SITE REMEDIATION AND CLOSURE REPORT

REPORTABLE RELEASE

Spur Energy Partners
Holiday #1H Battery
GPS: Latitude 32.8023071 Longitude -104.2290268
Eddy County, NM
Incident ID No. NRM2026056833

Prepared by:

Paragon Environmental LLC
225 Billy Walker Rd
Hobbs, NM 88240
903-522-0833

General Information

This report was prepared by Paragon Environmental LLC (Paragon) in response to the release for Spur Energy Partners (Spur) at the **Holiday #1H Battery** (Holiday).

Site Coordinates: Latitude: 32.8023071 Longitude: -104.2290268

Unit: UL D, Section 01, Township 20S, Range 25E

Date of Spill: 09/05/2020

Type of Spill: ☐Crude Oil ☒Produced Water ☐ Condensate ☐Other (Specify):

Comments: Reportable release.
Released: 50 bbls of Produced Water
Recovered: 50 bbls of Produced Water

Incident ID: **NRM2026056833**

Depth to Groundwater

According to the New Mexico State of Engineers Office, the nearest water data is less than 1/2 miles away and is 121 feet below grade surface (BGS). See Appendix A for details.

Soil Survey

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Piedmont alluvial deposits (Holocene to lower Pleistocene)-Includes deposits of higher gradient tributaries bordering major stream valleys, alluvial veneers of the piedmont slope, and alluvial fans. May locally include uppermost Pliocene deposits (QP). According to the United States Department of Agriculture Natural Resources Conservation Service soil survey, the soil in this area is comprised of the Reeves-Gypsum land complex, with 0 to 3 percent slopes. The drainage courses in this area are well-drained. There is a **high** potential for karst geology to be present in the area of the Holiday (Appendix B).

Release Description and Assessment

This release was caused by corrosion developing a hole in a three-inch check valve. The release was contained in the falcon-lined containment. A vacuum truck was dispatched to aid in the recovery of the fluids and placed the recovered fluids back into the water tank.

Site Assessment and Soil Sampling Results

On February 9, 2022, Paragon sent an Environmental Technician to the site to conduct a Liner inspection and to obtain soil samples. The results of this sampling event are in the following data table and all the laboratory results can be found in Appendix E.

2-9-22 Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (High Karst Area)								
Sample Date 2-9-22		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
N. COMP.	0	ND	ND	ND	ND	ND	ND	16
E. COMP.	0	ND	ND	ND	ND	ND	ND	144
S. COMP.	0	ND	ND	ND	ND	ND	ND	32
W. COMP.	0	ND	ND	ND	ND	ND	ND	32

ND- Analyte Not Detected

The liner was cleaned prior to the inspection. The 48-hour notification was given to the state on 2-7-22, see Appendix F. During the inspection, there were no obvious rips or tears in the liner to make me believe that the liner needs any repair or has lost the integrity to contain any spilled fluids. The liner report can also be found in Appendix F.

Remediation Activity Summary

Based on the Liner Inspection and the composite sample results being below closure criteria no remediation is needed for this incident.

Closure Request

After careful review, Paragon respectfully requests that the incident, NRM2026056833, be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Wayne Brunt at 903-522-0833 or wayne@paragonenvironmental.net.

Respectfully,

Wayne Brunt
Environmental Professional
Paragon Environmental LLC

Attachments

Figures:

1- Site Map
2- TOPO Map
3- Karst Map
4- Location Map

Appendices:

- Appendix A- Referenced Water Data
- Appendix B- Soil Survey & FEMA Flood Map
- Appendix C- C-141
- Appendix D- Photographic Documentation
- Appendix E- Laboratory Results
- Appendix F- Liner Inspection Notification and Form

Figures:

