



Region 6 - Enforcement & Compliance Assurance Division
INSPECTION REPORT

Inspection Date(s):	09/09/2025	
Media Program:	Air	
Regulatory Program(s)	State Implementation Plan (SIP) and New Source Performance Standards (NSPS)	
Company Name:	Spur Energy Partners, LLC (Spur)	
Facility Name:	Multiple Facilities in Eddy County, NM	
Facility Physical Location:	New Mexico Permian Basin	
(city, state, zip code)	Multiple	
Mailing address:	9655 Katy Freeway, Suite 500	
(city, state, zip code)	Houston, Texas 77024	
County/Parish:	Eddy County	
Facility Phone Number	281-904-8811	
Facility Contact:	John Nabors	Executive Vice President, Operations
	John@spurenergy.com	
FRS Number:	Multiple	
Identification/Permit Number:	Multiple	
Media Identifier Number:	Multiple	
NAICS:	211120	
SIC:	1311	
Personnel participating in inspection:		
Cassandra Lowder	Environmental Protection Agency (EPA) Region 6	Lead Inspector
Bailey Brown	EPA Region 6	Inspector
Cale Chapman	EPA Region 6	Inspector
Mitchell Schatz	New Mexico Environmental Department (NMED)	Inspector
John Hermes	Spur	Superintendent
John Connelly	Energy Resource Development Inc. (ERDI)	Spur Consultant
Paolo Bahena	Spur	Senior Foreman
EPA Lead Inspector Signature/Date	CASSANDRA LOWDER Digitally signed by CASSANDRA LOWDER Date: 2026.01.12 10:38:52 -06'00' Cassandra Lowder	Date
Supervisor Signature/Date	JAMIE SALABOGI Digitally signed by JAMIE SALABOGI Date: 2026.01.12 11:04:41 -06'00' Jamie Salabogi	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA Region 6 inspectors Cassandra Lowder, Bailey Brown, and Cale Chapman arrived at the Spur Energy Partners, LLC (“Spur”) field office located at 2407 Pecos Avenue, Artesia, New Mexico, at 9:35 am on August 9, 2025, for an announced inspection. Spur was not informed of the specific facilities until the day of the inspection. We met with John Hermes, Superintendent for Spur; Paolo Bahena, Senior Foreman for Spur; and John Connolly, Consultant for Spur (**Appendix 1**). Inspector Brown presented her credentials to Mr. Hermes, and I, Cassandra Lowder, informed him that this was an EPA inspection to determine compliance with the facilities’ permits or Notice of Intent (“NOI”) applications, and the Clean Air Act (“CAA”). The scope of the inspection was a partial compliance evaluation (“PCE”) and included evaluation of the compliance of each facility with its New Mexico State Implementation Plan (“SIP”), and federal CAA regulations. The New Mexico Environmental Department participated in the inspection, and NMED inspector Mitchell Schatz accompanied EPA Region 6 inspectors on September 9, 2025. During the opening conference, Spur staff informed us that the Spur facilities were sour gas and Level A personal protection equipment was required to be worn within tank battery berms and on tank battery walkways. We agreed to follow Spur’s safety protocol.

FACILITY DESCRIPTION

The inspection covered seven (7) Spur facilities listed in **Table 1**. Spur’s oil and gas production facilities had slightly different layouts depending on production, modifications to the facilities, and/or equipment that was onsite prior to Spur purchasing the leases. Spur had two general processes. One included facilities with a vapor Recovery Unit (“VRU”) and vapor recover tower (“VRT”), and the other included facilities without a VRU and VRT. The facility specific process descriptions with or without VRUs and VRTs are below:

Process Description without VRU and Vapor Recover Tower VRT

Production streams from well sites entered the separators to separate gas, oil, and water. The gas from the separator(s) was routed to the scrubber then to the sells line. The water from the separator(s) was routed to the produced water storage tanks or a gunbarrel tank. The oil from the separator(s) was sent to heater treater(s). The water from separator(s) was routed to the gunbarrel tank for further separation. The water off the gunbarrel tank was routed to the produced water storage tanks while the oil was routed to the skim oil tank. The gas from the gunbarrel tank was sent to the dual pressure flare. The oil from the separators was sent to heater treater(s) for further separation. The oil from the heater treater(s) was routed to the oil storage tanks. The water from heater treater(s) was routed to the produced water storage tanks. The gas generated from the heater treater(s) was used as fuel at the facility. The heater treater was also used to recirculate the bottoms from the oil storage tanks. The hydrocarbon emissions from the oil storage tanks and produced water storage tanks were routed to the dual pressure flare or the atmosphere. The oil from the oil storage tanks was routed to a lease automatic custody transfer (“LACT”) unit then trucked off-site to sales. The produced water was piped off-site to a saltwater disposal facility.

Process Description with VRU and VRT

Production streams from well sites enter the separator(s) to separate gas, oil, and water. The gas from the separator(s) was routed to the scrubber then to the sells line. The water from the separator(s) was routed to the produced water storage tanks or a gunbarrel tank. The oil from the separator(s) was routed to the VRT. The water from the separator(s) was routed to the gunbarrel tank for further separation. The water off the gunbarrel tank was routed to the produced water storage tanks while the oil was routed to the skim oil tank. The gas from the gunbarrel tank was sent to the dual pressure flare. The oil from the VRT was routed into oil storage tanks. The gas from the VRT was routed to the VRU then to the sells line. The hydrocarbon emissions from the produced water tanks were either routed to the atmosphere or the dual pressure flare. The hydrocarbon emissions from the oil storage tanks were routed to the dual pressure flare or the VRU to the sales line. The heater treater(s) onsite was used to recirculate oil from the bottoms of the oil storage tanks. The gas generated from the heater treater(s) was used as fuel. The oil from the oil storage tanks was routed to a LACT unit then trucked off-site to sales. The produced water was piped off-site to a saltwater disposal facility.

Section II – OBSERVATIONS

EPA inspectors were equipped with a FLIR-Teledyne model Gx620 optical gas imaging camera (“OGI camera”); a Ricoh Model WG-6 digital camera (“Ricoh”); a Nikon Coolpix AW120 camera (“Nikon”); and a Toxic Vapor Analyzer 2020 that measures total volatile organic compounds in parts per million. Photographs and videos taken during the inspection are found in **Appendix 2** and **3**, respectively. Videos recorded with Central Standard Time (CST) time stamp in image. Videos listed in **Appendix 2** are reflected in Mountain Standard Time (MST). All facilities were inspected with an OGI camera. We used the Ricoh at Arkansas 23 Fee 3 and Alto Amm 21 Tank during which we observed that the date and time stamps in the images were incorrect. We used the Nikon for all remaining facilities.

Table 1: Spur Facilities Inspected					
#	Facility Name	Permit Type	Permit Number	Latitude	Longitude
1	Arkansas 23 Fee 3	NOI	5380	32.64708	-104.45659
2	Alto Amm 21 Tank	NOI	9834	32.647473	-104.480757
3	B&B/Ross Ranch Yeso Battery	NOI	9305	32.648341	-104.479356
4	Goodman 22 Battery	NOI	8316	32.64524	-104.47354
5	Morris Boyd State Com #5H	NOI	8313	32.64057	-104.45889
6	Live Oak Tank Battery	GCP	9306	32.635811	-104.469561
7	Lakewood Federal Com 4H, 8H, 10H, 20H and 21H Facility	NOI	9110	32.625808	-104.469155

September 9, 2025, Inspections

1. Arkansas 23 Fee 3 (AIRS No. 350150916)

We arrived at the facility at 10:45 am (Photo No. 1 and Photo No. 3). The facility was comprised of one (1) heater treater; one (1) two-phase flare scrubber; one (1) dual pressure flare; one (1) operational 2-phase

separator and one (1) out-of-service (“OOS”) separator; one (1) OOS VRU; one (1) OOS VRT; five (5) OOS tanks; one (1) oil storage tank; and one (1) produced water storage tank. We observed hydrocarbon emissions from the pressure relief valve (PRV) on produced water storage tank 72238 using the OGI camera (Photo No. 2, Video No. 1, and Video No. 2)[AOC 1]. Spur staff stated tank gas was routed to the dual pressure flare and should not have emitted from the produced water storage tank. We departed the facility at 11:33 am.

