



Edge Safety
PO Box 234
Artesia, NM 88211
575-736-1047

November 16, 2024

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

Bureau of Land Management
620 East Green Street
Carlsbad, NM 88220

RE: Liner Inspection and Closure Report
API No. N/A
GPS: Latitude 32.802926 Longitude -104.078653
UL- J, Section 28, Township 17S, Range 29E
NMOCD Reference No. nAPP2428739646

Spur Energy Partners (Spur) has contracted Edge Safety (Edge) to perform a liner inspection and prepare this closure report for the release of produced water that happened at the GJ West Coop Unit 92 Battery (GJ West). On October 15, 2024, the initial C-141 was formally submitted. The corresponding release received the designation Incident ID No. nAPP2428739646 from the New Mexico Oil Conservation Division (NMOCD).

Site Information and Site Characterization

The GJ West is located approximately 11.94 miles southeast of Riverside, NM. This spill site is in Unit J, Section 28, Township 17S, Range 29E, Latitude 32.802926 Longitude -104.078653, 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, there are no pods located near the GJ West. For detailed references to water surveys and the precise locations of water wells, please refer to Appendix A, inclusive of the relevant maps. Notably, GJ West is situated within an area with a low potential for karst, as illustrated in Figure 3. Additionally, a comprehensive Topographic Map is available for reference in Figure 2.

Release Information

nAPP2428739646: On October 12, 2024, the 4" nipple on the water inlet developed a hole due to internal corrosion causing a 48.3-barrel spill inside lined containment. The total release area measured approximately 2906 square feet.

**Site Assessment and Liner Inspection**

October 12, 2024 Tri-Star personnel mobilized their team to the GJ West site to conduct remediation efforts within the lined containment area utilizing a Vacuum Truck and Power Washer to uphold integrity of the liner. A thorough cleaning spanning 7414 square feet was completed, with approximately 48-barrels of impacted material successfully extracted. Ensuring proper disposal, all contaminated material was transported and disposed of at R360, an approved disposal facility sanctioned by NMOCD. Following this, a detailed inspection for tears and rips was conducted. Upon confirming the absence of any tears or rips, an inspection was conducted to validate the integrity of the liner.

On November 12, 2024, Spur personnel submitted a notification for a liner inspection. The details of the 48-hour notification can be referenced in Appendix C.

On November 15, 2024, Edge Safety 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, Edge requests that this incident nAPP2428739646 be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Jennifer Mendoza at 575-748-4929 or jennifer.m@edgesafetyllc.com.

Respectfully,

Jennifer Mendoza

Jennifer
Owner
Edge Safety

Attachments

Figures:

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

Appendices:

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



**Edge Safety
PO Box234
Artesia, NM 88211**


Figures:


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

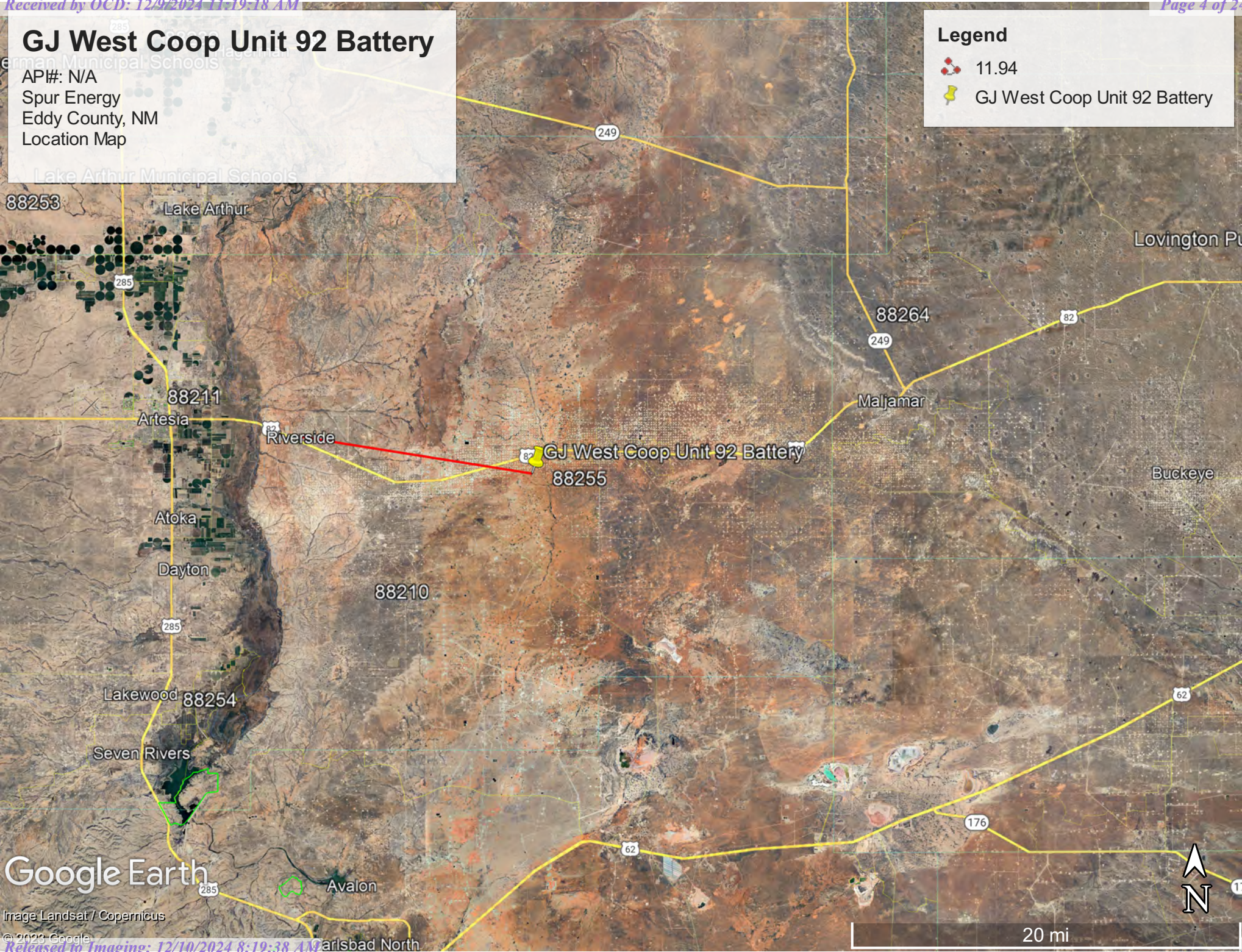
GJ West Coop Unit 92 Battery

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

Legend

 11.94

 GJ West Coop Unit 92 Battery



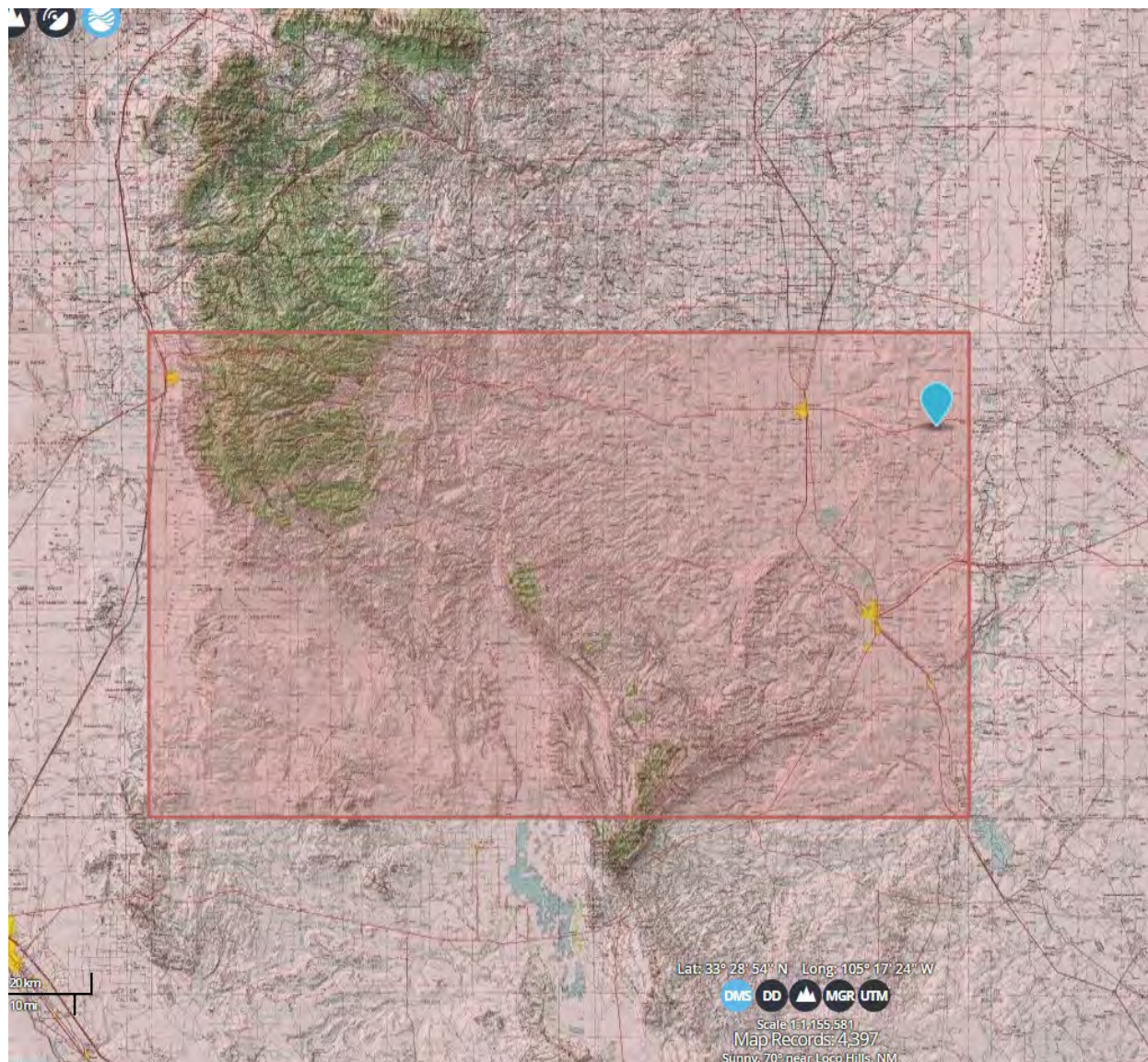
Google Earth

Image Landsat / Copernicus

© 2023 Google

GJ West COOP Unit 92 Battery





TOPO Map



GJ West Coop Unit 92 Battery

Karst Designation

Legend

-  GJ West Coop Unit 92 Battery
-  High
-  Low
-  Medium

verside

82

82

82

GJ West Coop Unit 92 Battery

Loco Hills

88255

88210

Google Earth

Image © 2024 Airbus

© 2023 Google





6 mi

GJ West Coop Unit 92 Battery

Site Map

Legend

-  GJ West Coop Unit 92 Battery
-  Release Area Green 10/12/2023

GJ West Coop Unit 92 Battery

Google Earth

Image © 2024 Airbus

Released to Imaging: 12/10/2024 8:19:38 AM

100 ft





**Edge Safety
PO Box 234
Artesia, NM 88211**

Appendix A:

**Water Surveys
OSE
Surface Water Map
Wetlands Map**

GJ West Coop Unit 92 Battery-Spur

Water Column/Average Depth to Water

No report data available.

Basin/County Search:

County: ED

PLSS Search:

Range: 29E

Township: 17S

Section: 28

* 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.

