



June 18, 2025

NMOCD District 2
Mr. Mike Bratcher
Artesia, NM 88210

Bureau of Land Management
Ms. Crisha Morgan
620 East Green Street
Carlsbad, NM 88220

Re: Site Assessment, Remediation, and Revised Closure Request
Welch C 28 St Com Tank Battery
API No. N/A
GPS: Latitude 32.80398 Longitude -104.16968
U/L "L," Sec. 27, T17S, R28E
Eddy County, NM
NMOCD Ref. No. NAPP2429527577

Paragon Environmental LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment and conduct remediation activities for the release site known as the Welch C 28 St Com Tank Battery (Welch). Details of the release are summarized below:

Release Details			
Type of Release:	Crude Oil	Volume of Release:	35 bbls
		Volume Recovered:	30 bbls
Source of Release:	Tank	Date of Release:	10/20/2024
Was Immediate Notice Given?	Yes	If, Yes, to Whom?	NMOCD Portal
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	State	Mineral Owner:	State
<p>The Battery lost power to the LACT unit, VRU, and transfer pumps. The levels in the oil tanks rose and without the VRU in operation, the gas began venting from the tanks along with the oil. The tanks ran over causing the leak on the tanks and in the containment and the strong winds caused the spill to go outside the containment. The loss of power also resulted in the alarm system to not send out notification.</p>			

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

REGULATORY FRAMEWORK & SITE CHARACTERIZATION

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

- Depth to Groundwater in the affected area 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- 1/2 mile-1 mile
- Any lakebed, sinkhole, or playa lake- 1/2-1 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 freshwater well field- 1-5 mi
- A wetland- 1000'-1/2 mi
- 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 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). The soil in this area is made up of Reagan-Upton Association, 0 to 9 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are well-drained.

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

INITIAL SITE ASSESSMENT

On February 6th, 2025, Paragon conducted an initial site assessment. During the initial site assessment, it was determined that we would gather samples in the area where the spill had come out of the lined containment and flowed onto the pad. We brought out a hand auger to excavate four (4) soil samples and three (3) background samples to determine the vertical and horizontal footprint of the spill. We performed field titrations on these samples. Because this was a produced water spill and there was no oil staining or odor, we only ran chloride tests for delineation purposes. A summary of the field results collected during the above-stated activities is provided below:

2-6-25 Soil Sample Results

Field Testing				
Sample Date 2-6-25				
Sample ID	Depth (BGS)	GRO	VOC	CHLORIDES
S-1	2'			ND
S-2	2'			ND
S-3	2'			ND
S-4	2'			ND
HZ-1	2'			ND
HZ-2	2'			ND
HZ-3	2'			ND

(ND) Analyte Not Detected

Laboratory data is attached in Appendix D

A Site Map is provided in Figure #1.

REMEDIATION ACTIVITIES

Based on the analytical results, site characteristics, and field observations made during the site assessment, Paragon conducted the following remedial activities to advance the Release Site towards an NMOCD-approved closure:

On February 6, 2025, Paragon mobilized personnel and equipment to this site to begin remediation efforts. Utilizing a hydrovac, the following excavation efforts were conducted.

- The areas of S-1 to S-4 were excavated to a depth of 2' BGS. The square footage of this area was 1300 s/f, and the total yardage was 96 c/y.

A confirmation soil sampling event in accordance with 19.15.19.12 NMAC was conducted, giving the OCD a 48-hour notification. The results of said soil sampling event are in the following data table:

3-4-25 Confirmation Laboratory Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')							
Sample Date 3-4-25	Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria ≤ 100 mg/kg	Closure Criteria ≤ 600 mg/kg
Sample ID	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S - 1 2'	ND	ND	ND	ND	ND	ND	32
S - 2 2'	ND	ND	ND	ND	ND	ND	48
S - 3 2'	ND	ND	ND	ND	ND	ND	32
S - 4 2'	ND	ND	ND	ND	ND	ND	32
S - 5 2'	ND	ND	ND	ND	ND	ND	ND
S - 6 2'	ND	ND	ND	ND	ND	ND	ND
S - 7 2'	ND	ND	ND	ND	ND	ND	ND
ESW - 1 2'	ND	ND	ND	ND	ND	ND	32
ESW - 2 2'	ND	ND	ND	ND	ND	ND	176
NSW - 1 2'	ND	ND	ND	ND	ND	ND	ND
NSW - 2 2'	ND	ND	ND	ND	ND	ND	80
NSW - 3 2'	ND	ND	ND	ND	ND	ND	32
SSW - 1 2'	ND	ND	ND	ND	ND	ND	32
SSW - 2 2'	ND	ND	ND	ND	ND	ND	48
WSW - 1 2'	ND	ND	ND	ND	ND	ND	32
WSW - 2 2'	ND	ND	ND	ND	ND	ND	16

(ND) – Analyte Not Detected

It was noted at the time of writing the report that the new technician mislabeled the samples as grab samples. We requested that the lab revise the report and COC to reflect the samples as composite samples. The samples were 5-point composite samples representing no more than 200 s/f for bottoms and 50 s/f for sidewalls.

These laboratory analytical results showed that the confirmation soil samples were below the NMOCD Closure Criteria. The excavated soils were loaded into trucks and transported to Lea Land, an NMOCD-approved waste disposal facility, where backfill material was also obtained. The affected area was backfilled, then contoured and machine-compacted to match the surrounding grade.

On April 3rd, Paragon performed a liner inspection on the Welch C 28. We set out to ensure the liner was in good condition and had the integrity to contain any future spills. We found the liner to be up to standard. A copy of the liner inspection can be found in Appendix C.