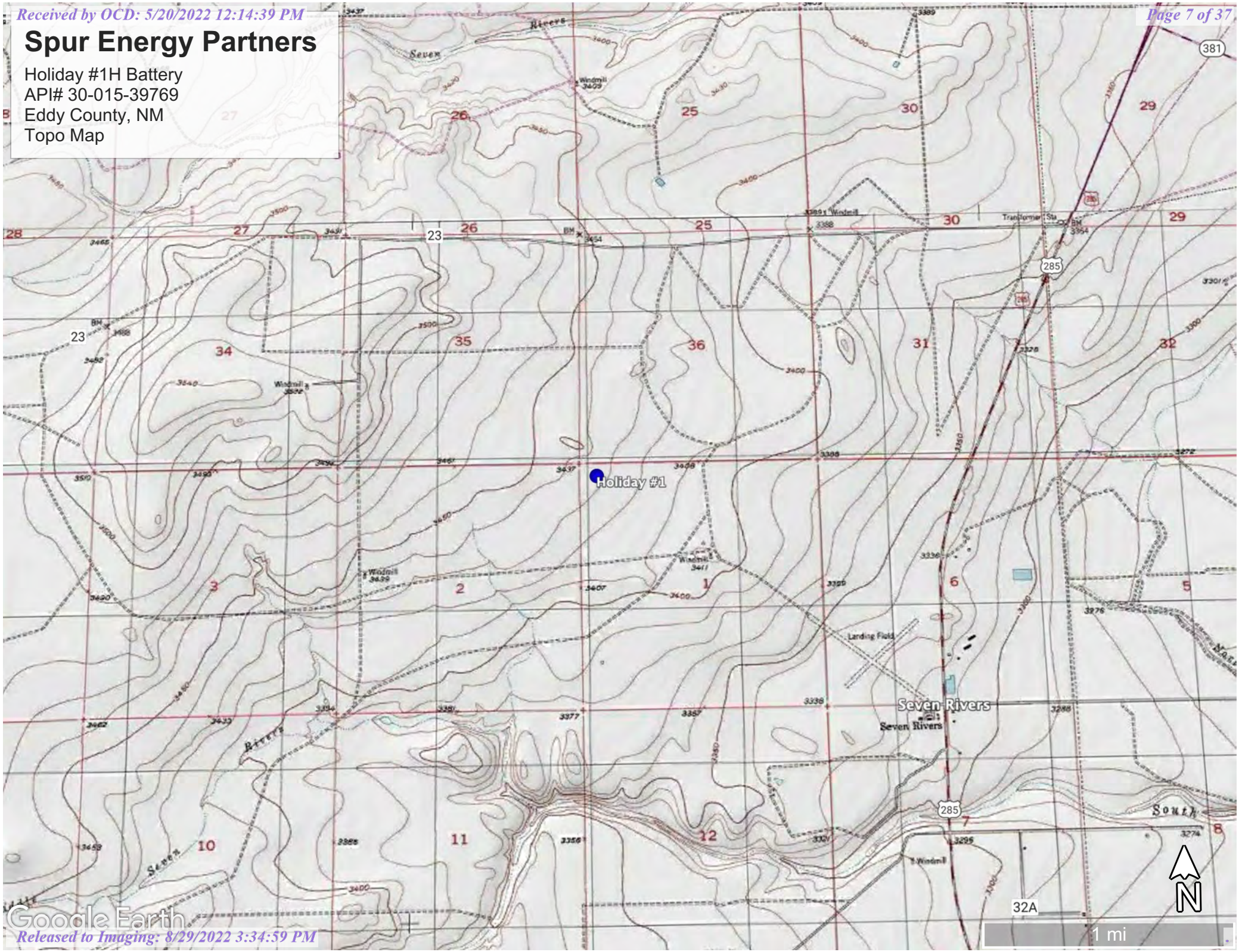
1-Site Map
2- TOPO Map
3- Karst Map
4- Location Map

Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Site Map

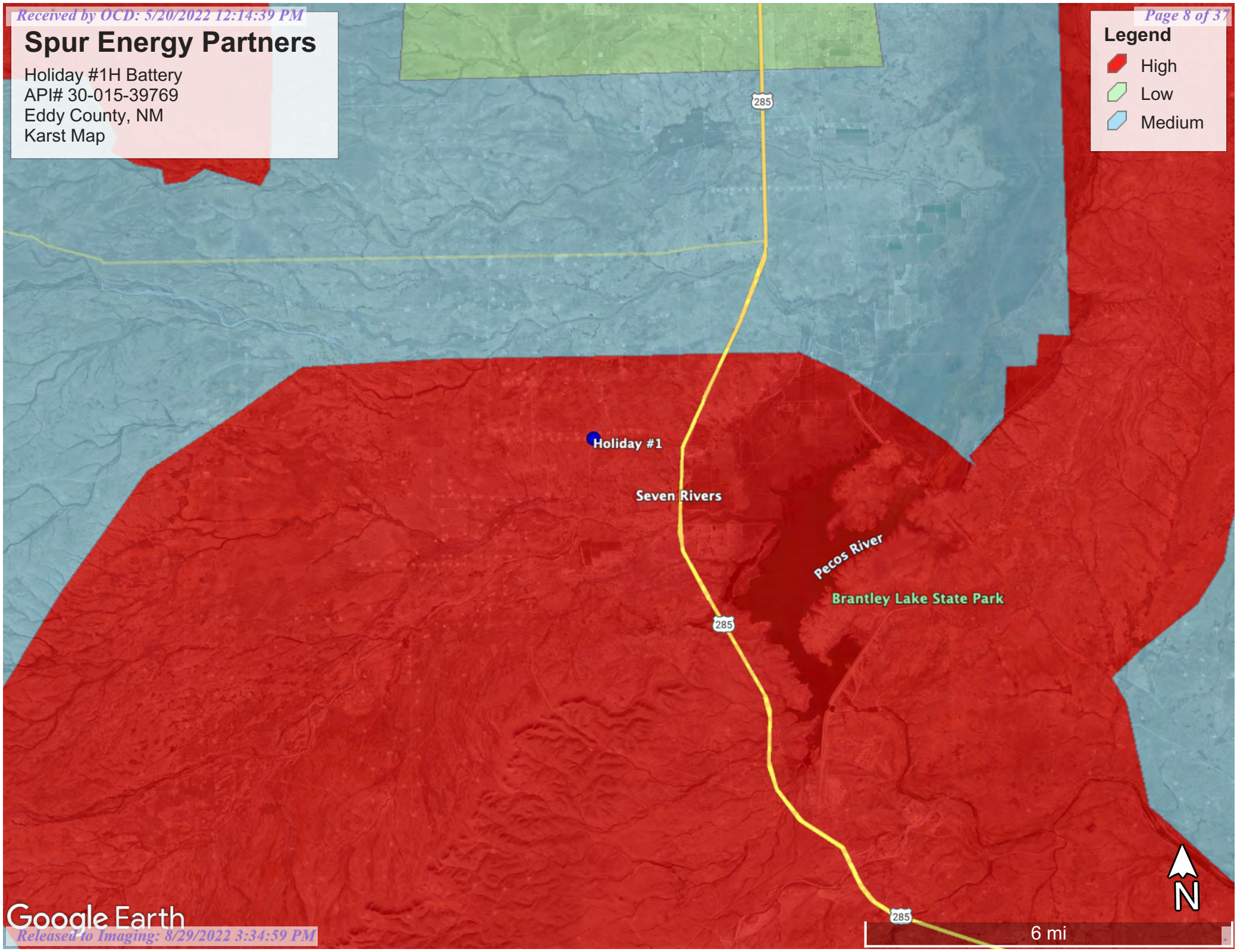
Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Topo Map



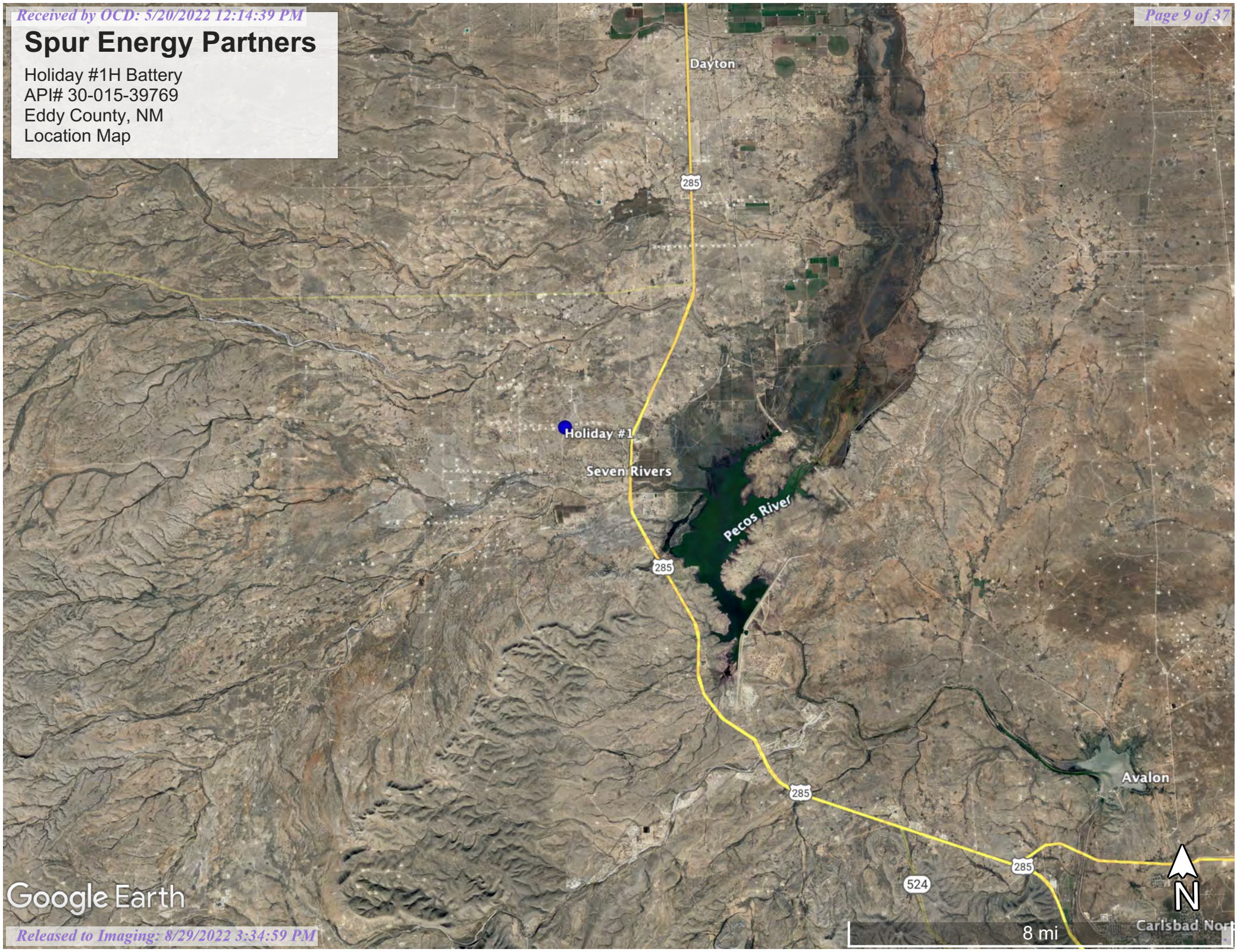
Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Karst Map