2. Alto Amm 21 Tank
(AIRS No. 350152764)

We arrived at the facility at 11:45 am (Photo No. 4 and Photo No. 7) and immediately smelled a strong odor of hydrocarbons. The facility was comprised of one (1) heater treater; one (1) two-phase flare scrubber; one (1) dual pressure flare; three (3) three-phase separators; one (1) VRU; one (1) VRT; two (2) oil storage tanks; and two (2) produced water storage tanks. We observed un-combusted hydrocarbon emissions from the dual pressure flare using an OGI camera (Photo No. 9, Video No. 3, and Video No. 4)[AOC 2]. I observed an illuminating green light indicating a lit pilot and a temperature reading of 932.15° F at the dual pressure flare control box (Photo No. 5 and Photo No. 6). We observed hydrocarbon emissions from the manifold PRV above oil storage tank 74538 using an OGI camera (Photo No. 7 and Video No. 5)[AOC 3]. We departed the facility at 12:32 pm.

3. B&B/Ross Ranch Yeso Battery
(AIRS No. 350152543)

We arrived at the facility at 12:45 pm (Photo 10) and immediately smelled a strong odor of hydrocarbons. The facility was comprised of one (1) operating heater treater and one (1) OOS heater treater; one (1) two-phase scrubber for the sales line; one (1) dual pressure flare; four (4) 3-phase separators; two (2) operating oil tanks and two (2) OOS oil tanks; two (2) produced water tanks; one (1) gunbarrel tank; and one (1) slop tank. We observed hydrocarbon emissions from the PRV on the produced water tank using the OGI camera (Photo No. 11 and Video No. 6)[AOC 4]. Spur staff stated that all the tanks were uncontrolled. We departed the facility at 1:15 pm.

4. Goodman 22 Battery
(AIRS No. 350152126)

We arrived at the facility at 2:17 pm (Photo No. 12). The facility was comprised of two (2) heater treaters that operated interchangeably; two (2) two-phase scrubbers that scrub gas from heater treater and separators; one (1) dual pressure flare; four (4) 3-phase separators; two (2) operating oil storage tanks; four (4) produced water storage tanks; and two (2) OOS slop storage tanks. We observed hydrocarbon emissions from the thief hatch on oil storage tank 71962 using the OGI camera (Photo No. 14) Video No. 7)[AOC 5]. We heard a hissing sound from the PRV on the produced water storage tank directly next to oil storage tank 71963 and observed hydrocarbon emissions from the PRV using the OGI camera (Photo No. 15 and Video No. 8 [AOC 6]. We observed un-combusted hydrocarbon emissions from the dual pressure flare and a heat signature using the OGI camera (Photo No. 13 and Video No. 9)[AOC 7]. I observed an illuminating green light indicating a lit pilot and a temperature reading of 864.88° F at the dual pressure

flare control box (Photo No. 16 and Photo No. 17). I observed oil residue on the dual pressure flare and the soil around the dual pressure flare (Photo No. 18, Photo No. 19, and Photo No. 20)[AOC 8]. Spur staff stated that there was an upset a few months prior to the inspection, and liquids made their way through the dual pressure flare and spilled onto the ground. I asked if there was a liner under the dual pressure flare and the Spur staff stated there was no liner. We departed the facility at 2:50 pm.

5. Morris Boyd State Com #5H
(AIRS No. 350152123)

We arrived at the facility at 2:56 pm (Photo No. 21 and Photo No. 22). The facility was comprised of one (1) operating heater treater and two (2) OOS heater treaters; two (2) VRUs; one (1) VRT; six (6) OOS separators and three (3) new operating separators; one (1) OOS two-phase scrubber and one (1) operating scrubber for the flare and sales line; one (1) dual pressure flare; eight (8) operating oil storage tanks and two (2) OOS oil storage tanks; eight (8) produced water storage tanks; one (1) gunbarrel storage tank; and three (3) slop storage tanks. We observed hydrocarbon emissions from a vent on the VRU for the oil tanks with the OGI camera (Photo No. 23 and Video No. 10)[AOC 9]. Spur stated that the VRUs were rented from Richard Energy, who was responsible for conducting all maintenance activities on the VRUs. We observed hydrocarbon emissions from the top of the oil storage tanks (Photo No. 24 and Video No. 11)[AOC 10]. We departed the facility at 4:18 pm.

6. Live Oak Tank Battery
(AIRS No. 350152544)

We arrived at the facility at 4:26 pm (Photo No. 25) and observed third-party contractors onsite installing pipes for the addition of new wells to the site. The facility was comprised of one (1) heater treater; one (1) two-phase flare scrubber; one (1) dual pressure flare; five (5) 3-phase separators; two (2) VRUs; one (1) VRT; three (3) oil storage tanks; three (3) produced water storage tanks; and two (2) half-round storage tanks that were used to separate sand and water for the new wells. We observed un-combusted hydrocarbon emissions from the unlit dual pressure flare (Photo No. 26 and Video No. 12)[AOC 11]. Spur confirmed the observation using their equipment. I observed a temperature reading that displayed a sensor error on the dual pressure flare control box (Photo No. 27). Spur reset the sensor by restarting blower/sensor. The thermocouple temperature increased to 848.7° F (Photo No. 29). The green light on the side of the thermocouple box was illuminated to indicate the pilot was lit on the dual pressure flare after it was reset (Photo No. 28). We observed un-combusted hydrocarbon emissions from the dual pressure flare with a heat signature after it was relit with the OGI camera (Photo No. 30 and Video No. 14). We observed hydrocarbon emissions from the thief hatch on oil storage tank 73875 with the OGI camera (Photos No. 31, Photo No. 32, Photo No. 33, and Video No.13)[AOC 12]. Spur staff confirmed emissions from the oil storage tank 73875 thief hatch using their own equipment. We departed the facility at 5:08 pm.

7. Lakewood Federal Com 4H, 8H, 10H, 20H and 21H Facility (Lakewood)
(AIRS No. 350152453)

We arrived at the facility at 5:15 pm (Photo No. 34 and Photo No. 35). The facility was comprised of one (1) heater treater; one (1) two-phase flare scrubber; one (1) dual pressure flare; five (5) 3-phase

separators; one (1) VRU; one (1) VRT; two (2) oil storage tanks; and two (2) produced water storage tanks. We observed un-combusted hydrocarbon emissions from the unlit dual pressure flare with the OGI camera (Photo No. 37 and Video No. 15)[AOC 13]. I observed a temperature reading of 92.609° F (Photo No. 36). Spur staff turned off main power at the control box to reset the blower and sensor. The thermocouple temperature increased to above the minimum set point of 300° F. We continued to observe un-combusted hydrocarbon emissions with the OGI camera from the dual pressure flare with a heat signature after Spur reset the blower and sensor (Video No. 16). We departed the facility at 5:33 pm.

Section III – AREAS OF CONCERN

The following areas of concern (“AOC”) were based on our observations during the inspections of the Spur facilities.

1. Hydrocarbon emissions from PRV on produced water storage tank 72238 at Arkansas 23 Fee 3.
2. Un-combusted hydrocarbon emissions from the dual pressure flare at Alto Amms 21 Tank.
3. Hydrocarbon emissions from the manifold PRV above oil storage tank 74538 at Alto Amms 21 Tank.
4. Hydrocarbon emissions from the PRV on produced water storage tank at B&B/Ross Ranch Yeso Battery.
5. Hydrocarbon emissions from the thief hatch on oil storage tank 71962 at Goodman 22 Battery.
6. Hydrocarbon emissions from the PRV on the produced water storage tank next to oil storage tank 71963 at Goodman 22 Battery.
7. Un-combusted hydrocarbon emissions from a lit dual pressure flare at Goodman 22 Battery.
8. Oil residue was observed on the dual pressure flare and the soil around the flare at Goodman 22 Battery.
9. Hydrocarbon emissions from the VRU for oil storage tanks while it was operating at Morris Boyd State Com #5.
10. Hydrocarbon emissions from the top of the oil storage tanks at Morris Boyd State Com #5.
11. Un-combusted hydrocarbon emissions from an unlit dual pressure flare at Live Oak Tank Battery.
12. Hydrocarbon emissions from the thief hatch on oil storage tank 73875/OT-1 at Live Oak Tank Battery.
13. Un-combusted hydrocarbon emissions from an unlit dual pressure flare at Lakewood Federal Com 4H, 8H, 10H, 20H and 21H Facility.

