

June 2, 2023

NMOCD District 2 Mike Bratcher Artesia, NM 88210

Bureau of Land Management Crisha Morgan Carlsbad Field Office

Re: Site Assessment, Remediation, and Deferral Request Skelly #942 Battery API No. 30-015-34645 GPS: Latitude 32.8240166 Longitude -103.8560791 UL "B", Sec. 22, T17S, R31E Eddy County, NM NMOCD Ref. No. NRM2003849084

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment and conduct remediation activities for the release site known as the Skelly #942 Battery (Skelly). Details of the release are summarized below:

	N	Release Details
Type of Release:	Crude Oil	Volume of Release: 7 bbls
Type of Release.	crude on	Volume Recovered: 4 bbls
Source of Release:	Oil Tank	Date of Release: 02/03/20
Was Immediate Notice Given?	No	If, Yes, to Whom? N/A
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse: N/A
Surface Owner:	Federal	Mineral Owner: State
A hole in the bottom of the o	il tank was found. The oil	tank was emptied to prevent any further release

Topographical and Aerial Maps are provided in Figures #2 and #4. A copy of the Initial Release Notification and Corrective Action (NMOCD Form C-141) can be found in Appendix C.

### **REGULATORY FRAMEWORK**

Surface impacts from unauthorized releases of fluids or gases are generally regulated by the New Mexico Oil Conservation Division (NMOCD) in accordance with 19.15.29 of the New Mexico Administrative Code (NMAC). 19.15.29 NMAC establishes reporting, site assessment/characterization, remediation, closure, variance, and enforcement procedures. Table I of 19.15.29.12 NMAC determines the closure criteria for soils impacted by a release based on depth to groundwater and the following characteristics:

Site Characteristics	
Approximate Depth to Groundwater	<50'
Within 330 ft. of any continuously flowing or significant watercourse?	NO
Within 200 ft. of any lakebed, sinkhole, or playa lake?	NO
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	NO
Within 500 ft. of a spring, private, or domestic freshwater well?	NO
Within 1000 ft. of any fresh water well?	NO
Within the incorporated municipal boundaries or within a municipal well field?	NO
Within 300 ft. of a wetland?	NO
Within the area overlying a subsurface mine?	NO
Within an unstable area such as Karst?	NO
Within a 100-year floodplain?	NO

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

Depth to groundwater information is provided in Appendix A.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation- and is made up of Eolian and Piedmont deposits (Holocene to middle Pleistocene)-Interlayed eolian sands and piedmont- slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (Qep). The soil in this area is made up of Kermit-Berino fine sands, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are excessively drained. There is NOT a high potential for karst geology to be present around the Skelly (Figure #3).

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

		TABLE I R SOILS IMPACTED BY A RELEA	SE
	Constituent	Method	Limit
	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846	100 mg/kg
	(GRO+DRO+MRO)	Method 8015M	100 mg/kg
<50 Feet	BTEX	EPA SW-846	50 mg/kg
	DIEA	Method 8021B or 8260B	50 mg/kg
	Denzene	EPA SW-846	10 mg/lsg
	Benzene	Method 8021B or 8260B	10 mg/kg

### **INITIAL SITE ASSESSMENT**

On August 17, 2022, Paragon conducted an initial site assessment. There was obvious staining inside the earthen berm containment from the spill. There were no signs outside the containment that the berm had been breached. Because this was an earthen berm containment, samples were collected inside the containment, and background samples were collected outside the containment. These samples were collected in accordance with NMAC 19.15.29 and submitted to an approved laboratory for analysis. A table summarizing laboratory analytical results from soil samples collected during the above-stated activities is provided below:

			8-17-22 Sa	-				
	NMOCD T	able 1 Closure	Criteria 19.1	5.29 NMA	C (Depth to	Groundw	ater is 50')	
Sample Date	8-17-22-22	Closure Criteria ≤50 mg/kg	Closure Criteria ≤10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
BG-1	SURFACE	ND	ND	ND	ND	ND	ND	163
BG-2	SURFACE	ND	ND	ND	ND	ND	ND	ND
BG-3	SURFACE	ND	ND	ND	ND	ND	ND	32
	0-6"	ND	ND	ND	1750	753	2503	48
S-1	1'	ND	ND	ND	410	231	641	112
	2' REFUSAL	ND	ND	ND	1380	468	1848	208
	0-6"	ND	ND	ND	1460	450	1910	352
	1'	26.3	0.215	467	4810	1170	6447	240
S-2	2'	39.3	0.296	809	7610	1690	10109	304
	3'	0.393	ND	ND	1090	546	1636	176
	4'	ND	ND	ND	42.6	15.8	58.4	96
	6"-1'	9.8	ND	399	4460	982	5841	1660
	1.5'	7.88	0.059	338	4800	1110	6248	1700
S-3	2'	ND	ND	ND	64.1	12.6	76.7	1330
	3'	ND	ND	ND	ND	ND	ND	944
	4'	ND	ND	ND	ND	ND	ND	1090
	1'	ND	ND	ND	ND	ND	ND	96
S-4	2'	ND	ND	ND	ND	ND	ND	48
3-4	3'	ND	ND	ND	ND	ND	ND	48
	4'	ND	ND	ND	10.5	ND	10.5	96
	1'	ND	ND	ND	ND	ND	ND	64
S-5	2'	ND	ND	ND	ND	ND	ND	64
3-3	3'	ND	ND	ND	ND	ND	ND	80
	4'	ND	ND	ND	ND	ND	ND	64
	1'	ND	ND	ND	ND	ND	ND	48
S-6	2'	ND	ND	ND	ND	ND	ND	32
	3'	ND	ND	ND	ND	ND	ND	48

8-17-22 Sample Results

(ND) - Analyte Not Detected

A Site Map is provided in Figure #1.