Spur Energy Partners

Holiday #1H Battery
API# 30-015-39769
Eddy County, NM
Location Map



Appendix A
Referenced Water Data:

New Mexico State of Engineers Office

New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

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

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Twn	Rng	X	Y	Distance	Depth Well	Depth Water	Water Column
RA 10898 POD1		RA	ED	2	1	3	01	20S	25E	552198	3607248*	874	810	121	689
RA 05458		RA	ED		3	3	01	20S	25E	552101	3606747*	1358	500	95	405

Average Depth to Water: **108 feet**

Minimum Depth: **95 feet**

Maximum Depth: **121 feet**

Record Count: 2

UTMNAD83 Radius Search (in meters):

Easting (X): 552011.538 **Northing (Y):** 3608102.562 **Radius:** 1500

***UTM location was derived from PLSS - see Help**

New Mexico Office of the State Engineer

Point of Diversion Summary

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

Well Tag	POD Number	Q64	Q16	Q4	Sec	Tws	Rng	X	Y
	RA 10898 POD1	2	1	3	01	20S	25E	552198	3607248*

Driller License:	331	**Driller Company:**	SBQ2, LLC DBA STEWART BROTHERS DRILLING CO.		
Driller Name:					
Drill Start Date:	02/17/2006	**Drill Finish Date:**	03/08/2006	**Plug Date:**	
Log File Date:	03/27/2006	**PCW Rcv Date:**		**Source:**	Artesian
Pump Type:		**Pipe Discharge Size:**		**Estimated Yield:**	1000 GPM
Casing Size:	8.63	**Depth Well:**	810 feet	**Depth Water:**	121 feet

Water Bearing Stratifications:	Top	Bottom	Description
	460	802	Limestone/Dolomite/Chalk

Casing Perforations:	Top	Bottom
	542	802

***UTM location was derived from PLSS - see Help**

Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

Eddy Area, New Mexico

RG—Reeves-Gypsum land complex, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w5f
Elevation: 1,250 to 5,000 feet
Mean annual precipitation: 10 to 25 inches
Mean annual air temperature: 57 to 70 degrees F
Frost-free period: 190 to 235 days
Farmland classification: Not prime farmland

Map Unit Composition

Reeves and similar soils: 55 percent
Gypsum land: 30 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Reeves

Setting

Landform: Ridges, plains, hills
Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope
Landform position (three-dimensional): Side slope, crest, nose slope, head slope
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Residuum weathered from gypsum

Typical profile

H1 - 0 to 8 inches: loam
H2 - 8 to 32 inches: clay loam
H3 - 32 to 60 inches: gypsiferous material

