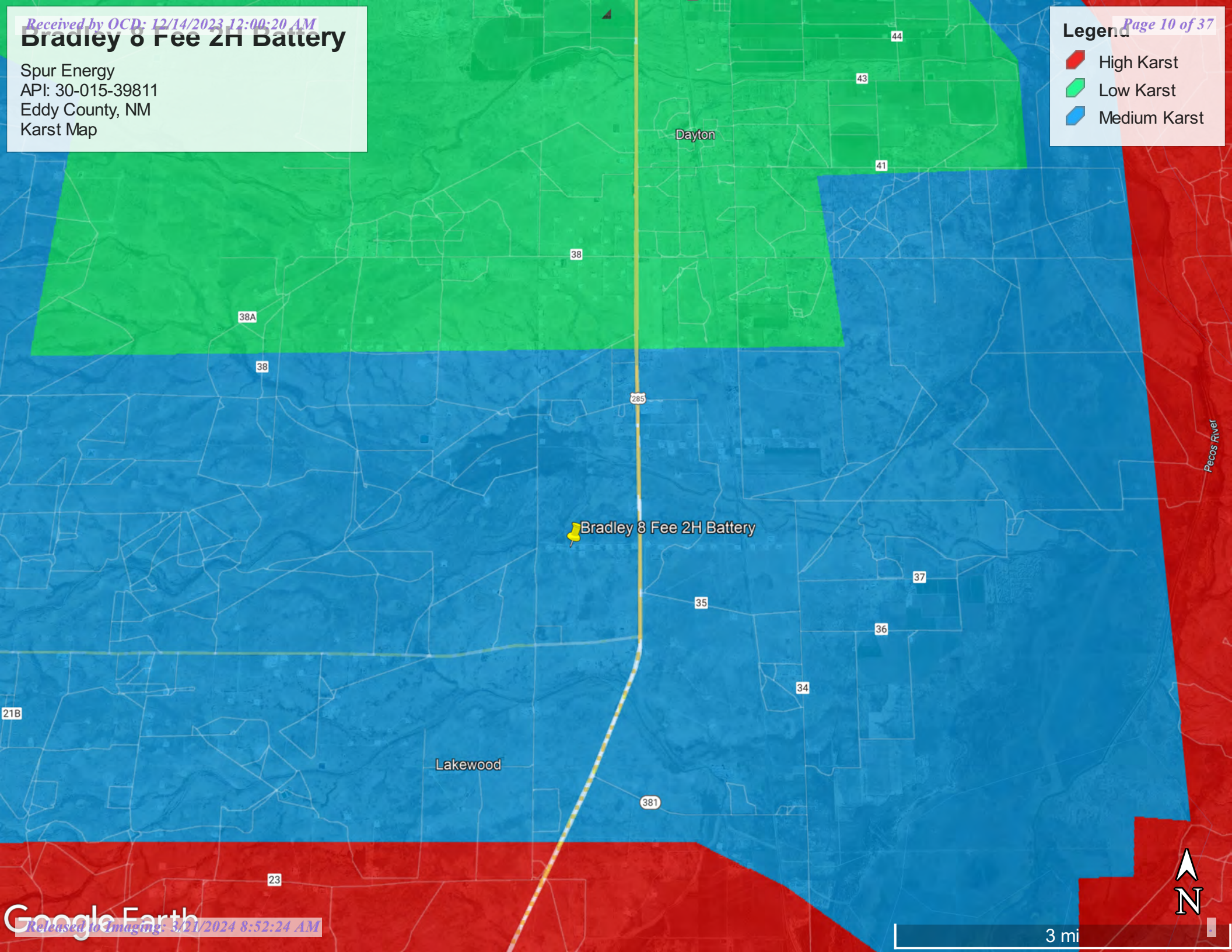


Bradley 8 Fee 2H Battery

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

Legend

-  High Karst
-  Low Karst
-  Medium Karst



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

Page 11 of 37

Legend

 Bradley 8 Fee 2H Battery

 Lined Containment



Bradley 8 Fee 2H Battery



Pima Environmental Services

Appendix A

Water Surveys:

OSE

USGS

Surface Water Map

Wetlands Map



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

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

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

(In feet)

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

Average Depth to Water: **109 feet**

Minimum Depth: **69 feet**

Maximum Depth: **190 feet**

Record Count: 9

UTMNAD83 Radius Search (in meters):

