

Spill Volume(Bbls) Calculator		
<i>Inputs in blue, Outputs in red</i>		
Length(Ft)	Width(Ft)	Depth(In)
<u>150.000</u>	<u>30.000</u>	<u>3.000</u>
Cubic Feet Impacted		<u>1125.000</u>
Barrels		<u>200.36</u>
Soil Type		Sand
Bbls Assuming 100% Saturation		<u>40.07</u>
Saturation	Fluid present with shovel/backhoe	
Estimated Barrels Released		40.10000

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)	150
Width (ft)	30
Depth (in)	3.000









October 27, 2025

NMOCD District 2
Mr. Mike Bratcher
Artesia, NM 88210

NMSLO
Environmental Compliance Office
310 Old Santa Fe Trail
Santa Fe, NM

Re: Proposed Remediation Plan
NG Phillips St Battery
GPS: Latitude 32.80540 Longitude -104.16075
U/L "F," Sec. 27, T17S, R28E
Eddy County, NM
NMOCD Ref. No. NAPP2504950030

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform remediation activities for the Release Site known as the NG Phillips St Battery (NG Phillips). Details of the release are summarized below:

Release Details			
Type of Release:	Produced Water	Volume of Release:	40 bbls
		Volume Recovered:	0 bbls
Source of Release:	Water Tank	Date of Release:	2/18/25
Was Immediate Notice Given?	Yes	If, Yes, to Whom?	NOR
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	State	Mineral Owner:	State
The water tank ran over due to overload tripping, which caused the release of PW into the unlined containment.			

Topo and Wetlands Maps are provided in Figures #2 and #4.

CULTURAL RESOURCES AND BIOLOGICAL COMPLIANCE

The proposed remediation area at the site had previously been disturbed areas developed for oil and gas operations and was therefore not required. Planned remediation activities will not extend beyond the previously disturbed areas.

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 26-50'
- 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- 100-200'
- A subsurface mine- >5 mi
- An (non-karst) unstable area- 1-5mi
- Categorize the risk of this well/site being in a karst area geology- Low
- A 100-year floodplain- 1-5 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). The soil in this area is made up of Stony and Rough broken land, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage course in this area is well-drained.

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

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

INITIAL SITE ASSESSMENT & SOIL SAMPLING EVENT

On February 27, 2025, Paragon arrived on location and conducted an initial site assessment and obtained soil samples. During the initial site assessment, three (3) soil samples were collected. Samples were collected every foot and tested until they were fully delineated in accordance with Table 1. A table summarizing the titration results from the soil samples collected during the above-stated activities is provided below:

2/27/25 Field Sampling Event

Field Testing		
Sample Date: 2-27-25		
Sample ID	Depth (BGS)	CHLORIDES
S-1	5'	124
S-2	9'	124
S-3	9'	124

During the review of this plan, it was determined to obtain additional samples and have them tested in a laboratory. On September 5, 2025, Paragon returned to the site and obtained additional samples, the results of this event are in the following data table:

9-5-25 Laboratory Results

SampleName	Sampled	Benzene	Total BTEX	DRO >C10-C28	GRO C6-C10	EXT DRO >C28-C36	Chloride
S - 1 0-6	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	4160
S - 1 1'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	2920
S - 1 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	960
S - 1 3'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	896
S - 1 4'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	928
S - 1 5'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	656
S - 1 6'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	640
S - 2 0-6	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	8560
S - 2 1'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	9120
S - 2 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	9680
S - 2 3'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	736
S - 2 4'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	960
S - 2 5'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	1940
S - 2 6'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	1220
S - 2 7'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	1280
S - 2 8'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	3200
S - 2 9'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	2960
S - 2 10'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	688
S - 2 11'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	656
S - 3 0-6	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	4080
S - 3 1'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	4240
S - 3 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	4880
S - 3 3'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	7920
S - 3 4'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	8000
S - 3 5'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	6400
S - 3 6'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	1620
S - 3 7'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	5470
S - 3 8'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	8660
S - 3 9'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	656
S - 3 10'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	672
S - 3 11'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	736
HZ - 1 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	<16.0
HZ - 2 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	<16.0
HZ - 3 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	<16.0
HZ - 4 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	<16.0
HZ - 5 2'	9/5/25	<0.050	<0.300	<10.0	<10.0	<10.0	16.0

Laboratory Results are attached in Appendix D

PROPOSED REMEDIATION ACTIVITIES

Based on the analytical results, site characteristics, and field observations made during these site assessments, Paragon recommends the following remedial activities be conducted to advance the Release Site towards an NMSLO and NMOCD-approved closure. Remediation will commence on 12-1-25, upon approval of this plan, and will conclude two to three weeks later.

