

Incident ID	NAPP2104927763
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 6/21/23

email: [katherine.purvis@spurenergy.com](mailto:katherine.purvis@spurenergy.com)

Telephone: 575-441-8619

**OCD Only**

Received by: Shelly Wells

Date: 6/22/2023

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

Closure Approved by: Robert Hamlet

Date: 11/22/2023

Printed Name: Robert Hamlet

Title: Environmental Specialist - Advanced



June 16, 2023

NMOCD District 2  
 Mike Bratcher  
 Artesia, NM 88210

Bureau of Land Management  
 Crisha Morgan  
 Carlsbad Field Office

**Re: Site Assessment, Remediation, and Closure Report  
 State S 19 #4  
 API No. 30-015-24273  
 GPS: Latitude 32.8146667 Longitude -104.1111374  
 UL "O", Sec. 19, T17S, R29E  
 Eddy County, NM  
 NMOCD Ref. No. NAPP2104927763**

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment, conduct remediation activities, and reclaim the old containment area for the release site known as the State S 19 #4. Details of the release are summarized below:

Release Details			
<b>Type of Release:</b>	Produced Water/Crude Oil	<b>Volume of Release:</b>	7 bbls
		<b>Volume Recovered:</b>	1.5 bbls
<b>Source of Release:</b>	Poly Flowline	<b>Date of Release:</b>	02/17/21
<b>Was Immediate Notice Given?</b>	No	<b>If, Yes, to Whom?</b>	N/A
<b>Was a Watercourse Reached?</b>	No	<b>If Yes, Volume Impacting Watercourse:</b>	N/A
<b>Surface Owner:</b>	State	<b>Mineral Owner:</b>	State
A POLY FLOWLINE BUSTED DUE TO FREEZING WEATHER.			

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:

<b>Site Characteristics</b>	
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, or private, domestic fresh water 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)— Interlayered 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 Simona Gravelly Fine Sandy Loam, 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 well-drained. There is NOT a high potential for karst geology to be present around the State S 19 #4 (Figure #3).

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

<b>TABLE I CLOSURE CRITERIA FOR SOILS IMPACTED BY A RELEASE</b>			
	<b>Constituent</b>	<b>Method</b>	<b>Limit</b>
<50 Feet	Chloride	EPA 300.0	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

**INITIAL SITE ASSESSMENT & SOIL SAMPLING EVENT**

On August 17th, 2022, Paragon conducted an initial site assessment. 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:

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100')							
Sample Date 8-17-22		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH
S-1	0-6" REFUSAL	ND	ND	ND	ND	ND	ND
S-2	0-6" REFUSAL	ND	ND	ND	582	235	582
S-3	0-6" REFUSAL	ND	ND	ND	ND	ND	ND
S-4	0-6" REFUSAL	ND	ND	ND	ND	ND	ND
S-5	0-6"	ND	ND	ND	ND	ND	ND
	1' REFUSAL	ND	ND	ND	ND	ND	ND
S-6	0-6"	ND	ND	ND	ND	ND	ND
	1' REFUSAL	ND	ND	ND	ND	ND	ND
S-7	0-6" REFUSAL	ND	ND	ND	ND	ND	ND

(ND) - Analyte Not Detected

All Laboratory analytical reports are provided in Appendix E. A Site Map & Sample Maps are provided in Figures #1, #5, and #6.

**REMEDIATION ACTIVITIES**

On September 23, 2022, Paragon mobilized personnel and heavy equipment to conduct remedial activities. Based on the site characteristics and field observations made during the site assessment, the following remedial activities were undertaken to advance the Release Site toward an NMOCD-approved site closure:

- We utilized a backhoe to remove the dirt from the S-2 area all the way down to 1 ft. BGS.
- Once the area was excavated to the specified depth, we emailed the NMOCD and conducted preliminary bottom composite confirmation samples. We utilized composite sampling, where each sample was representative of no more than 200 sq/ft. The results of this event are in the following data table on the next page:

9-26-22 Confirmation Samples

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100')								
Sample Date 9-26-22		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
N-SW Comp	1'	ND	ND	ND	ND	ND	0	224
S-SW Comp	1'	ND	ND	ND	ND	ND	0	288
2 Comp	1'	ND	ND	ND	79.6	15.5	95.1	304

(ND) - Analyte Not Detected

- These laboratory analytical results indicated concentrations were below NMOCD Closure Criteria.
- All excavated soils were temporarily stockpiled on-site atop a poly liner during the project. It was later transported to Lea Land, an NMOCD-approved waste disposal facility.
- After receiving laboratory analytical results below the closure criteria, the excavated areas were backfilled with “like” material obtained from Lea Land. The affected area was then contoured and machine-compacted to match the surrounding grade.

