

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

| Length(Ft)                    | Width(Ft)                         | Depth(In)      |
|-------------------------------|-----------------------------------|----------------|
| <u>50.000</u>                 | <u>40.000</u>                     | <u>1.500</u>   |
| Cubic Feet Impacted           |                                   | <u>250.000</u> |
| Barrels                       |                                   | <u>44.52</u>   |
| Soil Type                     |                                   | Clay/Sand      |
| Bbls Assuming 100% Saturation |                                   | <u>6.68</u>    |
| Saturation                    | Fluid present with shovel/backhoe |                |
| Estimated Barrels Released    |                                   | 6.70000        |

**Instructions**

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

(For data gathering instructions see appendix tab)

**Measurements**

|             |       |
|-------------|-------|
|             |       |
| Length (ft) | 50    |
| Width (ft)  | 40    |
| Depth (in)  | 1.500 |









May 29, 2024

NMOCD District 2  
Mike Bratcher  
Artesia, NM 88210

Bureau of Land Management  
Crisha Morgan  
Carlsbad Field Office

**Re: Site Assessment, Remediation, and Closure Report**  
**Electra Federal Battery**  
**API No. 30-015-36467**  
**GPS: Latitude 32.85311 Longitude -103.95909**  
**U/L "B", Sec. 10, T17S, R30E**  
**Eddy County, NM**  
**NMOCD Ref. No. nAPP2220727296**

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

| Release Details   |                  |                                       |         |
|---|------------------|---------------------------------------|---------|
| Type of Release:  | Crude Oil        | Volume of Release:                    | 7 bbls  |
|   |                  | Volume Recovered:                     | 5 bbls  |
| Source of Release:  | Circulating Line | Date of Release:                      | 7/25/22 |
| Was Immediate Notice Given?   | No               | If, Yes, to Whom?                     |         |
| Was a Watercourse Reached?  | No               | If Yes, Volume Impacting Watercourse: | N/A     |
| Surface Owner:  | Federal          | Mineral Owner:                        | Federal |
| The 2-inch circulating line from the circulating pump to the header developed a pine hole. This caused a release of fluid inside the containment. |                  |                                       |         |

Topographical and Aerial Maps are provided in Figures #2 and #4.

## REGULATORY FRAMEWORK & SITE CHARACTERIZATION

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:

- Depth to Groundwater in the affected area 100-500'
- Method to determine DTW NM OSE
- Did the release impact groundwater or surface water No

Depth to groundwater information is provided in Appendix A.

What are the minimum distances between the closest lateral extents of the release and the following surface areas:

- A Continuously flowing watercourse or any other significant watercourse- > 5 Mile
- Any lakebed, sinkhole, or playa lake- 1-5 mi
- An occupied permanent residence, school, hospital, institution, or church- 1-5 mi
- A spring or a private domestic fresh water well used by less than 5 households for domestic or stock watering purposes- 1-5 mi
- Any other fresh water well or spring- 1-5 mi
- Incorporated municipal boundaries or a defined municipal fresh water well field- 1-5 mi
- A wetland- 1-5 mi
- A subsurface mine- >5 mi
- An (non-karst) unstable area- >5 mi
- Categorize the risk of this well/site being in a karst area geology- Low
- A 100-year floodplain- 1/2-1 mi
- Did the release impact areas not on an exploration, development, production, or storage site- No

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). According to the United States Department of Agriculture Natural Resources Conservation Service, the soil in this area is made up of Berino Complex, with 0 to 3 percent slopes. The drainage courses in this area are well-drained. There is not a high potential for karst geology to be present around the Electra, so closure criteria were adhered to based on this characteristic (Figure #3).

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

## INITIAL SITE ASSESSMENT

On June 15, 2023, Paragon conducted an initial site assessment. During the initial site assessment, we sampled inside the footprint of the incident. The results of this sampling event are detailed in the following data table.

6-15-23 Sample Results

| NMOC Table 1 Closure Criteria 19.15.29 NMOC (Depth to Groundwater is >100') |             |                                |                                |                                       |      |      |                                 |                                  |
|---|-------------|--------------------------------|--------------------------------|---------------------------------------|------|------|---------------------------------|----------------------------------|
| Sample Date 6/15/23   |             | Closure Criteria<br>≤ 50 mg/kg | Closure Criteria<br>≤ 10 mg/kg | Combined Closure Criteria 1,000 mg/kg |      |      | Closure Criteria<br>2,500 mg/kg | Closure Criteria<br>20,000 mg/kg |
| Sample ID   | Depth (BGS) | BTEX                           | Benzene                        | GRO                                   | DRD  | MRO  | Total TPH                       | CHLORIDES                        |
| S-1   | 1'          | ND                             | ND                             | ND                                    | 326  | 183  | 509                             | 2480                             |
| S-2   | 1'          | ND                             | ND                             | ND                                    | 1260 | 931  | 2191                            | 160                              |
| S-3   | 1'          | ND                             | ND                             | ND                                    | 169  | 45.7 | 214.7                           | 4080                             |
| S-4   | 1'          | ND                             | ND                             | ND                                    | 116  | 40.5 | 156.5                           | 992                              |
| NSW-1   | 1'          | 0.428                          | ND                             | 63.1                                  | 2770 | 649  | 3482.1                          | 256                              |
| ESW-1   | 1'          | ND                             | ND                             | ND                                    | 441  | 256  | 697                             | 720                              |
| SSW-1   | 1'          | ND                             | ND                             | ND                                    | ND   | 11.3 | ND                              | 448                              |
| SSW-2   | 1'          | ND                             | ND                             | ND                                    | 505  | 235  | 740                             | 1720                             |
| WSW-1   | 1'          | ND                             | ND                             | ND                                    | 1450 | 663  | 2113                            | 1360                             |
| WSW-2   | 1'          | ND                             | ND                             | ND                                    | 612  | 153  | 765                             | 832                              |

ND- Analyte Not Detected

Laboratory Report can be found in Appendix D

A Site Map is provided in Figure #1.

## REMEDIAL ACTIVITIES

On January 25, 2024, Paragon mobilized equipment and personnel to the Electra to begin remediation activities. The following tasks were performed in accordance with Rule 19.15.29.12.

- Inside the battery, where the staining from the incident occurred, we manually excavated to a depth of 2 feet BGS. The material was hauled to Lea Land disposal, where clean backfill material was obtained.

Once this area was excavated (approximately 535 S/F) to the specified depths, we advised the OCD through the portal that we would be obtaining confirmation samples. Bottom samples were obtained, representing no more than 200 s/f. Sidewall samples were obtained, with each sample representing no more than 50 s/f. The results of this sampling event are in the following data table:

## 2/1/24 Laboratory Results

| NMOC Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100') |             |                                |                                |                                       |      |      |                                 |                                  |
|---|-------------|--------------------------------|--------------------------------|---------------------------------------|------|------|---------------------------------|----------------------------------|
| Sample Date 2/1/24  |             | Closure Criteria<br>≤ 50 mg/kg | Closure Criteria<br>≤ 10 mg/kg | Combined Closure Criteria 1,000 mg/kg |      |      | Closure Criteria<br>2,500 mg/kg | Closure Criteria<br>20,000 mg/kg |
| Sample ID   | Depth (BGS) | BTEX                           | Benzene                        | GRO                                   | DRO  | MRO  | Total TPH                       | CHLORIDES                        |
| S-1   | 2'          | ND                             | ND                             | ND                                    | 49.4 | ND   | 49.4                            | 112                              |
| S-2   | 2'          | ND                             | ND                             | ND                                    | 47.9 | ND   | 47.9                            | 224                              |
| S-3   | 2'          | ND                             | ND                             | ND                                    | 11.9 | ND   | 11.9                            | 240                              |
| S-4   | 2'          | ND                             | ND                             | ND                                    | ND   | ND   | ND                              | 288                              |
| NSW-1   | 2'          | ND                             | ND                             | ND                                    | 187  | 80.8 | 267.8                           | 816                              |
| NSW-2   | 2'          | ND                             | ND                             | ND                                    | 18.7 | ND   | 18.7                            | 2247                             |
| ESW-1   | 2'          | ND                             | ND                             | ND                                    | 12.6 | ND   | 12.6                            | 192                              |
| ESW-2   | 2'          | ND                             | ND                             | ND                                    | 21.9 | ND   | 21.9                            | 240                              |
| SSW-1   | 2'          | ND                             | ND                             | ND                                    | ND   | ND   | ND                              | 560                              |
| SSW-2   | 2'          | ND                             | ND                             | ND                                    | 86.6 | 14.3 | 100.9                           | 400                              |
| WSW-1   | 2'          | ND                             | ND                             | ND                                    | ND   | ND   | ND                              | 288                              |
| WSW-2   | 2'          | ND                             | ND                             | ND                                    | 12   | ND   | 12                              | 272                              |

ND- Analyte Not Detected

Because NSW-1 and NSW-2 were still above closure for sidewall samples, we extended this area horizontally an additional 6 inches. We then resampled this area. This result is in the following data table:

## 2-13-24 Laboratory Results

| NMOC Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100') |             |                                |                                |                                       |     |     |                                 |                                  |
|---|-------------|--------------------------------|--------------------------------|---------------------------------------|-----|-----|---------------------------------|----------------------------------|
| Sample Date 2/13/24   |             | Closure Criteria<br>≤ 50 mg/kg | Closure Criteria<br>≤ 10 mg/kg | Combined Closure Criteria 1,000 mg/kg |     |     | Closure Criteria<br>2,500 mg/kg | Closure Criteria<br>20,000 mg/kg |
| Sample ID   | Depth (BGS) | BTEX                           | Benzene                        | GRO                                   | DRO | MRO | Total TPH                       | CHLORIDES                        |
| NSW-1   | 2'          | ND                             | ND                             | ND                                    | ND  | ND  | ND                              | 64                               |

ND-Analyte Not Detected

After reviewing the data in preparation to write the closure report we realized the NSW-2 sample wasn't obtained. We again returned to the site and obtained a sample from this sample point. The result is in the following data table:

## 5-8-24 Laboratory Results

| NMOC Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is 80') |             |                                |                                |                                       |     |     |                                 |                                  |
|---|-------------|--------------------------------|--------------------------------|---------------------------------------|-----|-----|---------------------------------|----------------------------------|
| Sample Date 5/8/24  |             | Closure Criteria<br>≤ 50 mg/kg | Closure Criteria<br>≤ 10 mg/kg | Combined Closure Criteria 1,000 mg/kg |     |     | Closure Criteria<br>2,500 mg/kg | Closure Criteria<br>20,000 mg/kg |
| Sample ID   | Depth (BGS) | BTEX                           | Benzene                        | GRO                                   | DRO | MRO | Total TPH                       | CHLORIDES                        |
| NSW-2   | 2'          | ND                             | ND                             | ND                                    | ND  | ND  | ND                              | 80                               |

ND- Analyte Not Detected



### CLOSURE REQUEST

After careful review, Paragon requests that the incident, nAPP2220727296, 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 contact Chris Jones by phone at (575)964-7814 or email [chris@paragonenvironmental.net](mailto:chris@paragonenvironmental.net)