Properties and qualities

Slope: 0 to 1 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: High
Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 25 percent
Gypsum, maximum content: 80 percent
Maximum salinity: Very slightly saline to moderately saline (2.0 to 8.0 mmhos/cm)
Sodium adsorption ratio, maximum: 4.0
Available water supply, 0 to 60 inches: Low (about 4.3 inches)

Interpretive groups

Land capability classification (irrigated): 3s
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: B
Ecological site: R042XC007NM - Loamy
Hydric soil rating: No

Description of Gypsum Land

Setting

Landform: Ridges, plains, hills
Landform position (two-dimensional): Shoulder, backslope, footslope, toeslope
Landform position (three-dimensional): Side slope, crest, nose slope, head slope
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Residuum weathered from gypsum

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 8s
Hydric soil rating: No

Minor Components

Largo

Percent of map unit: 5 percent
Ecological site: R042XC007NM - Loamy
Hydric soil rating: No

Cottonwood

Percent of map unit: 5 percent
Ecological site: R042XC033NM - Salty Bottomland
Hydric soil rating: No

Reagan

Percent of map unit: 5 percent
Ecological site: R042XC007NM - Loamy
Hydric soil rating: No

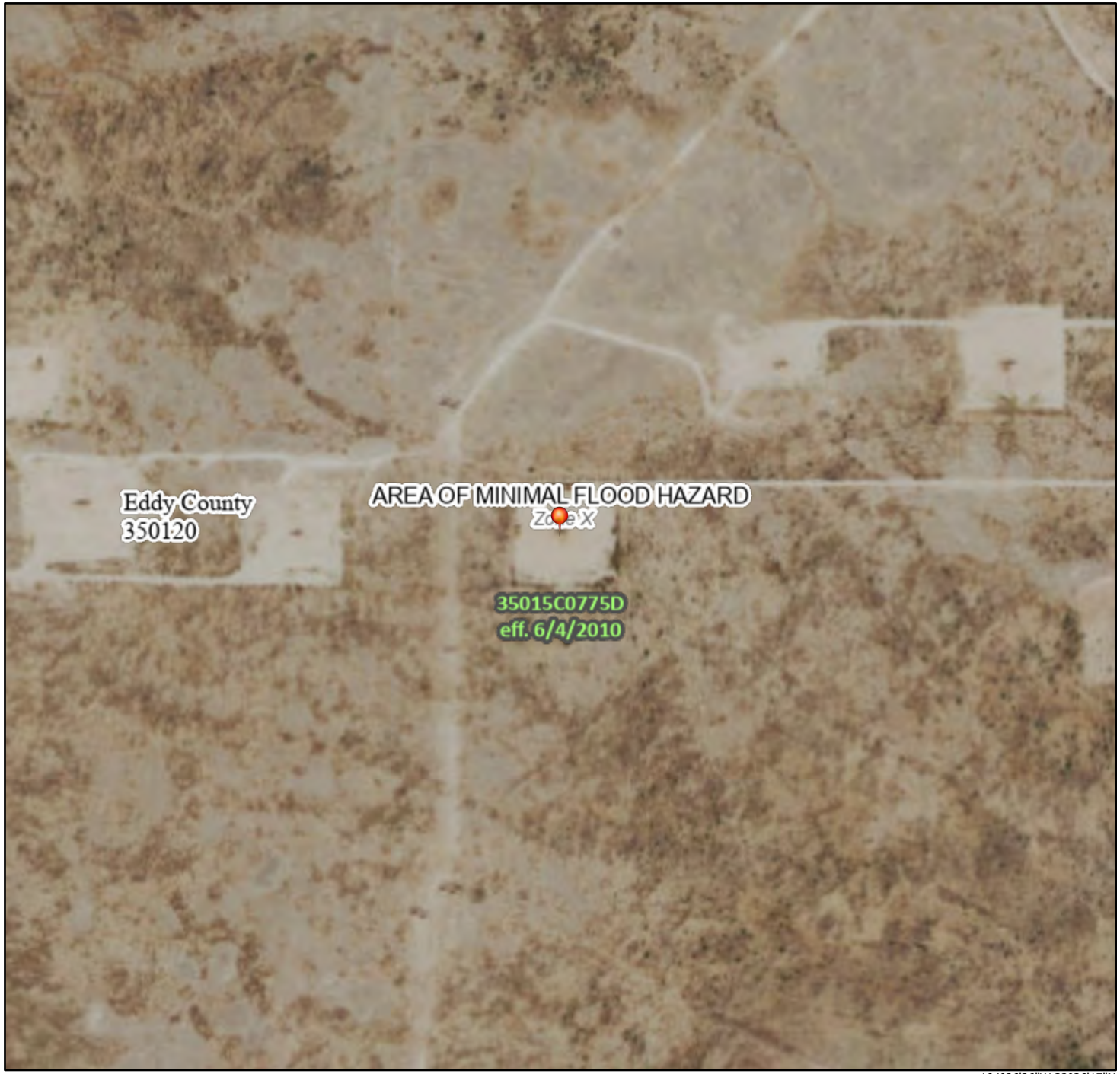
Data Source Information

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

National Flood Hazard Layer FIRMette

FEMA

104°27'3"W 32°36'47"N



104°26'26"W 32°36'17"N

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

1:6,000

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

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
- 17.5 Water Surface Elevation
- Coastal Transect
- Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

MAP PANELS
- Digital Data Available
- No Digital Data Available
- Unmapped

N

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 3/24/2022 at 12:58 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:

C-141

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NRM2026056833
District RP	
Facility ID	
Application ID	NCEVS-200910-C-1410

Release Notification

Responsible Party

Responsible Party: Spur Energy Partners	OGRID: 328947
Contact Name: Kenny Kidd	Contact Telephone: 575-616-5400
Contact email: kkidd@spurepllc.com	Incident # *(assigned by OCD)*
Contact mailing address: 2407 Pecos Drive Artesia, NM 88210	

Location of Release Source

Latitude: 32.6088257 Longitidue: -104.4456787
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Holiday Fee 1H	Site Type: Production Facility
Date Release Discovered: 9/05/2020	API# *(if applicable)*: 30-015-39769

Unit Letter	Section	Township	Range	County
D	01	20S	25E	Eddy

Surface Owner: ☐ State ☐ Federal ☐ Tribal ☒ Private (*Name:* _____)

Nature and Volume of Release

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

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☒ Produced Water	Volume Released (bbls) 50	Volume Recovered (bbls) 50
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release: A 3" check valve developed a hole causin a release of approximately 50 bbl of fluid inside a falcon containment. A Vacuum truck was utilized to recover all fluid from containment. The recovered fluid was unloaded back into the water tank.

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State of New Mexico
Oil Conservation Division

Incident ID	NRM2026056833
District RP	
Facility ID	
Application ID	NCEVS-200910-C-1410