### **REMEDIATION ACTIVITIES**

On March 8, 2023, Paragon mobilized personnel and equipment to conduct remedial activities. Based on the site characteristics and field observations made during the site assessment, the following details the remedial activities we conducted to advance the Release Site toward an NMOCD-approved deferred closure.

We excavated the stained soil from inside the containment utilizing a crew and hand tools. The depth of excavation ranged from 6-8 inches BGS. The spill was right against the tanks, and because of safety issues and risks of damaging any infrastructure, it was decided not to excavate any deeper than this and request a deferral.

We returned to the site on May 8, 2023, to obtain additional samples in an effort to obtain delineation for TPH at S-1 and Chlorides at S-3. An email notification was sent to the NMOCD, giving them 48 hours prior notice of the sampling event. The results of these samples are listed in the following data table.

	NMOCD Ta	ble 1 Closure	Criteria 19.15	.29 NMAC	C (Depth to	Groundwa	ter is <50')	
Sample Da	te 5-8-23	Closure Criteria ≤50 mg/kg	Closure Criteria ≤10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S-1	5'			ND	ND	ND	ND	-
S-3	6'			-	1	-		48

### 5-8-23 Delineation Samples

(ND) Analyte Not Detected / (--) Analyte Not Tested

These laboratory analytical results completed the delineation of this incident in accordance with deferral instructions for NMOCD Closure Criteria. The excavated soils were loaded into trucks and transported to Lea Land, an NMOCD-approved waste disposal facility. The excavated areas were backfilled with "like" material obtained from Lea Land. The affected area was then contoured and hand tool compacted to match the surrounding grade.

### **DEFERRAL REQUEST**

After careful review, Paragon respectfully requests that the incident, NRM2003849084, be granted a deferral. Spur has complied with the applicable requirements outlined in rule 19.15.19.12 NMAC. Remediation and or reclamation will take place upon major deconstruction or at the time of the facilities decommissioning.

If you have any questions or need additional information, please get in touch with Chris Jones by phone at (575)631-6977 or email at chris@paragonenvironmental.net.

Respectfully,

Tristan Jones Project Coordinator Paragon Environmental, LLC

Chris Jones Environmental Professional Paragon Environmental, LLC



### **Attachments**

### Figures:

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

### Appendices:

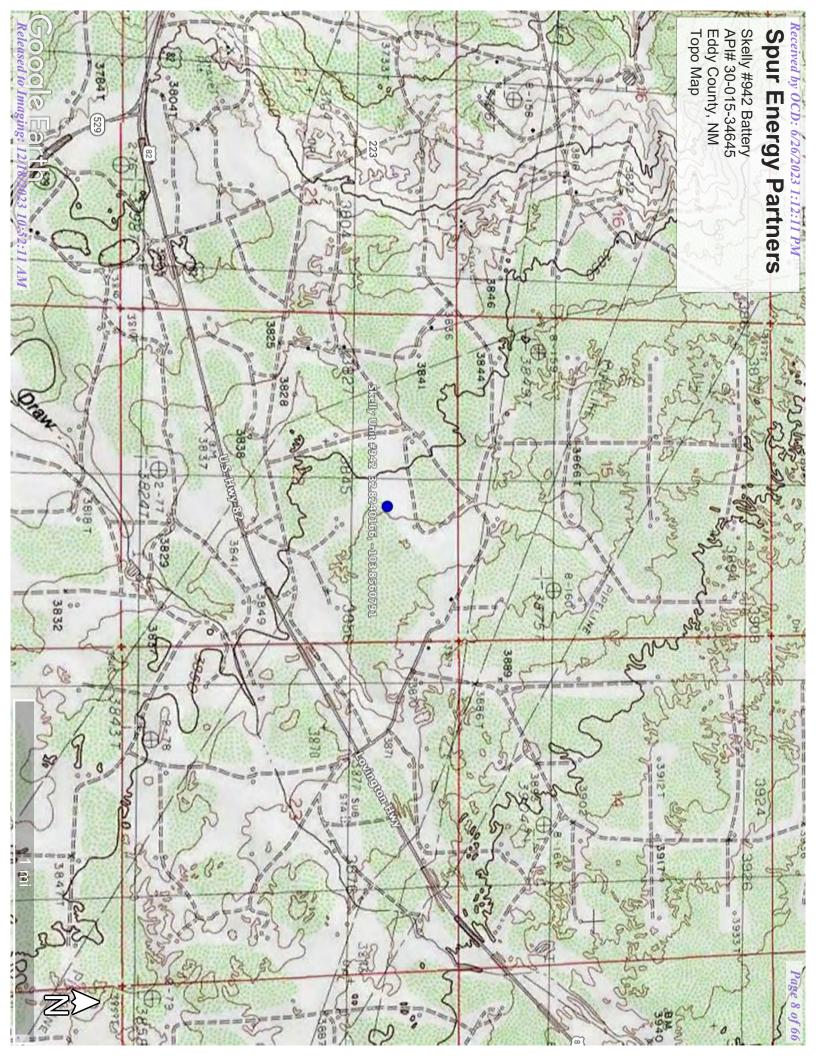
Appendix A – Referenced Water Surveys Appendix B – Soil Survey and FEMA Flood Map Appendix C – C-141 Appendix D – Email Notification & Photographic Documentation Appendix E – Laboratory Reports