Unfortunately, after this project was completed, we were compiling the data and necessary documentation for the closure of this project the operator who dug this out left the company. He had taken the initial, and during photos that we were unable to obtain, so the only photos we have to attach to the report are the completed photos.

### CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2104927763, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

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

Respectfully,

Tristan Jones  
Project Coordinator  
Paragon Environmental, LLC



A handwritten signature in blue ink, appearing to read 'Chris Jones', is positioned above the typed name and title.

Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



#### **Attachments**

##### **Figures:**

- 1- Site Map
- 2- Topographic Map
- 3- Karst Map
- 4- Aerial Map
- 5- Confirmation Sample Map

##### **Appendices:**

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



Figures:

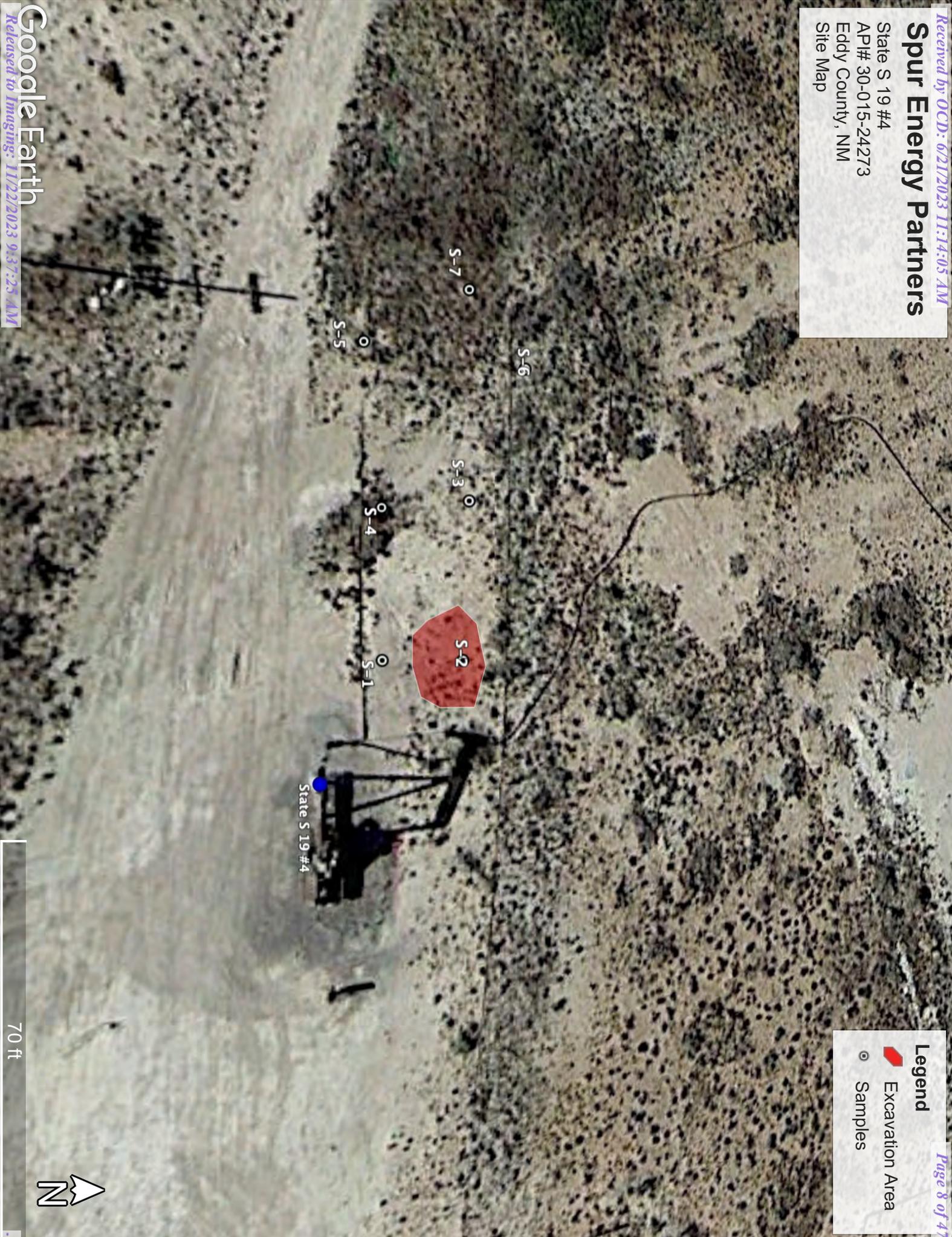
- 1-Site Map
- 2- Topo Map
- 3- Karst Map
- 4- Aerial Map
- 5- Confirmation Map