CLOSURE REQUEST

After careful review, Paragon requests that the incident, NAPP2429527577, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

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

Respectfully,



Tristan Jones
Project Manager
Paragon Environmental, LLC



Chris Jones
Environmental Professional
Paragon Environmental, LLC



Attachments

Figures:

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

Appendices:

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





Figures:

- 1-Site Map
- 2- TOPO Map
- 3- Karst Map
- 4- Wetlands Map
- 5- Confirmation Sample Map

Spur Energy Partners

Welch C 28 St Com Btty
Eddy County, NM
Site Map

Legend

-  2' Excavation 1300 S/F
-  Battery Spill 4800 S/F

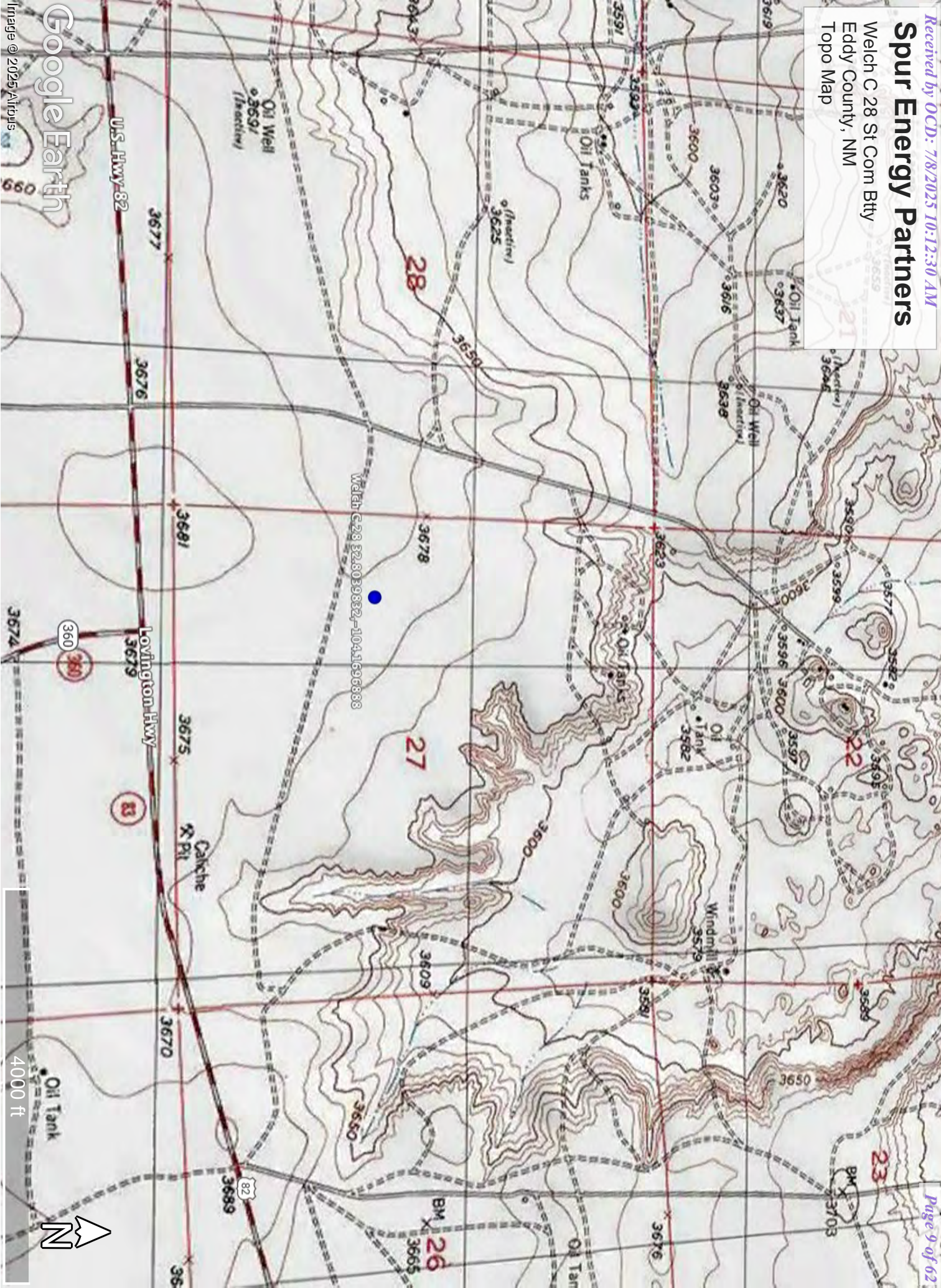


Google Earth

Image © 2025 Airbus

Spur Energy Partners

Welch C 28 St Com Btly
Eddy County, NM
Topo Map



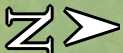
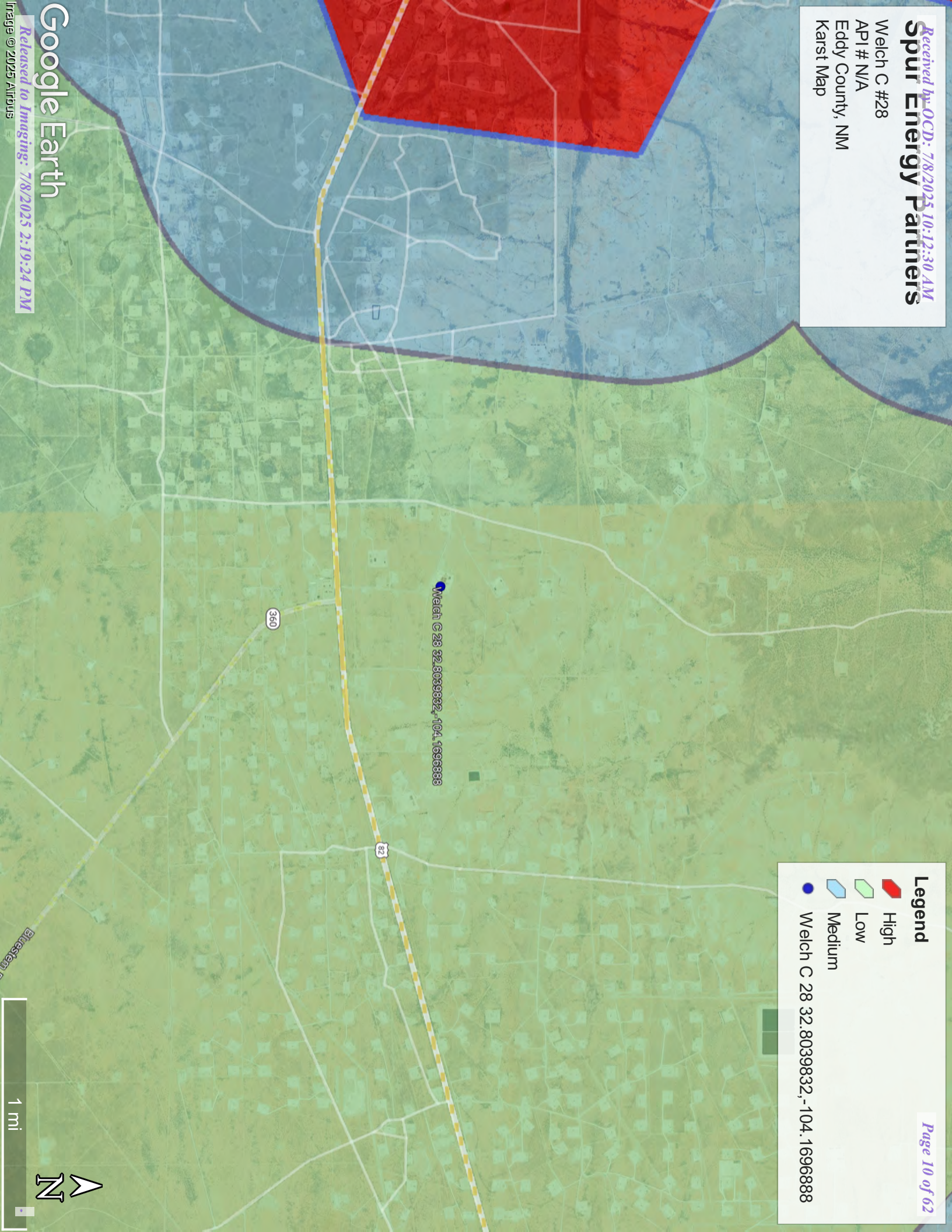
Google Earth