Figures:

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











Appendix A Referenced Water Data:

New Mexico State of Engineers Office

A REAL	Received by OCD: 6/26/2023 1:12:11 PM
New Mexico Office of	

# Water Column/Average Depth to Water the State Engineer

Arrian Styles Commonly	<b>AAdr</b>				vera		Water ColumnAverage Deput to Water	J VVQ		
(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)	п	(quarters are (quarters are	(quarters are 1=NW 2=NE 3=SV (quarters are smallest to largest)	V 4=	-SE) (NAD83 UTM in meters)	meters)	(In feet)	eet)	
	POD Sub-		QQQ						W	Water
POD Number	Code basin	County	_	Tws Rng	X	Y	DistanceDe	DistanceDepthWellDepthWater Column	hWater Col	umn
RA 11590 POD3	RA		3 1 2	17S	6039	3629260 🔵	4420	60		
L 14207 POD3	Τ	LE	2 3 3 31	16S 37E	606117	3636977 🌑	4715	240	96	144
<u>RA 11590 POD4</u>	RA	ED	4 1 1 32	17S 31E	603308	3629253 🌑	4888	55		
						Aver	Average Depth to Water:	ter:	96 feet	
							Minimum Depth:	epth:	96 feet	
							Maximum Depth:	pth:	96 feet	
Record Count: 3	Conch (in motors)									
<b>Easting (X):</b> 607(	607081.581	Nort	Northing (Y): 3632361.535	2361.535		Radius: 5000				
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, or suitability for any particular purpose of the data.	NMOSE/ISC and is ac eliability, usability, or	cepted by t suitability f	he recipient with for any particular	the expressed purpose of the	understanding data.	that the OSE/ISC	make no warranti	es, expressed of	implied, conc	erning
8/17/22 1:25 PM							WATER COI WATER	WATER COLUMN/ AVERAGE DEPTH TO WATER	AGE DEPTH	H TO



Appendix B Soil Survey:

U.S.D.A. FEMA Flood Map

# Eddy Area, New Mexico

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

### Map Unit Setting

National map unit symbol: 1w4q Elevation: 3,100 to 4,200 feet Mean annual precipitation: 10 to 14 inches Mean annual air temperature: 60 to 64 degrees F Frost-free period: 190 to 230 days Farmland classification: Not prime farmland

### **Map Unit Composition**

Kermit and similar soils: 50 percent Berino and similar soils: 35 percent Minor components: 15 percent Estimates are based on observations, descriptions, and transects of the mapunit.

### **Description of Kermit**

### Setting

Landform: Plains, alluvial fans Landform position (three-dimensional): Talf, rise Down-slope shape: Convex, linear Across-slope shape: Linear Parent material: Mixed alluvium and/or eolian sands

### **Typical profile**

*H1 - 0 to 7 inches:* fine sand *H2 - 7 to 60 inches:* fine sand

### **Properties and qualities**

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Negligible
Capacity of the most limiting layer to transmit water (Ksat): Very high (20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Low (about 3.1 inches)

### Interpretive groups

Land capability classification (irrigated): None specified Land capability classification (nonirrigated): 7e Hydrologic Soil Group: A Ecological site: R042XC005NM - Deep Sand Hydric soil rating: No

### **Description of Berino**

### Setting

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

### **Typical profile**

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

### **Properties and qualities**

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

### Interpretive groups

Land capability classification (irrigated): 4e Land capability classification (nonirrigated): 7e Hydrologic Soil Group: B Ecological site: R042XC003NM - Loamy Sand Hydric soil rating: No

### **Minor Components**

### Active dune land

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

# Data Source Information

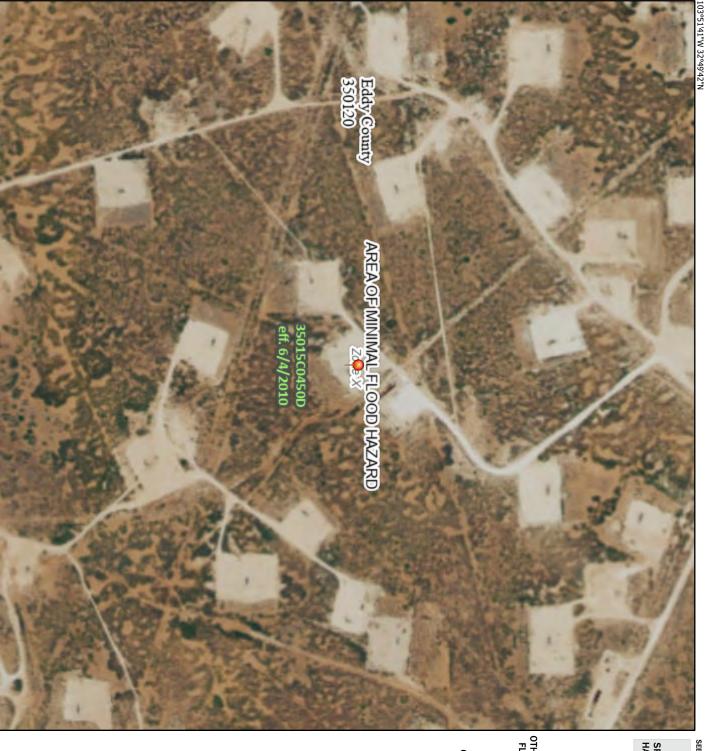
Soil Survey Area: Eddy Area, New Mexico Survey Area Data: Version 17, Sep 12, 2021



# National Flood Hazard Layer FIRMette

🕃 FEMA

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regulatory purposes.