# Spur Energy Partners

State S 19 #4  
API# 30-015-24273  
Eddy County, NM  
Site Map

**Legend**

-  Excavation Area
-  Samples



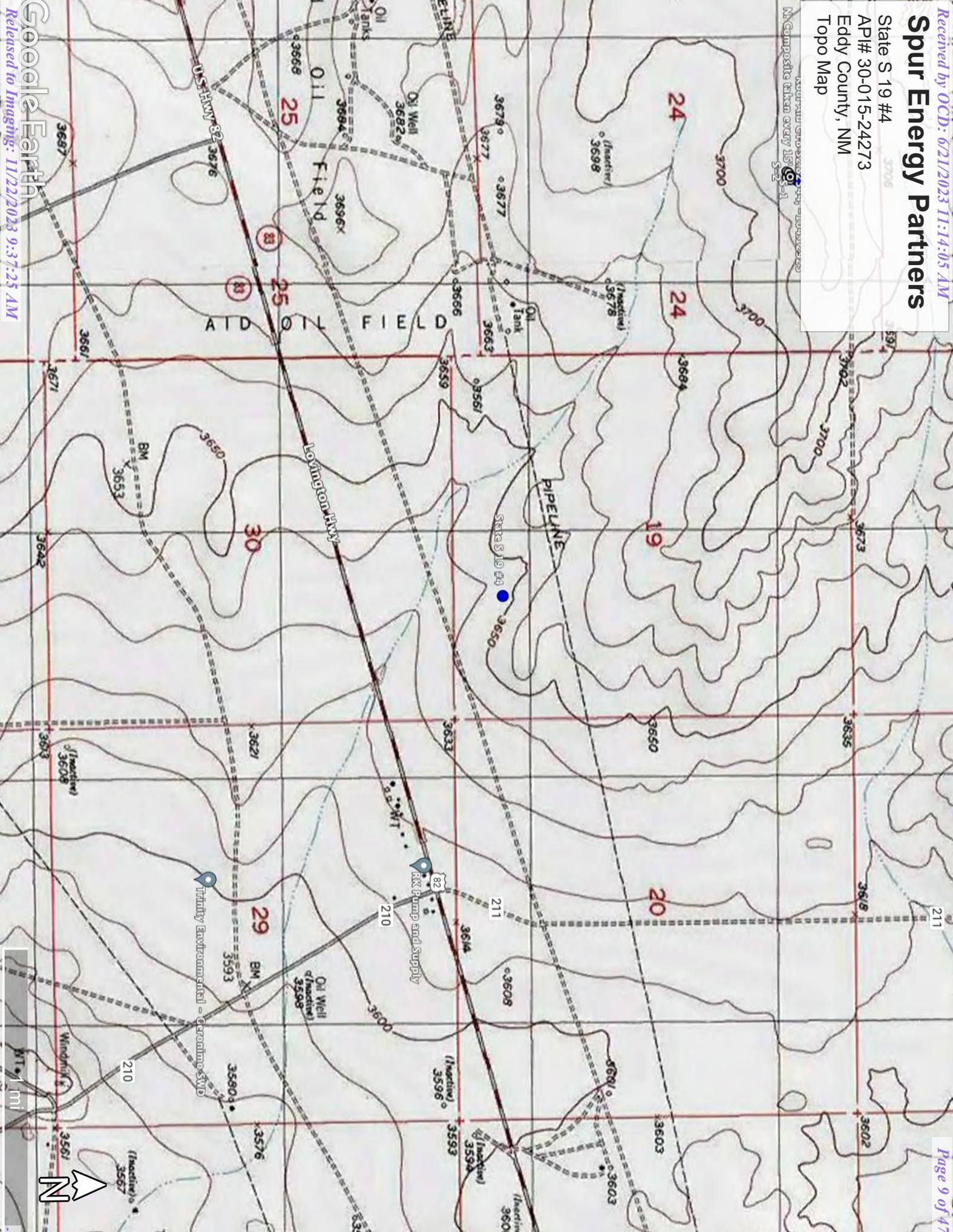
70 ft



# Spur Energy Partners

State S 19 #4  
API# 30-015-24273  
Eddy County, NM  
Topo Map

Map Composite taken every 15 seconds

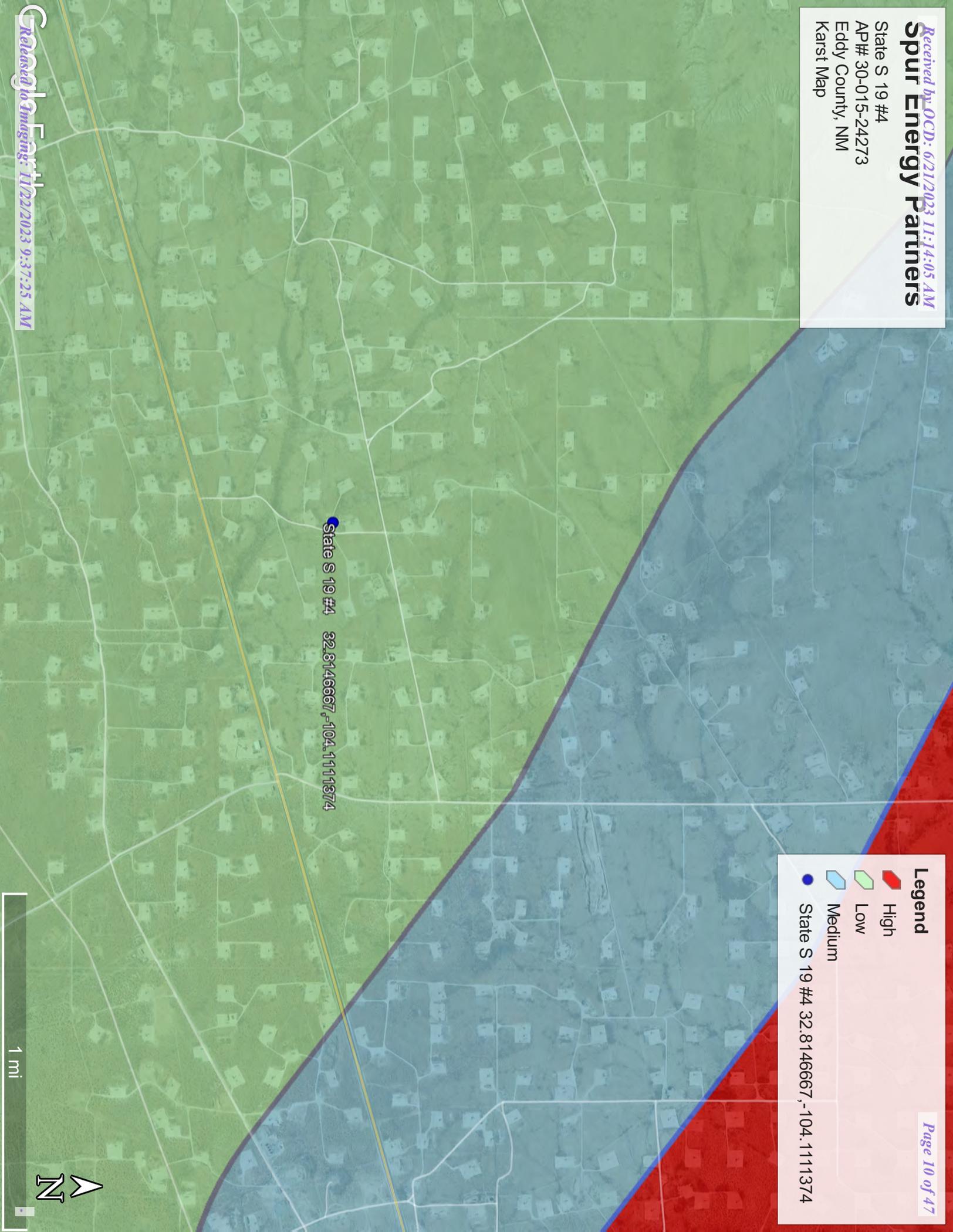


State S 19 #4  
AP# 30-015-24273  
Eddy County, NMI  
Karst Map

**Legend**

- High
- Low
- Medium

State S 19 #4 32.8146667, -104.1111374



1 mi

State S 19 #4  
AP# 30-015-24273  
Eddy County, NMI  
Aerial Map

**Legend**

- State S 19 #4 32.8146667, -104.1111374

● State S 19 #4 32.8146667, -104.1111374

6 mi



# Spur Energy Partners

State S 19 #4  
API# 30-015-24273  
Eddy County, NMI  
Confirmation Map

**Legend**

-  Excavation Area
-  Samples



2000 ft





Appendix A  
Referenced Water Data:

New Mexico State of Engineers Office



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

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

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

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	Code	Sub-basin	County	Q 1	Q 2	Q 3	Q 4	Sec	Tws	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
<a href="#">RA 12307</a> <a href="#">POD1</a>	RA	ED	4	2	2	14	17S	28E	580495	3633981		3966	140	58	82	
<a href="#">RA 11807</a> <a href="#">POD1</a>	RA	ED	1	2	3	22	17S	29E	587360	3631585		4177	131	76	55	

Average Depth to Water: **67 feet**  
 Minimum Depth: **58 feet**  
 Maximum Depth: **76 feet**

Record Count: 2

UTM NAD83 Radius Search (in meters):

**Easting (X):** 583211.464

**Northing (Y):** 3631091

**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, usability, or suitability for any particular purpose of the data.