Respectfully,



Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



### Attachments

#### **Figures:**

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

#### **Appendices:**

- Appendix A – Referenced Water Surveys & RA-13319 POD1
- Appendix B – Soil Survey and FEMA Flood Map
- Appendix C – Photographic Documentation & OCD Notification
- Appendix D – Laboratory Reports



Figures:

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



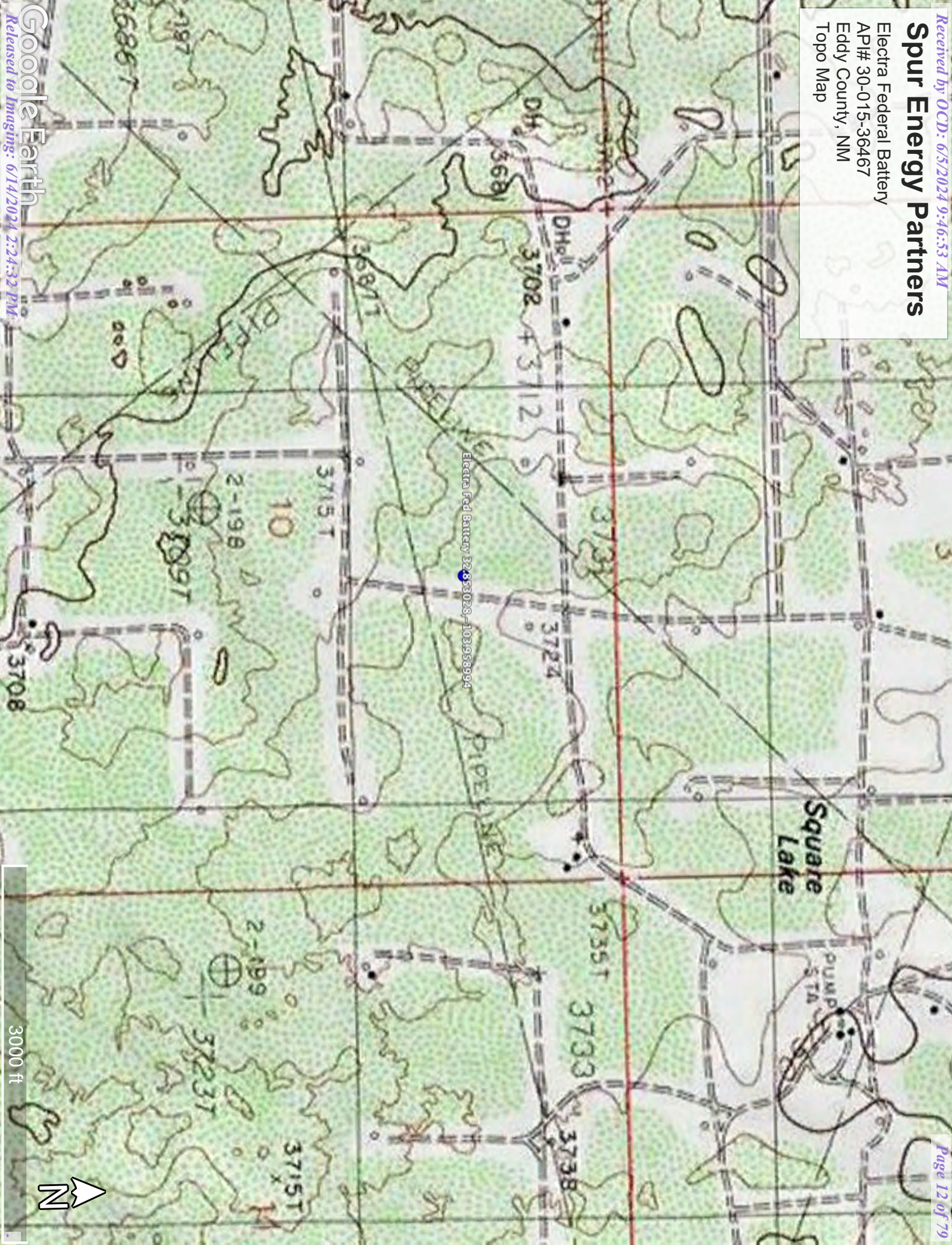
Electra Federal Battery  
API# 30-015-36467  
Eddy County, NM  
Site Map





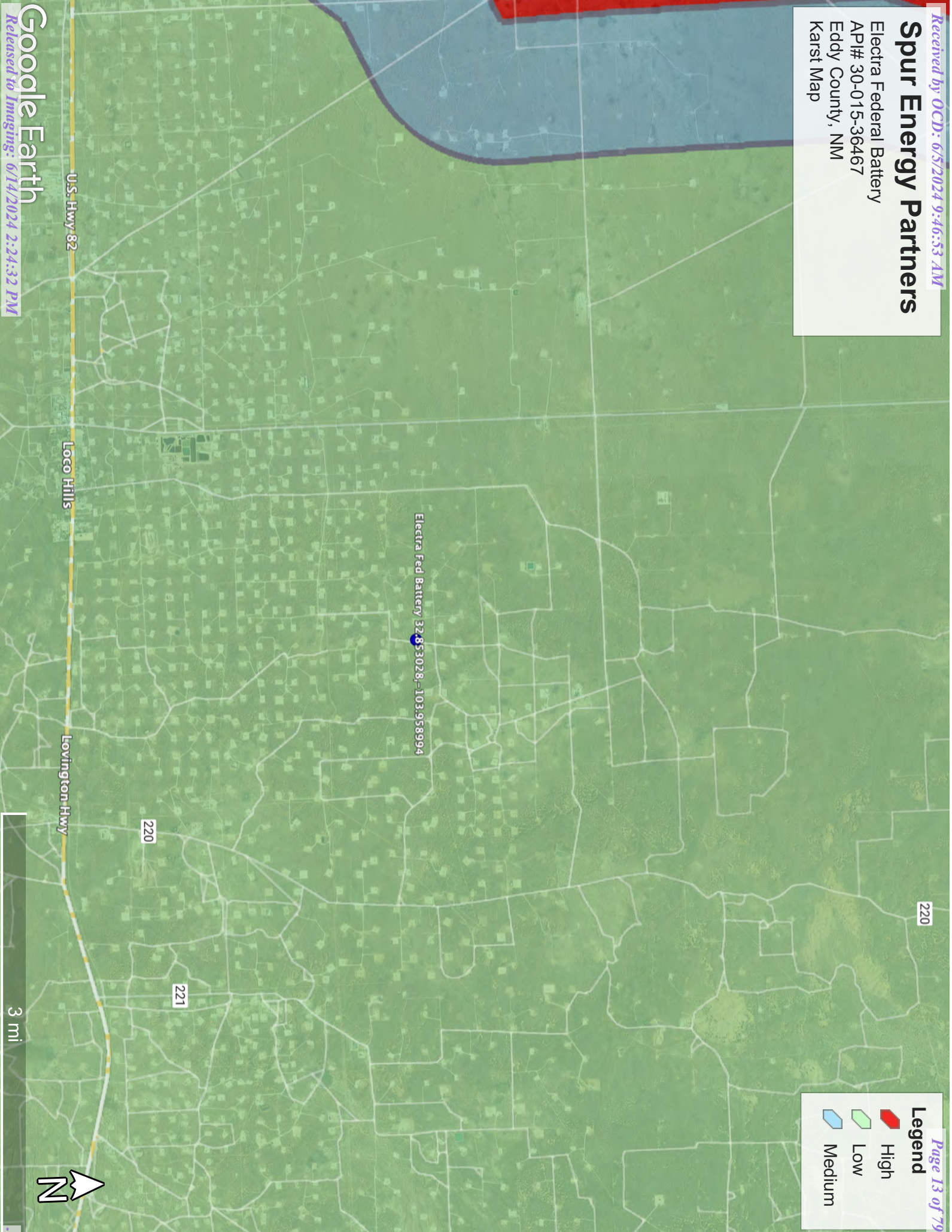
# Spur Energy Partners

Electra Federal Battery  
API# 30-015-36467  
Eddy County, NM  
Topo Map





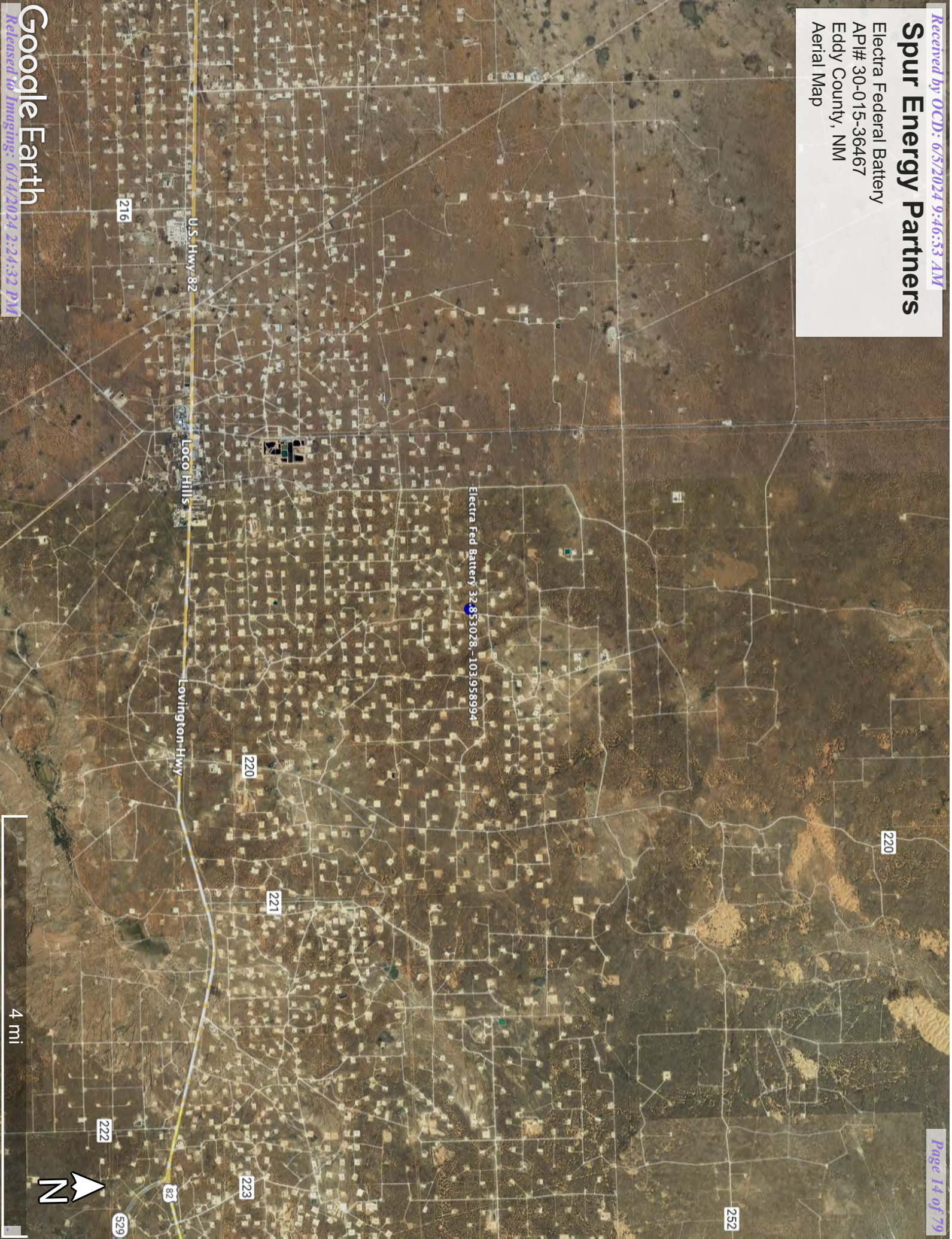
Electra Federal Battery  
API# 30-015-36467  
Eddy County, NM  
Karst Map