103°51'3"W 32°49'11"N OTHER AREAS OF FLOOD HAZARD SPECIAL FLOOD HAZARD AREAS SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT Legend OTHER AREAS STRUCTURES IIIIII Levee, Dike, or Floodwall MAP PANELS legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for 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 unmapped and unmodernized areas cannot be used for elements do not appear: basemap imagery, flood zone labels, become superseded by new data over time. reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or was exported on 8/17/2022 at 3:26 PM and does not authoritative NFHL web services provided by FEMA. This map The flood hazard information is derived directly from the accuracy standards This map image is void if the one or more of the following map FEATURES GENERAL ---- Channel, Culvert, or Storm Sewer OTHER B 20.2 NO SCREEN Area of Minimal Flood Hazard Zone X m 513 mm Base Flood Elevation Line (BFE) The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location. 17.5 Coastal Transect Baseline Area with Flood Risk due to Levee Zone D Limit of Study Water Surface Elevation **Cross Sections with 1% Annual Chance** Effective LOMRs Digital Data Available Unmapped No Digital Data Available Hydrographic Feature Profile Baseline Jurisdiction Boundary Coastal Transect Area of Undetermined Flood Hazard Zone D Levee. See Notes. Zone X Area with Reduced Flood Risk due to Chance Flood Hazard Zone X **Future Conditions 1% Annual** 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average **Regulatory Floodway** With BFE or Depth Zone AE, AO, AH, VE, AR areas of less than one square mile Zone X depth less than one foot or with drainage Without Base Flood Elevation (BFE) Zone A, V, A99

Basemap: USGS National Map: Orthoimagery: Data refreshed October, 2020

2,000

Feet

1:6,000

UReleasea Vo Imaging: 12/18/2023010:52:11 AM 1,500



Appendix C:

C-141

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	NRM2003849084
District RP	
Facility ID	
Application ID	

# **Release Notification**

# **Responsible Party**

Responsible Party SPUR ENERGY PARTNERS	OGRID <b>32894</b> 7	
Contact Name KENNY KIDD	Contact Telephone 575-616-5400	
Contact email KKIDD@SPUREPLLC.COM	Incident # (assigned by OCD)	

### **Location of Release Source**

Latitude 32.8240166

Longitude -103.8560791

(NAD 83 in decimal degrees to 5 decimal places)

Site Name SKELLY #942 BATTERY	Site Type OIL & GAS	
Date Release Discovered 2/3/2020	API# (if applicable) <u>30-015-34645</u>	

Unit Letter	Section	Township	Range	County
В	22	175	31E	EDDY

Surface Owner: State Federal Tribal Private (Name: \_

# Nature and Volume of Release

🔀 Crude Oil	Volume Released (bbls) 7BBLS	Volume Recovered (bbls) 4BBLS
Produced Water	Volume Released (bbls)	Volume Recovered (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

A HOLE IN THE BOTTOM OF THE OIL TANK WAS FOUND. THIS IS AN UNLINED FACILITY. THE SITE WILL BE FULLY DELINEATED AND REMEDIATED AS PER FEDERAL AND NMOCD GUIDELINES.

eceived by OCD: 6/26/202	33 <b>0:12:11 RM</b>			Page 19 D
				-
			Incident ID	NRM2003849084
			District RP	
			Facility ID	
Was this a major	If YES, for what reason(s) does the re	esponsible norty conside	Application ID	<u></u>
release as defined by 19.15.29.7(A) NMAC?		esponsible party conside	r uns a major rerease	31
If YES, was immediate n	otice given to the OCD? By whom? T	o whom? When and by	what means (phone,	email, etc)?
	Initia	l Response		
The responsible p	party must undertake the following actions imme	-	e a safety hazard that wo	uld result in injury
$\square$ The source of the rele	ease has been stopped.			
$\boxtimes$ The impacted area ha	s been secured to protect human health	and the environment.		
	we been contained via the use of berms		or other containm	ant devices
	ecoverable materials have been removed	-		ent devices.
	d above have <u>not</u> been undertaken, expl		atery.	
THE TANK WAS EMP RECOVERED VIA VA	TIED TO PREVENT ANY FURTHI CUUM TRUCK. ALL FLUIDS REN	ER RELEASE OF FLU MAINED INSIDE THE	UDS, THE STAND UNLINED CONT	ING FLUIDS WAS AINMENT.
has begun, please attach a	AC the responsible party may commen a narrative of actions to date. If remea t area (see $19.15.29.11(A)(5)(a)$ NMA(	dial efforts have been su	ccessfully complete	d or if the release occurred
regulations all operators are n public health or the environm failed to adequately investiga	mation given above is true and complete to required to report and/or file certain release nent. The acceptance of a C-141 report by t ate and remediate contamination that pose a F a C-141 report does not relieve the operato	notifications and perform of the OCD does not relieve the threat to groundwater, surf	corrective actions for r ne operator of liability face water, human heal	eleases which may endanger should their operations have th or the environment. In
Printed Name: NATAL	JE GLADDEN Title: DIREC	CTOR OF ENVIRONM	IENTAL AND REC	GULATORY
Signature: pota	hi ( adden	Date: 2/4/2020		
email: <u>NGLADDEN@H</u>	UNGRY-HORSE.COM	Telephone:57	/5-390-6397	
OCD Only				
Received by: <u>Ramon</u>	a Marcus	Date: 2/7/2020		