EPA Region 6 inspectors Bailey Brown, Cale Chapman, and I conducted a closing conference with Spur representatives John Hermes, Superintendent for Spur; Paolo Bahena, ESG Senior Foreman for Spur; and John Connolly, Consultant for Spur (**Appendix 1**) at Spur’s Lakewood facility at 6:05 pm on September 9, 2025. NMED inspector Mitchell Schatz was in attendance. During the closing conference, I reviewed the thirteen (13) AOCs noted during the inspection, fielded questions from company staff, and provided information about the next steps in the inspection process. We thanked them for their time and completed the closing conference at 6:18 pm.

Section IV – FOLLOW UP

On September 16, 2025, I requested the following information via email from Spur: current permits or NOIs; pending permit applications or NOIs; maintenance records; inspection records; control device manufacturing specifications, schematics, and manufacturer recommended maintenance; monitoring

data; tanks' potential to emit 12-month rolling average; total well counts for each facility; and any other relevant documentation for the seven (7) facilities. I also provided Spur electronic copies of the digital photographs and videos that were taken during the inspection.

Spur provided the requested records on October 1, 2025.

Section V – LIST OF APPENDICES

Appendix 1 – Opening/Pre-Inspection Meeting and Closing Conference/Post Inspection Meeting Lists

Appendix 2 - Photograph Log – 37 digital photographs taken 09/09/2025

Appendix 3 – Video Log – 16 OGI camera videos taken 09/09/2025

Appendix 1

Opening / Pre-Inspection Meeting and Closing Conference/Post Inspection Meeting Lists

2025 CAA NM PCE Inspections

Spur Energy Partners, LLC

Page 3 of 82

Opening/Pre-Inspection Meeting

Commence opening/pre-inspection meeting.....Time: 0840

Name	Title	Representing	Telephone No.	Email
Bailey Brown	EPA R6	Inspector	214-665-6632	brown.bailey@epa.gov
Mitchell Schatz	NMED		505-629-2350	Mitchell.schatz@env.nm.gov
John Hermes JP	SPUR superintendent	Spur	575-763-6218	jhermes@spurenergy.com
John Connolly	ERDI		225-573-7633	johnm@erdi-hse.com
Paolo Behara	ES&S Sr. Foreman Spur Energy Partners	SPUR	432-557-5308	pbehera@spurenergy.com
CALIE CHAPMAN	EPA R6 Inspector	EPA R6	214-665-6790	Chapman.calie@epa.gov
Cassandra Loucher	EPA R6 Inspector	EPA R6	214-665-6790	Loucher.Cassandra@epa.gov

Initials / Date: BB / 9/9/25

Closing Conference/Post-Inspection Meeting

Commence closing conference/post-inspection meeting..... Time: 6:05 PM

Name	Title	Representing	Telephone No.	Email
Bailey Brown	Inspector	EPA - R6	214-665-6632	brown.bailey@epa.gov
CALE CHAPMAN	Inspector	EPA R6	214-665-6790	chapman.cale@epa.gov
Mitchell Schatz	Inspector	NMED - EPC&B	805-629-2350	mitche11.schatz@nm.gov
Cassandra Louder	R6 Inspector	EPA - R6	214-665-5545	louder.cassandra@epa.gov
Phil Padgett	ES& Sr. Foreman	Spur Energy	472-557-5308	ppadgett@spurenergy.com
John Connelly	President - ERDI	Spur Energy	225-573-8033	johnc@erdi-lse.com
John Hermes Jr	SPUR Superintendent	Spur Energy	579-703-6218	jahermes@spurenergy.com

Initials / Date: BB , 9/9/25

Appendix 2

Photograph Log



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 1

Facility/Location:		Spur Energy Partners, LLC - Arkansas 23 Fee 3						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010623.JPG	Photo Date:		09/09/2025		Time:	10:59:09	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Sign – The date/time stamp in the image is incorrect		
Latitude:	32.64708	Longitude:	-104.45659



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 2

Facility/Location:		Spur Energy Partners, LLC - Arkansas 23 Fee 3						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010626.JPG	Photo Date:		09/09/2025		Time:	11:02:32	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Produced Water Storage Tank 72238 – The date/time stamp on the photo is incorrect.		
Latitude:	32.64708	Longitude:	-104.45659



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 3

Facility/Location:		Spur Energy Partners, LLC - Arkansas 23 Fee 3						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010629.JPG	Photo Date:		09/09/2025		Time:	11:29:47	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility – The date stamp on the photo is incorrect.		
Latitude:	32.64708	Longitude:	-104.45659



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010631.JPG	Photo Date:		09/09/2025		Time:	11:59:04	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Sign – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757

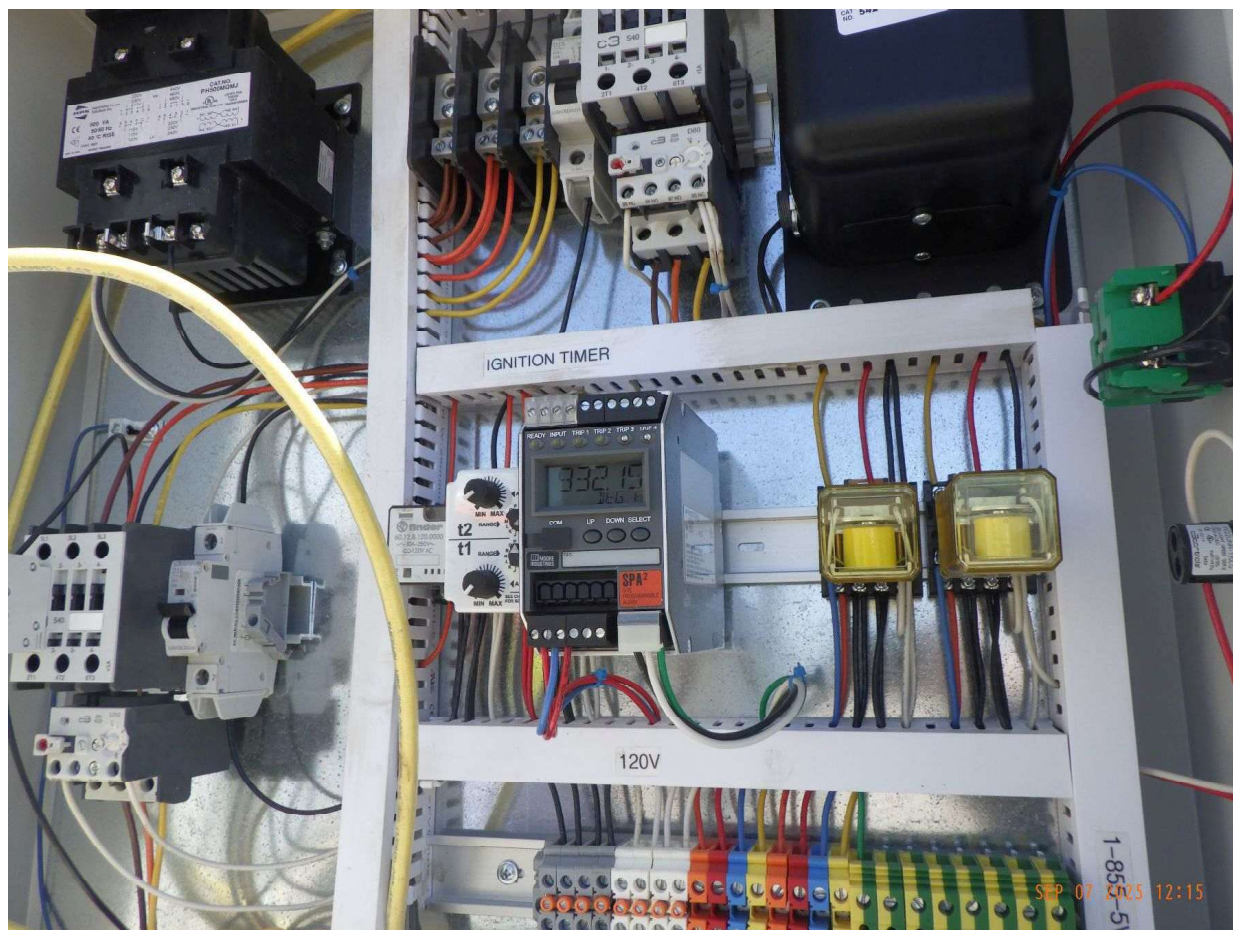


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 2

Photo No. 5

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010633.JPG	Photo Date:		09/09/2025		Time:	12:15:52	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Thermocouple temperature at Flare Control Box – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010634.JPG	Photo Date:		09/09/2025		Time:	12:16:18	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Flare Control Box with green light illuminated indicating a lit flare pilot – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 7

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010635.JPG	Photo Date:		09/09/2025		Time:	12:22:45	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 8