Was this a major release as defined by 19.15.29.7(A) NMAC? ☒ Yes ☐ No	If YES, for what reason(s) does the responsible party consider this a major release? The release was greater than 5bbl however all fluid was recovered.

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Immediate notice was provided by Kenny Kidd with Spur Energy on 09/08/2020 to the NMOCD via email correspondence to: NMOCD Victoria Venegas, Robert Hamlet, and Mike Bratcher. The BLM was also notified.

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.
- ☒ The impacted area has been secured to protect human health and the environment.
- ☒ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☒ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

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

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

Printed Name: Rebecca Pons Title: Project Manager

Signature: _____ Date: 09/10/2020

email: rpons@talonlpe.com Telephone: 575-441-0980

OCD Only

Received by: Ramona Marcus Date: 9/24/2020

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State of New Mexico
Oil Conservation Division

Incident ID	NRM2026056833
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	121 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☒ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☒ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☒ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☒ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☒ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☒ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☒ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☒ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☒ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☒ No

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

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

☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
☒ Field data
☒ Data table of soil contaminant concentration data
☒ Depth to water determination
☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
☐ Boring or excavation logs
☒ Photographs including date and GIS information
☒ Topographic/Aerial maps
☒ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

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State of New Mexico
Oil Conservation Division

Incident ID	NRM2026056833
District RP	
Facility ID	
Application ID	

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

Printed Name: Braidy Moulder

Title: HSE Manager

Signature: Braidy Moulder

Date: 4-12-22

email: bmoulder@spurepllc.com

Telephone: 713-264-2517

OCD Only

Received by: _____

Date: _____

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State of New Mexico
Oil Conservation Division

Incident ID	NRM2026056833
District RP	
Facility ID	
Application ID	

Closure

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

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

☒ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☒ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☒ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☒ Description of remediation activities

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

Printed Name: Braidy Moulder
Title: HSE Manager

Signature: Braidy Moulder
Date: 4-12-22

email: bmoulder@spurepllc.com
Telephone: 713-264-2517

OCD Only

Received by: _____ Date: _____

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

Closure Approved by: Jennifer Nobui Date: 08/29/2022

Printed Name: Jennifer Nobui Title: Environmental Specialist A

Appendix D:

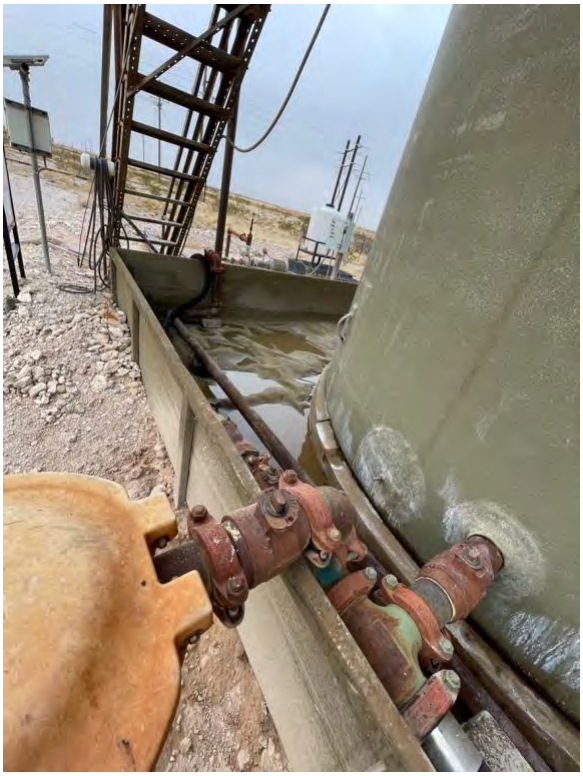
Photographic Documentation

PARAGON ENVIRONMENTAL

Photographic Documentation

Liner Inspection Composite Samples From Around The Containment

Cleaned & Completed



Appendix E:

Laboratory Results

CARDINAL Laboratories

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

February 15, 2022

CASON SPURLOCK

PARAGON ENVIROMENTAL

5002 CARRAIGE RD

HOBBS, NM 88242

RE: HOLIDAY 1 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/11/22 10:05.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-21-14. 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 accreditated through the State of Colorado Department of Public Health and Environment for:

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

Celey D. Keene

Celey D. Keene

Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

PARAGON ENVIROMENTAL
CASON SPURLOCK
5002 CARRAIGE RD
HOBBS NM, 88242
Fax To:

Received:	02/11/2022	Sampling Date:	02/09/2022
Reported:	02/15/2022	Sampling Type:	Soil
Project Name:	HOLIDAY 1 BATTERY	Sampling Condition:	** (See Notes)
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

Sample ID: NORTH COMP (H220542-01)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

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

Chloride, SM4500Cl-B mg/kg Analyzed By: GM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**16.0**	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane *113 %* *66.9-136*

Surrogate: 1-Chlorooctadecane *128 %* *59.5-142*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

PARAGON ENVIROMENTAL
CASON SPURLOCK
5002 CARRAIGE RD
HOBBS NM, 88242
Fax To:

Received:	02/11/2022	Sampling Date:	02/09/2022
Reported:	02/15/2022	Sampling Type:	Soil
Project Name:	HOLIDAY 1 BATTERY	Sampling Condition:	** (See Notes)
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

Sample ID: EAST COMP (H220542-02)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

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

Chloride, SM4500Cl-B mg/kg Analyzed By: GM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**144**	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane *105 %* *66.9-136*

Surrogate: 1-Chlorooctadecane *117 %* *59.5-142*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

PARAGON ENVIROMENTAL
CASON SPURLOCK
5002 CARRAIGE RD
HOBBS NM, 88242
Fax To:

Received:	02/11/2022	Sampling Date:	02/09/2022
Reported:	02/15/2022	Sampling Type:	Soil
Project Name:	HOLIDAY 1 BATTERY	Sampling Condition:	** (See Notes)
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

Sample ID: SOUTH COMP (H220542-03)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

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

Chloride, SM4500Cl-B mg/kg Analyzed By: GM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane *106 %* *66.9-136*

Surrogate: 1-Chlorooctadecane *120 %* *59.5-142*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

Analytical Results For:

PARAGON ENVIROMENTAL
CASON SPURLOCK
5002 CARRAIGE RD
HOBBS NM, 88242
Fax To:

Received:	02/11/2022	Sampling Date:	02/09/2022
Reported:	02/15/2022	Sampling Type:	Soil
Project Name:	HOLIDAY 1 BATTERY	Sampling Condition:	** (See Notes)
Project Number:	SPUR	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY CO NM		