# Spur Energy Partners

Electra Federal Battery  
API# 30-015-36467  
Eddy County, NM  
Aerial Map







# Spur Energy Partners

Electra Federal Battery  
API# 30-015-36467  
Eddy County, NM  
Groundwater Map

## Legend

-  GW at 0.55 Mile
-  YALE ST 1 RA-13319 POD 1 TW-1 101'



Electra Fed Battery 32.853028,-103.958994

YALE ST 1 RA-13319 POD 1 TW-1 101'

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 | POD Sub-basin | County | Q 64 | Q 16 | Q 4 | Sec | Tw  | Rng | X      | Y       | Distance | DepthWell | DepthWater | Water Column |
|-------------------------------|------|---------------|--------|------|------|-----|-----|-----|-----|--------|---------|----------|-----------|------------|--------------|
| <a href="#">RA 13212 POD1</a> |      | RA            | CH     | 1    | 3    | 4   | 11  | 17S | 30E | 598984 | 3634474 | 1858     |           |            |              |
| <a href="#">RA 13284 POD1</a> |      | RA            | ED     | 2    | 1    | 4   | 08  | 17S | 30E | 594450 | 3634729 | 3055     |           |            |              |
| <a href="#">RA 13106 POD3</a> |      | RA            | ED     | 4    | 2    | 3   | 01  | 17S | 30E | 600381 | 3636421 | 3116     |           |            |              |
| <a href="#">RA 13106 POD2</a> |      | RA            | ED     | 4    | 2    | 3   | 01  | 17S | 30E | 600406 | 3636426 | 3140     |           |            |              |

Average Depth to Water: --

Minimum Depth: --

Maximum Depth: --

**Record Count:** 4

### UTM NAD83 Radius Search (in meters):

**Easting (X):** 597414.232

**Northing (Y):** 3635468.999

**Radius:** 3200

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.

5/3/23 11:37 AM

WATER COLUMN/ AVERAGE DEPTH TO  
WATER



2904 W 2nd St.  
Roswell, NM 88201  
voice: 575.624.2420  
fax: 575.624.2421  
www.atkinseng.com

April 14, 2023

DII-NMOSE  
1900 W 2<sup>nd</sup> Street  
Roswell, NM 88201

*Hand Delivered to the DII Office of the State Engineer*

Re: Well Record RA-13319 Pod-1

To whom it may concern:

Attached please find a well log & record and a plugging record, in duplicate, for a one (1) soil borings, RA-13319 Pod-1.

If you have any questions, please contact me at 575.499.9244 or [lucas@atkinseng.com](mailto:lucas@atkinseng.com).

Sincerely,

A handwritten signature in black ink that reads "Lucas Middleton". The signature is written in a cursive, flowing style.

Lucas Middleton

Enclosures: as noted above

OSE DII AUG 23 2023 PM 2:00



# WELL RECORD & LOG

OFFICE OF THE STATE ENGINEER


[www.ose.state.nm.us](http://www.ose.state.nm.us)

|   |   |                             |   |   |   |  |                                      |                          |
|---|---|-----------------------------|---|---|---|--|--------------------------------------|--------------------------|
| 1. GENERAL AND WELL LOCATION  | OSE POD NO. (WELL NO.)<br>POD 1 (TW-1)  |                             | WELL TAG ID NO.<br>N/A                                  |   | OSE FILE NO(S).<br>RA-13319                             |  |                                      |                          |
|   | WELL OWNER NAME(S)<br>Spur Energy Partners LLC  |                             |   |   | PHONE (OPTIONAL)  |  |                                      |                          |
|   | WELL OWNER MAILING ADDRESS<br>9655 Katy Freeway, Suite 500  |                             |   |   | CITY<br>Houston   | STATE<br>TX  | ZIP<br>77024                         |                          |
|   | WELL LOCATION<br>(FROM GPS)   | DEGREES<br>LATITUDE         | MINUTES<br>32   | SECONDS<br>51   | 25.10   | N  |                                      |                          |
|   |   | LONGITUDE                   | 103   | 56  | 59.71   | W  |                                      |                          |
| * ACCURACY REQUIRED: ONE TENTH OF A SECOND<br>* DATUM REQUIRED: WGS 84  |   |                             |   |   |   |  |                                      |                          |
| DESCRIPTION RELATING WELL LOCATION TO STREET ADDRESS AND COMMON LANDMARKS - PLSS (SECTION, TOWNSHIP, RANGE) WHERE AVAILABLE<br>SW SW SW Sec. 02 T17S R30E, NMPM |   |                             |   |   |   |  |                                      |                          |
| 2. DRILLING & CASING INFORMATION  | LICENSE NO.<br>1249   |                             | NAME OF LICENSED DRILLER<br>Jackie D. Atkins            |   |   | NAME OF WELL DRILLING COMPANY<br>Atkins Engineering Associates, Inc. |                                      |                          |
|   | DRILLING STARTED<br>8/15/2023   | DRILLING ENDED<br>8/15/2023 | DEPTH OF COMPLETED WELL (FT)<br>Temporary Well Material |   | BORE HOLE DEPTH (FT)<br>±101                            | DEPTH WATER FIRST ENCOUNTERED (FT)<br>N/A                            |                                      |                          |
|   | COMPLETED WELL IS: <input type="checkbox"/> ARTESIAN <input checked="" type="checkbox"/> DRY HOLE <input type="checkbox"/> SHALLOW (UNCONFINED)   |                             |   |   |   | STATIC WATER LEVEL IN COMPLETED WELL (FT)<br>N/A                     | DATE STATIC MEASURED<br>8/23/2023    |                          |
|   | DRILLING FLUID: <input type="checkbox"/> AIR <input type="checkbox"/> MUD ADDITIVES - SPECIFY:  |                             |   |   |   |  |                                      |                          |
|   | DRILLING METHOD: <input type="checkbox"/> ROTARY <input type="checkbox"/> HAMMER <input type="checkbox"/> CABLE TOOL <input checked="" type="checkbox"/> OTHER - SPECIFY: Hollow Stem Auger |                             |   |   |   | CHECK HERE IF PITLESS ADAPTER IS INSTALLED <input type="checkbox"/>  |                                      |                          |
|   | DEPTH (feet bgl)  |                             | BORE HOLE<br>DIAM.<br>(inches)                          | CASING MATERIAL AND/OR<br>GRADE<br>(include each casing string, and<br>note sections of screen) | CASING<br>CONNECTION<br>TYPE<br>(add coupling diameter) | CASING<br>INSIDE DIAM.<br>(inches)                                   | CASING WALL<br>THICKNESS<br>(inches) | SLOT<br>SIZE<br>(inches) |
|   | FROM  | TO                          |   |   |   |  |                                      |                          |
|   | 0   | 101                         | ±6.25   | Soil Boring   | --  | --   | --                                   | --                       |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
| 3. ANNULAR MATERIAL   | DEPTH (feet bgl)  |                             | BORE HOLE<br>DIAM. (inches)                             | LIST ANNULAR SEAL MATERIAL AND<br>GRAVEL PACK SIZE-RANGE BY INTERVAL                            | AMOUNT<br>(cubic feet)                                  | METHOD OF<br>PLACEMENT   |                                      |                          |
|   | FROM  | TO                          |   |   |   |  |                                      |                          |
|   |   |                             |   | N/A   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |
|   |   |                             |   |   |   |  |                                      |                          |

FOR OSE INTERNAL USE

WR-20 WELL RECORD & LOG (Version 01/28/2022)

|          |                 |             |
|----------|-----------------|-------------|
| FILE NO. | POD NO.         | TRN NO.     |
| LOCATION | WELL TAG ID NO. | PAGE 1 OF 2 |

| 4. HYDROGEOLOGIC LOG OF WELL  | DEPTH (feet bgl)   |   | THICKNESS<br>(feet) | COLOR AND TYPE OF MATERIAL ENCOUNTERED -<br>INCLUDE WATER-BEARING CAVITIES OR FRACTURE ZONES<br>(attach supplemental sheets to fully describe all units) | WATER<br>BEARING?<br>(YES / NO)           | ESTIMATED<br>YIELD FOR<br>WATER-<br>BEARING<br>ZONES (gpm) |
|---|--|---|---------------------|--|---|--|
|   | FROM   | TO  |                     |  |   |  |
|   | 0  | 4   | 4                   | Sand, fine-grained poorly grained, Brown   | Y ✓ N                                     |  |
|   | 4  | 30  | 26                  | Sand, fine-grained poorly grained, with caliche Brown  | Y ✓ N                                     |  |
|   | 30   | 60  | 60                  | Sand, fine-grained poorly grained, semi-cemented, Brown  | Y ✓ N                                     |  |
|   | 60   | 95  | 35                  | Clay, friable with fine-grained sand, Brown  | Y ✓ N                                     |  |
|   | 95   | 101   | 6                   | Clay, Stiff, medium plasticity, Dark Brown   | Y ✓ N                                     |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
|   |  |   |                     |  | Y N                                       |  |
| METHOD USED TO ESTIMATE YIELD OF WATER-BEARING STRATA:  |  |   |                     |  | TOTAL ESTIMATED<br>WELL YIELD (gpm): 0.00 |  |
| <input type="checkbox"/> PUMP <input type="checkbox"/> AIR LIFT <input type="checkbox"/> BAILER <input type="checkbox"/> OTHER - SPECIFY: |  |   |                     |  |   |  |
| 5. TEST; RIG SUPERVISION  | WELL TEST  | TEST RESULTS - ATTACH A COPY OF DATA COLLECTED DURING WELL TESTING, INCLUDING DISCHARGE METHOD, START TIME, END TIME, AND A TABLE SHOWING DISCHARGE AND DRAWDOWN OVER THE TESTING PERIOD. |                     |  |   |  |
|   | MISCELLANEOUS INFORMATION: Temporary well material removed and soil boring backfilled using drill cuttings from total depth to ten feet below ground surface(bgs), then hydrated bentonite chips ten feet bgs to surface.  |   |                     |  |   |  |
|   | PRINT NAME(S) OF DRILL RIG SUPERVISOR(S) THAT PROVIDED ONSITE SUPERVISION OF WELL CONSTRUCTION OTHER THAN LICENSEE:<br>Shane Eldridge, Cameron Pruitt  |   |                     |  |   |  |
| 6. SIGNATURE  | THE UNDERSIGNED HEREBY CERTIFIES THAT, TO THE BEST OF HIS OR HER KNOWLEDGE AND BELIEF, THE FOREGOING IS A TRUE AND CORRECT RECORD OF THE ABOVE DESCRIBED HOLE AND THAT HE OR SHE WILL FILE THIS WELL RECORD WITH THE STATE ENGINEER AND THE PERMIT HOLDER WITHIN 30 DAYS AFTER COMPLETION OF WELL DRILLING:<br><br><div style="display: flex; justify-content: space-between;"> <div> <br/>           SIGNATURE OF DRILLER / PRINT SIGNEE NAME         </div> <div>           Jackie D. Atkins<br/>           DATE         </div> <div>           8/29/2023         </div> </div> |   |                     |  |   |  |