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

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Incident ID	NRM2003849084
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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>&lt;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 <b>not</b> 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

 $\boxtimes$  Depth to water determination

- Determination of water sources and significant watercourses within <sup>1</sup>/<sub>2</sub>-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

<b>Received by OCD: 6/26/202</b> Form C-141 Page 2	<i>1:12:11 PM</i> State of New Mexico Oil Conservation Division		Incident ID District RP Facility ID Application ID	Page 21 of 66 NRM2003849084
plan. That plan must includ and methods, anticipated tim 19.15.29.12 NMAC, however I hereby certify that the infor regulations all operators are a public health or the environm failed to adequately investige	port does not include completed efforts at re- te the estimated volume of material to be re- helines for beginning and completing the re- er, use of the table is modified by site- and mation given above is true and complete to the required to report and/or file certain release not hent. The acceptance of a C-141 report by the C atte and remediate contamination that pose a three 'a C-141 report does not relieve the operator of	emediated, the propose emediation. The closu release-specific paran best of my knowledge a ifications and perform co OCD does not relieve the eat to groundwater, surfa	ed remediation techni re criteria for a releas neters. nd understand that purs prrective actions for rele e operator of liability shi ce water, human health	que, proposed sampling plan se are contained in Table 1 of uant to OCD rules and eases which may endanger ould their operations have or the environment. In
Printed Name: Kathy Purv	vis.	Title: HSE Coordin	ator	
Signature: <u>Katherin</u>	e Purvis	Date: 6/26/23		
email: <u>katherine.purvis@s</u>	purenergy.com	Telephone: 575-44	1-8619	
OCD Only				
Received by: <u>Shelly Wel</u>	ls	Date: 6/26/20	023	

Received by OCD: 6/26/2023 1:12:11 PM Form C-141 State of New Mexico

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Oil Conservation Division

Incident ID	NRM2003849084
District RP	
Facility ID	
Application ID	

# **Remediation Plan**

Remediation Plan Checklist: Each of the following items must be included in the plan.

Detailed description of proposed remediation technique

Scaled sitemap with GPS coordinates showing delineation points

Estimated volume of material to be remediated

Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC

Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

<u>Deferral Requests Only</u> : Each of the following items must be con	ifirmed as part of any request for deferral of remediation.
Contamination must be in areas immediately under or around pr deconstruction.	roduction equipment where remediation could cause a major facility
Extents of contamination must be fully delineated.	
Contamination does not cause an imminent risk to human health	n, the environment, or groundwater.
	e and remediate contamination that pose a threat to groundwater, acceptance of a C-141 report does not relieve the operator of
Printed Name: Kathy Purvis.	Title: HSE Coordinator
Signature: <u>Katherine Purvis</u>	Date: 6/26/23
email: katherine.purvis@spurenergy.com	Telephone: 575-441-8619
OCD Only	
Received by: <u>Shelly Wells</u>	Date: <u>6/26/2023</u>
Approved Approved with Attached Conditions of	Approval Denied Deferral Approved
Signature:	Date:

•



Appendix D:

**Email Notification** 

Photographic Documentation

Subject:	Skelly 942

Date: Wednesday, May 3, 2023 at 2:30:44 PM Central Daylight Time

From: Angel Pena

To: Bratcher, Michael, EMNRD, Chris Jones, Hamlet, Robert, EMNRD, Harimon, Jocelyn, EMNRD, Nobui, Jennifer, EMNRD

To All,

This is to inform you we will be obtaining additional confirmation samples at the Skelly 942 on 5-08-23 at approximately 8 am.

Thank You,

Angel O. Peña

Field supervisor

1601 N. Turner Ste. 500

Hobbs, NM 88240

angel@paragonenvironmental.net

575-605-0773



# Photographic Documentation During







# Completed











Appendix E:

Laboratory Results



August 23, 2022

CHRIS JONES PARAGON ENVIROMENTAL 5002 CARRAIGE RD HOBBS, NM 88242

RE: SKELLY #942

Enclosed are the results of analyses for samples received by the laboratory on 08/19/22 16:27.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.85	6079		

### Sample ID: BG - 1 (H223827-01)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifie
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.156	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	16.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	214	107	200	1.50	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	88.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	88.5	% 46.3-17	0						

### **Cardinal Laboratories**

### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

### Sample ID: BG - 2 (H223827-02)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	<16.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	214	107	200	1.50	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	95.1	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	94.9	% 46.3-17	8						

### Cardinal Laboratories

### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

### Sample ID: BG - 3 (H223827-03)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.059	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	107 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	214	107	200	1.50	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	91.4	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	91.1	% 46.3-17	8						

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### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

### Sample ID: S - 1 0-6" (H223827-04)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.093	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	106 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<100	100	08/22/2022	ND	214	107	200	1.50	
DRO >C10-C28*	1750	100	08/22/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	753	100	08/22/2022	ND					
Surrogate: 1-Chlorooctane	119 9	45.3-16	1						
Surrogate: 1-Chlorooctadecane	172 9	% 46.3-17	8						

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### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