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010636.JPG	Photo Date:		09/09/2025		Time:	12:23:42	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil and Produced Water Storage Tanks – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 9

Facility/Location:		Spur Energy Partners, LLC - Alto Amm 21 Tank						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	R0010638.JPG	Photo Date:		09/09/2025		Time:	12:30:52	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Dual Pressure Flare – The date/time stamp on the photo is incorrect.		
Latitude:	32.647473	Longitude:	-104.480757



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 10

Facility/Location:		Spur Energy Partners, LLC - B&B / Ross Ranch Yeso Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1595.JPG	Photo Date:		09/09/2025		Time:	12:57:20	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Sign		
Latitude:	32.648341	Longitude:	-104.479356



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 11

Facility/Location:		Spur Energy Partners, LLC - B&B / Ross Ranch Yeso Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1601.JPG	Photo Date:		09/09/2025		Time:	13:11:49	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Produced Water Storage Tank with hydrocarbon emissions from PRV		
Latitude:	32.648341	Longitude:	-104.479356



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 12

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1602.JPG	Photo Date:		09/09/2025		Time:	14:20:32	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Sign		
Latitude:	32.64524	Longitude:	-104.47354



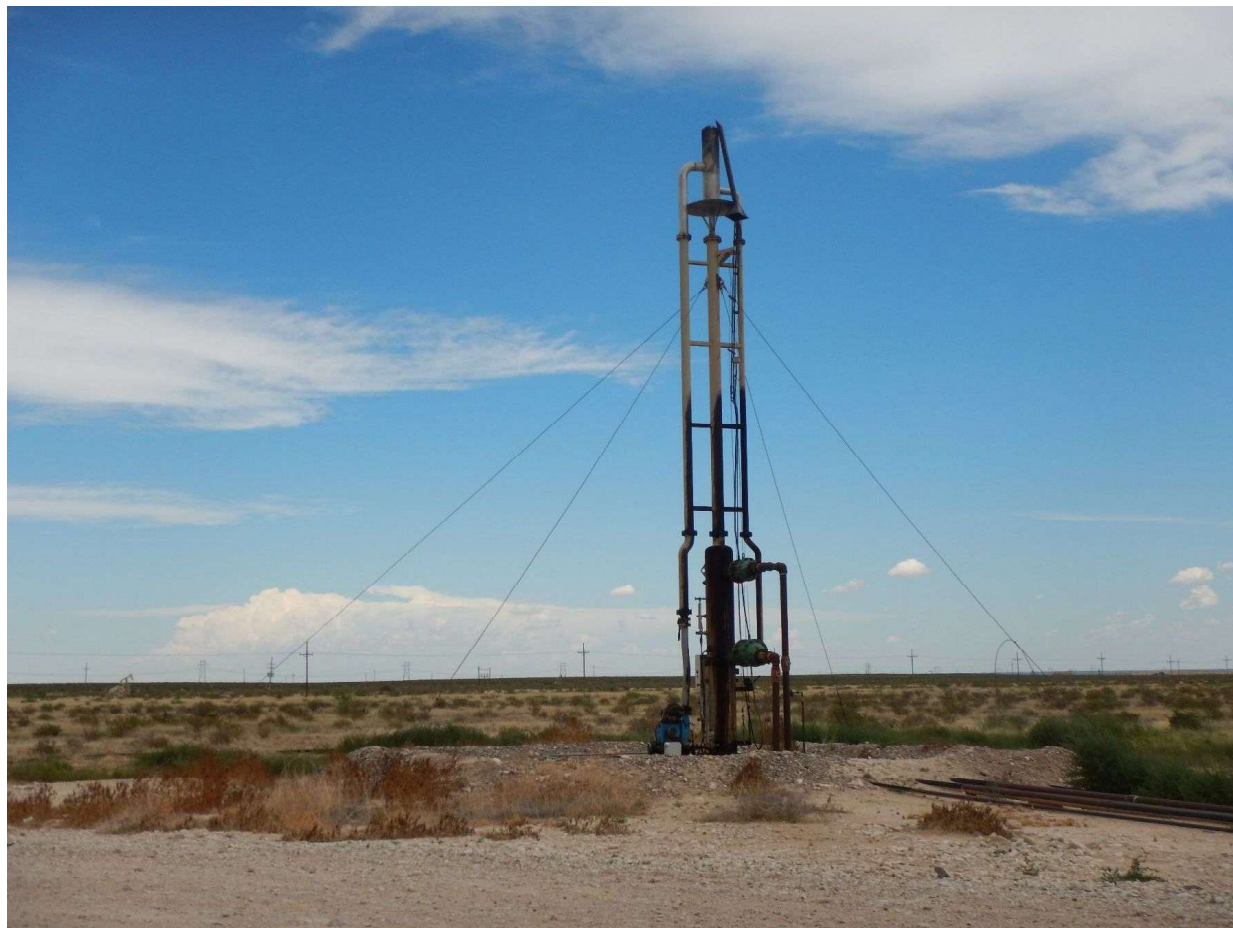
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 13

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1605.JPG	Photo Date:		09/09/2025		Time:	14:30:26	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Dual Pressure Flare		
Latitude:	32.64524	Longitude:	-104.47354



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 2

Photo No. 14

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1606.JPG	Photo Date:		09/09/2025		Time:	14:37:47	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil Storage Tank 71962		
Latitude:	32.64524	Longitude:	-104.47354



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 15

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/W	
Filename:	DSCN1607.JPG	Photo Date:		09/09/2025		Time:	14:38:51	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Produced Water Storage Tank to the right of Oil Storage Tank 71963		
Latitude:	32.64524	Longitude:	-104.47354



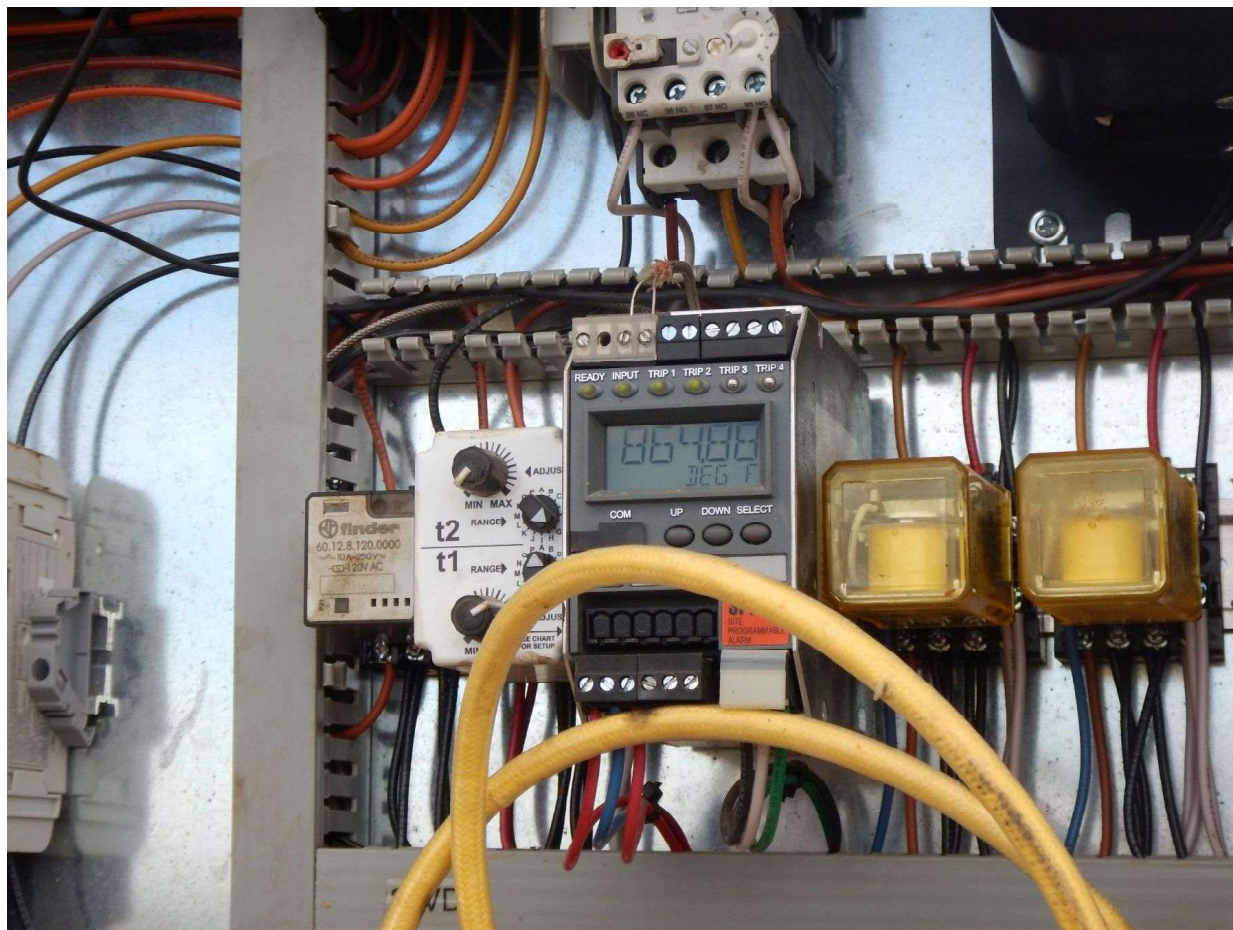
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 16