FOR USE INTERNAL USE

WR-20 WELL RECORD &amp; LOG (Version 01/28/2022)

|          |                 |             |
|----------|-----------------|-------------|
| FILE NO. | POD NO.         | TRN NO.     |
| LOCATION | WELL TAG ID NO. | PAGE 2 OF 2 |



# PLUGGING RECORD



**NOTE: A Well Plugging Plan of Operations shall be approved by the State Engineer prior to plugging - 19.27.4 NMAC**

## I. GENERAL / WELL OWNERSHIP:

State Engineer Well Number: RA-13319 POD-1

Well owner: Spur Energy Partners LLC

Phone No.: 832-930-8502

Mailing address: 9655 Katy Freeway, Suite 500

City: Houston State: Texas Zip code: 77024

## II. WELL PLUGGING INFORMATION:

- 1) Name of well drilling company that plugged well: Jackie D. Atkins ( Atkins Engineering Associates Inc.)
- 2) New Mexico Well Driller License No.: 1249 Expiration Date: 04/30/25
- 3) Well plugging activities were supervised by the following well driller(s)/rig supervisor(s): Cameron Pruitt
- 4) Date well plugging began: 8/23/2023 Date well plugging concluded: 8/23/2023
- 5) GPS Well Location: Latitude: 32 deg, 51 min, 25.10 sec  
Longitude: 103 deg, 56 min, 59.71 sec, WGS 84
- 6) Depth of well confirmed at initiation of plugging as: 101 ft below ground level (bgl),  
by the following manner: weighted tape
- 7) Static water level measured at initiation of plugging: n/a ft bgl
- 8) Date well plugging plan of operations was approved by the State Engineer: 4/25/2023
- 9) Were all plugging activities consistent with an approved plugging plan? Yes If not, please describe differences between the approved plugging plan and the well as it was plugged (attach additional pages as needed):

0501 PM AUG 29 2023

- 10) Log of Plugging Activities - Label vertical scale with depths, and indicate separate plugging intervals with horizontal lines as necessary to illustrate material or methodology changes. Attach additional pages if necessary.

For each interval plugged, describe within the following columns:

| <u>Depth</u><br>(ft bgl) | <u>Plugging Material Used</u><br>(include any additives used) | <u>Volume of Material Placed</u><br>(gallons) | <u>Theoretical Volume of Borehole/ Casing</u><br>(gallons) | <u>Placement Method</u><br>(tremie pipe, other) | <u>Comments</u><br>("casing perforated first", "open annular space also plugged", etc.) |
|--------------------------|---|---|--|---|---|
| 0-10'                    | Hydrated Bentonite  | Approx. 15 gallons                            | 15 gallons   | Augers  |   |
| 10'-101'                 | Drill Cuttings  | Approx. 145 gallons                           | 145 gallons  | Boring  |   |

|                      |    |            |
|----------------------|----|------------|
| MULTIPLY             | BY | AND OBTAIN |
| cubic feet x 7.4805  | =  | gallons    |
| cubic yards x 201.97 | =  | gallons    |

QSE 011 AUG 23 2023 PM2:05

### III. SIGNATURE:

I, Jackie D. Atkins, say that I am familiar with the rules of the Office of the State Engineer pertaining to the plugging of wells and that each and all of the statements in this Plugging Record and attachments are true to the best of my knowledge and belief.

*Jack Atkins*

Signature of Well Driller

8/29/2023

Date






# 2023-08-29-RA-13339-packet-forsign

Final Audit Report

2023-08-29

|                 |  |
|-----------------|--|
| Created:        | 2023-08-29                                   |
| By:             | Lucas Middleton (lucas@atkinseng.com)        |
| Status:         | Signed                                       |
| Transaction ID: | CBJCHBCAABAARJfnFA8sxeIWRMBRDy3khmxsOsOiYmlb |

## "2023-08-29-RA-13339-packet-forsign" History

-  Document created by Lucas Middleton (lucas@atkinseng.com)  
2023-08-29 - 4:04:07 PM GMT- IP address: 24.52.18.211
-  Document emailed to Jack Atkins (jack@atkinseng.com) for signature  
2023-08-29 - 4:05:43 PM GMT
-  Email viewed by Jack Atkins (jack@atkinseng.com)  
2023-08-29 - 4:27:24 PM GMT- IP address: 64.90.153.232
-  Document e-signed by Jack Atkins (jack@atkinseng.com)  
Signature Date: 2023-08-29 - 4:38:00 PM GMT - Time Source: server- IP address: 64.90.153.232
-  Agreement completed.  
2023-08-29 - 4:38:00 PM GMT

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Appendix B  
Soil Survey:

U.S.D.A.

FEMA Flood Map



Map Unit Description: Berino complex, 0 to 3 percent slopes, eroded---Eddy Area, New Mexico

---

## Eddy Area, New Mexico

### BB—Berino complex, 0 to 3 percent slopes, eroded

#### Map Unit Setting

*National map unit symbol:* 1w43

*Elevation:* 2,000 to 5,700 feet

*Mean annual precipitation:* 5 to 15 inches

*Mean annual air temperature:* 57 to 70 degrees F

*Frost-free period:* 180 to 260 days

*Farmland classification:* Not prime farmland

#### Map Unit Composition

*Berino and similar soils:* 60 percent

*Pajarito and similar soils:* 25 percent

*Minor components:* 15 percent

*Estimates are based on observations, descriptions, and transects of the mapunit.*

#### 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 58 inches:* sandy clay loam

*H3 - 58 to 60 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 8.0 inches)

##### Interpretive groups

*Land capability classification (irrigated):* None specified

Map Unit Description: Berino complex, 0 to 3 percent slopes, eroded---Eddy Area, New Mexico

---

*Land capability classification (nonirrigated): 7e*  
*Hydrologic Soil Group: B*  
*Ecological site: R070BD003NM - Loamy Sand*  
*Hydric soil rating: No*

### Description of Pajarito

#### Setting

*Landform: Dunes, plains, interdunes*  
*Landform position (three-dimensional): Side slope*  
*Down-slope shape: Convex, linear*  
*Across-slope shape: Convex, linear*  
*Parent material: Mixed alluvium and/or eolian sands*

#### Typical profile

*H1 - 0 to 9 inches: loamy fine sand*  
*H2 - 9 to 72 inches: fine sandy loam*

#### Properties and qualities

*Slope: 0 to 3 percent*  
*Depth to restrictive feature: More than 80 inches*  
*Drainage class: Well drained*  
*Runoff class: Very low*  
*Capacity of the most limiting layer to transmit water (Ksat): High*  
*(2.00 to 6.00 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: Nonsaline (0.0 to 1.0 mmhos/cm)*  
*Sodium adsorption ratio, maximum: 1.0*  
*Available water supply, 0 to 60 inches: Moderate (about 8.0 inches)*

#### Interpretive groups

*Land capability classification (irrigated): 2e*  
*Land capability classification (nonirrigated): 7e*  
*Hydrologic Soil Group: A*  
*Ecological site: R070BD003NM - Loamy Sand*  
*Hydric soil rating: No*

### Minor Components

#### Pajarito

*Percent of map unit: 4 percent*  
*Ecological site: R070BD003NM - Loamy Sand*  
*Hydric soil rating: No*

#### Wink

*Percent of map unit: 4 percent*  
*Ecological site: R070BD003NM - Loamy Sand*  
*Hydric soil rating: No*

#### Cacique

*Percent of map unit: 4 percent*

Map Unit Description: Berino complex, 0 to 3 percent slopes, eroded---Eddy Area, New Mexico

---

*Ecological site:* R070BD004NM - Sandy

*Hydric soil rating:* No

**Kermit**

*Percent of map unit:* 3 percent

*Ecological site:* R070BD005NM - Deep Sand

*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 18, Sep 8, 2022


# National Flood Hazard Layer FIRMette





103°57'51"W 32°51'26"N
















## Legend




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


|                                   |   |
|-----------------------------------|---|
| <b>SPECIAL FLOOD HAZARD AREAS</b> | <br>Without Base Flood Elevation (BFE)<br>Zone A, V, A99<br>With BFE or Depth Zone AE, AO, AH, VE, AR<br>Regulatory Floodway |
|-----------------------------------|---|

|   |  |
|---|--|
| <b>OTHER AREAS OF FLOOD HAZARD</b>  | <br>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 |
| <br>Future Conditions 1% Annual Chance Flood Hazard Zone X       |  |
| <br>Area with Reduced Flood Risk due to Levee. See Notes. Zone X |  |
| <br>Area with Flood Risk due to Levee Zone D                     |  |

|  |  |
|--|--|
| <b>OTHER AREAS</b>   | <br>NO SCREEN Area of Minimal Flood Hazard Zone X |
| <br>Effective LOMRs                         |  |
| <br>Area of Undetermined Flood Hazard Zone D |  |
| <b>GENERAL STRUCTURES</b>  | <br>Channel, Culvert, or Storm Sewer                |
| <br>Levee, Dike, or Floodwall                 |  |

|  |   |
|--|---|
| <br>20.2<br>B<br>Cross Sections with 1% Annual Chance Water Surface Elevation |   |
| <br>17.5<br>Coastal Transect  |   |
| <br>Base Flood Elevation Line (BFE)   |   |
| <br>Limit of Study  |   |
| <br>Jurisdiction Boundary   |   |
| <br>Coastal Transect Baseline   |   |
| <br>Profile Baseline  |   |
| <b>OTHER FEATURES</b>  | <br>Hydrographic Feature |