Easting (X): 555618.35

Northing (Y): 3614684.51

Radius: 2000

*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

11/20/23 3:14 PM

WATER COLUMN/ AVERAGE DEPTH TO
WATER

Bradley 8 Fee 2H Battery

Spur Energy
AP#: 30-015-39811
Eddy County, NM
RA 05037 Pod Map

Legend

-  Bradley 8 Fee 2H Battery
-  RA 05037
-  RA 05037- 0.31 of a mile



Google Earth

1000 ft



USGS Home
Contact USGS
Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hideNews Bulletins

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

Groundwater levels for the Nation

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

Search Results -- 1 sites found

site_no list =

- 323917104235201

Minimum number of levels = 1

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

USGS 323917104235201 19S.26E.20.22110

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

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

Land-surface elevation 3,362 feet above NAVD88

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

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

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

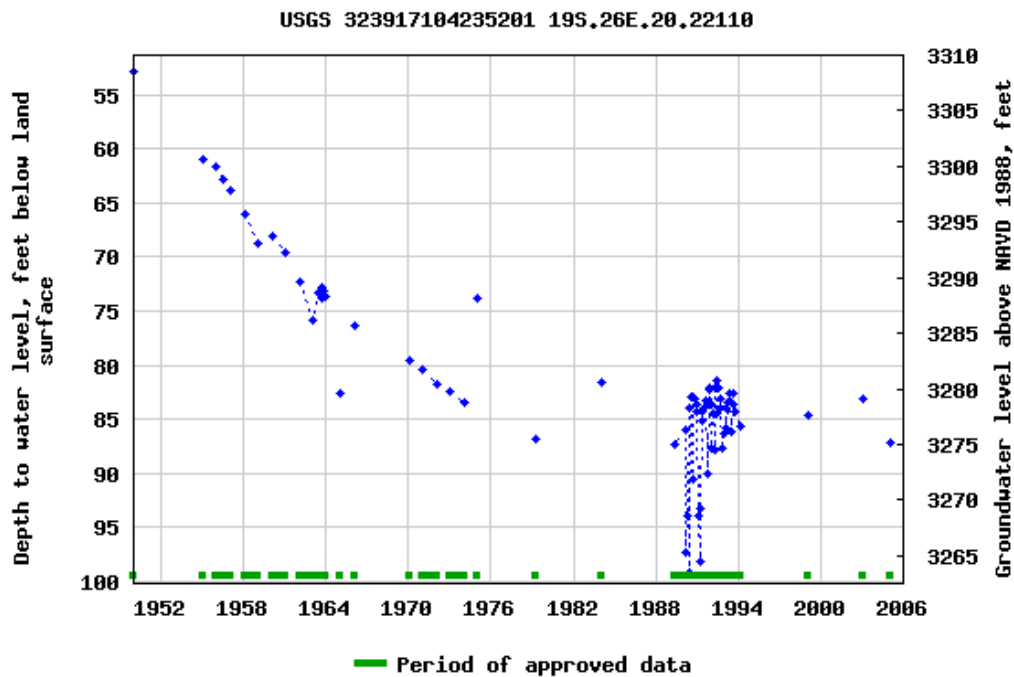
Output formats

[Table of data](#)

[Tab-separated data](#)

[Graph of data](#)

[Reselect period](#)