Image © 2025 Airbus

Welch C #28
API # N/A
Eddy County, NM
Karst Map

Legend

- High
- Low
- Medium
- Welch C 28 32.8039832,-104.1696888



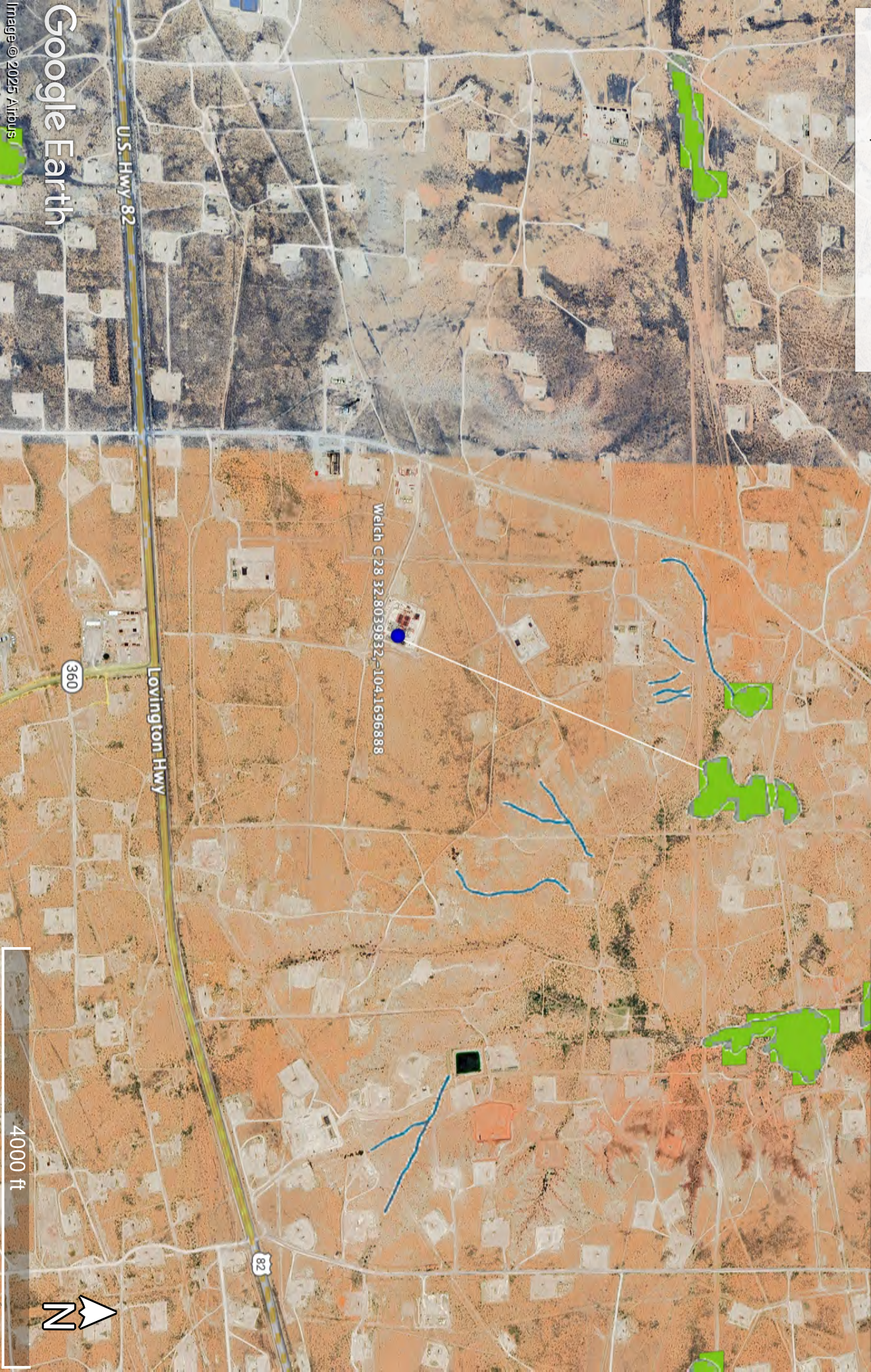
1 mi

Spur Energy Partners

Welch C 28 St Com Btly
Eddy County, NM
Wetlands Map

Legend

- Welch C 28 32.8039832, -104.1696888
- Wetlands 0.67 Mile






Google Earth

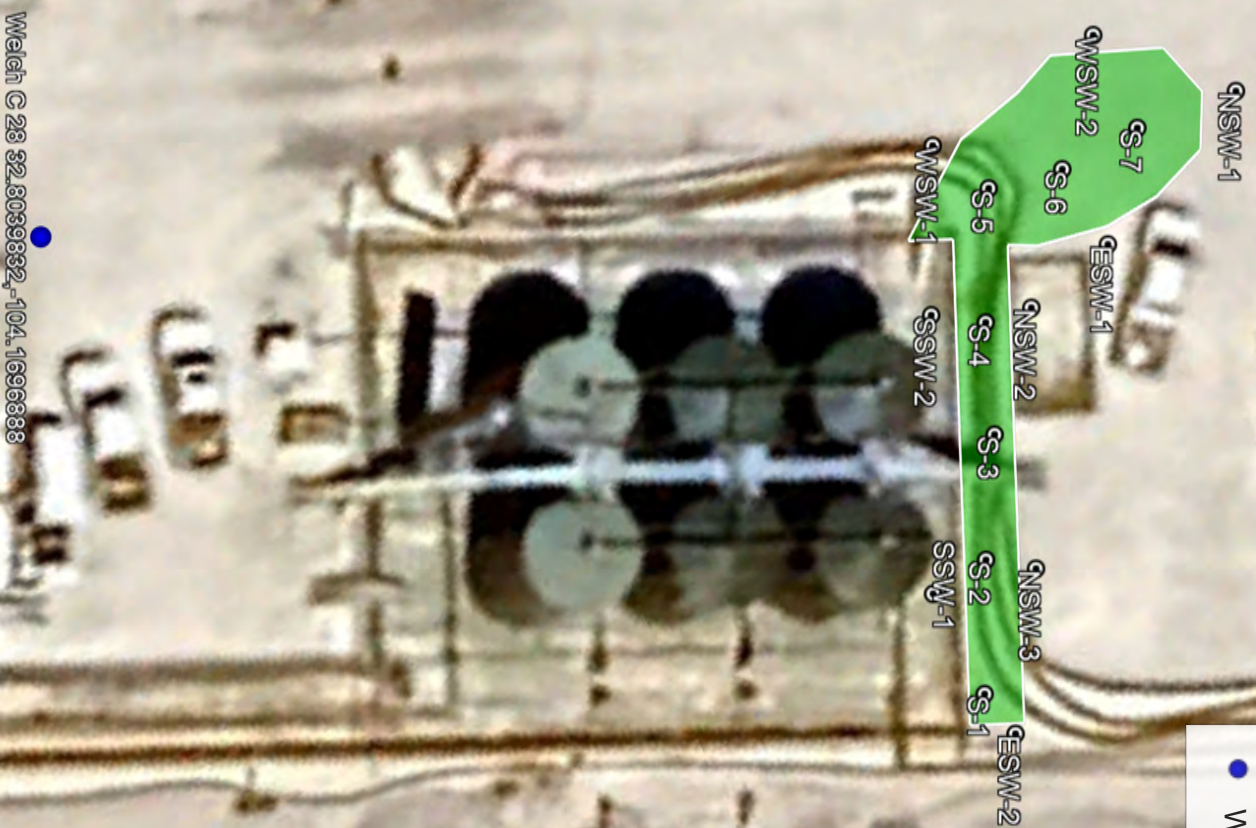
Image © 2025 Airbus

Spur Energy Partners

Welch C 28
API # N/A
Eddy County, NM
Confirmation Sample Map

Legend

-  2' Excavation 1300 S/F
-  Feature 1
-  Welch C 28 32.8039832, -104.1696888



Google Earth

Image acquired on: 7/8/2025 2:19:24 PM

90 ft





Appendix A
Referenced Water Data:

New Mexico State of Engineers Office

Water Column/Average Depth to Water

No report data available.

Basin/County Search:

Basin: C

County: ED

UTM Filters (in meters):

Easting: 577737.094

Northing: 3629883.917

Radius: 3000

* UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

2/25/25 4:19 PM MST

Water Column/Average Depth to Water

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Appendix B
Soil Survey:

U.S.D.A.
FEMA Flood Map

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

Eddy Area, New Mexico

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

Map Unit Setting

National map unit symbol: 1w5w

Elevation: 2,750 to 5,000 feet

Mean annual precipitation: 8 to 16 inches

Mean annual air temperature: 57 to 70 degrees F

Frost-free period: 180 to 230 days

Farmland classification: Not prime farmland

Map Unit Composition

Simona and similar soils: 95 percent

Minor components: 5 percent

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

Description of Simona

Setting

Landform: Plains, alluvial fans

Landform position (three-dimensional): Rise

Down-slope shape: Convex, linear

Across-slope shape: Linear

Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 19 inches: gravelly fine sandy loam

H2 - 19 to 23 inches: indurated

Properties and qualities

Slope: 0 to 3 percent

Depth to restrictive feature: 7 to 20 inches to petrocalcic

Drainage class: Well drained

Runoff class: Very high

Capacity of the most limiting layer to transmit water (Ksat): Very low to moderately low (0.00 to 0.06 in/hr)