11/14/24 12:09 PM MST Water Column/Average Depth to Water

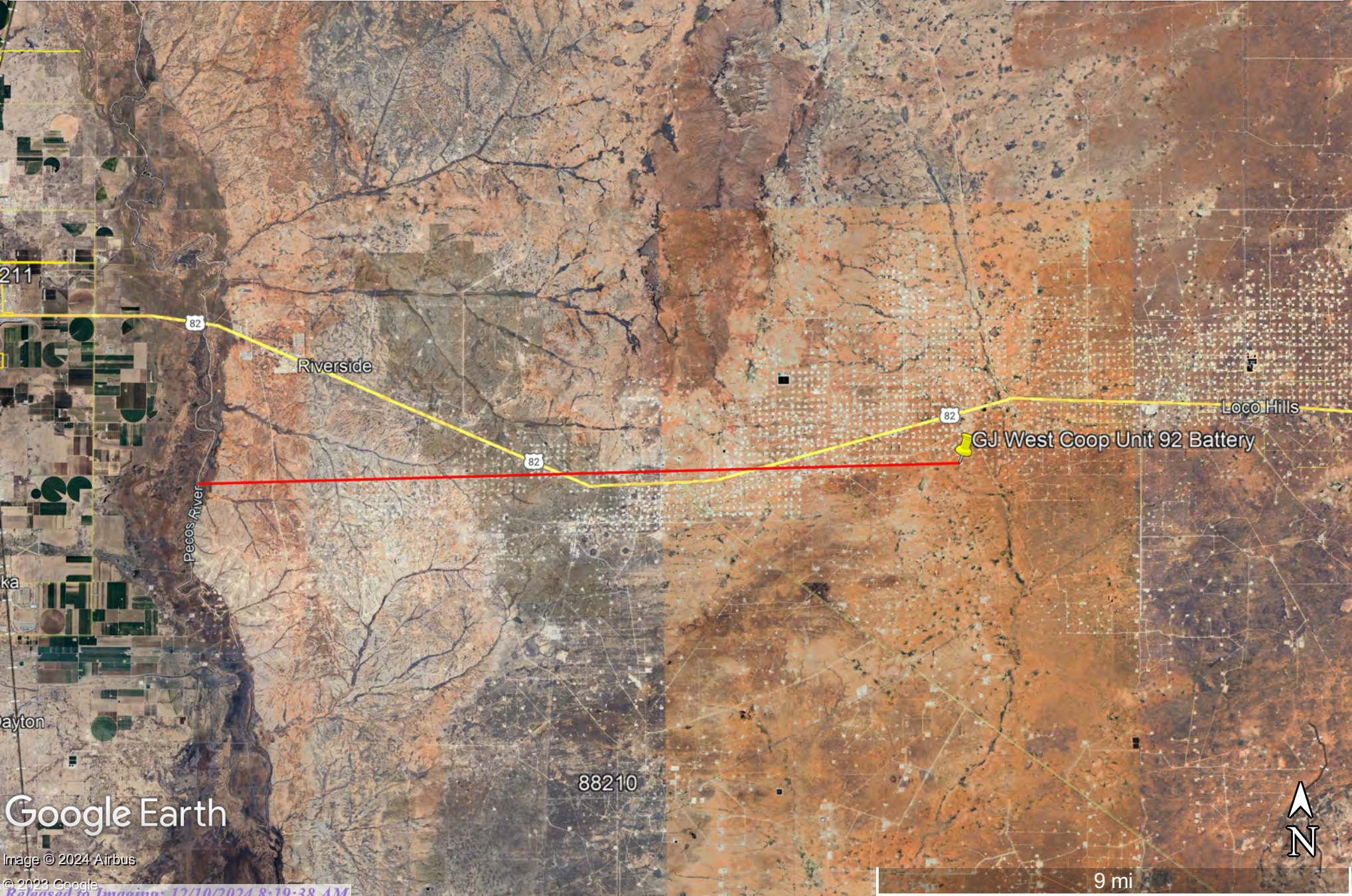
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GJ West Coop Unit 92 Battery