Sample ID: WEST COMP (H220542-04)

BTEX 8021B mg/kg Analyzed By: JH

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/12/2022	ND	2.11	105	2.00	2.41	
Toluene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.95	
Ethylbenzene*	<0.050	0.050	02/12/2022	ND	2.08	104	2.00	2.87	
Total Xylenes*	<0.150	0.150	02/12/2022	ND	6.50	108	6.00	2.74	
Total BTEX	<0.300	0.300	02/12/2022	ND					

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

Chloride, SM4500Cl-B mg/kg Analyzed By: GM

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	**32.0**	16.0	02/14/2022	ND	416	104	400	3.77	

TPH 8015M mg/kg Analyzed By: CK

Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	02/14/2022	ND	192	96.0	200	3.13	
DRO >C10-C28*	<10.0	10.0	02/14/2022	ND	197	98.6	200	3.00	
EXT DRO >C28-C36	<10.0	10.0	02/14/2022	ND					

Surrogate: 1-Chlorooctane *116 %* *66.9-136*

Surrogate: 1-Chlorooctadecane *133 %* *59.5-142*

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

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

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

Cardinal Laboratories *=Accredited Analyte

Celey D. Keene, Lab Director/Quality Manager

CARDINAL Laboratories

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name:	Paragon Environmental
Project Manager:	Cason Spurlock
Address:	5002 Carriage Rd
City:	Hobbs
State:	NM
Zip:	88242
Phone #:	575-631-6977
Fax #:	
Project #:	
Project Owner:	
Project Name:	Spur
Project Location:	Holiday 1 Battery
Sampler Name:	Chris Jones

BILL TO

P.O. #:	
Company:	Spur
Attn:	DaKota Neel
Address:	
City:	
State:	Zip:
Phone #:	
Fax #:	

ANALYSIS REQUEST

FOR LAB USE ONLY Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX: GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	PRESERV.: ACID/BASE:	ICE / COOL	OTHER :	SAMPLING: DATE	TIME	BTEX	TPH-Ext	Chlorides
H220542																	
1	North Comp.	C				✓					✓		2.9.22	1000	✓	✓	✓
2	East Comp.	C				✓					✓		"	1015	|	|	|
3	South Comp.	C				✓					✓		"	1030	|	|	|
4	West Comp.	C				✓					✓		↓	1045	|	|	|

Relinquished By:	Date: 2.11.22	Received By:	
Relinquished By:	Time: 1005	Received By:	
	Date:		
	Time:		

Delivered By: (Circle One) Sampler - UPS - Bus - Other: 20.1°C -0.5°C / 19.6°C #113

Sample Condition: Cool: Yes / No; Intact: Yes / No

CHECKED BY: (Initials)

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

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

Appendix F:

Liner Inspection and Email Notification

Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners

Site: Holiday #1H Battery

Lat/Long: 32.8023071, -104.2290268

NMOCD Incident ID & Incident Date: NMR2026056833

2-Day Notification Sent: 2-7-22

Inspection Date: 2-9-22

Liner Type: Earthen w/liner | Earthen no liner | Polystar | Steel w/poly liner | Steel w/spray epoxy | No Liner

Other: _____

Visualization	Yes	No	Comments
Is there a tear in the liner?		x	
Are there holes in the liner?		x	
Is the liner retaining any fluids?		x	
Does the liner have integrity to contain a leak?	x		

Comments: _____

Inspector Name: Travis Collins Inspector Signature: _____

Gmail

Cason Spurlock <cason@paragonenvironmental.net>

Holiday #1 Battery

1 message

Cason <cason@paragonenvironmental.net> Mon, Feb 7, 2022 at 5:57 AM
To: mike.bratcher@state.nm.us, robert.hamlet@state.nm.us, chad.hensley@state.nm.us, Braidy Moulder <bmoulder@spurepllc.com>, Dakota Neel <dneel@spurepllc.com>

Gentleman,

On behalf of Spur Energy, Paragon will be conducting a liner inspection at the referenced location. This inspection will be conducted in reference to incidents NAPP2119633013, NAPP2119561140, and NRM2026056833. We will be conducting this inspection on 2-9-22 at approximately 9 am. If you have any questions or care to join you can reach out and let me know.

--
Paragon Environmental
225 Billy Walker Rd
Hobbs, NM 88240

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 109071

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 109071
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Closure Approved. Please note incidents need to be addressed within 90 days of the release.	8/29/2022