Depth to water table: More than 80 inches

Frequency of flooding: None

Frequency of ponding: None

Calcium carbonate, maximum content: 15 percent

Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0 mmhos/cm)

Sodium adsorption ratio, maximum: 1.0

Available water supply, 0 to 60 inches: Very low (about 2.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified

Land capability classification (nonirrigated): 7e

Hydrologic Soil Group: D

Ecological site: R070BD002NM - Shallow Sandy

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

Hydric soil rating: No

Minor Components

Simona

Percent of map unit: 4 percent

Ecological site: R070BD002NM - Shallow Sandy

Hydric soil rating: No

Playa

Percent of map unit: 1 percent

Landform: Playas

Landform position (three-dimensional): Talf

Down-slope shape: Concave, convex

Across-slope shape: Concave, linear

Ecological site: R070BC017NM - Bottomland

Hydric soil rating: Yes

Data Source Information

Soil Survey Area: Eddy Area, New Mexico

Survey Area Data: Version 20, Sep 3, 2024


National Flood Hazard Layer FIRMette





104°10'30"W 32°48'29"N















Legend




SEE THIS 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
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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 17.5 Cross Sections with 1% Annual Chance Water Surface Elevation  8 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
-------------------	--

 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 3/31/2025 at 9:43 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:

Liner Inspection

NMOCD Notification

Photographic Documentation



Paragon Environmental LLC

Liner Inspection Form

Company Name: Spur Energy Partners_____

Site: Welch C 28 St Com Battery_____

Lat/Long: 32.80398, -104.16968_____

NMOCD Incident ID

& Incident Date: NAPP2429527577 & 10/21/24_____

2-Day Notification

Sent: 3/31/25_____

Inspection Date: 4/3/25_____

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		Rain Water
Does the liner have integrity to contain a leak?	X		

Comments: Liner is in good condition_____

Inspector Name: Angel Pena_____ Inspector Signature: AOP_____

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Liner Inspection (C-141L) Application

Submission Information

Submission ID:	447434	Districts:	Artesia
Operator:	[328947] Spur Energy Partners LLC	Counties:	Eddy
Description:	Spur Energy Partners LLC [328947] , WELCH C 28 STATE COM TANK BATTERY , nAPP2429527577		
Status:	APPROVED		
Status Date:	03/31/2025		
References (1):	nAPP2429527577		

Foms

This application type does not have attachments.

Questions

Prerequisites

Incident ID (n#)	nAPP2429527577
Incident Name	NAPP2429527577 WELCH C 28 STATE COM TANK BATTERY @ 0
Incident Type	Oil Release
Incident Status	Initial C-141 Approved

Location of Release Source

Site Name	WELCH C 28 STATE COM TANK BATTERY
Date Release Discovered	10/21/2024
Surface Owner	State

Liner Inspection Event Information

Please answer all the questions in this group.

What is the liner inspection surface area in square feet	4,750
Have all the impacted materials been removed from the liner	Yes
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	04/03/2025
Time liner inspection will commence	08:00 AM
<div>Warning: Notification can not be less than two business days prior to conducting liner inspection.</div>	
Please provide any information necessary for observers to liner inspection	tristan jones 575-318-6841
Please provide any information necessary for navigation to liner inspection site	32.80398,-104.16968

Searches Operator Data Hearing Fee Application

Comments

No comments found for this submission.

Conditions

Summary: *tristanjones (3/31/2025)*, Failure to notify the OCD of liner inspections including any changes in date/time per the requirements of 19.15.29.11.A(5)(a)(ii) NMAC, may result in the inspection not being accepted.

Reasons

No reasons found for this submission.

Go Back

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Sampling (C-141N) Application

Submission Information

Submission ID:	437942	Districts:	Artesia
Operator:	[328947] Spur Energy Partners LLC	Counties:	Eddy
Description:	Spur Energy Partners LLC [328947] , WELCH C 28 STATE COM TANK BATTERY , nAPP2429527577		
Status:	APPROVED		
Status Date:	02/28/2025		
References (1):	nAPP2429527577		

Foms

This application type does not have attachments.

Questions

Prerequisites

Incident ID (n#)	nAPP2429527577
Incident Name	NAPP2429527577 WELCH C 28 STATE COM TANK BATTERY @ 0
Incident Type	Oil Release
Incident Status	Initial C-141 Approved

Location of Release Source

Site Name	WELCH C 28 STATE COM TANK BATTERY
Date Release Discovered	10/21/2024
Surface Owner	State

Sampling Event General Information

Please answer all the questions in this group.

What is the sampling surface area in square feet	1,300
What is the estimated number of samples that will be gathered	15
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/04/2025
Time sampling will commence	08:00 AM
<div>Warning: Notification can not be less than two business days prior to conducting final sampling.</div>	
Please provide any information necessary for observers to contact samplers	angel pena 5756050773
Please provide any information necessary for navigation to sampling site	32.80398,-104.16968

Comments

No comments found for this submission.

Conditions

Summary: *tristanjones (2/28/2025)*, Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.

Reasons

No reasons found for this submission.

Go Back



**Photographic Documentation
Before**





Photographic Documentation
During





Photographic Documentation
Post





Photographic Documentation Liner Inspection





Appendix D:
Laboratory Results

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

May 06, 2025

CHRIS JONES

PARAGON ENVIROMENTAL

1601 N TURNER ST., STE 500

HOBBS, NM 88240

RE: WELCH C 28 TB

Enclosed are the results of analyses for samples received by the laboratory on 03/04/25 16:07.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. 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/ga/lab_accred_certif.html.