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1608.JPG	Photo Date:		09/09/2025		Time:	14:44:04	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Thermocouple Temperature		
Latitude:	32.64524	Longitude:	-104.47354



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 17

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1609.JPG	Photo Date:		09/09/2025		Time:	14:44:48	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Flare Control Box with green light illuminated indicating a lit flare pilot		
Latitude:	32.64524	Longitude:	-104.47354



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 18

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1610.JPG	Photo Date:		09/09/2025		Time:	14:46:18	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil overflow spillage from Dual Pressure Flare		
Latitude:	32.64524	Longitude:	-104.47354



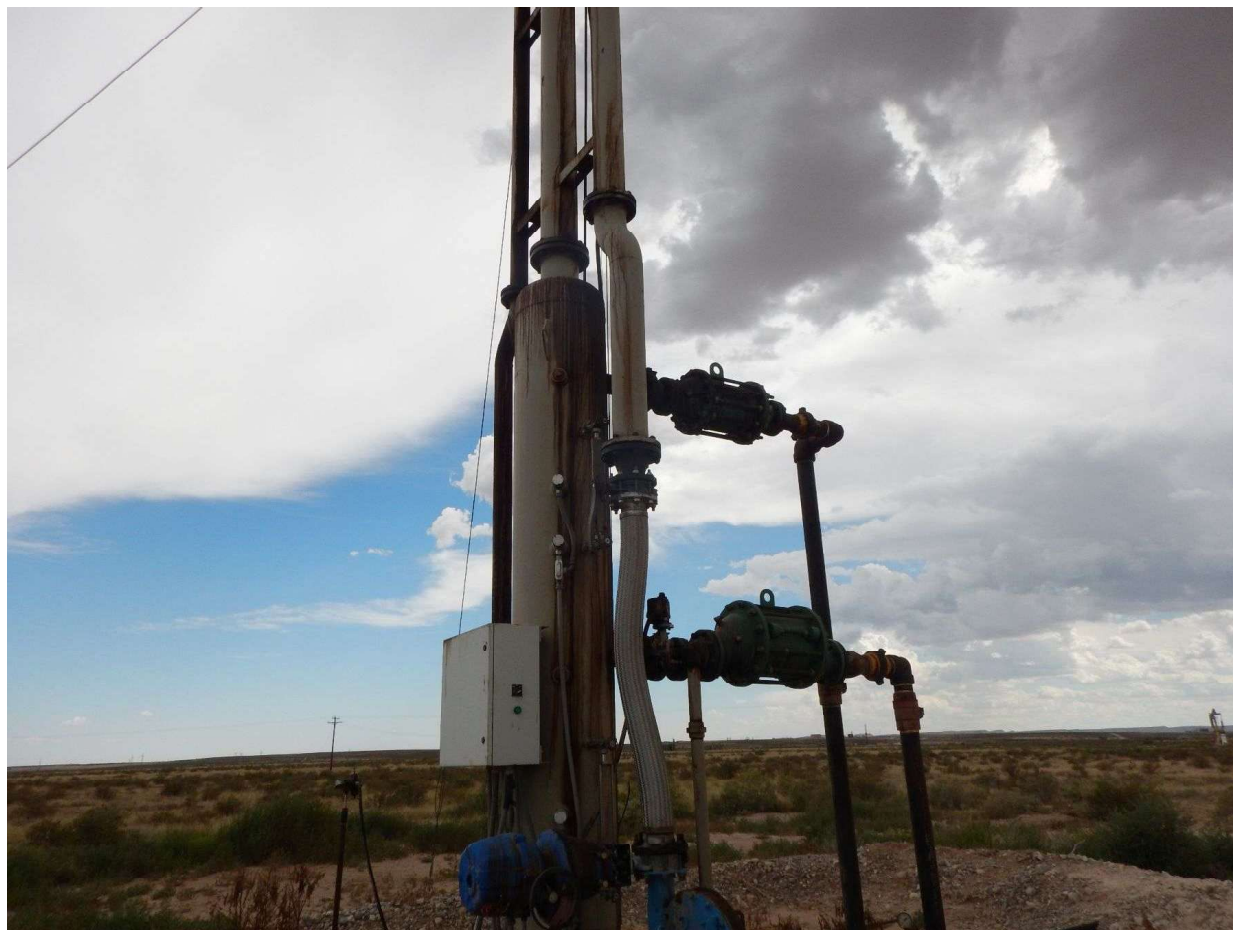
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 19

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1611.JPG	Photo Date:		09/09/2025		Time:	14:46:25	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Fluid residue on Dual Pressure Flare stack		
Latitude:	32.64524	Longitude:	-104.47354



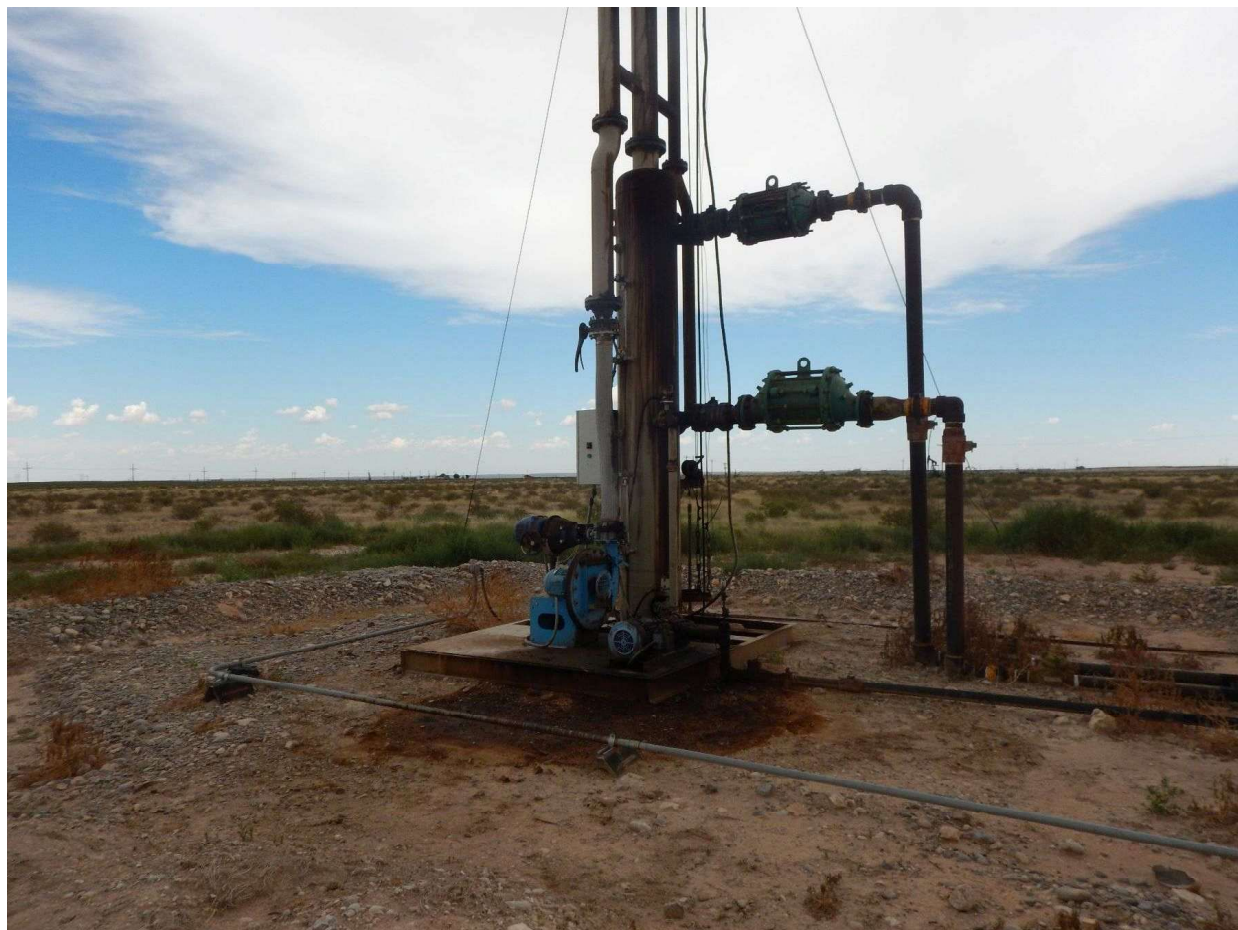
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 20