- Utilizing mechanical equipment, the excavation will range in depth from 7 to 12 feet BGS.
 - The area of S-1 is approximately 1100 s/f. We anticipate excavating approximately 285 cubic yards.
 - In the areas of S-2 and S-3 is approximately 2700 s/f. We anticipate excavating 1200 c/y from these areas. These two areas will be fully delineated (Chlorides 600/TPH 100) vertically and horizontally during the remediation process.
 - A sampling notification will be submitted to the SLO & NMOCD 2 business days before obtaining sidewall samples and vertical samples, which will be submitted to a certified laboratory for official verification. Sampling will be conducted in accordance with rule 19.15.29.12 of the NMAC.
 - We will then backfill with like material, machine compact, and contour the area to match the surrounding areas.

If you have any questions or need any additional information, please feel free to contact Chris Jones by phone or email.

Respectfully,


Chris Jones
Environmental Professional
Paragon Environmental, LLC



Attachments

Figures:

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

Appendices:

- Appendix A- Referenced Water Surveys
- Appendix B- Soil Survey and FEMA Flood Map
- Appendix C- Photographic Documentation
- Appendix D- Laboratory Results



Figures:

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

Spur Energy Partners

NG Phillips St Battery
Eddy County, NM
Site map

Legend

- 12' 2700 S/F
- 7' 1100 S/F
- Samples



Google Earth

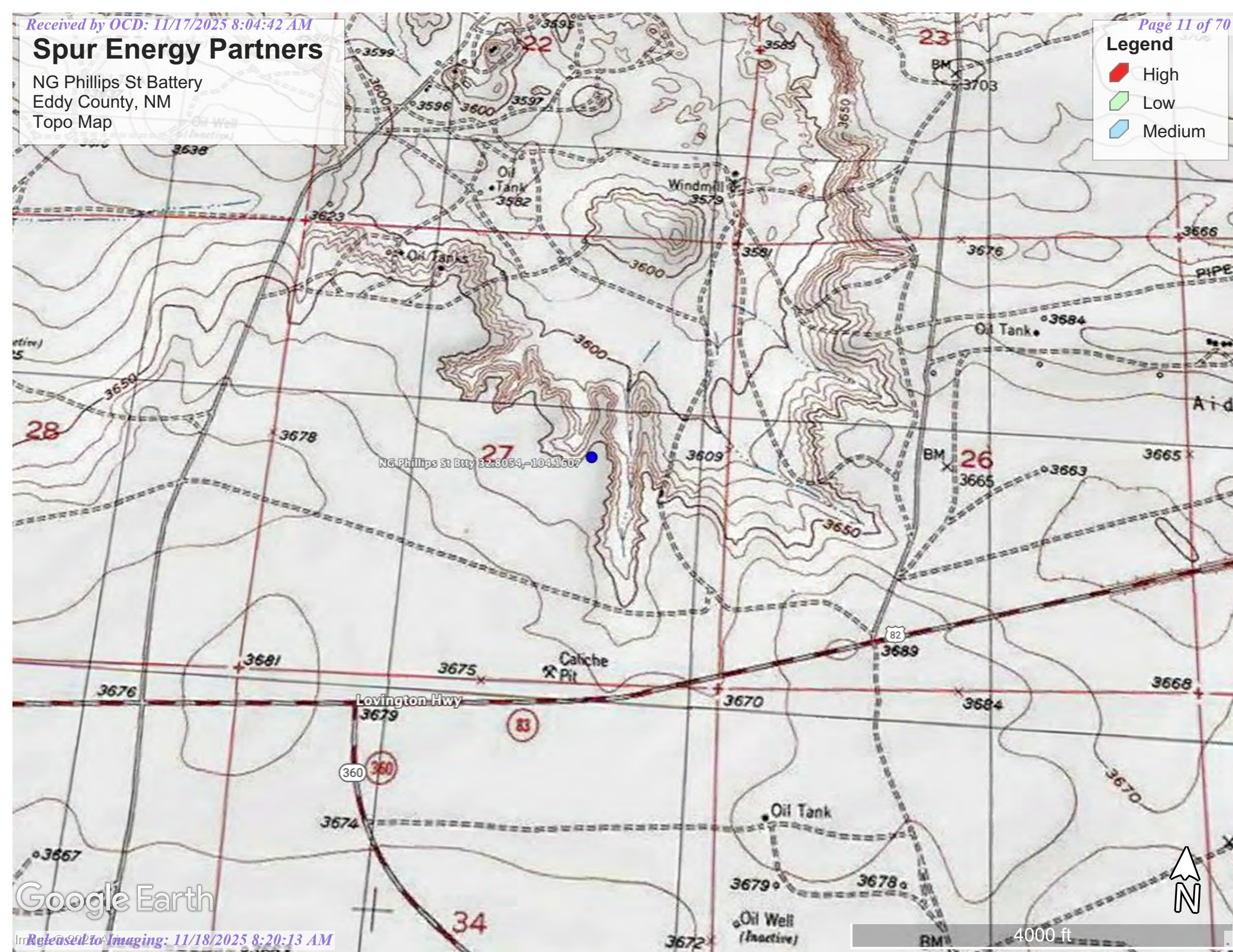
100 ft

Spur Energy Partners

NG Phillips St Battery
Eddy County, NM
Topo Map

Legend

- High
- Low
- Medium



Google Earth

Spur Energy Partners

NG Phillips St Battery
Eddy County, NM
Karst Map

Legend

- High
- Low
- Medium

NG Phillips St Btty 32.8054,-104.1607

82

360



1 mi

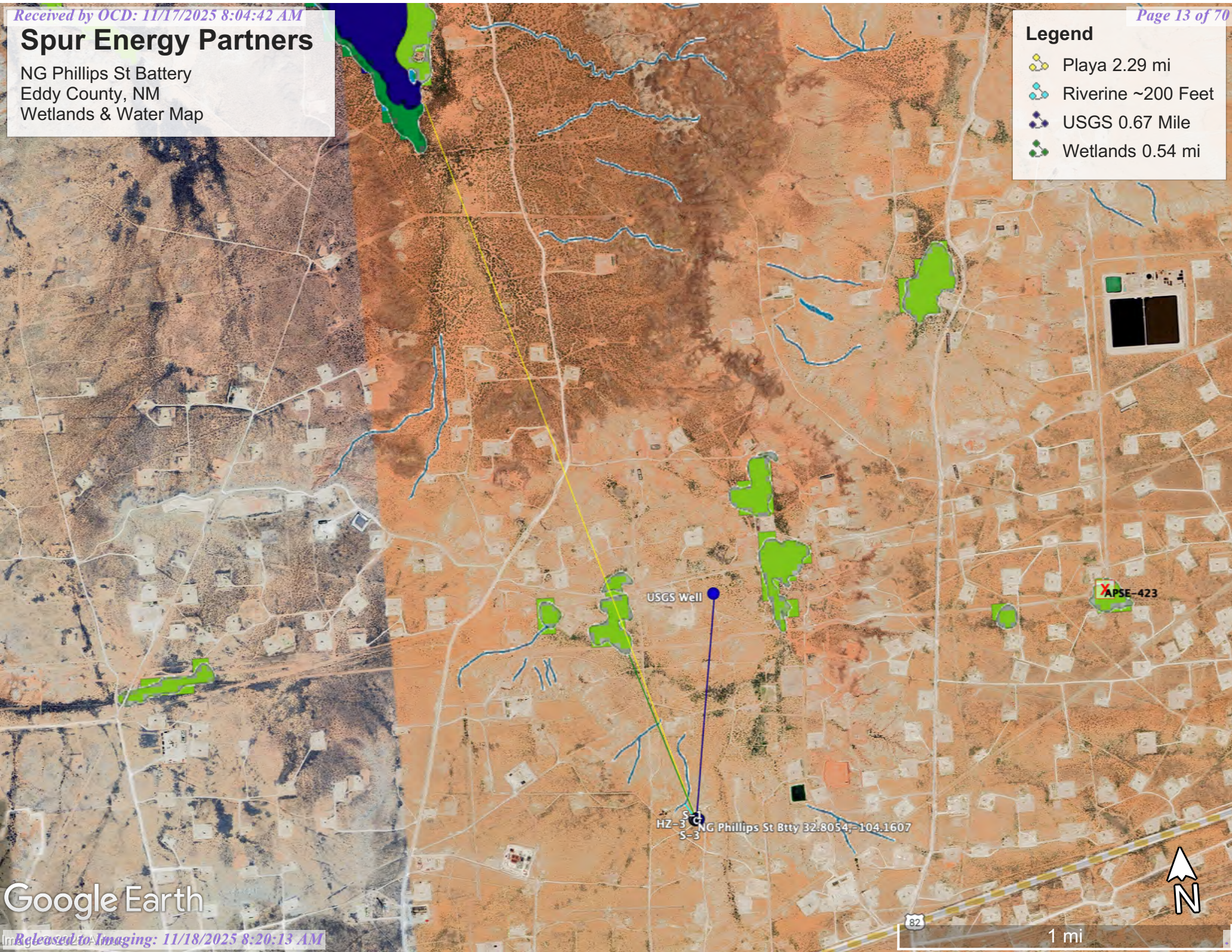
Google Earth

Spur Energy Partners

NG Phillips St Battery
Eddy County, NM
Wetlands & Water Map

Legend

- Playa 2.29 mi
- Riverine ~200 Feet
- USGS 0.67 Mile
- Wetlands 0.54 mi



Google Earth



Appendix A:

Referenced Water Data

USGS

Click to hide News Bulletins

- Explore the *NEW* [USGS National Water Dashboard](#) interactive map to access real-time water data from over 13,500 stations nationwide.