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

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

Cardinal Laboratories is accredited through the State of New Mexico Environment Department for:

Method SM 9223-B	Total Coliform and E. coli (Colilert MMO-MUG)
Method EPA 524.2	Regulated VOCs and Total Trihalomethanes (TTHM)
Method EPA 552.2	Total Haloacetic Acids (HAA-5)

Accreditation applies to public drinking water matrices for State of Colorado and New Mexico.

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

Lab Director/Quality Manager



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

Analytical Results For:

PARAGON ENVIROMENTAL
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
S - 1 2'	H251291-01	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 2 2'	H251291-02	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 3 2'	H251291-03	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 4 2'	H251291-04	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 5 2'	H251291-05	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 6 2'	H251291-06	Soil	04-Mar-25 00:00	04-Mar-25 16:07
S - 7 2'	H251291-07	Soil	04-Mar-25 00:00	04-Mar-25 16:07
ESW - 1 2'	H251291-08	Soil	04-Mar-25 00:00	04-Mar-25 16:07
ESW - 2 2'	H251291-09	Soil	04-Mar-25 00:00	04-Mar-25 16:07
SSW - 1 2'	H251291-10	Soil	04-Mar-25 00:00	04-Mar-25 16:07
SSW - 2 2'	H251291-11	Soil	04-Mar-25 00:00	04-Mar-25 16:07
NSW - 1 2'	H251291-12	Soil	04-Mar-25 00:00	04-Mar-25 16:07
NSW - 2 2'	H251291-13	Soil	04-Mar-25 00:00	04-Mar-25 16:07
NSW - 3 2'	H251291-14	Soil	04-Mar-25 00:00	04-Mar-25 16:07
WSW - 1 2'	H251291-15	Soil	04-Mar-25 00:00	04-Mar-25 16:07
WSW - 2 2'	H251291-16	Soil	04-Mar-25 00:00	04-Mar-25 16:07

05/06/25 - Client changed all samples to composites (see COC). This is the revised report and will replace the one sent on 03/10/25.

Cardinal Laboratories

*=Accredited Analyte

PLEASE NOTE: Liability and Damages. Cardinal's liability and client's exclusive remedy for any claim arising, whether based in contract or tort, shall be limited to the amount paid by client for analyses. All claims, including those for negligence or any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within thirty (30) days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damage including, without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of the services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise. Results relate only to the samples identified above. This report shall not be reproduced except in full with written approval of Cardinal Laboratories.

Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PARAGON ENVIROMENTAL
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 1 2'
H251291-01 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			109 %	71.5-134		5030503	JH	05-Mar-25	8021B	
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane			118 %	44.4-145		5030447	MS	05-Mar-25	8015B	
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Surrogate: 1-Chlorooctadecane			119 %	40.6-153		5030447	MS	05-Mar-25	8015B	
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 2 2'

H251291-02 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			110 %	71.5-134		5030503	JH	05-Mar-25	8021B	
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane			111 %	44.4-145		5030447	MS	05-Mar-25	8015B	
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Surrogate: 1-Chlorooctadecane			112 %	40.6-153		5030447	MS	05-Mar-25	8015B	
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 3 2'**H251291-03 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 131 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 136 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 4 2'**H251291-04 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 131 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 138 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 5 2'**H251291-05 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	<16.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 131 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 134 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 6 2'**H251291-06 (Soil)**

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	<16.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 111 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 122 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 126 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

S - 7 2'

H251291-07 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	<16.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 128 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 130 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

ESW - 1 2'
H251291-08 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 127 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 129 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

ESW - 2 2'
H251291-09 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	176		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050	0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050	0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150	0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300	0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)	109 %	71.5-134	5030503	JH	05-Mar-25	8021B
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B
DRO >C10-C28*	<10.0	10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B
EXT DRO >C28-C36	<10.0	10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B

Surrogate: 1-Chlorooctane	120 %	44.4-145	5030447	MS	05-Mar-25	8015B
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Surrogate: 1-Chlorooctadecane	122 %	40.6-153	5030447	MS	05-Mar-25	8015B
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

SSW - 1 2'
H251291-10 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 107 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030447	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 126 % 44.4-145 5030447 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 129 % 40.6-153 5030447 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

SSW - 2 2'
H251291-11 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	48.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 108 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 87.3 % 44.4-145 5030448 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 85.8 % 40.6-153 5030448 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

NSW - 1 2'
H251291-12 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	<16.0		16.0	mg/kg	4	5030518	HM	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 88.5 % 44.4-145 5030448 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 83.6 % 40.6-153 5030448 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

NSW - 2 2'
H251291-13 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	80.0		16.0	mg/kg	4	5030605	AC	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

<i>Surrogate: 4-Bromofluorobenzene (PID)</i>			107 %	71.5-134		5030503	JH	05-Mar-25	8021B	
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

<i>Surrogate: 1-Chlorooctane</i>			98.3 %	44.4-145		5030448	MS	05-Mar-25	8015B	
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<i>Surrogate: 1-Chlorooctadecane</i>			94.6 %	40.6-153		5030448	MS	05-Mar-25	8015B	
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

NSW - 3 2'
H251291-14 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030605	AC	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 98.4 % 44.4-145 5030448 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 94.7 % 40.6-153 5030448 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

WSW - 1 2'
H251291-15 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	32.0		16.0	mg/kg	4	5030605	AC	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID)			111 %	71.5-134		5030503	JH	05-Mar-25	8021B	
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Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane			100 %	44.4-145		5030448	MS	05-Mar-25	8015B	
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Surrogate: 1-Chlorooctadecane			98.5 %	40.6-153		5030448	MS	05-Mar-25	8015B	
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

WSW - 2 2'
H251291-16 (Soil)

Analyte	Result	MDL	Reporting Limit	Units	Dilution	Batch	Analyst	Analyzed	Method	Notes
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Cardinal Laboratories**Inorganic Compounds**