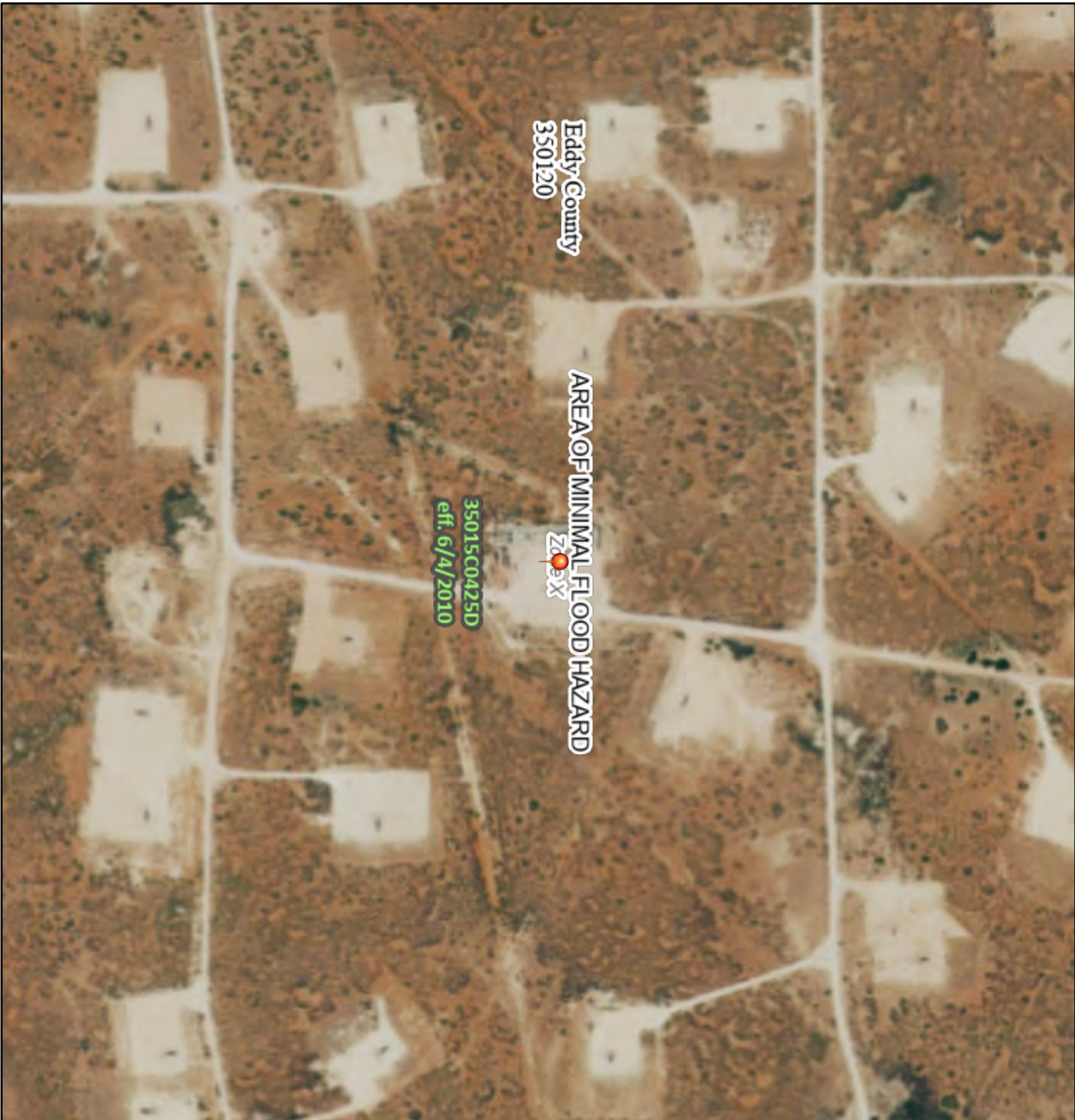
|  |   |
|--|---|
| <b>MAP PANELS</b>  | <br>Digital Data Available |
| <br>No Digital Data Available |   |
| <br>Unmapped                  |   |

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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 5/3/2023 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 unmoderized areas cannot be used for regulatory purposes.





Appendix C:

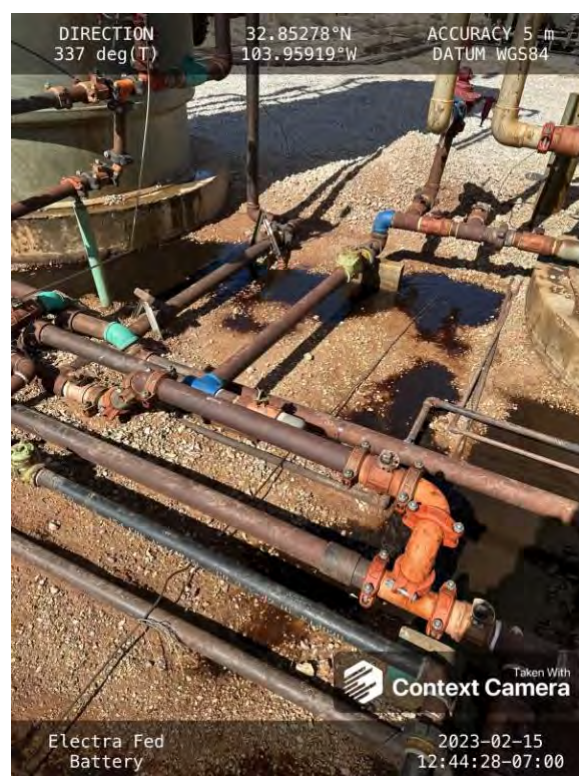
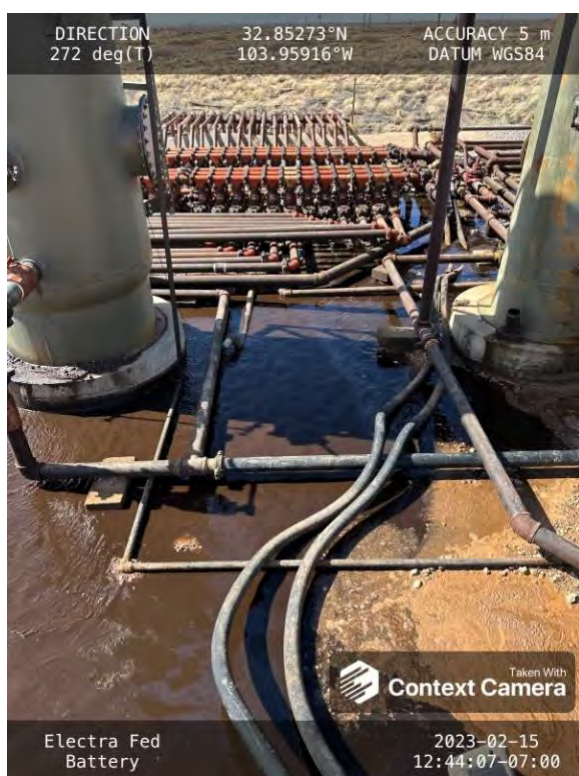
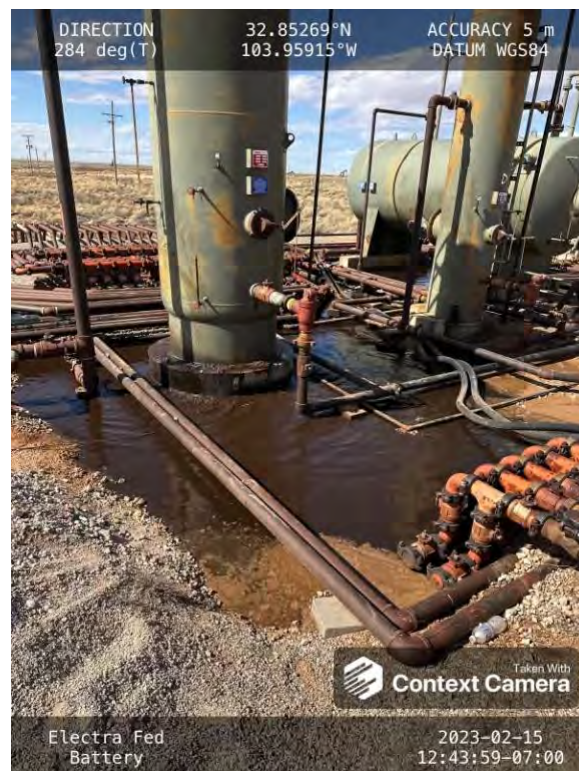
Photographic Documentation

OCD Notification





### Photographic Documentation Incident Photos



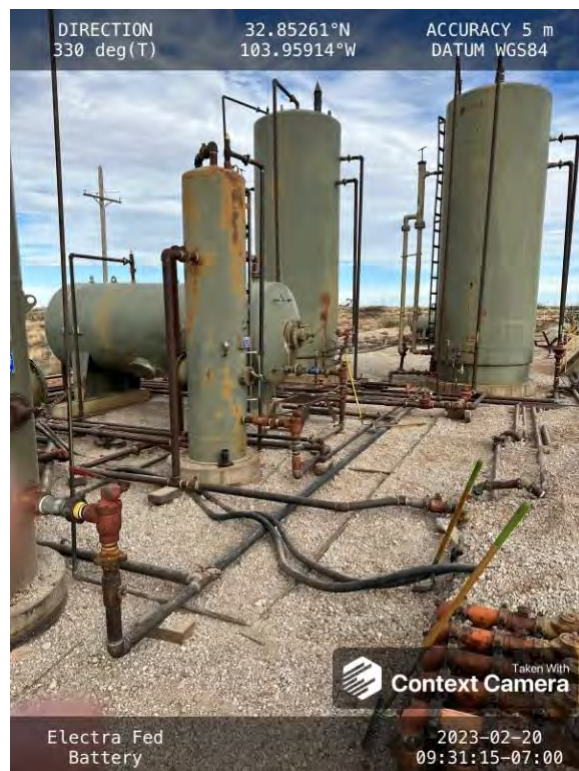


During





Completed





Monday, February 5, 2024 at 09:58:38 Central Standard Time

---

**Subject:** The Oil Conservation Division (OCD) has accepted the application,  
Application ID: 308870  
**Date:** Monday, January 29, 2024 at 10:45:17 AM Central Standard Time  
**From:** OCDOnline@state.nm.us  
**To:** chris@paragonenvironmental.net

To whom it may concern (c/o Chris Jones for Paragon Environmental LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N),  
for incident ID (n#) nAPP2220727296.

The sampling event is expected to take place:

**When:** 01/31/2024 @ 09:30

**Where:** B-10-17S-30E 0 FNL 0 FEL (32.85299,-103.95895)

**Additional Information:** Angel Pena 575-602-0773

**Additional Instructions:** GPS 32.853028,-103.958994

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

**New Mexico Energy, Minerals and Natural Resources Department**  
1220 South St. Francis Drive  
Santa Fe, NM 87505



Appendix D:  
Laboratory Results



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

June 23, 2023

CHRIS JONES

PARAGON ENVIROMENTAL

5002 CARRAIGE RD

HOBBS, NM 88242

RE: ELECTRA FED BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 06/16/23 14:10.