Groundwater levels for the Nation

Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

Agency code = usgs
site_no list =

- 324855104093101

Minimum number of levels = 1

[Save file of selected sites](#) to local disk for future upload

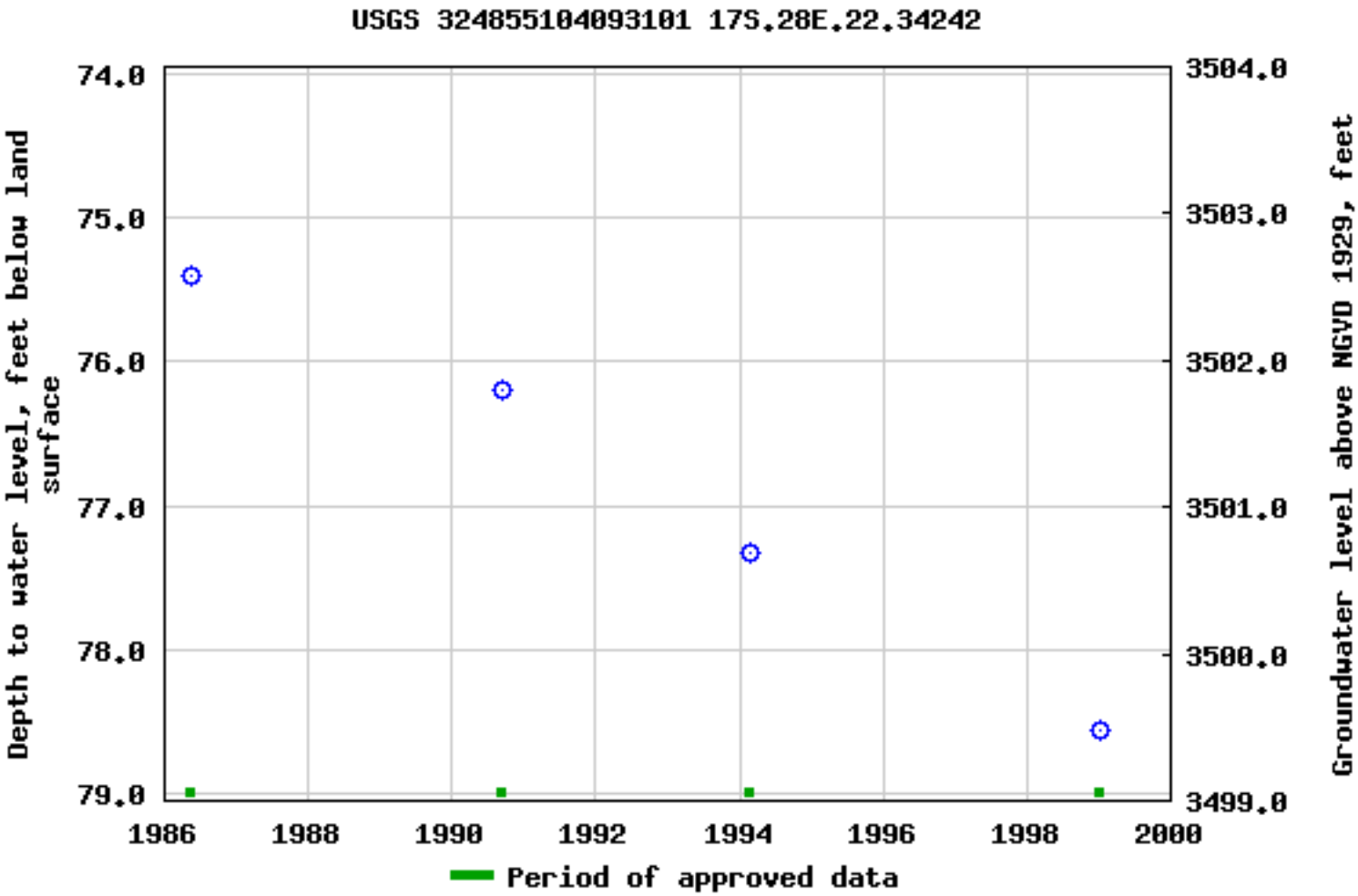
USGS 324855104093101 17S.28E.22.34242

Available data for this site Groundwater: Field measurements GO

Eddy County, New Mexico
Hydrologic Unit Code 13060011
Latitude 32°48'55", Longitude 104°09'31" NAD27
Land-surface elevation 3,578 feet above NGVD29
The depth of the well is 95.00 feet below land surface.
This well is completed in the Other aquifers (N9999OTHER) national aquifer.
This well is completed in the Alluvium, Bolson Deposits and Other Surface Deposits (110AVMB) local aquifer.

Output formats

- [Table of data](#)
- [Tab-separated data](#)
- [Graph of data](#)
- [Reselect period](#)



Breaks in the plot represent a gap of at least one year between field measurements.

[Download a presentation-quality graph](#)

[Questions or Comments](#)
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[Data Tips](#)
[Explanation of terms](#)
[Subscribe for system changes](#)



Appendix B:

Soil Survey

U.S.D.A.

FEMA Flood Map

Map Unit Description: Stony and Rough broken land---Eddy Area, New Mexico

Eddy Area, New Mexico

SR—Stony and Rough broken land

Map Unit Composition

Stony and rough broken land: 100 percent

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

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024



National Flood Hazard Layer FIRMMette



104°9'57"W 32°48'35"N



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

1:6,000

104°9'20"W 32°48'4"N

Legend

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

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) Zone A, V, A99
		With BFE or Depth Zone AE, AO, AH, VE, AR
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
		Future Conditions 1% Annual Chance Flood Hazard Zone X
		Area with Reduced Flood Risk due to Levee. See Notes. Zone X
		Area with Flood Risk due to Levee Zone D
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard Zone X
		Effective LOMRs
		Area of Undetermined Flood Hazard Zone D
GENERAL STRUCTURES		Channel, Culvert, or Storm Sewer
		Levee, Dike, or Floodwall
OTHER FEATURES		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped



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

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

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 8/20/2025 at 1:46 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

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



Appendix C:
Photographic Documentation



**Photographic Documentation
Initial Photos**





Appendix D:
Laboratory Results



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

September 16, 2025

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: NG PHILLIPS ST BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 09/10/25 15:28.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C25-00101. 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.

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:	09/10/2025	Sampling Date:	09/05/2025
Reported:	09/16/2025	Sampling Type:	Soil
Project Name:	NG PHILLIPS ST BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S - 1 0-6 (H255683-01)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/11/2025	ND	1.84	92.2	2.00	1.68	
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57	
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54	
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11	
Total BTEX	<0.300	0.300	09/11/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	4160	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 79.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.7 % 40.6-153

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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 1' (H255683-02)