Surface Water Map

Legend

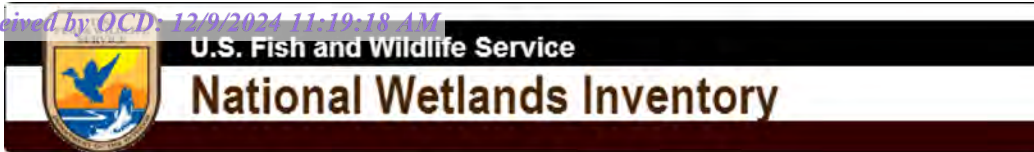
- 14.46 miles to nearest water
- GJ West Coop Unit 92 Battery



Google Earth

Image © 2024 Airbus

© 2023 Google








GJ West Coop Unit 92 Battery



November 14, 2024

Wetlands

-  Estuarine and Marine Deepwater
-  Estuarine and Marine Wetland

-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond

-  Lake
-  Other
-  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°4'31"W 32°48'52"N



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

1:6,000

104°3'53"W 32°48'22"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
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 **11/14/2024 at 7:16 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.



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Appendix B:

48- Hour Notification

GJ West Coop Unit 92 Battery -Spur

From: OCDOnline@state.nm.us <OCDOnline@state.nm.us>

Sent: Tuesday, November 12, 2024 8:21 AM

To: Katherine Purvis <katherine.purvis@spurenergy.com>

Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 402438

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

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2428739646.

The liner inspection is expected to take place:

When: 11/15/2024 @ 09:00

Where: J-28-17S-29E 0 FNL 0 FEL (32.80292,-104.07865)

Additional Information: Josh Rodriguez
5759091802

Additional Instructions: 32.80292, -104.078653

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



**Edge Safety
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Artesia, NM 88211**

Appendix C:

Liner Inspection

Photographic Documentation

GJ West Coop Unit 92 Battery -Spur



PO Box 234, Artesia NM 88211
575-736-1047

Liner Inspection Form

Company Name: Spur EP LLC

Site: GJ West Coop Unit # 92 Battery

Lat/Long: 32.802926, -104.078653

NMOCD Incident ID
& Incident Date: nAPP2428739646

2-Day Notification
Sent: 11/12/2024

Inspection Date: 11/15/2024


Liner Type: Earthen w/Liner Eathen 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 Josh Rodriguez Inspector Signature: 



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Spur Energy Partners
GJ West Coop Unit #92 Battery
Site Photographs

Liner Inspection:





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575-736-1047



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 409899

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 409899
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2428739646
Incident Name	NAPP2428739646 GJ WEST COOP UNIT 92 BATTERY @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source*Please answer all the questions in this group.*

Site Name	GJ WEST COOP UNIT 92 BATTERY
Date Release Discovered	10/12/2024
Surface Owner	State

Incident Details*Please answer all the questions in this group.*

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

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Fitting Produced Water Released: 48 BBL Recovered: 48 BBL Lost: 0 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)	CORROSION OF A 4" NIPPLE ON THE WATER INLET LINE DEVELOPED A HOLE AND RELEASED PW INTO LINED CONTAINMENT

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QUESTIONS, Page 2

Action 409899

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 409899
	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: 10/15/2024
--	--

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

QUESTIONS, Page 3

Action 409899

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	409899
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 51 and 75 (ft.)
What method was used to determine the depth to ground water	Estimate or Other
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	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1 and 5 (mi.)
Any other fresh water well or spring	Between 1 and 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Between 1 and 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Between 1 and 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 1000 (ft.) and ½ (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	10/12/2024
On what date will (or did) the final sampling or liner inspection occur	11/15/2024
On what date will (or was) the remediation complete(d)	10/12/2024
What is the estimated surface area (in square feet) that will be remediated	7414
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 4

Action 409899

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 409899
	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: 12/09/2024
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 6

Action 409899

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 409899
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	402438
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	11/15/2024
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	1600

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	7414
What was the total volume (cubic yards) remediated	0
Summarize any additional remediation activities not included by answers (above)	LINER WAS POWERWASHED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN FLUIDS

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: 12/09/2024
--	---

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CONDITIONS

Action 409899

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 409899
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvez	Liner inspection approved, release resolved.	12/10/2024