### Sample ID: S - 1 1' (H223827-05)

BTEX 8021B	mg	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.088	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	101	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	112	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/23/2022	ND	214	107	200	1.50	
DRO >C10-C28*	410	10.0	08/23/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	231	10.0	08/23/2022	ND					
Surrogate: 1-Chlorooctane	99.0	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	145	% 46.3-17	8						

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### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

### Sample ID: S - 1 2' REFUSAL (H223827-06)

BTEX 8021B	mg/	kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.058	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	103 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	'kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	'kg	Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<50.0	50.0	08/22/2022	ND	214	107	200	1.50	
DRO >C10-C28*	1380	50.0	08/22/2022	ND	209	104	200	0.000957	
EXT DRO >C28-C36	468	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	105 9	45.3-16	1						
Surrogate: 1-Chlorooctadecane	150 \$	46.3-17	8						

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### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 2 0-6" (H223827-07)

BTEX 8021B	mg/	′kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.105	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	352	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<50.0	50.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	1460	50.0	08/22/2022	ND	223	111	200	0.246	QM-07
EXT DRO >C28-C36	450	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	102 9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	147 9	46.3-17	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 2 1' (H223827-08)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.215	0.100	08/23/2022	ND	1.94	96.9	2.00	8.11	GC-NC1
Toluene*	1.80	0.100	08/23/2022	ND	2.21	110	2.00	9.59	GC-NC1
Ethylbenzene*	12.3	0.100	08/23/2022	ND	2.21	110	2.00	9.66	GC-NC1
Total Xylenes*	11.9	0.300	08/23/2022	ND	6.92	115	6.00	10.5	GC-NC1
Total BTEX	26.3	0.600	08/23/2022	ND					GC-NC1
Surrogate: 4-Bromofluorobenzene (PID	270	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	240	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	467	50.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	4810	50.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	1170	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	135	% 45.3-16	51						
Surrogate: 1-Chlorooctadecane	154	% 46.3-17	8						

#### Cardinal Laboratories

\*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 2 2' (H223827-09)

BTEX 8021B	mg/kg		Analyze	d By: JH					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.296	0.100	08/23/2022	ND	1.94	96.9	2.00	8.11	GC-NC1
Toluene*	2.61	0.100	08/23/2022	ND	2.21	110	2.00	9.59	GC-NC1
Ethylbenzene*	18.6	0.100	08/23/2022	ND	2.21	110	2.00	9.66	GC-NC1
Total Xylenes*	17.8	0.300	08/23/2022	ND	6.92	115	6.00	10.5	GC-NC1
Total BTEX	39.3	0.600	08/23/2022	ND					GC-NC1
Surrogate: 4-Bromofluorobenzene (PID	302	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	304	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	809	50.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	7610	50.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	1690	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	166	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	185	% 46.3-17	8						

#### Cardinal Laboratories

\*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 2 3' (H223827-10)

BTEX 8021B	mg/	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.338	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	0.055	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	0.393	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	104 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/23/2022	ND	210	105	200	2.20	
DRO >C10-C28*	1090	10.0	08/23/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	546	10.0	08/23/2022	ND					
Surrogate: 1-Chlorooctane	86.1	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	127 9	% 46.3-17	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 2 4' (H223827-11)

BTEX 8021B	mg	/kg	Analyze	d By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/22/2022	ND	1.94	96.9	2.00	8.11	
Toluene*	0.071	0.050	08/22/2022	ND	2.21	110	2.00	9.59	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	2.21	110	2.00	9.66	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.92	115	6.00	10.5	
Total BTEX	<0.300	0.300	08/22/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	103	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	42.6	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	15.8	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	82.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	88.0	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 3 6"-1' (H223827-12)

BTEX 8021B	mg,	/kg	Analyze	d By: JH/					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	0.761	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	GC-NC1
Ethylbenzene*	1.05	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	√C1, QM-07, C
Total Xylenes*	7.99	0.150	08/23/2022	ND	6.04	101	6.00	12.1	√C1, QM-07, C
Total BTEX	9.80	0.300	08/23/2022	ND					GC-NC1
Surrogate: 4-Bromofluorobenzene (PID	478	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1660	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					S-06
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	388	50.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	4460	50.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	982	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	137	% 45.3-16	51						
Surrogate: 1-Chlorooctadecane	254	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 3 1.5' (H223827-13)

BTEX 8021B	mg/kg		Analyze	d By: JH/					S-04
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	0.059	0.050	08/23/2022	ND	2.01	101	2.00	12.3	GC-NC1
Toluene*	0.499	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	GC-NC1
Ethylbenzene*	0.892	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	GC-NC1
Total Xylenes*	6.43	0.150	08/23/2022	ND	6.04	101	6.00	12.1	GC-NC1
Total BTEX	7.88	0.300	08/23/2022	ND					GC-NC1
Surrogate: 4-Bromofluorobenzene (PID	416	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	'kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1700	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg,	kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	338	50.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	4800	50.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	1110	50.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	131	45.3-16	51						
Surrogate: 1-Chlorooctadecane	131	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 3 2' (H223827-14)

BTEX 8021B	mg,	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	113 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1330	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	64.1	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	12.6	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	96.8	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	104	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 3 3' (H223827-15)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	111 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	944	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	90.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	94.2	% 46.3-17	8						

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Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 3 4' (H223827-16)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1090	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	88.4	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	92.6	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 4 1' (H223827-17)