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	09/11/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/11/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2920	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 77.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 75.6 % 40.6-153

Cardinal Laboratories

*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 2' (H255683-03)

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	09/11/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/11/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	960	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 76.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 74.1 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 3' (H255683-04)

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	09/11/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/11/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	896	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 80.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 76.5 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 4' (H255683-05)

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	09/11/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/11/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	928	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 83.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 80.2 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 5' (H255683-06)

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	09/11/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/11/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/11/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/11/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/11/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	656	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 72.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 69.3 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 1 6' (H255683-07)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	640	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 82.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.8 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 0-6 (H255683-08)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8560	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 81.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.5 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 1' (H255683-09)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	9120	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 76.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 74.1 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 2' (H255683-10)

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	09/12/2025	ND	1.84	92.2	2.00	1.68	
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57	
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54	
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11	
Total BTX	<0.300	0.300	09/12/2025	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	9680	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 67.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 65.8 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 3' (H255683-11)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	736	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 79.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.4 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 4' (H255683-12)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	960	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 79.1 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.8 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 5' (H255683-13)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1940	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 87.2 % 44.4-145

Surrogate: 1-Chlorooctadecane 85.2 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 6' (H255683-14)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1220	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 82.3 % 44.4-145

Surrogate: 1-Chlorooctadecane 80.3 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 7' (H255683-15)