Facility/Location:		Spur Energy Partners, LLC - Goodman 22 Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1612.JPG	Photo Date:		09/09/2025		Time:	14:46:41	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Fluid residue from Dual Pressure Flare stack, pad, and on ground		
Latitude:	32.64524	Longitude:	-104.47354



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 2

Photo No. 21

Facility/Location:		Spur Energy Partners, LLC - Morris Boyd State COM #5H						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1613.JPG	Photo Date:		09/09/2025		Time:	15:02:58	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Well Sign used as a Facility Sign		
Latitude:	32.64057	Longitude:	-104.45889



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 22

Facility/Location:		Spur Energy Partners, LLC - Morris Boyd State COM #5H						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1614.JPG	Photo Date:		09/09/2025		Time:	15:33:37	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Front		
Latitude:	32.64057	Longitude:	-104.45889

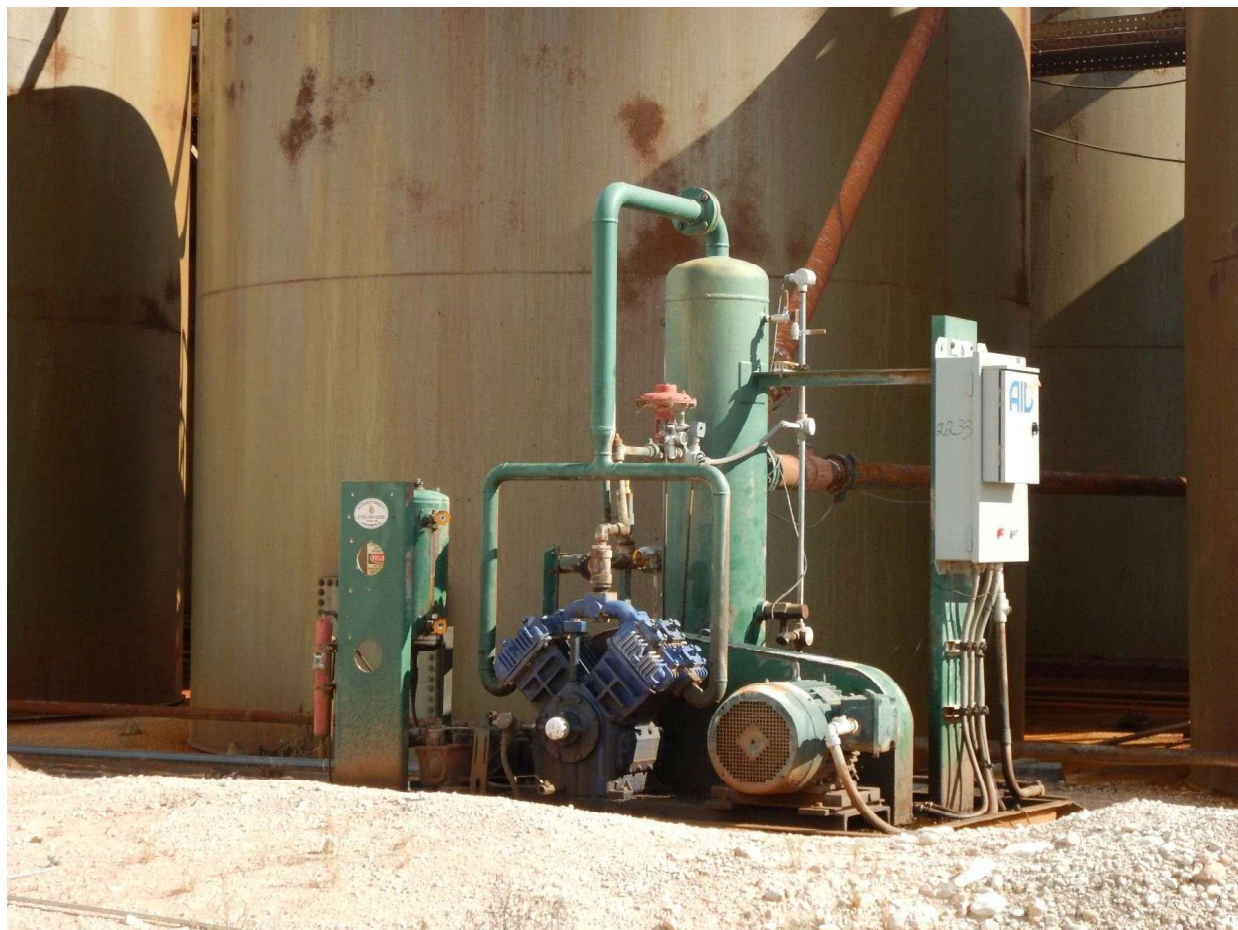


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 23

Facility/Location:		Spur Energy Partners, LLC - Morris Boyd State COM #5H						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1619.JPG	Photo Date:		09/09/2025		Time:	16:06:15	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Vapor Recovery Unit for Oil Storage Tanks		
Latitude:	32.64057	Longitude:	-104.45889



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 2

Photo No. 24

Facility/Location:		Spur Energy Partners, LLC - Morris Boyd State COM #5H						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1621.JPG	Photo Date:		09/09/2025		Time:	16:12:59	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil Storage Tank Pad		
Latitude:	32.64057	Longitude:	-104.45889



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 25

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1622.JPG	Photo Date:		09/09/2025		Time:	16:39:23	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 26

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1623.JPG	Photo Date:		09/09/2025		Time:	16:40:03	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Dual Pressure Flare		
Latitude:	32.635811	Longitude:	-104.469561