8/18/22 11:37 AM

WATER COLUMN/ AVERAGE DEPTH TO  
WATER



Appendix B  
Soil Survey:

U.S.D.A.  
FEMA Flood Map

Map Unit Description: Simona gravelly fine sandy loam, 0 to 3 percent slopes---Eddy Area,  
New Mexico

---

## Eddy Area, New Mexico

### SG—Simona gravelly fine sandy loam, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* 1w5w  
*Elevation:* 2,750 to 5,000 feet  
*Mean annual precipitation:* 8 to 16 inches  
*Mean annual air temperature:* 57 to 70 degrees F  
*Frost-free period:* 180 to 230 days  
*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Simona and similar soils:* 95 percent  
*Minor components:* 5 percent  
*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### Description of Simona

##### Setting

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

##### Typical profile

*H1 - 0 to 19 inches:* gravelly fine sandy loam  
*H2 - 19 to 23 inches:* indurated

##### Properties and qualities

*Slope:* 0 to 3 percent  
*Depth to restrictive feature:* 7 to 20 inches to petrocalcic  
*Drainage class:* Well drained  
*Runoff class:* Very high  
*Capacity of the most limiting layer to transmit water (Ksat):* Very low to moderately low (0.00 to 0.06 in/hr)  
*Depth to water table:* More than 80 inches  
*Frequency of flooding:* None  
*Frequency of ponding:* None  
*Calcium carbonate, maximum content:* 15 percent  
*Maximum salinity:* Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)  
*Sodium adsorption ratio, maximum:* 1.0  
*Available water supply, 0 to 60 inches:* Very low (about 2.1 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified  
*Land capability classification (nonirrigated):* 7e  
*Hydrologic Soil Group:* D  
*Ecological site:* R042XC002NM - Shallow Sandy

Map Unit Description: Simona gravelly fine sandy loam, 0 to 3 percent slopes---Eddy Area,  
New Mexico

---

*Hydric soil rating:* No

### **Minor Components**

#### **Simona**

*Percent of map unit:* 4 percent

*Ecological site:* R042XC002NM - Shallow Sandy

*Hydric soil rating:* No

#### **Playa**

*Percent of map unit:* 1 percent

*Landform:* Playas

*Landform position (three-dimensional):* Talf

*Down-slope shape:* Concave, convex

*Across-slope shape:* Concave, linear

*Ecological site:* R042XC017NM - Bottomland

*Hydric soil rating:* Yes

## **Data Source Information**

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 17, Sep 12, 2021



104°59'W 32°49'N



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

## Legend

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

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

### OTHER AREAS OF FLOOD HAZARD

	NO SCREEN Area of Minimal Flood Hazard Zone X
	Effective LOMRs
	Area of Undetermined Flood Hazard Zone D
	Channel, Culvert, or Storm Sewer
	Levee, Dike, or Floodwall

### OTHER AREAS GENERAL STRUCTURES

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

### OTHER FEATURES

	Digital Data Available
	No Digital Data Available
	Unmapped

### MAP PANELS

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.



This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 8/18/2022 at 1:38 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



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	NAPP2104927763
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party <b>SPUR ENERGY PARTNERS</b>	OGRID <b>328947</b>
Contact Name <b>BRAIDY MOULDER</b>	Contact Telephone <b>713-264-2517</b>
Contact email <b>BMOULDER@SPUREPLLC.COM</b>	Incident # <i>(assigned by OCD)</i>
Contact mailing address <b>919 MILAM STREET SUITE 2475 HOUSTON, TEXAS 77002</b>	

### Location of Release Source

Latitude **32.8146667**

Longitude **-104.1111374**

*(NAD 83 in decimal degrees to 5 decimal places)*

Site Name <b>STATE S 19 #004</b>	Site Type <b>PRODUCTION - FACILITY</b>
Date Release Discovered <b>2/17/21</b>	API# <i>(if applicable)</i> <b>30-015-24273</b>

Unit Letter	Section	Township	Range	County
<b>O</b>	<b>19</b>	<b>17S</b>	<b>29E</b>	<b>EDDY</b>

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

### Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) <b>1BBLS</b>	Volume Recovered (bbls) <b>.5BBLs</b>
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) <b>6BBLS</b>	Volume Recovered (bbls) <b>1BBLs</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

**A POLY FLOWLINE BUSTED DUE TO FREEZING WEATHER.**

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Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? <b>NMOCD WAS NOTIFIED BY EMAIL ON 2/17/21 AT 3:08PM.</b>	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>NATALIE GLADDEN</u> Title: <u>DIRECTOR OF ENVIRONMENTAL AND REGULATORY SERVICES</u>
Signature: <u></u> Date: <u>2/17/21</u>
email: <u>NATALIE@ENERGYSTAFFINGLLC.COM</u> Telephone: <u>575-390-6397</u>