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	09/12/2025	ND	1.84	92.2	2.00	1.68	
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57	
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54	
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11	
Total BTX	<0.300	0.300	09/12/2025	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	1280	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 77.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 75.3 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 8' (H255683-16)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	3200	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 78.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 76.2 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 9' (H255683-17)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	2960	16.0	09/11/2025	ND	432	108	400	0.00		

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 84.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 82.5 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 10' (H255683-18)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	688	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 85.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 84.4 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 2 11' (H255683-19)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: KH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	656	16.0	09/11/2025	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 72.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 71.1 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 0-6 (H255683-20)

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	09/12/2025	ND	1.84	92.2	2.00	1.68		
Toluene*	<0.050	0.050	09/12/2025	ND	1.89	94.4	2.00	1.57		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	1.90	95.2	2.00	2.54		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	5.82	97.0	6.00	3.11		
Total BTX	<0.300	0.300	09/12/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	4080	16.0	09/11/2025	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	09/11/2025	ND	190	95.1	200	0.275	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	188	94.1	200	1.08	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 80.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.2 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 1' (H255683-21)

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	09/12/2025	ND	1.94	97.0	2.00	3.24	
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76	
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817	
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284	
Total BTX	<0.300	0.300	09/12/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	4240	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 86.1 % 44.4-145

Surrogate: 1-Chlorooctadecane 82.7 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 2' (H255683-22)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEX	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 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	4880	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 82.0 % 44.4-145

Surrogate: 1-Chlorooctadecane 110 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 3' (H255683-23)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	7920	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 89.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 86.0 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 4' (H255683-24)

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	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTX	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 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	8000	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 79.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 76.6 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 5' (H255683-25)

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	09/12/2025	ND	1.94	97.0	2.00	3.24	
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76	
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817	
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284	
Total BTX	<0.300	0.300	09/12/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	6400	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 81.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 78.1 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 6' (H255683-26)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	1620	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 79.8 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.1 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 7' (H255683-27)

BTEx 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24	
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76	
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817	
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284	
Total BTEx	<0.300	0.300	09/12/2025	ND					

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5470	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 84.4 % 44.4-145

Surrogate: 1-Chlorooctadecane 81.0 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 8' (H255683-28)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8660	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 76.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 72.5 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 9' (H255683-29)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	656	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 87.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 84.5 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 10' (H255683-30)

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	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTX	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	672	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 71.5 % 44.4-145

Surrogate: 1-Chlorooctadecane 69.2 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: S - 3 11' (H255683-31)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	736	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 84.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 81.7 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: HZ - 1 2' (H255683-32)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 103 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 76.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 73.6 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

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

Received: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: HZ - 2 2' (H255683-33)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 73.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 69.5 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: HZ - 3 2' (H255683-34)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 77.7 % 44.4-145

Surrogate: 1-Chlorooctadecane 73.2 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: HZ - 4 2' (H255683-35)

BTEx 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTEx	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 102 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	<16.0	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 80.6 % 44.4-145

Surrogate: 1-Chlorooctadecane 77.0 % 40.6-153

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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: 09/10/2025
Reported: 09/16/2025
Project Name: NG PHILLIPS ST BATTERY
Project Number: NONE GIVEN
Project Location: SPUR - EDDY CO NM

Sampling Date: 09/05/2025
Sampling Type: Soil
Sampling Condition: Cool & Intact
Sample Received By: Alyssa Parras

Sample ID: HZ - 5 2' (H255683-36)

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	09/12/2025	ND	1.94	97.0	2.00	3.24		
Toluene*	<0.050	0.050	09/12/2025	ND	2.07	104	2.00	2.76		
Ethylbenzene*	<0.050	0.050	09/12/2025	ND	2.07	103	2.00	0.0817		
Total Xylenes*	<0.150	0.150	09/12/2025	ND	6.08	101	6.00	0.284		
Total BTX	<0.300	0.300	09/12/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 101 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	16.0	16.0	09/11/2025	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	09/11/2025	ND	198	98.9	200	0.722	
DRO >C10-C28*	<10.0	10.0	09/11/2025	ND	190	95.2	200	1.04	
EXT DRO >C28-C36	<10.0	10.0	09/11/2025	ND					

Surrogate: 1-Chlorooctane 73.9 % 44.4-145

Surrogate: 1-Chlorooctadecane 71.3 % 40.6-153

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

ND	Analyte NOT DETECTED at or above the reporting limit
RPD	Relative Percent Difference
**	Samples not received at proper temperature of 6°C or below.
***	Insufficient time to reach temperature.
-	Chloride by SM4500Cl-B does not require samples be received at or below 6°C Samples reported on an as received basis (wet) unless otherwise noted on report