BTEX 8021B	mg	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	111 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	86.5	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	89.8	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 4 2' (H223827-18)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	89.8	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	95.2	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 4 3' (H223827-19)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	109	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	91.1	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	96.2	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 4 4' (H223827-20)

BTEX 8021B	mg	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110	% 69.9-14	0						
Chloride, SM4500Cl-B	mg	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	10.5	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	97.4	% 45.3-16	51						
Surrogate: 1-Chlorooctadecane	100	% 46.3-17	8						

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		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 5 6"-1' (H223827-21)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/23/2022	ND	432	108	400	0.00	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	85.6	% 45.3-16	51						
Surrogate: 1-Chlorooctadecane	91.3	% 46.3-17	'8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 5 2' (H223827-22)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	90.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	94.4	% 46.3-17	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 5 3' (H223827-23)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	112 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	88.3	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	92.5	% 46.3-17	8						

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#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

## Sample ID: S - 5 4' (H223827-24)

BTEX 8021B	mg/	/kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg,	/kg	Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	64.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	/kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	90.5	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	94.9	% 46.3-17	8						

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#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 6 1' (H223827-25)

BTEX 8021B	mg/	′kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	87.0	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	90.5	% 46.3-17	8						

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#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 6 2' (H223827-26)

BTEX 8021B	mg/	′kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	110 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	32.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	210	105	200	2.20	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	223	111	200	0.246	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	97.8	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	102 9	% 46.3-17	8						

#### Cardinal Laboratories

#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



		PARAGON ENVIROMENTAL CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:		
Received:	08/19/2022		Sampling Date:	08/17/2022
Reported:	08/23/2022		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Tamara Oldaker
Project Location:	32.824017,-103.856	5079		

#### Sample ID: S - 6 3' (H223827-27)

BTEX 8021B	mg/	′kg	Analyze	d By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	08/23/2022	ND	2.01	101	2.00	12.3	
Toluene*	<0.050	0.050	08/23/2022	ND	1.99	99.6	2.00	12.5	
Ethylbenzene*	<0.050	0.050	08/23/2022	ND	1.94	97.1	2.00	12.6	
Total Xylenes*	<0.150	0.150	08/23/2022	ND	6.04	101	6.00	12.1	
Total BTEX	<0.300	0.300	08/23/2022	ND					
Surrogate: 4-Bromofluorobenzene (PID	109 9	% 69.9-14	0						
Chloride, SM4500Cl-B	mg/	′kg	Analyze	d By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	08/23/2022	ND	416	104	400	3.77	
TPH 8015M	mg/	′kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	08/22/2022	ND	195	97.3	200	0.197	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	204	102	200	0.317	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					
Surrogate: 1-Chlorooctane	91.9	% 45.3-16	1						
Surrogate: 1-Chlorooctadecane	106 9	% 46.3-17	8						

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#### \*=Accredited Analyte

Celez D. Keine

Celey D. Keene, Lab Director/Quality Manager



## **Notes and Definitions**

S-06	The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-03	The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
GC-NC1	8260 confirmation analysis was performed; initial GC results were not supported by GC/MS analysis and are biased high with interfering compounds.
BS-3	Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

#### **Cardinal Laboratories**

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

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Page 30 of 32

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Marcine     State:     Zip:     State:     Zip:       Address:     Po.0.#:     Company: Surv       Address:     Phone #:       Phone #:     Phone #:       Pho	(Circle One)	Time Date: Time	of or related to the performance of services	client's ordustv er cause wholec nsoquental demu				5-4 1	-7 4				-	S-2 4	-	Sample I.D.	)	3	321824017 - 10	Jullis 442	Project	Fax #:	State:			Paragon Environment	01 East Marland, Hobbs, NN 375) 393-2326 FAX (575) 39	lborato	ARDIN
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Project Name: Sulla A		State: Zip:				
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PLEASE NOTE: Liability and Damages. Cardina's lability and clerks exclusive analyses. All datins including those for negligence and any other cause whats analyses in a super shall Contrast he liable for incidential or consecutively dam	PLEASE NOTE: Libbilly and Damages. Cardina's labitly and clerits and usine nonedy for any cleim aning whether begin in outrined or the functional bits an include bit an expression of the annum part of the annum	ra nomedy for any claim artistic whether based in portinad or ford, shall be inhibid to the smooth god by the out- owere shall be deemed waived out-intea made in writing and nacivited by Councies waiting 10 days after completion of the at assos including without inhibiton, business interruptions, loss of use, or base of profile incurred by claim. Its subaidistries,	aid by the client for the for completion of the appl client, its subsidiaries,	loable		
affiliates or successors arking cut of or releted to the performa	to the performance of earliest hereunder by Cardinal, repardless of whether s	rdises of whether such delin is based upon any of the above stated in ved BV:	Phone Result:	TYes No	Add'I Phone #:	
5 5	Time:	na Maladora	Find Result: REMARKS:	L Yes No	Add'i Fax #:	
Delivered By: (Circle One) Sampler - UPS - Bus - Other:	-9,3° (2040	Sample Condition CHECKED BY: Cool Intest (Initials)				
+ Cardinal cannot ac	Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326	es to (575) 393-2326				

Page 32 of 32



May 11, 2023

CHRIS JONES PARAGON ENVIROMENTAL 5002 CARRAIGE RD HOBBS, NM 88242

RE: SKELLY #942

Enclosed are the results of analyses for samples received by the laboratory on 05/09/23 8:25.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at <a href="https://www.tceq.texas.gov/field/ga/lab\_accred\_certif.html">www.tceq.texas.gov/field/ga/lab\_accred\_certif.html</a>.