<b>OCD Only</b> Received by: <u>Ramona Marcus</u> Date: <u>2/19/2021</u>
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State of New Mexico  
Oil Conservation Division

Form C-141

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## 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan

State of New Mexico  
Oil Conservation Division

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Application ID	

and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 6/21/23

email: [katherine.purvis@spurenergy.com](mailto:katherine.purvis@spurenergy.com)

Telephone: 575-441-8619

**OCD Only**

Received by: Shelly Wells

Date: 6/22/2023

Incident ID	NAPP2104927763
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 6/21/23

email: [katherine.purvis@spurenergy.com](mailto:katherine.purvis@spurenergy.com)

Telephone: 575-441-8619

**OCD Only**

Received by: Shelly Wells

Date: 6/22/2023

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

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_



Appendix D:  
Photographic Documentation



**Photographic Documentation**

**Completed**







Appendix E:  
Laboratory Results



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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August 23, 2022

CASON SPURLOCK  
PARAGON ENVIROMENTAL  
5002 CARRAIGE RD  
HOBBS, NM 88242

RE: STATE S #4

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 [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene  
Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-1 0-6" REFUSAL (H223825-01)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
Toluene*	<0.050	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	3840	16.0	08/23/2022	ND	416	104	400	3.77	

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	170	85.1	200	20.4	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	183	91.6	200	21.3	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					

Surrogate: 1-Chlorooctane 96.6 % 45.3-161

Surrogate: 1-Chlorooctadecane 103 % 46.3-178

Cardinal Laboratories

\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-2 0-6" REFUSAL (H223825-02)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
<b>Toluene*</b>	<b>0.059</b>	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>96.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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	170	85.1	200	20.4	
<b>DRO &gt;C10-C28*</b>	<b>582</b>	10.0	08/22/2022	ND	183	91.6	200	21.3	
<b>EXT DRO &gt;C28-C36</b>	<b>235</b>	10.0	08/22/2022	ND					

Surrogate: 1-Chlorooctane 84.1 % 45.3-161

Surrogate: 1-Chlorooctadecane 124 % 46.3-178

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-3 0-6" REFUSAL (H223825-03)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
<b>Toluene*</b>	<b>0.056</b>	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 111 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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	170	85.1	200	20.4	
DRO >C10-C28*	<10.0	10.0	08/22/2022	ND	183	91.6	200	21.3	
EXT DRO >C28-C36	<10.0	10.0	08/22/2022	ND					

Surrogate: 1-Chlorooctane 99.8 % 45.3-161

Surrogate: 1-Chlorooctadecane 103 % 46.3-178

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-4 0-6" REFUSAL (H223825-04)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
Toluene*	<0.050	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 105 % 69.9-140

Chloride, SM4500CI-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	416	104	400	3.77	

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 97.6 % 45.3-161

Surrogate: 1-Chlorooctadecane 96.2 % 46.3-178

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-5 0-6" REFUSAL (H223825-05)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
Toluene*	<0.050	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 69.9-140

Chloride, SM4500CI-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	416	104	400	3.77	

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 101 % 45.3-161

Surrogate: 1-Chlorooctadecane 101 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-5 6"-1' REFUSAL (H223825-06)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
Toluene*	<0.050	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 107 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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 98.6 % 45.3-161

Surrogate: 1-Chlorooctadecane 98.1 % 46.3-178

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\* = Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-6 0-6" REFUSAL (H223825-07)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
<b>Toluene*</b>	<b>0.074</b>	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 108 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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 96.3 % 45.3-161

Surrogate: 1-Chlorooctadecane 96.9 % 46.3-178

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-6 1' REFUSAL (H223825-08)**

BTEX 8021B		mg/kg		Analyzed 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	2.01	100	2.00	5.76	
<b>Toluene*</b>	<b>0.061</b>	0.050	08/22/2022	ND	1.99	99.3	2.00	4.77	
Ethylbenzene*	<0.050	0.050	08/22/2022	ND	1.94	97.0	2.00	5.57	
Total Xylenes*	<0.150	0.150	08/22/2022	ND	6.02	100	6.00	5.45	
Total BTEX	<0.300	0.300	08/22/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 106 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>48.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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 115 % 45.3-161

Surrogate: 1-Chlorooctadecane 117 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 CASON SPURLOCK  
 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:	STATE S #4	Sampling Condition:	Cool & Intact
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	32.814667,-104.113129		

**Sample ID: S-7 0-6" REFUSAL (H223825-09)**

BTEX 8021B		mg/kg		Analyzed 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	
<b>Toluene*</b>	<b>0.060</b>	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) 111 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>32.0</b>	16.0	08/23/2022	ND	416	104	400	3.77	

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 87.4 % 45.3-161

Surrogate: 1-Chlorooctadecane 84.1 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QR-04 The RPD for the BS/BSD was outside of historical limits.
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