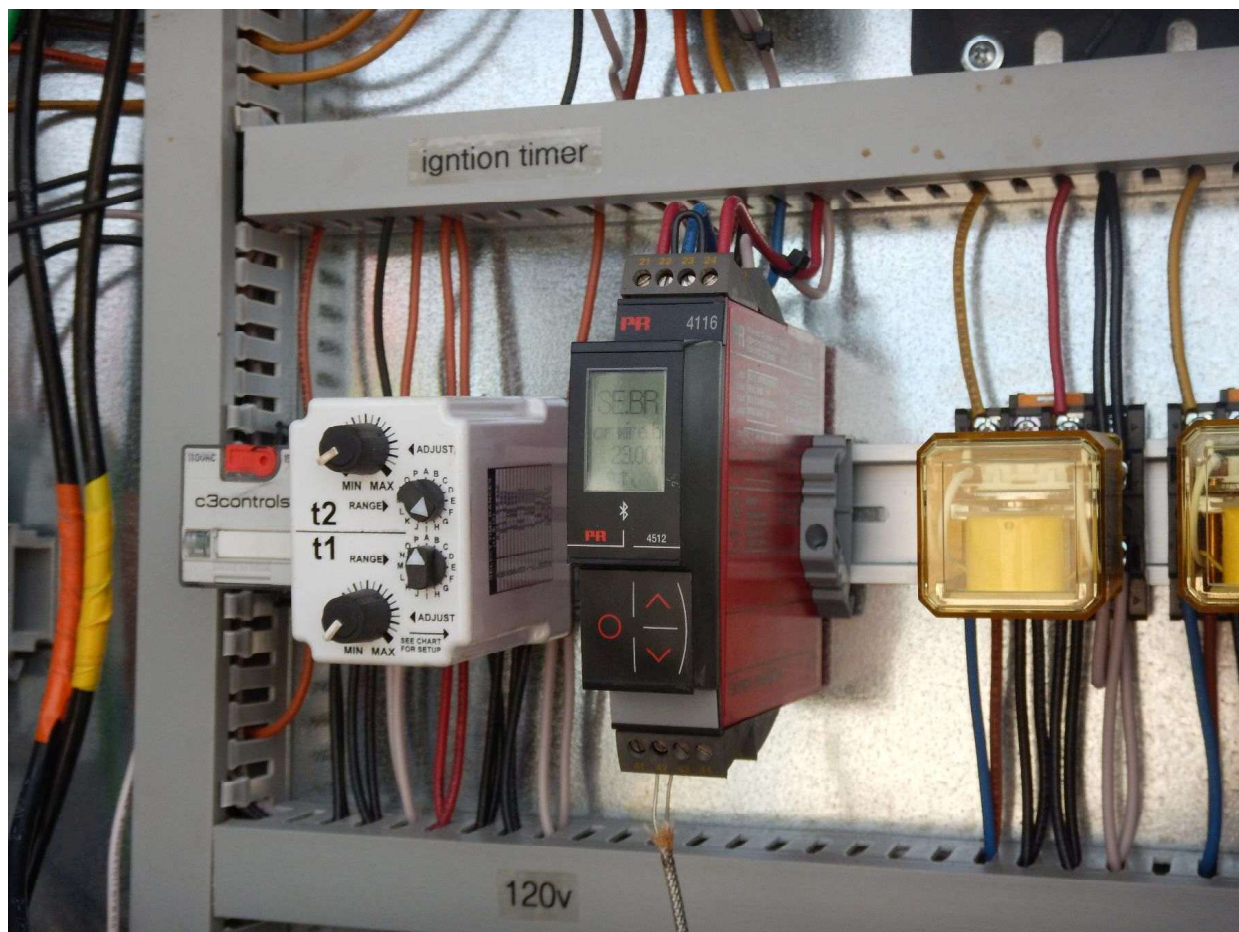


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 27

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1624.JPG	Photo Date:		09/09/2025		Time:	16:41:55	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Thermocouple temperature at Flare Control Box		
Latitude:	32.635811	Longitude:	-104.469561



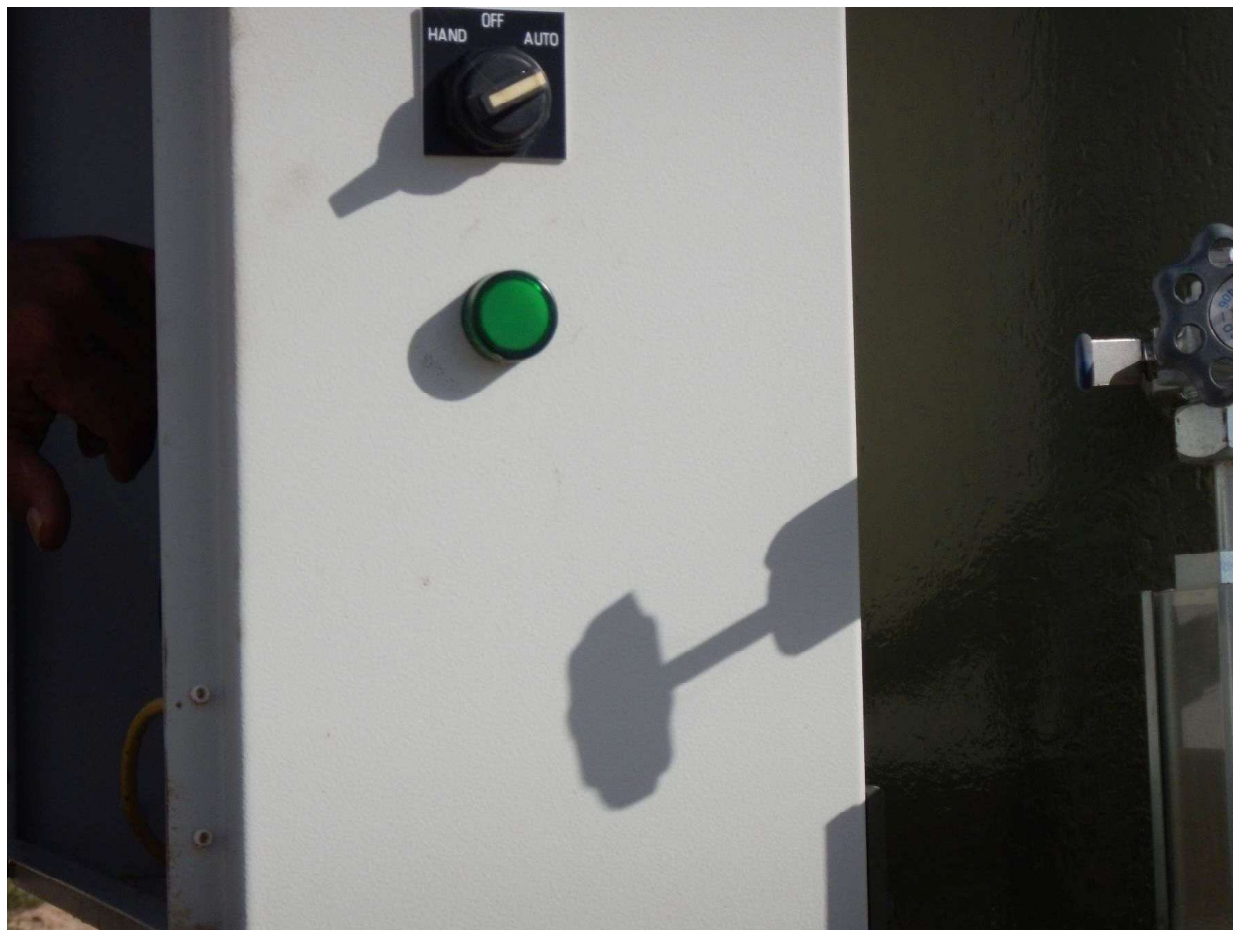
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 28

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1625.JPG	Photo Date:		09/09/2025		Time:	16:43:16	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Flare Control Box with green light illuminated indicating a lit flare pilot		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 29

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1626.JPG	Photo Date:		09/09/2025		Time:	16:44:36	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Thermocouple temperature at Flare Control Box		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 30

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1630.JPG	Photo Date:		09/09/2025		Time:	16:58:45	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Combustion on Dual Pressure Flare		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 31

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1631.JPG	Photo Date:		09/09/2025		Time:	16:59:37	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil Storage Tank with hydrocarbon emissions.		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Photograph Log

Appendix 2

Photo No. 32

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1632.JPG	Photo Date:		09/09/2025		Time:	16:59:52	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Oil Storage Tank 73875		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 33

Facility/Location:		Spur Energy Partners, LLC - Live Oak Central Tank Battery						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1633.JPG	Photo Date:		09/09/2025		Time:	17:01:27	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Top of Oil Storage Tank 73875		
Latitude:	32.635811	Longitude:	-104.469561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 34

Facility/Location:		Spur Energy Partners, LLC - Lakewood Federal Com						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1635.JPG	Photo Date:		09/09/2025		Time:	17:20:43	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility Sign		
Latitude:	32.625808	Longitude:	-104.469155



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 35

Facility/Location:		Spur Energy Partners, LLC - Lakewood Federal Com						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1636.JPG	Photo Date:		09/09/2025		Time:	17:24:02	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Facility		
Latitude:	32.625808	Longitude:	-104.469155