Cardinal Laboratories is accreditated through the State of Colorado Department of Public Health and Environment for:

Method EPA 552.2	Haloacetic Acids (HAA-5)
Method EPA 524.2	Total Trihalomethanes (TTHM)
Method EPA 524.4	Regulated VOCs (V1, V2, V3)

Accreditation applies to public drinking water matrices.

This report meets NELAP requirements and is made up of a cover page, analytical results, and a copy of the original chain-of-custody. If you have any questions concerning this report, please feel free to contact me.

Sincerely,

Celey D. Keine

Celey D. Keene Lab Director/Quality Manager



	PARAGON ENVIROMENTA CHRIS JONES 5002 CARRAIGE RD HOBBS NM, 88242 Fax To:			
Received:	05/09/2023		Sampling Date:	05/08/2023
Reported:	05/11/2023		Sampling Type:	Soil
Project Name:	SKELLY #942		Sampling Condition:	Cool & Intact
Project Number:	SPUR		Sample Received By:	Shalyn Rodriguez
Project Location:	32.824017,-103.85	56079		

## Sample ID: S - 3 6' (H232277-01)

Chloride, SM4500Cl-B	mg	/kg	Analyze	d By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	48.0	16.0	05/09/2023	ND	400	100	400	0.00	

## Sample ID: S - 1 5' (H232277-02)

TPH 8015M	mg/	'kg	Analyze	d By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	05/10/2023	ND	194	96.9	200	3.19	
DRO >C10-C28*	<10.0	10.0	05/10/2023	ND	185	92.4	200	3.73	
EXT DRO >C28-C36	<10.0	10.0	05/10/2023	ND					
Surrogate: 1-Chlorooctane	83.5	% 48.2-13	4						
Surrogate: 1-Chlorooctadecane	99.6	% 49.1-14	8						

#### **Cardinal Laboratories**

\*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager



## **Notes and Definitions**

QM-07	The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C
	Samples reported on an as received basis (wet) unless otherwise noted on report

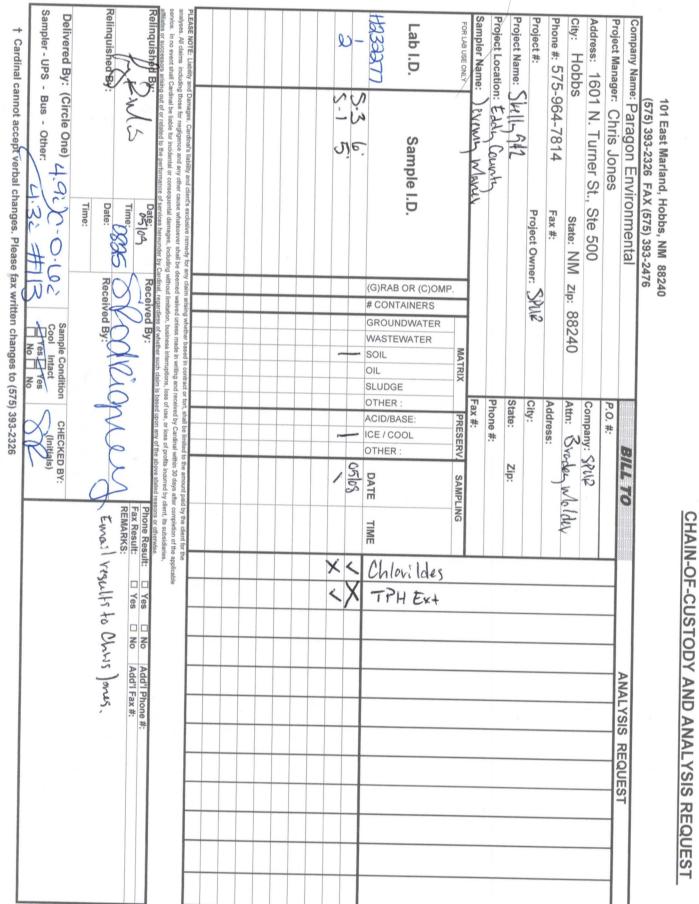
#### Cardinal Laboratories

#### \*=Accredited Analyte

Celeg D. Keine

Celey D. Keene, Lab Director/Quality Manager

## Received by OCD: 6/26/2023 1:12:11 PM





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District I 1625 N. French Dr., Hobbs, NM 88240 Phone:(575) 393-6161 Fax:(575) 393-0720

811 S. First St., Artesia, NM 88210 Phone:(575) 748-1283 Fax:(575) 748-9720

District III

1000 Rio Brazos Rd., Aztec, NM 87410 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV

1220 S. St Francis Dr., Santa Fe, NM 87505 Phone: (505) 476-3470 Fax: (505) 476-3462

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

CONDITIONS

Operator:	OGRID:
Spur Energy Partners LLC	328947
9655 Katy Freeway	Action Number:
Houston, TX 77024	232822
	Action Type:
	[C-141] Release Corrective Action (C-141)

#### CONDITIONS

Created By	Condition	Condition Date
scwells	Area around tank battery represented by S-1, S-2, and S-3 approved for deferral. Final remediation and reclamation/revegetation shall take place in accordance with 19.15.29.12 and 19.15.29.13 NMAC at time of a major facility deconstruction or at plugging and abandonment, whichever comes first.	12/18/2023

Action 232822