Chloride	16.0		16.0	mg/kg	4	5030605	AC	06-Mar-25	4500-Cl-B	
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Toluene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Ethylbenzene*	<0.050		0.050	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total Xylenes*	<0.150		0.150	mg/kg	50	5030503	JH	05-Mar-25	8021B	
Total BTEX	<0.300		0.300	mg/kg	50	5030503	JH	05-Mar-25	8021B	

Surrogate: 4-Bromofluorobenzene (PID) 109 % 71.5-134 5030503 JH 05-Mar-25 8021B

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
DRO >C10-C28*	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	
EXT DRO >C28-C36	<10.0		10.0	mg/kg	1	5030448	MS	05-Mar-25	8015B	

Surrogate: 1-Chlorooctane 98.1 % 44.4-145 5030448 MS 05-Mar-25 8015B

Surrogate: 1-Chlorooctadecane 95.1 % 40.6-153 5030448 MS 05-Mar-25 8015B

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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

Inorganic Compounds - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
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Batch 5030518 - 1:4 DI Water**Blank (5030518-BLK1)**

Prepared & Analyzed: 05-Mar-25

Chloride	ND	16.0	mg/kg						
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LCS (5030518-BS1)

Prepared & Analyzed: 05-Mar-25

Chloride	416	16.0	mg/kg	400	104	80-120			
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LCS Dup (5030518-BSD1)

Prepared & Analyzed: 05-Mar-25

Chloride	432	16.0	mg/kg	400	108	80-120	3.77	20	
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Batch 5030605 - 1:4 DI Water**Blank (5030605-BLK1)**

Prepared & Analyzed: 06-Mar-25

Chloride	ND	16.0	mg/kg						
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LCS (5030605-BS1)

Prepared & Analyzed: 06-Mar-25

Chloride	416	16.0	mg/kg	400	104	80-120			
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LCS Dup (5030605-BSD1)

Prepared & Analyzed: 06-Mar-25

Chloride	416	16.0	mg/kg	400	104	80-120	0.00	20	
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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
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

Volatile Organic Compounds by EPA Method 8021 - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 5030503 - Volatiles**Blank (5030503-BLK1)**

Prepared & Analyzed: 05-Mar-25

Benzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Surrogate: 4-Bromofluorobenzene (PID)	0.0548		mg/kg	0.0500		110	71.5-134			

LCS (5030503-BS1)

Prepared & Analyzed: 05-Mar-25

Benzene	2.10	0.050	mg/kg	2.00		105	82.8-130			
Toluene	2.19	0.050	mg/kg	2.00		109	86-128			
Ethylbenzene	2.18	0.050	mg/kg	2.00		109	85.9-128			
m,p-Xylene	4.60	0.100	mg/kg	4.00		115	89-129			
o-Xylene	2.16	0.050	mg/kg	2.00		108	86.1-125			
Total Xylenes	6.76	0.150	mg/kg	6.00		113	88.2-128			
Surrogate: 4-Bromofluorobenzene (PID)	0.0505		mg/kg	0.0500		101	71.5-134			

LCS Dup (5030503-BSD1)

Prepared & Analyzed: 05-Mar-25

Benzene	2.05	0.050	mg/kg	2.00		102	82.8-130	2.74	15.8	
Toluene	2.13	0.050	mg/kg	2.00		107	86-128	2.66	15.9	
Ethylbenzene	2.12	0.050	mg/kg	2.00		106	85.9-128	3.01	16	
m,p-Xylene	4.46	0.100	mg/kg	4.00		111	89-129	3.23	16.2	
o-Xylene	2.08	0.050	mg/kg	2.00		104	86.1-125	3.32	16.7	
Total Xylenes	6.54	0.150	mg/kg	6.00		109	88.2-128	3.26	16.3	
Surrogate: 4-Bromofluorobenzene (PID)	0.0510		mg/kg	0.0500		102	71.5-134			

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

Petroleum Hydrocarbons by GC FID - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 5030447 - General Prep - Organics**Blank (5030447-BLK1)**

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	47.2		mg/kg	50.0		94.4	44.4-145			
Surrogate: 1-Chlorooctadecane	47.3		mg/kg	50.0		94.6	40.6-153			

LCS (5030447-BS1)

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	204	10.0	mg/kg	200		102	81.5-123			
DRO >C10-C28	207	10.0	mg/kg	200		103	77.7-122			
Total TPH C6-C28	411	10.0	mg/kg	400		103	80.9-121			
Surrogate: 1-Chlorooctane	55.7		mg/kg	50.0		111	44.4-145			
Surrogate: 1-Chlorooctadecane	55.9		mg/kg	50.0		112	40.6-153			

LCS Dup (5030447-BS1)

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	197	10.0	mg/kg	200		98.7	81.5-123	3.49	13	
DRO >C10-C28	195	10.0	mg/kg	200		97.7	77.7-122	5.65	15.6	
Total TPH C6-C28	393	10.0	mg/kg	400		98.2	80.9-121	4.57	18.5	
Surrogate: 1-Chlorooctane	58.4		mg/kg	50.0		117	44.4-145			
Surrogate: 1-Chlorooctadecane	55.9		mg/kg	50.0		112	40.6-153			

Batch 5030448 - General Prep - Organics**Blank (5030448-BLK1)**

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	ND	10.0	mg/kg							
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
Surrogate: 1-Chlorooctane	43.4		mg/kg	50.0		86.8	44.4-145			
Surrogate: 1-Chlorooctadecane	42.6		mg/kg	50.0		85.2	40.6-153			

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Celey D. Keene, Lab Director/Quality Manager



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Analytical Results For:

PARAGON ENVIROMENTAL
1601 N TURNER ST., STE 500
HOBBS NM, 88240

Project: WELCH C 28 TB
Project Number: NONE GIVEN
Project Manager: CHRIS JONES
Fax To:

Reported:
06-May-25 16:39

Petroleum Hydrocarbons by GC FID - Quality Control**Cardinal Laboratories**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC Limits	RPD	RPD Limit	Notes
---------	--------	--------------------	-------	----------------	------------------	----------------	-----	--------------	-------