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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: S - 1 1' (H233131-01)**

| BTX 8021B      |              | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result       | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050       | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050       | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | <b>0.101</b> | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <b>0.177</b> | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTX      | <0.300       | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

| Chloride, SM4500Cl-B |             | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|-------------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result      | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | <b>2480</b> | 16.0            | 06/19/2023 | 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            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | <b>326</b> | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | <b>183</b> | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 99.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 142 % 49.1-148

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  
CHRIS JONES  
5002 CARRAIGE RD  
HOBBS NM, 88242  
Fax To:

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: S - 2 1' (H233131-02)**

| BTEx 8021B     |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | 0.062  | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTEX     | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 160    | 16.0            | 06/19/2023 | ND              | 416 | 104        | 400           | 3.77 |           |

| TPH 8015M        |        | mg/kg           |            | Analyzed By: MS |     |            |               | S-06 |           |
|------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte          | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10*      | <50.0  | 50.0            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | 1260   | 50.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 931    | 50.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 93.6 % 48.2-134

Surrogate: 1-Chlorooctadecane 197 % 49.1-148

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  
CHRIS JONES  
5002 CARRAIGE RD  
HOBBS NM, 88242  
Fax To:

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: S - 3 1' (H233131-03)**

| BTX 8021B      |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | 0.064  | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTX      | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 4080   | 16.0            | 06/19/2023 | 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            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | 169    | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 45.7   | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 103 % 48.2-134

Surrogate: 1-Chlorooctadecane 129 % 49.1-148

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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  
CHRIS JONES  
5002 CARRAIGE RD  
HOBBS NM, 88242  
Fax To:

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: S - 4 1' (H233131-04)**

| BTX 8021B      |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTX      | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 992    | 16.0            | 06/19/2023 | 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            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | 116    | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 40.5   | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 106 % 48.2-134

Surrogate: 1-Chlorooctadecane 122 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: NSW 1' (H233131-05)**

| BTX 8021B        |              | mg/kg           | Analyzed By: MS |              |      |            |               | S-04 |           |
|------------------|--------------|-----------------|-----------------|--------------|------|------------|---------------|------|-----------|
| Analyte          | Result       | Reporting Limit | Analyzed        | Method Blank | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*         | <0.050       | 0.050           | 06/21/2023      | ND           | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*         | <0.050       | 0.050           | 06/21/2023      | ND           | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*    | <b>0.372</b> | 0.050           | 06/21/2023      | ND           | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes*   | <0.150       | 0.150           | 06/21/2023      | ND           | 6.06 | 101        | 6.00          | 5.64 |           |
| <b>Total BTX</b> | <b>0.428</b> | 0.300           | 06/21/2023      | ND           |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 202 % 71.5-134

| Chloride, SM4500CI-B |            | mg/kg           | Analyzed By: AC |              |     |            |               |      |           |
|----------------------|------------|-----------------|-----------------|--------------|-----|------------|---------------|------|-----------|
| Analyte              | Result     | Reporting Limit | Analyzed        | Method Blank | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| <b>Chloride</b>      | <b>256</b> | 16.0            | 06/19/2023      | 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 |
| <b>GRO C6-C10*</b>         | <b>63.1</b> | 10.0            | 06/21/2023      | ND           | 165 | 82.5       | 200           | 4.35 |           |
| <b>DRO &gt;C10-C28*</b>    | <b>2770</b> | 10.0            | 06/21/2023      | ND           | 166 | 82.8       | 200           | 3.00 |           |
| <b>EXT DRO &gt;C28-C36</b> | <b>649</b>  | 10.0            | 06/21/2023      | ND           |     |            |               |      |           |

Surrogate: 1-Chlorooctane 124 % 48.2-134

Surrogate: 1-Chlorooctadecane 123 % 49.1-148

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**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: ESW 1' (H233131-06)**

| BTEX 8021B     |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |  |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |  |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |  |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |  |
| Ethylbenzene*  | 0.074  | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |  |
| Total BTEX     | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 720    | 16.0            | 06/19/2023 | ND              | 416 | 104        | 400           | 3.77 |           |  |

| TPH 8015M        |        | mg/kg           |            | Analyzed By: MS |     |            |               | S-04 |           |
|------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte          | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10*      | <10.0  | 10.0            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | 441    | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 256    | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 120 % 48.2-134

Surrogate: 1-Chlorooctadecane 174 % 49.1-148

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**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SSW - 1 1' (H233131-07)**

| BTEx 8021B     |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |  |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |  |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |  |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |  |
| Total BTEx     | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 448    | 16.0            | 06/19/2023 | ND              | 432 | 108        | 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            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 11.3   | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 98.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 108 % 49.1-148

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**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: SSW - 2 1' (H233131-08)**

| BTEx 8021B     |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | 0.056  | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTEx     | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 1720   | 16.0            | 06/19/2023 | ND              | 432 | 108        | 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            | 06/21/2023 | ND              | 165 | 82.5       | 200           | 4.35 |           |
| DRO >C10-C28*    | 505    | 10.0            | 06/21/2023 | ND              | 166 | 82.8       | 200           | 3.00 |           |
| EXT DRO >C28-C36 | 235    | 10.0            | 06/21/2023 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 131 % 48.2-134

Surrogate: 1-Chlorooctadecane 139 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: WSW - 1 1' (H233131-09)**

| BTX 8021B      |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |
| Total BTX      | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |              |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|--------------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier    |
| Chloride             | 1360   | 16.0            | 06/19/2023 | ND              | 432 | 108        | 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*          | <50.0  | 50.0            | 06/21/2023 | ND              | 212 | 106        | 200           | 7.07 |              |
| DRO >C10-C28*        | 1450   | 50.0            | 06/21/2023 | ND              | 207 | 103        | 200           | 2.09 | QM-07, QR-03 |
| EXT DRO >C28-C36     | 663    | 50.0            | 06/21/2023 | ND              |     |            |               |      |              |

Surrogate: 1-Chlorooctane 84.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 134 % 49.1-148

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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  
CHRIS JONES  
5002 CARRAIGE RD  
HOBBS NM, 88242  
Fax To:

Received: 06/16/2023  
Reported: 06/23/2023  
Project Name: ELECTRA FED BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 06/15/2023  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: WSW - 2 1' (H233131-10)**

| BTEx 8021B     |        | mg/kg           |            | Analyzed By: MS |      |            |               |      |           |  |
|----------------|--------|-----------------|------------|-----------------|------|------------|---------------|------|-----------|--|
| Analyte        | Result | Reporting Limit | Analyzed   | Method Blank    | BS   | % Recovery | True Value QC | RPD  | Qualifier |  |
| Benzene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.92 | 95.9       | 2.00          | 4.59 |           |  |
| Toluene*       | <0.050 | 0.050           | 06/21/2023 | ND              | 1.91 | 95.6       | 2.00          | 4.08 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 06/21/2023 | ND              | 1.99 | 99.7       | 2.00          | 6.07 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 06/21/2023 | ND              | 6.06 | 101        | 6.00          | 5.64 |           |  |
| Total BTEx     | <0.300 | 0.300           | 06/21/2023 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 832    | 16.0            | 06/19/2023 | ND              | 432 | 108        | 400           | 3.77 |           |  |

| TPH 8015M        | mg/kg  |                 | Analyzed By: MS |              |     |            |               | S-04 |           |
|------------------|--------|-----------------|-----------------|--------------|-----|------------|---------------|------|-----------|
| Analyte          | Result | Reporting Limit | Analyzed        | Method Blank | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| GRO C6-C10*      | <10.0  | 10.0            | 06/21/2023      | ND           | 212 | 106        | 200           | 7.07 |           |
| DRO >C10-C28*    | 612    | 10.0            | 06/21/2023      | ND           | 207 | 103        | 200           | 2.09 |           |
| EXT DRO >C28-C36 | 153    | 10.0            | 06/21/2023      | ND           |     |            |               |      |           |

Surrogate: 1-Chlorooctane 113 % 48.2-134

Surrogate: 1-Chlorooctadecane 170 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager

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### 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.  |
| 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<br>Samples reported on an as received basis (wet) unless otherwise noted on report                          |

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Cardinal Laboratories

\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "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

Project Manager: Chris Jones

Address: 1601 N. Turner St., Ste 500

City: Hobbs State: NM Zip: 88240

Phone #: 575-964-7814 Fax #:

Project #: Project Owner: SPUR

Project Name: Electric Fed Battery

Project Location: Edley, NM

Sample Name: Levee, NM

FOR LAB USE ONLY

Lab I.D.

Sample I.D.

(G)RAB OR (C)OMP.  
# CONTAINERS  
MATRIX  
GROUNDWATER  
WASTEWATER  
SOIL  
OIL  
SLUDGE  
OTHER:  
ACID/BASE:  
ICE / COOL  
OTHER:

DATE  
TIME

H23331  
1 5.1 1'

2 5.2 1'

3 5.3 1'

4 5.4 1'

5 NW 1'

6 SW 1'

7 SW 1'

8 SW 1'

9 SW 1'

10 SW 2'

6/15

TPH Ext  
BTEX  
Chlorides

ANALYSIS REQUEST

P.O. #:

Company: SPUR

Attn: Graham Winkler

Address:

City:

State: Zip:

Phone #:

Fax #:

PRESERV

SAMPLING

Relinquished By:

Date: 6/16/23

Received By:

Phone Result:

Yes

No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 6/16/23

Received By:

Phone Result:

Yes

No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 6/16/23

Received By:

Phone Result:

Yes

No

Add'l Phone #:

Add'l Fax #:

Relinquished By:

Date: 6/16/23

Received By:

Phone Result:

Yes

No

Add'l Phone #:

Add'l Fax #:

Delivered By: (Circle One)

413

Sample Condition:  
Cool ☒ Intact ☒  
Yes ☒ No ☐

CHECKED BY: (Initials)

90

Remarks: Final results to client 6/16/23

Sampler - UPS - Bus - Other:

-49/-5.55

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





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

February 26, 2024

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: ELECTRA FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/21/24 17:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager





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

**Analytical Results For:**

PARAGON ENVIROMENTAL  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/21/2024  
Reported: 02/26/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/13/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: NSW - 1 2' (H240868-01)**

| 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           | 02/26/2024 | ND              | 2.17 | 108        | 2.00          | 3.39 |           |  |
| Toluene*       | <0.050 | 0.050           | 02/26/2024 | ND              | 2.10 | 105        | 2.00          | 10.4 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 02/26/2024 | ND              | 2.13 | 106        | 2.00          | 12.2 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 02/26/2024 | ND              | 6.29 | 105        | 6.00          | 12.7 |           |  |
| Total BTEX     | <0.300 | 0.300           | 02/26/2024 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 95.8 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 64.0   | 16.0            | 02/23/2024 | ND              | 448 | 112        | 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            | 02/23/2024 | ND              | 196 | 97.8       | 200           | 0.691 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 02/23/2024 | ND              | 196 | 98.2       | 200           | 1.15  |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/23/2024 | ND              |     |            |               |       |           |

Surrogate: 1-Chlorooctane 66.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 66.4 % 49.1-148