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

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

Title: Groundwater for USA: Water Levels

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



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

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

0.63 0.54 nadww02

Spur Energy
API#: 30-015-39811
Eddy County, NM
USGS Water Well Location Map

Legend

-  1 Mile
-  Bradley 8 Fee 2H Battery
-  USGS 323917104235201

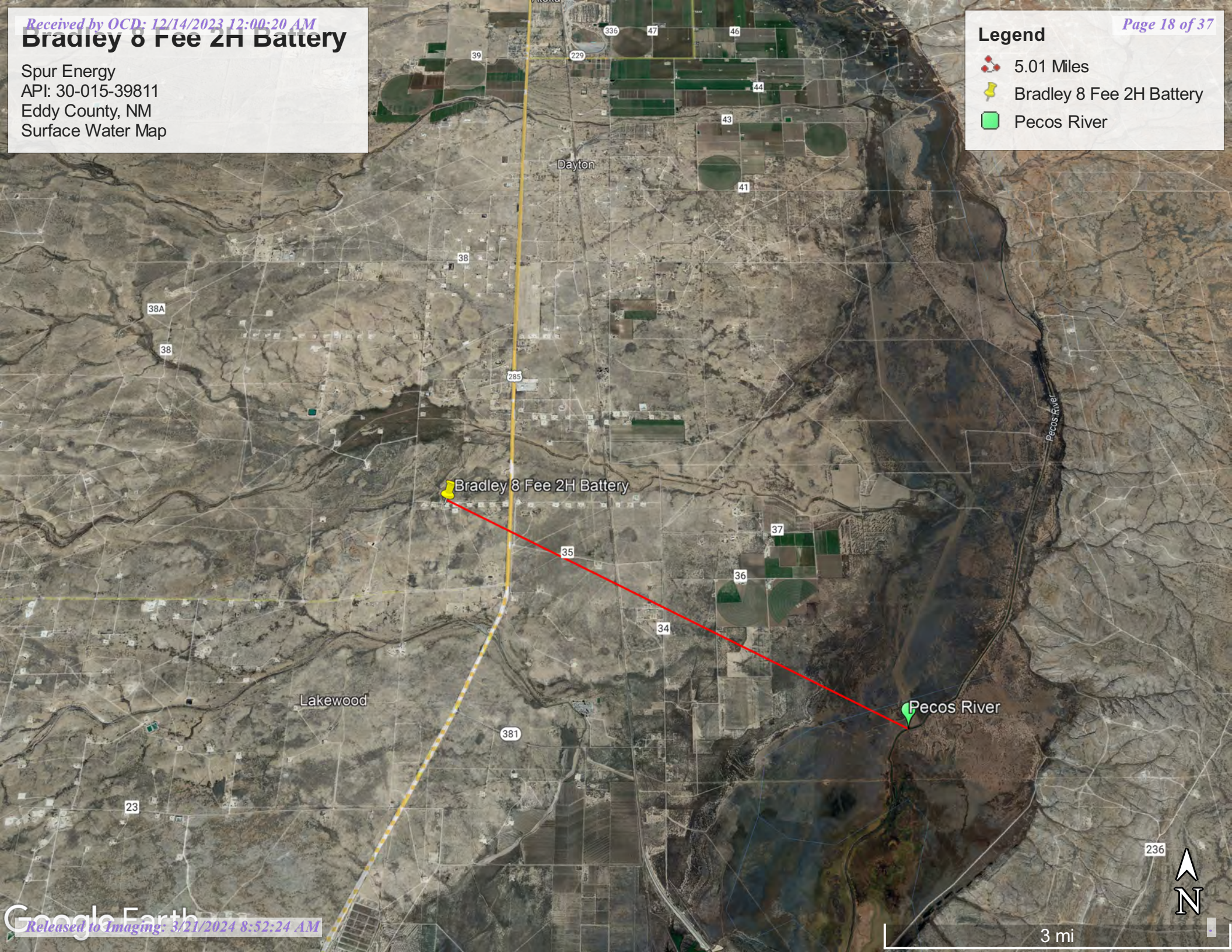


4000 ft

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

Legend

-  5.01 Miles
-  Bradley 8 Fee 2H Battery
-  Pecos River



Bradley 8 Fee Battery



December 5, 2023

Wetlands

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

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

National Flood Hazard Layer FIRMette



104°24'43"W 32°40'22"N



0 250 500 1,000 1,500 2,000 Feet

1:6,000

104°24'6"W 32°39'51"N

Released to Imaging: 3/21/2024 8:32:24 AM

Basemap Imagery Source: USGS National Map 2023

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 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 10/17/2023 at 2:13 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.



Pima Environmental Services

Appendix B

C-141 Form

48-Hour Notification

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

State of New Mexico
Energy Minerals and Natural
Resources Department

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

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

Incident ID	nAPP2328944050
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Spur Energy Partners LLC	OGRID	328947
Contact Name	Katherine Purvis	Contact Telephone	(575) 441-8619
Contact email	katherine.purvis@spurenergy.com	Incident # (assigned by OCD)	nAPP2328944050
Contact mailing address	9655 Katy Freeway; Houston, TX 77024		

Location of Release Source

Latitude 32.66842 Longitude -104.40683
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	BRADLEY 8 FEE 2H BATTERY	Site Type	BATTERY
Date Release Discovered	10/16/2023	API# (if applicable)	30-015-39811

Unit Letter	Section	Township	Range	County
N	8	19S	26E	EDDY

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

☒ Crude Oil	Volume Released (bbls) 55 BBLS	Volume Recovered (bbls) 54 BBLS
☒ Produced Water	Volume Released (bbls) 100 BBLS	Volume Recovered (bbls) 99 BBLS
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☒ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release
4" T FROM HEADER TO SEPARATOR DEVELOPED A HOLE RELEASING OIL AND PRODUCED WATER INTO LINED CONTAINMENT