Batch 5030448 - General Prep - Organics**LCS (5030448-BS1)**

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	192	10.0	mg/kg	200		96.2	81.5-123		
DRO >C10-C28	160	10.0	mg/kg	200		79.8	77.7-122		
Total TPH C6-C28	352	10.0	mg/kg	400		88.0	80.9-121		
Surrogate: 1-Chlorooctane	53.2		mg/kg	50.0		106	44.4-145		
Surrogate: 1-Chlorooctadecane	49.2		mg/kg	50.0		98.4	40.6-153		

LCS Dup (5030448-BS1)

Prepared: 04-Mar-25 Analyzed: 05-Mar-25

GRO C6-C10	185	10.0	mg/kg	200		92.5	81.5-123	3.90	13
DRO >C10-C28	162	10.0	mg/kg	200		80.8	77.7-122	1.24	15.6
Total TPH C6-C28	347	10.0	mg/kg	400		86.7	80.9-121	1.54	18.5
Surrogate: 1-Chlorooctane	53.2		mg/kg	50.0		106	44.4-145		
Surrogate: 1-Chlorooctadecane	49.1		mg/kg	50.0		98.1	40.6-153		

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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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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 Maryland, Hobbs, NM 88240
(575) 393-2326 FAX (575) 393-2476

Company Name: Paragon Environmental		P.O. #:		BILL TO									
Project Manager: Chris Jones		Company: <i>SPUR</i>		ANALYSIS REQUEST									
Address: 1601 N. Turner St., Ste 500		Attn:											
City: Hobbs		Address:											
Phone #: 575-964-7814		City:											
Fax #:		State:											
Project #:		Zip:											
Project Name: <i>Weldn C 38 TB</i>		Phone #:											
Project Location: <i>Eddy County</i>		Fax #:											
Sampler Name: <i>Francisco Pichardo</i>													
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					
<i>H051291</i>		<i>5-1 2'</i>		<i>X</i>		<i>3</i>		<i>7/04</i>					
<i>2 5-2 2'</i>													
<i>3 5-3 2'</i>													
<i>4 5-4 2'</i>													
<i>5 5-5 2'</i>													
<i>6 5-6 2'</i>													
<i>7 5-7 2'</i>													
<i>8 5-8 2'</i>													
<i>9 5-9 2'</i>													
<i>10 5-10 2'</i>													
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Relinquished By: <i>For 12K</i>		Date: <i>3/4/05</i>		Received By: <i>APACU</i>		Time: <i>11:00</i>		Sample Condition		CHECKED BY: (Initials)		REMARKS:	
Delivered By: (Circle One) <i>-3.0' / 4.0' -</i>		Cool / Intact		Yes / No		Yes / No		Yes / No		Yes / No		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Phone #:	
Sampler - UPS - Bus - Other: <i>-2.7' / 4.140</i>		Cool / Intact		Yes / No		Yes / No		Yes / No		Yes / No		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No Add'l Fax #:	
<i>* Cust. Requested Changes at 5/2/05</i>													

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



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

[illegible]

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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 482524

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2429527577
Incident Name	NAPP2429527577 WELCH C 28 STATE COM TANK BATTERY @ 0
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received
Incident Facility	[fAPP2421332923] Welch C 28 State Com Tank Battery

Location of Release Source	
Please answer all the questions in this group.	
Site Name	WELCH C 28 STATE COM TANK BATTERY
Date Release Discovered	10/21/2024
Surface Owner	State

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

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Cause: Power Failure Tank (Any) Crude Oil Released: 35 BBL Recovered: 30 BBL Lost: 5 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
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)	POWER FAILURE CAUSED OIL TO LEAK INSIDE LINED CONTAINMENT AND ONTO THE LOCATION PAD

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QUESTIONS, Page 2

Action 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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: 10/21/2024
--	--

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QUESTIONS, Page 3

Action 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between ½ and 1 (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 1000 (ft.) and ½ (mi.)
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)	176
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	02/02/2025
On what date will (or did) the final sampling or liner inspection occur	03/04/2025
On what date will (or was) the remediation complete(d)	03/05/2025
What is the estimated surface area (in square feet) that will be reclaimed	1300
What is the estimated volume (in cubic yards) that will be reclaimed	96
What is the estimated surface area (in square feet) that will be remediated	1300
What is the estimated volume (in cubic yards) that will be remediated	96
<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 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

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	LEA LAND LANDFILL [fEEM0112342028]
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: 07/08/2025
<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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QUESTIONS, Page 5

Action 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
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.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

Sante Fe Main Office
Phone: (505) 476-3441

General Information
Phone: (505) 629-6116

Online Phone Directory
<https://www.emnrd.nm.gov/ocd/contact-us>

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

QUESTIONS, Page 6

Action 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID:
	328947
	Action Number:
	482524
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	437942
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	03/04/2025
What was the (estimated) number of samples that were to be gathered	15
What was the sampling surface area in square feet	1300

Remediation Closure Request

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

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	1300
What was the total volume (cubic yards) remediated	96
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	1300
What was the total volume (in cubic yards) reclaimed	96
Summarize any additional remediation activities not included by answers (above)	CONTAMINATED SOIL WAS REMOVED TO MEET THE MOST STRINGENT STANDARD SET FORTH BY NMOCD AND THE LINER WAS CLEANED AND INSPECTED AND FOUND TO HAVE THE ABILITY TO CONTAIN SPILLS ***NOTE THE LINER WAS NOT BREACHED. STRONG WINDS CAUSED THE SPRAY LEAK TO GO ONTO THE LOCATION PAD

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

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 07/08/2025
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QUESTIONS, Page 7

Action 482524

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

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

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CONDITIONS

Action 482524

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 482524
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
scwells	None	7/8/2025