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*=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				BILL TO				ANALYSIS REQUEST											
Project Manager: Chris Jones				P.O. #:				<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TPH</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">CHLORIDES</div> </div>											
Address: 1601 N. Turner St., Ste 500				Company: SPUR Energy															
City: Hobbs State: NM Zip: 88240				Attn: Kathy Pirus															
Phone #: 575-964-7814 Fax #:				Address:															
Project #: Project Owner:				City:															
Project Name: NGR Phillips St Battery				State: Zip:															
Project Location: Eddy County				Phone #:															
Sampler Name: Francisco Robledo				Fax #:															
FOR LAB USE ONLY																			
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV.	SAMPLING										
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME					
#253083	S-1 0-6	G	1										9/5						
1	S-1 1'																		
2	S-1 2'																		
3	S-1 3'																		
4	S-1 4'																		
5	S-1 5'																		
6	S-1 6'																		
7	S-2 0-6																		
8	S-2 1'																		
9	S-2 2'																		

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Relinquished By:	Date: 9-10-25	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: 1528		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:			
Delivered By: (Circle One) <u>4.4</u> / <u>Geo. B.</u>	Sample Condition	CHECKED BY: (Initials)		
Sampler - UPS - Bus - Other: <u>4.3</u> / <u>#140</u>	Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> No <input type="checkbox"/> No	<u>AD</u>		



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Paragon Environmental				BILL TO				ANALYSIS REQUEST											
Project Manager: Chris Jones				P.O. #:				<div style="display: flex; flex-direction: column; align-items: center; justify-content: center;"> <div>TPH</div> <div>BTEX</div> <div>CHLORIDES</div> </div>											
Address: 1601 N. Turner St., Ste 500				Company: "															
City: Hobbs State: NM zip: 88240				Attn: L															
Phone #: 575-964-7814 Fax #:				Address:															
Project #: Project Owner:				City:															
Project Name: "				State: Zip:															
Project Location: "				Phone #:															
Sampler Name: L				Fax #:															
FOR LAB USE ONLY																			
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV		SAMPLING									
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME					
H233083													9/5						
11	S-2 3'																		
12	S-2 4'																		
13	S-2 5'																		
14	S-2 6'																		
15	S-2 7'																		
16	S-2 8'																		
17	S-2 9'																		
18	S-2 10'																		
19	S-2 11'																		
20	S-3 0-6																		

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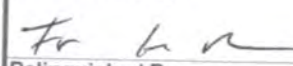


Relinquished By:	Date: 9-10-05	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: 1:50P		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:			
Delivered By: (Circle One)	-4.00 / C-4.30	Sample Condition	CHECKED BY: (Initials)	
Sampler - UPS - Bus - Other:	-4.30 / C-4.30 #140	Cool Intact	100	
		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
		<input type="checkbox"/> No <input type="checkbox"/> No		

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Paragon Environmental				BILL TO				ANALYSIS REQUEST																		
Project Manager: Chris Jones				P.O. #:				<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TPH</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">CHLORIDES</div> </div>																		
Address: 1601 N. Turner St., Ste 500				Company: U																						
City: Hobbs State: NM Zip: 88240				Attn: U																						
Phone #: 575-964-7814 Fax #:				Address:																						
Project #: Project Owner:				City:																						
Project Name: I				State: Zip:																						
Project Location: I				Phone #:																						
Sampler Name: U				Fax #:																						
FOR LAB USE ONLY																										
Lab I.D.	Sample I.D.	(G) RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV.		SAMPLING																
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME												
#255083	S-3 1'	G											9/5													
21	S-3 1'																									
22	S-3 2'																									
23	S-3 3'																									
24	S-3 4'																									
25	S-3 5'																									
26	S-3 6'																									
27	S-3 7'																									
28	S-3 8'																									
29	S-3 9'																									
30	S-3 10'																									

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Relinquished By:	Date: 9-10-25	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
	Time: 7:528		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:			
Delivered By: (Circle One) -4.0- / C40 3'	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other: -4.3- / #140	Cool Intact <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	(Initials) 		