Incident ID	nAPP2328944050
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☒ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release? THE RELEASE IS GREATER THAN 25 BBLS
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? YES, BY KATHY PURVIS OF SPUR ENERGY VIA NOR SUBMISSION TO NMOC D PERMITTING PORTAL ON 10/16/2023	

Initial Response

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

☒ The source of the release has been stopped. ☒ The impacted area has been secured to protect human health and the environment. ☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. ☒ All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: N/A	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: Katherine Purvis	Title: EHS Coordinator
Signature: <i>Katherine Purvis</i>	Date: 10/16/2023
email: katherine.purvis@spurenergy.com	Telephone: (575) 441-8619
<u>OCD Only</u>	
Received by: Shelly Wells	Date: 10/16/2023

Incident ID	NAPP2328944050
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u><50</u> (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas not on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☒ Photographs including date and GIS information.
- ☒ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	NAPP2328944050
District RP	
Facility ID	
Application ID	

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

Printed Name: Katherine Purvis

Title: EHS Coordinator

Signature: Katherine Purvis

Date: 12/13/2023

email: Katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: _____

Date: _____

Incident ID	NAPP2328944050
District RP	
Facility ID	
Application ID	

Closure

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

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

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

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

Printed Name: Katherine Purvis

Title: EHS Coordinator

Signature: Katherine Purvis

Date: 12/13/2023

email: Katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: _____

Date: _____

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: _____ Date: _____

Printed Name: _____

Title: _____

Sebastian@pimaoil.com

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

Good afternoon Sebastian,

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

Thank you,

Shelly

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

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

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

Good afternoon,

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

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





Pima Environmental Services

Appendix C

Liner Inspection Form

Photographic Documentation



Pima Environmental Services, LLC

Liner Inspection FormCompany Name: Spur EnergySite: Bradley 8 Fee 2H BatteryLat/Long: 32.66870, -104.40690NMOCD Incident ID
& Incident Date: NAPP2328944050 10/16/20232-Day Notification
Sent: via Email by Sebastian Orozco 11/14/2023Inspection Date: 8/17/2023