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

Notes and Definitions

- 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.
- 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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A handwritten signature in black ink, appearing to read "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

|   |  |  |  |  |  |  |  |
|---|--|--|--|--|--|--|--|
| <b>Company Name:</b> Paragon Environmental<br><b>Project Manager:</b> Cason Spurlock<br><b>Address:</b> 5002 Carriage Rd<br><b>City:</b> Hobbs<br><b>Phone #:</b> 575-631-6977<br><b>State:</b> NM <b>Zip:</b> 88242<br><b>Project #:</b><br><b>Project Name:</b> Electric Fed Bakery<br><b>Project Location:</b> Eddy<br><b>Sampler Name:</b> Jeremy Wanner<br><b>FOR LAB USE ONLY</b> |  |  |  | <b>P.O. #:</b><br><b>Company:</b> Bradley Walker<br><b>Attn:</b> Spivey<br><b>Address:</b><br><b>City:</b><br><b>State:</b><br><b>Zip:</b><br><b>Phone #:</b><br><b>Fax #:</b>                               |  |  |  |
| <b>Lab I.D.</b><br>1240868<br>1 NSU-1 2:  |  | <b>Sample I.D.</b><br>(G)RAB OR (C)OMP.<br># CONTAINERS<br>GROUNDWATER<br>WASTEWATER<br>SOIL<br>OIL<br>SLUDGE<br>OTHER:<br>ACID/BASE:<br>ICE / COOL<br>OTHER:  |  | <b>DATE</b><br>02/15<br><b>TIME</b>  |  |  |  |
| <b>Relinquished By:</b><br>[Signature]<br><b>Date:</b> 2/15/05<br><b>Time:</b> 1705   |  | <b>Received By:</b><br>[Signature]<br><b>Date:</b> 2/15/05<br><b>Time:</b>   |  | <b>REMARKS:</b><br>TPH Ext<br>BTEX<br>Chlorides  |  |  |  |
| <b>Delivered By: (Circle One)</b><br>Sampler - UPS - Bus - Other:   |  | <b>Sample Condition</b><br>Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/><br>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>                        |  | <b>CHECKED BY:</b><br>(Initials)<br>[Signature]  |  |  |  |
| <b>Relinquished By:</b><br>[Signature]<br><b>Date:</b> 2/15/05<br><b>Time:</b>  |  | <b>Phone Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No<br><b>Fax Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No<br><b>Add'l Phone #:</b><br><b>Add'l Fax #:</b> |  | <b>Phone Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No<br><b>Fax Result:</b> <input type="checkbox"/> Yes <input type="checkbox"/> No<br><b>Add'l Phone #:</b><br><b>Add'l Fax #:</b> |  |  |  |



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

February 07, 2024

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: ELECTRA FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/02/24 14:31.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

PARAGON ENVIROMENTAL  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/02/2024  
Reported: 02/07/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/01/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Dionica Hinojos

**Sample ID: S - 1 2' (H240515-01)**

| 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           | 02/05/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/05/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/05/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/05/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/05/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 112 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 112    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 49.4   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 95.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 107 % 49.1-148

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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: S - 2 2' (H240515-02)**

| 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           | 02/05/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/05/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/05/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/05/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/05/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 115 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 224    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 47.9   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 91.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/02/2024  
Reported: 02/07/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/01/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Dionica Hinojos

**Sample ID: S - 3 2' (H240515-03)**

| BTX 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTX      | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 240    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 11.9   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 92.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 105 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: S - 4 2' (H240515-04)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |  |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |  |
| Total BTEx     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 106 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 288    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 89.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/02/2024  
Reported: 02/07/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/01/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Dionica Hinojos

**Sample ID: NSW - 1 2' (H240515-05)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 122 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 816    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 187    | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | 80.8   | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 90.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 103 % 49.1-148

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**Analytical Results For:**

PARAGON ENVIROMENTAL  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/02/2024  
Reported: 02/07/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/01/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Dionica Hinojos

**Sample ID: NSW - 2 2' (H240515-06)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 224    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 18.7   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 93.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 105 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 02/02/2024  
Reported: 02/07/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 02/01/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Dionica Hinojos

**Sample ID: ESW - 1 2' (H240515-07)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 192    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 12.6   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 92.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 103 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: ESW - 2 2' (H240515-08)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 240    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 21.9   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 89.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 103 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: SSW - 1 2' (H240515-09)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 114 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 560    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 91.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: SSW - 2 2' (H240515-10)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 113 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 400    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 86.6   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | 14.3   | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 97.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: WSW - 1 2' (H240515-11)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |  |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |  |
| Total BTEx     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134

| Chloride, SM4500CI-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 288    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 86.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.5 % 49.1-148

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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  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

|                   |                         |                     |                 |
|-------------------|-------------------------|---------------------|-----------------|
| Received:         | 02/02/2024              | Sampling Date:      | 02/01/2024      |
| Reported:         | 02/07/2024              | Sampling Type:      | Soil            |
| Project Name:     | ELECTRA FEDERAL BATTERY | Sampling Condition: | Cool & Intact   |
| Project Number:   | NOT GIVEN               | Sample Received By: | Dionica Hinojos |
| Project Location: | SPUR - EDDY COUNTY      |                     |                 |

**Sample ID: WSW - 2 2' (H240515-12)**

| 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           | 02/06/2024 | ND              | 2.20 | 110        | 2.00          | 8.58 |           |  |
| Toluene*       | <0.050 | 0.050           | 02/06/2024 | ND              | 2.30 | 115        | 2.00          | 10.8 |           |  |
| Ethylbenzene*  | <0.050 | 0.050           | 02/06/2024 | ND              | 2.44 | 122        | 2.00          | 12.1 |           |  |
| Total Xylenes* | <0.150 | 0.150           | 02/06/2024 | ND              | 7.30 | 122        | 6.00          | 12.2 |           |  |
| Total BTEX     | <0.300 | 0.300           | 02/06/2024 | ND              |      |            |               |      |           |  |

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: AC |     |            |               |      |           |  |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|--|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |  |
| Chloride             | 272    | 16.0            | 02/05/2024 | ND              | 432 | 108        | 400           | 3.64 |           |  |

| 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            | 02/05/2024 | ND              | 224 | 112        | 200           | 1.24 |           |
| DRO >C10-C28*    | 12.0   | 10.0            | 02/05/2024 | ND              | 215 | 107        | 200           | 3.30 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 02/05/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 86.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 97.5 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager

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### 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<br>Samples reported on an as received basis (wet) unless otherwise noted on report |

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\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "Celey D. Keene", is written over a horizontal line.

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

1/2

|  |          |                      |       |                  |  |
|--|----------|----------------------|-------|------------------|--|
| Company Name: Paragon Environmental  |          | P.O. #:              |       | ANALYSIS REQUEST |  |
| Project Manager: Cason Spurlock  |          | Company: Spur        |       |                  |  |
| Address: 5002 Carriage Rd  |          | Attn: Bradley Melder |       |                  |  |
| City: Hobbs  |          | Address:             |       |                  |  |
| Phone #: 575-631-6977  |          | City:                |       |                  |  |
| Fax #:   |          | State: NM Zip: 88242 |       |                  |  |
| Project #:   |          | Project Owner: Spur  |       |                  |  |
| Project Name: Electra Federal Battery  |          | State:               |       |                  |  |
| Project Location: Eddy   |          | City:                |       |                  |  |
| Sampler Name: Jereamy Manner   |          | Phone #:             |       |                  |  |
| FOR LAB USE ONLY   |          | Fax #:               |       |                  |  |
| H240515  |          | PRESERV              |       |                  |  |
| Lab I.D.   |          | SAMPLING             |       |                  |  |
| Sample I.D.  |          | DATE                 |       | TIME             |  |
| 1  | S-1 Z'   | (G)RAB OR (C)OMP.    | 02/01 | TPH Ext          |  |
| 2  | S-2 Z'   | # CONTAINERS         |       | BTEX             |  |
| 3  | S-3 Z'   | GROUNDWATER          |       | Chlorides        |  |
| 4  | S-4 Z'   | WASTEWATER           |       |                  |  |
| 5  | NSW-1 Z' | SOIL                 |       |                  |  |
| 6  | NSW-2 Z' | OIL                  |       |                  |  |
| 7  | ESW-1 Z' | SLUDGE               |       |                  |  |
| 8  | ESW-2 Z' | OTHER :              |       |                  |  |
| 9  | SSW-1 Z' | ACID/BASE:           |       |                  |  |
| 10   | SSW-2 Z' | ICE / COOL           |       |                  |  |
|  |          | OTHER :              |       |                  |  |
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| Relinquished By: J2. MLC   |          | 01/02                |       |                  |  |
| Time: 14:31  |          |                      |       |                  |  |
| Date:  |          |                      |       |                  |  |
| Relinquished By:   |          |                      |       |                  |  |
| Time:  |          |                      |       |                  |  |
| Delivered By: (Circle One) 1.90c   |          |                      |       |                  |  |
| Sampler - UPS - Bus - Other: #140  |          |                      |       |                  |  |
| Sample Condition Cool Intact Yes Yes No No   |          |                      |       |                  |  |
| CHECKED BY: (Initials) DA  |          |                      |       |                  |  |
| REMARKS: Email results to Chris Jones.   |          |                      |       |                  |  |
| Phone Result: Yes No Add'l Phone #:  |          |                      |       |                  |  |
| Fax Result: Yes No Add'l Fax #:  |          |                      |       |                  |  |

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



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(575) 393-2326 FAX (575) 393-2476

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## ANALYSIS REQUEST

[illegible]



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

May 16, 2024

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: ELECTRA FEDERAL BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 05/10/24 17:04.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-23-16. 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 "Coley D. Keene". The signature is written in a cursive style with a large, stylized 'C' and 'K'.

Celey D. Keene

Lab Director/Quality Manager



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

**Analytical Results For:**

PARAGON ENVIROMENTAL  
CHRIS JONES  
1601 N TURNER ST., STE 500  
HOBBS NM, 88240  
Fax To:

Received: 05/10/2024  
Reported: 05/16/2024  
Project Name: ELECTRA FEDERAL BATTERY  
Project Number: NOT GIVEN  
Project Location: SPUR - EDDY COUNTY

Sampling Date: 05/08/2024  
Sampling Type: Soil  
Sampling Condition: Cool & Intact  
Sample Received By: Tamara Oldaker

**Sample ID: NSW - 2 2' (H242583-01)**

| 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           | 05/15/2024 | ND              | 1.92 | 96.1       | 2.00          | 7.47 |           |
| Toluene*       | <0.050 | 0.050           | 05/15/2024 | ND              | 1.99 | 99.6       | 2.00          | 7.16 |           |
| Ethylbenzene*  | <0.050 | 0.050           | 05/15/2024 | ND              | 1.99 | 99.5       | 2.00          | 7.08 |           |
| Total Xylenes* | <0.150 | 0.150           | 05/15/2024 | ND              | 6.16 | 103        | 6.00          | 6.65 |           |
| Total BTEX     | <0.300 | 0.300           | 05/15/2024 | ND              |      |            |               |      |           |

Surrogate: 4-Bromofluorobenzene (PID) 105 % 71.5-134

| Chloride, SM4500Cl-B |        | mg/kg           |            | Analyzed By: HM |     |            |               |      |           |
|----------------------|--------|-----------------|------------|-----------------|-----|------------|---------------|------|-----------|
| Analyte              | Result | Reporting Limit | Analyzed   | Method Blank    | BS  | % Recovery | True Value QC | RPD  | Qualifier |
| Chloride             | 80.0   | 16.0            | 05/14/2024 | ND              | 432 | 108        | 400           | 3.64 |           |

| 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            | 05/14/2024 | ND              | 186 | 92.8       | 200           | 1.24 |           |
| DRO >C10-C28*    | <10.0  | 10.0            | 05/14/2024 | ND              | 183 | 91.7       | 200           | 1.29 |           |
| EXT DRO >C28-C36 | <10.0  | 10.0            | 05/14/2024 | ND              |     |            |               |      |           |

Surrogate: 1-Chlorooctane 99.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 124 % 49.1-148