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CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Paragon Environmental				BILL TO				ANALYSIS REQUEST																		
Project Manager: Chris Jones				P.O. #:				<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">TPH</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">BTEX</div> <div style="writing-mode: vertical-rl; transform: rotate(180deg);">CHLORIDES</div> </div>																		
Address: 1601 N. Turner St., Ste 500				Company: t																						
City: Hobbs State: NM Zip: 88240				Attn: l																						
Phone #: 575-964-7814 Fax #:				Address:																						
Project #: Project Owner:				City:																						
Project Name: l				State: Zip:																						
Project Location: l				Phone #:																						
Sampler Name: l				Fax #:																						
FOR LAB USE ONLY																										
Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX				PRESERV.		SAMPLING																
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER:	ACID/BASE:	ICE / COOL	OTHER:	DATE	TIME												
H259082	S-3 11'	1											9/5													
32	H2-1 2'																									
33	H2-2 2'																									
34	H2-3 2'																									
35	H2-4 2'																									
36	H2-5 2'																									

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Relinquished By:	Date: 9-10-25	Received By:	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:
<i>for G</i>	Time: 1528	<i>apaw</i>	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:
Relinquished By:	Date:	Received By:	REMARKS:	
	Time:			
Delivered By: (Circle One)	Sample Condition	CHECKED BY:		
Sampler - UPS - Bus - Other: -4-6- / C40-3-	Cool Intact	(Initials)		
-4-3- / #140	<input type="checkbox"/> Yes <input type="checkbox"/> No	<i>AA</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 526964

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2504950030
Incident Name	NAPP2504950030 NG PHILLIPS STATE BATTERY @ J-27-17S-28E
Incident Type	Produced Water Release
Incident Status	Remediation Plan Received

Location of Release Source

Please answer all the questions in this group.

Site Name	NG PHILLIPS STATE BATTERY
Date Release Discovered	02/18/2025
Surface Owner	State

Incident Details

Please answer all the questions in this group.

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

Nature and Volume of Release

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

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Overflow - Tank, Pit, Etc. Tank (Any) Produced Water Released: 40 BBL Recovered: 0 BBL Lost: 40 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	Yes
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)	WATER TANK RAN OVER DUE TO OVERLOAD TRIPPING WHICH CAUSE THE RELEASE OF PW INTO UNLINED CONTAINMENT

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Oil Conservation Division
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Santa Fe, NM 87505

QUESTIONS, Page 2

Action 526964

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

Initial Response

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

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

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

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 11/17/2025
--	--

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Phone: (505) 476-3441

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QUESTIONS, Page 3

Action 526964

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 26 and 50 (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
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	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 100 and 200 (ft.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Between 1 and 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	9680
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	12/01/2025
On what date will (or did) the final sampling or liner inspection occur	12/20/2025
On what date will (or was) the remediation complete(d)	12/30/2025
What is the estimated surface area (in square feet) that will be reclaimed	3800
What is the estimated volume (in cubic yards) that will be reclaimed	1485
What is the estimated surface area (in square feet) that will be remediated	3800
What is the estimated volume (in cubic yards) that will be remediated	1485
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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QUESTIONS, Page 4

Action 526964

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	Yes
Which OCD approved facility will be used for off-site disposal	fEEM0112342028 LEA LAND LANDFILL
OR which OCD approved well (API) will be used for off-site disposal	Not answered.
OR is the off-site disposal site, to be used, out-of-state	Not answered.
OR is the off-site disposal site, to be used, an NMED facility	Not answered.
(Ex Situ) Excavation and on-site 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 Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 11/17/2025
<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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State of New Mexico
Energy, Minerals and Natural Resources
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1220 S. St Francis Dr.
Santa Fe, NM 87505

QUESTIONS, Page 5

Action 526964

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Deferral Requests Only	
<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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Phone: (505) 476-3441

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QUESTIONS, Page 6

Action 526964

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	{Unavailable.}

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	No

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Phone: (505) 476-3441

General Information
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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

CONDITIONS

Action 526964

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 526964
	Action Type: [C-141] Site Char./Remediation Plan C-141 (C-141-v-Plan)

CONDITIONS

Created By	Condition	Condition Date
nvez	Remediation plan is approved as written except with the following conditions; 1. Spur Energy (Spur) must complete the excavation and removal of impacted soils until confirmation samples collected from the bottom and sidewalls of the excavation are below closure standards for groundwater < 50 feet below grade per Table 1 of 19.15.29.12 NMAC. 2. Prior to backfilling the open excavation per 19.15.29.12D (2) NMAC, Spur must collect a minimum of one (1) 5-point composite sample from the media being used as backfill to verify that it meets non-waste containing, uncontaminated, earthen material with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, or other test methods approved by the division. This is especially important for the material being used within the top four (4) feet from the ground surface. 3. Spur has 90-days (February 17, 2026) to submit to OCD its appropriate or final remediation closure report.	11/18/2025