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

101 East Marland, Hobbs, NM 88240  
 (575) 393-2326 FAX (575) 393-2476

Company Name: Paragon Environmental

**BILL TO**

**ANALYSIS REQUEST**

Project Manager:

P.O. #:

Address:

Company: Spur

City: Hobbs

State: Zip:

Attn: Brady Wolder

Phone #:

Fax #:

Address:

Project #:

Project Owner: Spur

City:

Project Name:

State S # 4

State: Zip:

Project Location:

St. 81467, -104.113129

Phone #:

Sampler Name:

Jeremy Wolder

Fax #:

FOR LAB USE ONLY

MATRIX

PRESERV/

SAMPLING

Lab I.D.

Sample I.D.

H223825

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX							DATE	TIME	TPH Ext.	BTEX	Chlorides
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:					
1	S-1 0-6" Refusal										8/17	11:05			
2	S-2 0-6" Refusal										8/17	11:10			
3	S-3 0-6" Refusal										8/17	11:15			
4	S-4 0-6" Refusal										8/17	11:20			
5	S-5 0-6" Refusal										8/17	11:25			
6	S-5 6"-1' Refusal										8/17	11:30			
7	S-6 0-6" Refusal										8/17	11:35			
8	S-6 1' Refusal										8/17	11:40			
9	S-7 0-1" Refusal										8/17	11:45			

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Relinquished By:

Date: 8-19-22

Time: 10:37

Received By:

Relinquished By:

Date:

Time:

Received By:

Delivered By: (Circle One)

-9.3°C CO.6°C

Sample Condition Cool Intact

CHECKED BY: (Initials)

Sampler - UPS - Bus - Other:

-9.9°C #1/3

Yes No

Yes No

Phone Result:  Yes  No Add'l Phone #:  
 Fax Result:  Yes  No Add'l Fax #:  
 REMARKS:

† Cardinal cannot accept verbal changes. Please fax written changes to (575) 393-2326



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

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September 27, 2022

TRISTAN JONES  
PARAGON ENVIROMENTAL  
5002 CARRAIGE RD  
HOBBS, NM 88242

RE: STATE S 19 #004

Enclosed are the results of analyses for samples received by the laboratory on 09/26/22 16:50.

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 [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

Cardinal Laboratories is accredited 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,

A handwritten signature in black ink that reads "Celey D. Keene".

Celey D. Keene  
Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 TRISTAN JONES  
 5002 CARRAIGE RD  
 HOBBS NM, 88242  
 Fax To:

Received:	09/26/2022	Sampling Date:	09/26/2022
Reported:	09/27/2022	Sampling Type:	Soil
Project Name:	STATE S 19 #004	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

**Sample ID: N - SW COMP (H224466-01)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/27/2022	ND	1.88	94.2	2.00	9.74	
Toluene*	<0.050	0.050	09/27/2022	ND	1.83	91.4	2.00	9.07	
Ethylbenzene*	<0.050	0.050	09/27/2022	ND	1.76	88.1	2.00	10.2	
Total Xylenes*	<0.150	0.150	09/27/2022	ND	5.43	90.4	6.00	10.2	
Total BTEX	<0.300	0.300	09/27/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 93.8 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	224	16.0	09/27/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2022	ND	203	102	200	1.09	
DRO >C10-C28*	<10.0	10.0	09/27/2022	ND	206	103	200	0.321	
EXT DRO >C28-C36	<10.0	10.0	09/27/2022	ND					

Surrogate: 1-Chlorooctane 95.7 % 45.3-161

Surrogate: 1-Chlorooctadecane 113 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 TRISTAN JONES  
 5002 CARRAIGE RD  
 HOBBS NM, 88242  
 Fax To:

Received:	09/26/2022	Sampling Date:	09/26/2022
Reported:	09/27/2022	Sampling Type:	Soil
Project Name:	STATE S 19 #004	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

**Sample ID: S - SW COMP (H224466-02)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/27/2022	ND	1.88	94.2	2.00	9.74	
Toluene*	<0.050	0.050	09/27/2022	ND	1.83	91.4	2.00	9.07	
Ethylbenzene*	<0.050	0.050	09/27/2022	ND	1.76	88.1	2.00	10.2	
Total Xylenes*	<0.150	0.150	09/27/2022	ND	5.43	90.4	6.00	10.2	
Total BTEX	<0.300	0.300	09/27/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.9 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	09/27/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2022	ND	203	102	200	1.09	
DRO >C10-C28*	<10.0	10.0	09/27/2022	ND	206	103	200	0.321	
EXT DRO >C28-C36	<10.0	10.0	09/27/2022	ND					

Surrogate: 1-Chlorooctane 96.0 % 45.3-161

Surrogate: 1-Chlorooctadecane 112 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