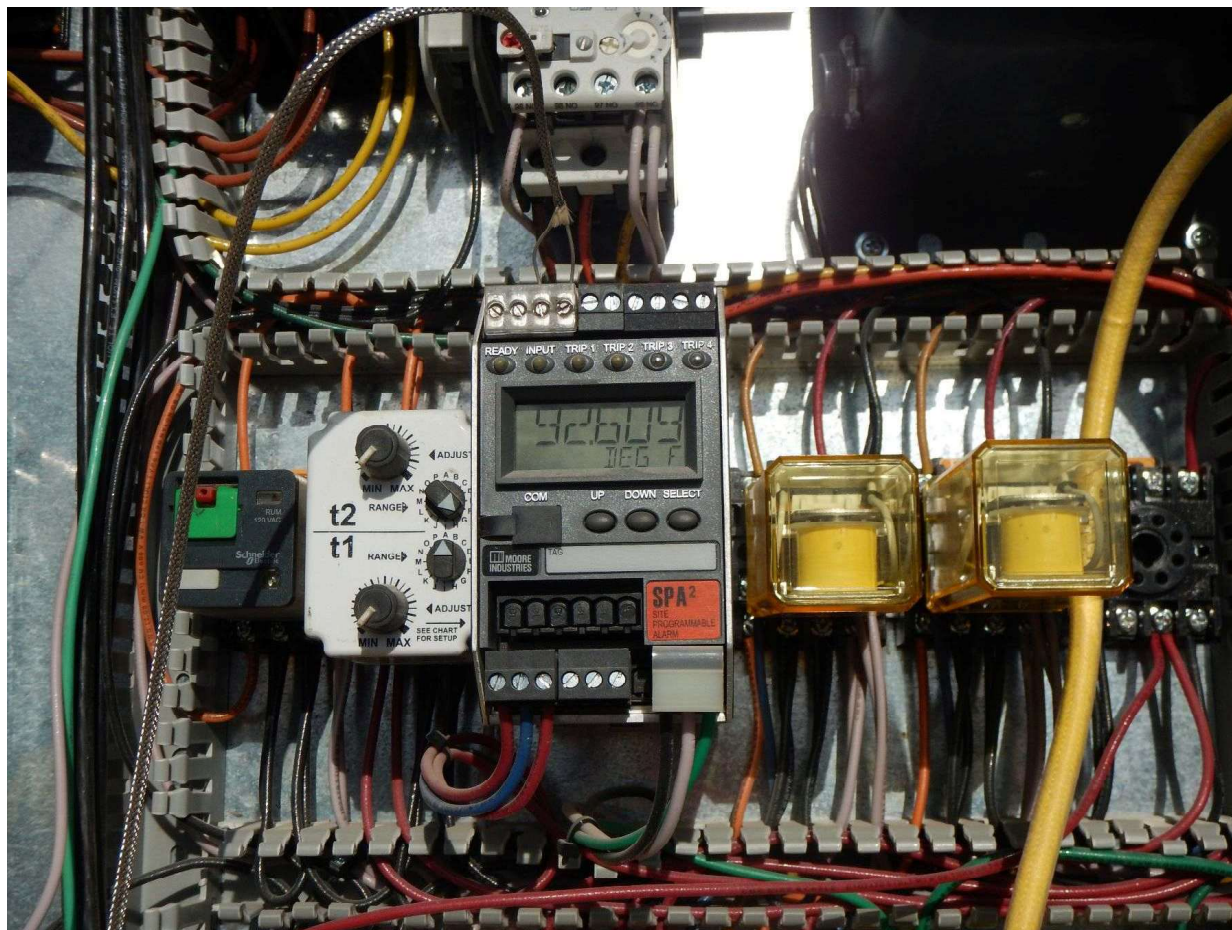
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 36

Facility/Location:		Spur Energy Partners, LLC - Lakewood Federal Com						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1638.JPG	Photo Date:		09/09/2025		Time:	17:25:44	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Thermocouple temperature at Flare Control Box		
Latitude:	32.625808	Longitude:	-104.469155



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Appendix 2

Photograph Log

Photo No. 37

Facility/Location:		Spur Energy Partners, LLC - Lakewood Federal Com						
City:	Lakewood	County:	Eddy County	State:	NM	Direction:	N/A	
Filename:	DSCN1639.JPG	Photo Date:		09/09/2025		Time:	17:27:15	
Photographer:	Cassandra Lowder			Witness Name:		Bailey Brown		



Description:	Unlit Dual Pressure Flare		
Latitude:	32.625808	Longitude:	-104.469155

Appendix 3

Video Log



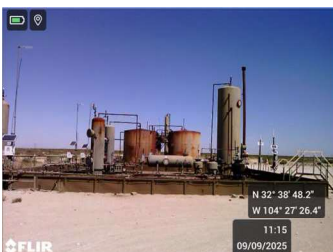
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Spur Energy Partners, LLC – Multiple New Mexico Permian Basin Facilities		
City: near Lakewood	County: Eddy County	State: New Mexico



Video No.: 1
 Facility Name: Arkansas 23 Fee 3
 Video File Name: [FLIR0064.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 11:10 am
 Videographer: Bailey Brown
 Description: Hydrocarbon emissions from pressure relief valve on produced water storage tank 72238



Video No.: 2
 Facility Name: Arkansas 23 Fee 3
 Video File Name: [FLIR0065.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 11:15 am
 Videographer: Bailey Brown
 Description: Emissions from pressure relief valve on produced water tank



Video No.: 3
 Facility Name: Alto Amm 21 Tank Battery
 Video File Name: [FLIR0066.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 12:03 pm
 Videographer: Cale Chapman
 Description: Emissions from Dual Pressure Flare



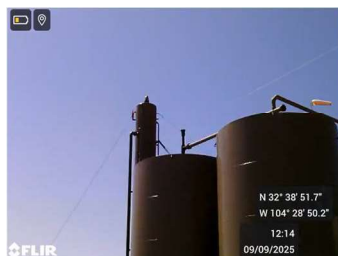
Video No.: 4
 Facility Name: Alto Amm 21 Tank Battery
 Video File Name: [FLIR0067.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 12:07 pm
 Videographer: Cale Chapman
 Description: Emissions from Dual Pressure Flare



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Spur Energy Partners, LLC – Multiple New Mexico Permian Basin Facilities		
City: near Lakewood	County: Eddy County	State: New Mexico



Video No.: 5
 Facility Name: Alto Amm 21 Tank Battery
 Video File Name: [FLIR0068.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 12:14 pm
 Videographer: Cale Chapman
 Description: Hydrocarbon emissions from manifold pressure relief valve above oil storage tank 74538



Video No.: 6
 Facility Name: B&B / Ross Ranch Yeso Battery
 Video File Name: [FLIR0070.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 1:10 pm
 Videographer: Cale Chapman
 Description: Hydrocarbon emissions from pressure relief valve on produced water storage tank



Video No.: 7
 Facility Name: Goodman 22 Tank Battery
 Video File Name: [FLIR0071.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 3:03 pm
 Videographer: Cale Chapman
 Description: Emissions from the thief hatch on oil tank



Video No.: 8
 Facility Name: Goodman 22 Tank Battery
 Video File Name: [FLIR0072.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 2:36 pm
 Videographer: Cale Chapman
 Description: Emissions from pressure relief valve on produced water tank



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Spur Energy Partners, LLC – Multiple New Mexico Permian Basin Facilities		
City: near Lakewood	County: Eddy County	State: New Mexico



Video No.: 9
 Facility Name: Goodman 22 Tank Battery
 Video File Name: [FLIR0073.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 2:44 pm
 Videographer: Cale Chapman
 Description: Emissions from Dual Pressure Flare (heat signature in video)



Video No.: 10
 Facility Name: Morris Boyd State Com #5H
 Video File Name: [FLIR0075.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 4:08 pm
 Videographer: Cale Chapman
 Description: Emissions from Vapor Recovery Unit (VRU for oil tank battery; VRU operating prior to video)



Video No.: 11
 Facility Name: Morris Boyd State Com #5H
 Video File Name: [FLIR0076.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 4:10 pm
 Videographer: Cale Chapman
 Description: Hydrocarbon emissions from the top of an oil storage tank



Video No.: 12
 Facility Name: Live Oak Central Tank Battery
 Video File Name: [FLIR0077.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 4:33 pm
 Videographer: Cale Chapman
 Description: Un-combusted hydrocarbons emissions from an unlit Dual Pressure Flare



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Video Log

Location: Spur Energy Partners, LLC – Multiple New Mexico Permian Basin Facilities		
City: near Lakewood	County: Eddy County	State: New Mexico



Video No.: 13
 Facility Name: Live Oak Central Tank Battery
 Video File Name: [FLIR0078.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 4:55 pm
 Videographer: Bailey Brown
 Description: Hydrocarbon emissions from thief hatch on oil storage tank 73875



Video No.: 14
 Facility Name: Live Oak Central Tank Battery
 Video File Name: [FLIR0079.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 5:00 pm
 Videographer: Cale Chapman
 Description: Hydrocarbon emissions from Dual Pressure Flare



Video No.: 15
 Facility Name: Lakewood Federal Com 4H, 8H, 10H, 20H and 21H Facility
 Video File Name: [FLIR0080.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 5:22 pm
 Videographer: Cale Chapman
 Description: Un-combusted hydrocarbon emissions from an unlit Dual Pressure Flare



Video No.: 16
 Facility Name: Lakewood Federal Com 4H, 8H, 10H, 20H and 21H Facility
 Video File Name: [FLIR0081.mp4](#)
 Date of Video: 09/09/2025
 Time of Video: 5:28 pm
 Videographer: Cale Chapman
 Description: Un-combusted hydrocarbon emissions from High Pressure/Low Pressure Flare after flare pilot was lit