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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<br>Samples reported on an as received basis (wet) unless otherwise noted on report |

---

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\*=Accredited Analyte

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A handwritten signature in black ink, appearing to read "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

[illegible]

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

QUESTIONS  
  
Action 350970

QUESTIONS

|   |                |   |
|---|----------------|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:         | 328947  |
|   | Action Number: | 350970  |
|   | Action Type:   | [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |
|   |                |   |

QUESTIONS

|                   |   |
|-------------------|---|
| Prerequisites     |   |
| Incident ID (n#)  | nAPP2220727296                                |
| Incident Name     | NAPP2220727296 ELECTRA FEDERAL BATTERY @ 0    |
| Incident Type     | Oil Release                                   |
| Incident Status   | Remediation Closure Report Received           |
| Incident Facility | [fAPP2203343093] Electra Federal Tank Battery |

|  |                         |
|--|-------------------------|
| Location of Release Source                     |                         |
| Please answer all the questions in this group. |                         |
| Site Name                                      | ELECTRA FEDERAL BATTERY |
| Date Release Discovered                        | 07/25/2022              |
| Surface Owner                                  | Federal                 |

|  |             |
|--|-------------|
| Incident Details   |             |
| Please answer all the questions in this group.   |             |
| Incident Type  | Oil Release |
| Did this release result in a fire or is the result of a fire   | No          |
| Did this release result in any injuries  | No          |
| Has this release reached or does it have a reasonable probability of reaching a watercourse          | No          |
| Has this release endangered or does it have a reasonable probability of endangering public health    | No          |
| Has this release substantially damaged or will it substantially damage property or the environment   | No          |
| Is this release of a volume that is or may with reasonable probability be detrimental to fresh water | No          |

|  |   |
|--|---|
| Nature and Volume of Release   |   |
| Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission. |   |
| Crude Oil Released (bbls) Details  | Cause: Corrosion   Pipeline (Any)   Crude Oil   Released: 7 BBL   Recovered: 5 BBL   Lost: 2 BBL. |
| Produced Water Released (bbls) Details   | Not answered.   |
| Is the concentration of chloride in the produced water >10,000 mg/l  | Not answered.   |
| Condensate Released (bbls) Details   | Not answered.   |
| Natural Gas Vented (Mcf) Details   | Not answered.   |
| Natural Gas Flared (Mcf) Details   | Not answered.   |
| Other Released Details   | Not answered.   |
| Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)                                 | Not answered.   |

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QUESTIONS, Page 2

Action 350970

**QUESTIONS (continued)**

|   |                |
|---|----------------|
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**QUESTIONS**

| Nature and Volume of Release (continued)  |   |
|---|---|
| Is this a gas only submission (i.e. only significant Mcf values reported)   | No, according to supplied volumes this does not appear to be a "gas only" report. |
| Was this a major release as defined by Subsection A of 19.15.29.7 NMAC  | No  |
| Reasons why this would be considered a submission for a notification of a major release   | Unavailable.  |
| With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form. |   |

**Initial Response**

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

|  |      |
|--|------|
| The source of the release has been stopped   | True |
| The impacted area has been secured to protect human health and the environment                                     | True |
| Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices | True |
| All free liquids and recoverable materials have been removed and managed appropriately                             | True |
| If all the actions described above have not been undertaken, explain why   | N/A  |

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

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

|  |  |
|--|--|
| I hereby agree and sign off to the above statement | Name: Katherine Purvis<br>Title: EHS Coordinator<br>Email: katherine.purvis@spurenergy.com<br>Date: 06/05/2024 |
|--|--|



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QUESTIONS, Page 3

Action 350970

**QUESTIONS (continued)**

|   |                |
|---|----------------|
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|   | 328947         |
|   | Action Number: |
|   | 350970         |
| Action Type:  |                |
| [C-141] Remediation Closure Request C-141 (C-141-v-Closure)                     |                |

**QUESTIONS****Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

|  |                                |
|--|--------------------------------|
| What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs) | Between 100 and 500 (ft.)      |
| What method was used to determine the depth to ground water  | NM OSE iWaters Database Search |
| Did this release impact groundwater or surface water   | No                             |
| <b>What is the minimum distance, between the closest lateral extents of the release and the following surface areas:</b>   |                                |
| A continuously flowing watercourse or any other significant watercourse  | Greater than 5 (mi.)           |
| Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)  | Between 1 and 5 (mi.)          |
| An occupied permanent residence, school, hospital, institution, or church  | Between 1 and 5 (mi.)          |
| A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes  | Between 1 and 5 (mi.)          |
| Any other fresh water well or spring   | Between 1 and 5 (mi.)          |
| Incorporated municipal boundaries or a defined municipal fresh water well field  | Between 1 and 5 (mi.)          |
| A wetland  | Between 1 and 5 (mi.)          |
| A subsurface mine  | Greater than 5 (mi.)           |
| An (non-karst) unstable area   | Greater than 5 (mi.)           |
| Categorize the risk of this well / site being in a karst geology   | Low                            |
| A 100-year floodplain  | Between ½ and 1 (mi.)          |
| Did the release impact areas not on an exploration, development, production, or storage site                               | No                             |

**Remediation Plan**

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

|   |     |
|---|-----|
| Requesting a remediation plan approval with this submission   | Yes |
| Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC. |     |
| Have the lateral and vertical extents of contamination been fully delineated  | Yes |
| Was this release entirely contained within a lined containment area   | No  |

**Soil Contamination Sampling:** (Provide the highest observable value for each, in milligrams per kilograms.)

|                   |                                    |        |
|-------------------|------------------------------------|--------|
| Chloride          | (EPA 300.0 or SM4500 Cl B)         | 4080   |
| TPH (GRO+DRO+MRO) | (EPA SW-846 Method 8015M)          | 3482   |
| GRO+DRO           | (EPA SW-846 Method 8015M)          | 2833.1 |
| BTEX              | (EPA SW-846 Method 8021B or 8260B) | 0.4    |
| Benzene           | (EPA SW-846 Method 8021B or 8260B) | 0      |

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

|   |            |
|---|------------|
| On what estimated date will the remediation commence                        | 01/25/2024 |
| On what date will (or did) the final sampling or liner inspection occur     | 02/01/2024 |
| On what date will (or was) the remediation complete(d)                      | 05/08/2024 |
| What is the estimated surface area (in square feet) that will be reclaimed  | 535        |
| What is the estimated volume (in cubic yards) that will be reclaimed        | 40         |
| What is the estimated surface area (in square feet) that will be remediated | 535        |
| What is the estimated volume (in cubic yards) that will be remediated       | 40         |

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

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

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QUESTIONS, Page 4

Action 350970

QUESTIONS (continued)

|   |                |   |
|---|----------------|---|
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|   | Action Number: | 350970  |
|   | Action Type:   | [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |
|   |                |   |

QUESTIONS

|  |  |
|--|--|
| <b>Remediation Plan (continued)</b>  |  |
| <i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>   |  |
| <b>This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:</b>   |  |
| <i>(Select all answers below that apply.)</i>  |  |
| (Ex Situ) Excavation and <b>off-site</b> disposal (i.e. dig and haul, hydrovac, etc.)  | Yes  |
| Which OCD approved facility will be used for <b>off-site</b> disposal  | LEA LAND LANDFILL [fEEM0112342028]   |
| <b>OR</b> which OCD approved well (API) will be used for <b>off-site</b> disposal  | Not answered.  |
| <b>OR</b> is the <b>off-site</b> disposal site, to be used, out-of-state   | Not answered.  |
| <b>OR</b> is the <b>off-site</b> disposal site, to be used, an NMED facility   | Not answered.  |
| (Ex Situ) Excavation and <b>on-site</b> remediation (i.e. On-Site Land Farms)  | Not answered.  |
| (In Situ) Soil Vapor Extraction  | Not answered.  |
| (In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)  | Not answered.  |
| (In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)   | Not answered.  |
| (In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)   | Not answered.  |
| Ground Water Abatement pursuant to 19.15.30 NMAC   | Not answered.  |
| OTHER (Non-listed remedial process)  | Not answered.  |
| <i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>   |  |
| I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. |  |
| I hereby agree and sign off to the above statement   | Name: Katherine Purvis<br>Title: EHS Coordinator<br>Email: katherine.purvis@spurenergy.com<br>Date: 06/05/2024 |
| <i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>  |  |

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QUESTIONS, Page 5  
  
Action 350970

**QUESTIONS (continued)**

|   |   |
|---|---|
| Operator:<br>Spur Energy Partners LLC<br>9655 Katy Freeway<br>Houston, TX 77024 | OGRID:<br>328947  |
|   | Action Number:<br>350970  |
|   | Action Type:<br>[C-141] Remediation Closure Request C-141 (C-141-v-Closure) |

**QUESTIONS**

|   |    |
|---|----|
| <b>Deferral Requests Only</b>   |    |
| <i>Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.</i> |    |
| Requesting a deferral of the remediation closure due date with the approval of this submission  | No |

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QUESTIONS, Page 6

Action 350970

**QUESTIONS (continued)**

|   |                |   |
|---|----------------|---|
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|   | Action Number: | 350970  |
|   | Action Type:   | [C-141] Remediation Closure Request C-141 (C-141-v-Closure) |
|   |                |   |

**QUESTIONS**

| Sampling Event Information  |            |
|---|------------|
| Last sampling notification (C-141N) recorded  | 308870     |
| Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC | 01/31/2024 |
| What was the (estimated) number of samples that were to be gathered                             | 10         |
| What was the sampling surface area in square feet   | 530        |

**Remediation Closure Request**

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

|  |     |
|--|-----|
| Requesting a remediation closure approval with this submission   | Yes |
| Have the lateral and vertical extents of contamination been fully delineated   | Yes |
| Was this release entirely contained within a lined containment area  | No  |
| All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion   | Yes |
| What was the total surface area (in square feet) remediated  | 535 |
| What was the total volume (cubic yards) remediated   | 40  |
| All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene | Yes |
| What was the total surface area (in square feet) reclaimed   | 535 |
| What was the total volume (in cubic yards) reclaimed   | 40  |
| Summarize any additional remediation activities not included by answers (above)  | N/A |

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

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

|  |  |
|--|--|
| I hereby agree and sign off to the above statement | Name: Katherine Purvis<br>Title: EHS Coordinator<br>Email: katherine.purvis@spurenergy.com<br>Date: 06/05/2024 |
|--|--|



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QUESTIONS, Page 7  
  
Action 350970

QUESTIONS (continued)

|   |   |
|---|---|
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QUESTIONS

|   |    |
|---|----|
| Reclamation Report  |    |
| Only answer the questions in this group if all reclamation steps have been completed. |    |
| Requesting a reclamation approval with this submission                                | No |

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CONDITIONS  
  
Action 350970

CONDITIONS

|   |   |
|---|---|
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CONDITIONS

| Created By | Condition  | Condition Date |
|------------|--|----------------|
| rhamlet    | We have received your Remediation Closure Report for Incident #NAPP2220727296 ELECTRA FEDERAL BATTERY, thank you. This Remediation Closure Report is approved. | 6/14/2024      |