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

Other: _____

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

Comments: _____

Inspector Name: Andrew Franco Inspector Signature: Andrew Franco

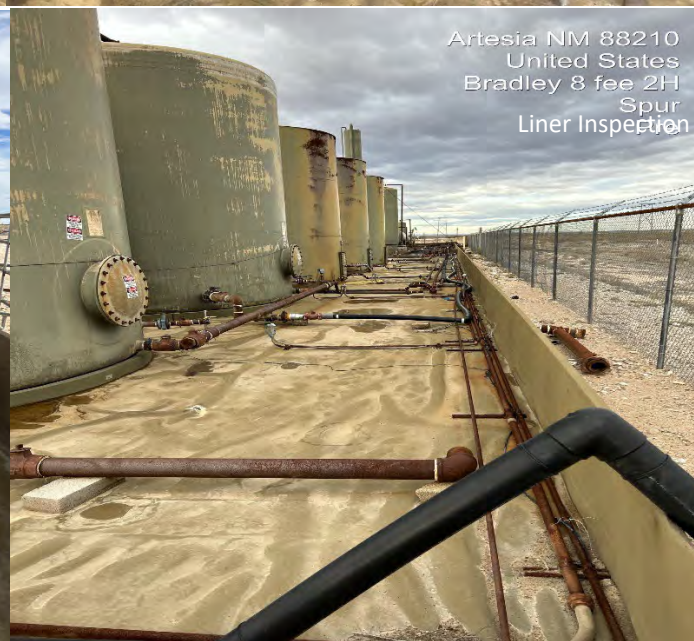
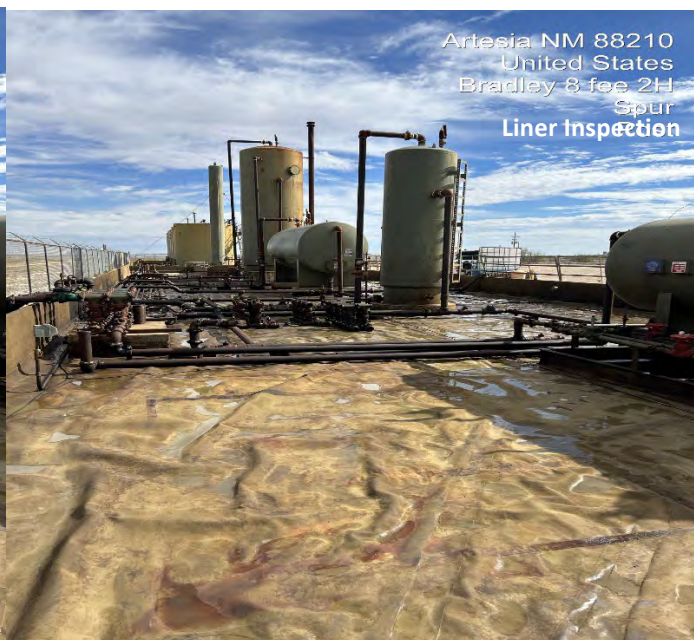
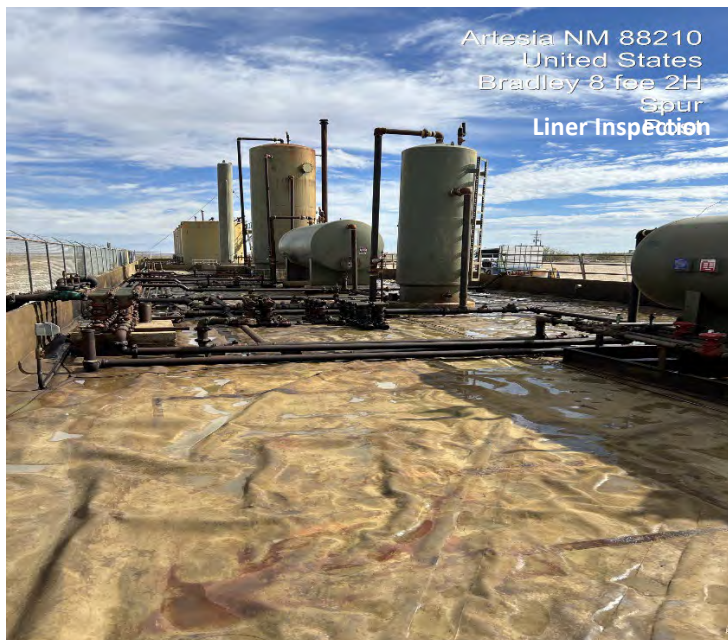


**SITE PHOTOGRAPHS
SPUR ENERGY PARTNERS**

Bradley 8 Fee 2H

Liner Inspection





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QUESTIONS

Action 294001

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 294001
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2328944050
Incident Name	NAPP2328944050 BRADLEY 8 FEE 2H BATTERY @ 30-015-39811
Incident Type	Release Other
Incident Status	Remediation Closure Report Received
Incident Well	[30-015-39811] BRADLEY 8 FEE #002H

Location of Release Source	
Please answer all the questions in this group.	
Site Name	BRADLEY 8 FEE 2H BATTERY
Date Release Discovered	10/16/2023
Surface Owner	Private

Incident Details	
Please answer all the questions in this group.	
Incident Type	Release Other
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	Cause: Corrosion Other (Specify) Crude Oil Released: 55 BBL Recovered: 54 BBL Lost: 1 BBL.
Produced Water Released (bbls) Details	Cause: Corrosion Other (Specify) Produced Water Released: 100 BBL Recovered: 99 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)	4" TEE FROM HEADER TO SEPARATOR DEVELOPED A HOLE RELEASING OIL AND PRODUCED WATER INTO LINED CONTAINMENT

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QUESTIONS, Page 2

Action 294001

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	294001
	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.
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	N/A

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

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 12/13/2023
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QUESTIONS, Page 3

Action 294001

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	294001
	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 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 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	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between ½ and 1 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Medium
A 100-year floodplain	Between ½ and 1 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

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	11/13/2023
On what date will (or did) the final sampling or liner inspection occur	11/17/2023
On what date will (or was) the remediation complete(d)	11/17/2023
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
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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QUESTIONS, Page 4

Action 294001

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	294001
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Remediation Plan (continued)**

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

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

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

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

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

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

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

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QUESTIONS, Page 6

Action 294001

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:	328947
	Action Number:	294001
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	293980
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/17/2023
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	4000

Remediation Closure Request

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

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	LINER POWER WASHED AND INSPECTED, FOUND TO BE INTACT AND WORKING PROPERLY

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

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

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

Action 294001

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 294001
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2328944050 BRADLEY 8 FEE 2H BATTERY, thank you. This Remediation Closure Report is approved.	3/21/2024