PHONE (575) 393-2326 ° 101 E. MARLAND ° HOBBS, NM 88240

**Analytical Results For:**

PARAGON ENVIROMENTAL  
 TRISTAN JONES  
 5002 CARRAIGE RD  
 HOBBS NM, 88242  
 Fax To:

Received:	09/26/2022	Sampling Date:	09/26/2022
Reported:	09/27/2022	Sampling Type:	Soil
Project Name:	STATE S 19 #004	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

**Sample ID: 2 COMP (H224466-03)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/27/2022	ND	1.88	94.2	2.00	9.74	
Toluene*	<0.050	0.050	09/27/2022	ND	1.83	91.4	2.00	9.07	
Ethylbenzene*	<0.050	0.050	09/27/2022	ND	1.76	88.1	2.00	10.2	
Total Xylenes*	<0.150	0.150	09/27/2022	ND	5.43	90.4	6.00	10.2	
Total BTEX	<0.300	0.300	09/27/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 94.0 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>304</b>	16.0	09/27/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: CK					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/27/2022	ND	203	102	200	1.09	
<b>DRO &gt;C10-C28*</b>	<b>79.6</b>	10.0	09/27/2022	ND	206	103	200	0.321	
<b>EXT DRO &gt;C28-C36</b>	<b>15.5</b>	10.0	09/27/2022	ND					

Surrogate: 1-Chlorooctane 96.3 % 45.3-161

Surrogate: 1-Chlorooctadecane 121 % 46.3-178

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Celey D. Keene, Lab Director/Quality Manager



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**Notes and Definitions**

- 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

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Celey D. Keene, Lab Director/Quality Manager



101 East Marland, Hobbs, NM 88240  
 (575) 393-2326 FAX (575) 393-2476

**CHAIN-OF-CUSTODY AND ANALYSIS REQUEST**

Company Name: <u>Palumbo</u>		<b>BILL TO</b>		P.O. #:		<b>ANALYSIS REQUEST</b>					
Project Manager: <u>Trigdan Jaeger</u>		Address: <u>1601 New Turner St. SE</u>		Company: <u>SPUR</u>							
City: <u>Hobbs</u>		State: <u>NM</u>		Attn: <u>Brendy Moulder</u>							
Phone #: <u>575-318-6841</u>		Fax #:		Address:							
Project #:		Project Owner: <u>SPUR</u>		City:							
Project Name: <u>State 519 #14</u>		State:		Zip:							
Project Location: <u>Eddy, NM</u>		Phone #:		Fax #:							
Sampler Name: <u>Trigdan Jaeger</u>		Matrix:		PRESERV:							
FOR LAB USE ONLY		(G)RAB OR (C)OMP.		DATE							
Lab I.D.		# CONTAINERS		TIME							
Sample I.D.		GROUNDWATER		TPH EX T							
<u>182446</u>		WASTEWATER		BTEX							
<u>1</u>		SOIL		Chlorides							
<u>3</u>		OIL									
<u>NSW Camp</u>		SLUDGE									
<u>S-SW Camp</u>		OTHER:									
<u>2</u>		ACID/BASE:									
<u>Camp</u>		ICE / COOL									
<u>Camp</u>		OTHER:									
<u>C</u>		DATE									
<u>9/26</u>		TIME									
Relinquished By: <u>[Signature]</u>		Received By: <u>[Signature]</u>		Verbal Result: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No							
Date: <u>9/29</u>		Time: <u>4:50pm</u>		Add'l Phone #:							
Date:		Time:		All Results are emailed. Please provide Email address:							
Relinquished By:		Received By:		REMARKS:							
Delivered By: (Circle One)		Observed Temp. °C <u>3.7</u>		Turnaround Time:							
Sampler - UPS - Bus - Other:		Corrected Temp. °C <u>4.3</u>		Standard <input checked="" type="checkbox"/> <u>Rush</u>							
FORM 9000-R-3-3-07719722		Sample Condition		Bacteria (only) <input checked="" type="checkbox"/>							
+ Cardinal cannot accept verbal changes. Please email changes to <a href="mailto:celey.keene@cardinalabnm.com">celey.keene@cardinalabnm.com</a>		Cool <input checked="" type="checkbox"/> Intact <input type="checkbox"/>		Sample Condition Cool Intact							
		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		Observed Temp. °C							
		No <input type="checkbox"/> Yes <input checked="" type="checkbox"/>		Corrected Temp. °C							

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

Action 231114

**CONDITIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 231114
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
rhamlet	We have received your closure report and final C-141 for Incident #NAPP2104927763 STATE S 19 #004, thank you. This closure is approved. If pictures of the excavation before back-fill are not included in the next report, the report will be immediately denied.	11/22/2023