



May 2nd, 2023

NMOCD District 2  
 Mike Bratcher  
 Artesia, NM 88210

Bureau of Land Management  
 Crisha Morgan  
 Carlsbad Field Office

**Re: Site Assessment, Remediation, and Closure Report  
 Federal Bi #1 SWD  
 API No. 30-025-27068  
 GPS: Latitude 32.79969 Longitude -103.77356  
 UL "N", Sec. 28, T17S, R32E  
 Lea County, NM  
 NMOCD Ref. No. nAPP2234734667**

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment, conduct remediation activities, and reclaim the old containment area for the release site known as the Federal Bi #1 SWD (Federal Bi). Details of the release are summarized below:

Release Details			
<b>Type of Release:</b>	Produced Water	<b>Volume of Release:</b>	45 bbls
		<b>Volume Recovered:</b>	3 bbls
<b>Source of Release:</b>	Injection Line	<b>Date of Release:</b>	12/12/22
<b>Was Immediate Notice Given?</b>	Yes	<b>If, Yes, to Whom?</b>	Mike Bratcher, NMOCD
<b>Was a Watercourse Reached?</b>	No	<b>If Yes, Volume Impacting Watercourse:</b>	N/A
<b>Surface Owner:</b>	Federal	<b>Mineral Owner:</b>	Federal
High pressure on a flow line caused the injection line to release produced water onto the pad.			

Topographical and Aerial Maps are provided in Figures #2 and #4. A copy of the Initial Release Notification and Corrective Action (NMOCD Form C-141) can be found in Appendix C.

## REGULATORY FRAMEWORK

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

<b>Site Characteristics</b>	
Approximate Depth to Groundwater	<b>&gt;100'</b>
Within 330 ft. of any continuously flowing or significant watercourse?	<b>NO</b>
Within 200 ft. of any lakebed, sinkhole, or playa lake?	<b>NO</b>
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	<b>NO</b>
Within 500 ft. of a spring, private, or domestic freshwater well?	<b>NO</b>
Within 1000 ft. of any fresh water well?	<b>NO</b>
Within the incorporated municipal boundaries or within a municipal well field?	<b>NO</b>
Within 300 ft. of a wetland?	<b>NO</b>
Within the area overlying a subsurface mine?	<b>NO</b>
Within an unstable area such as Karst?	<b>NO</b>
Within a 100-year floodplain?	<b>NO</b>

A search of the groundwater database maintained by the New Mexico Office of the State Engineer (NMOSE) was conducted to determine the average groundwater depth within one (1) Mile radius of the Release Site and identify any registered water wells within ½ Mile of the Release Site. The data initially found on the State Engineers website showed there was water data at 108 ft within a ½ mile radius.

Depth to groundwater information is provided in Appendix A.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Quaternary Formation- and is made up of Eolian and piedmont deposits (Holocene to middle Pleistocene)— Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits (QEP). The soil in this area is made up of Maljamar and Palomas Fine Sands, with 0 to 3 percent slopes, according to the United States Department of Agriculture Natural Resources Conservation Service. The drainage courses in this area are well-drained. There is NOT a high potential for karst geology to be present around the Federal Bi (Figure #3).

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

<b>TABLE I CLOSURE CRITERIA FOR SOILS IMPACTED BY A RELEASE</b>			
	<b>Constituent</b>	<b>Method</b>	<b>Limit</b>
<b>&gt;100 Feet</b>	Chloride	EPA 300.0	20,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

### **INITIAL SITE ASSESSMENT**

On March 16, 2023, Paragon conducted an initial site assessment. During the initial site assessment, our field tech performed field titrations to determine the vertical and horizontal extents of the spill. We found that the soil cleaned up at 2 feet BGS and covered an area of approximately 2000 sq/ft.

A Site Map & Sample Maps are provided in Figures #1 and #5.

## REMEDIATION ACTIVITIES

On March 8, 2023, Paragon mobilized personnel and heavy equipment to conduct remedial activities. Based on the site characteristics and field observations made during the site assessment, the following details the remedial activities we conducted to advance the Release Site toward an NMOCD-approved site closure.

Our remediation began by working around the already exposed injection line. We used the backhoe on the east side of the injection line to dig out 2 ft BGS. Meanwhile, on the west side of the injection line, we used a hand crew to dig out and expose some lines marked from our 1 call. Once all the lines were exposed via hand crew we utilized the backhoe to excavate the remaining contaminated soil.

Upon removing all of the contaminated soil, an email notification was sent to the NMOCD. We utilized 5-point bottom composite sampling and sidewall composite sampling, where each sample was representative of no more than 200 sq/ft. The results of this event are in the following data table:

### 3-16-23 Confirmation Samples

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >100')								
Sample Date 4-1-21		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg	Combined Closure Criteria ≤ 1,000 mg/kg			Closure Criteria ≤ 2,500 mg/kg	Closure Criteria ≤ 20,000 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S - 1	2'	ND	ND	ND	ND	ND	0	400
S - 2	2'	ND	ND	ND	ND	ND	0	256
S - 3	2'	ND	ND	ND	ND	ND	0	256
S - 4	2'	ND	ND	ND	ND	ND	0	576
S - 5	2'	ND	ND	ND	ND	ND	0	768
S - 6	2'	ND	ND	ND	ND	ND	0	1010
S - 7	2'	ND	ND	ND	ND	ND	0	624
S - 8	2'	ND	ND	ND	78.1	36.3	114.4	1310
S - 9	2'	ND	ND	ND	16.6	14.3	30.9	96
S - 10	2'	ND	ND	ND	ND	ND	0	80
S - 11	2'	ND	ND	ND	ND	ND	0	80
ESW - 1	2'	ND	ND	ND	ND	ND	0	128
NSW - 1	2'	ND	ND	ND	ND	ND	0	144
SSW - 1	2'	ND	ND	ND	ND	ND	0	512
SSW - 2	2'	ND	ND	ND	ND	ND	0	288
WSW - 1	2'	ND	ND	ND	ND	ND	0	256

(ND) Analyte Not Detected / (--) Analyte Not Tested.

Due to the sample results being within closure criteria, the excavated soils were loaded into trucks and transported to Lea Land, an NMOCD-approved waste disposal facility. The excavated areas were backfilled with “like” material from Lea Land. The affected area was then contoured and machine-compacted to match the surrounding grade.

**CLOSURE REQUEST**

After careful review, Paragon requests that the incident, **nAPP2234734667**, be closed. Spur has complied with the applicable closure requirements outlined in rule 19.15.19.12 NMAC.

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

Respectfully,



Tristan Jones  
Project Coordinator  
Paragon Environmental, LLC



Chris Jones  
Environmental Professional  
Paragon Environmental, LLC



**Attachments**

**Figures:**

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

**Appendices:**

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



Figures:

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

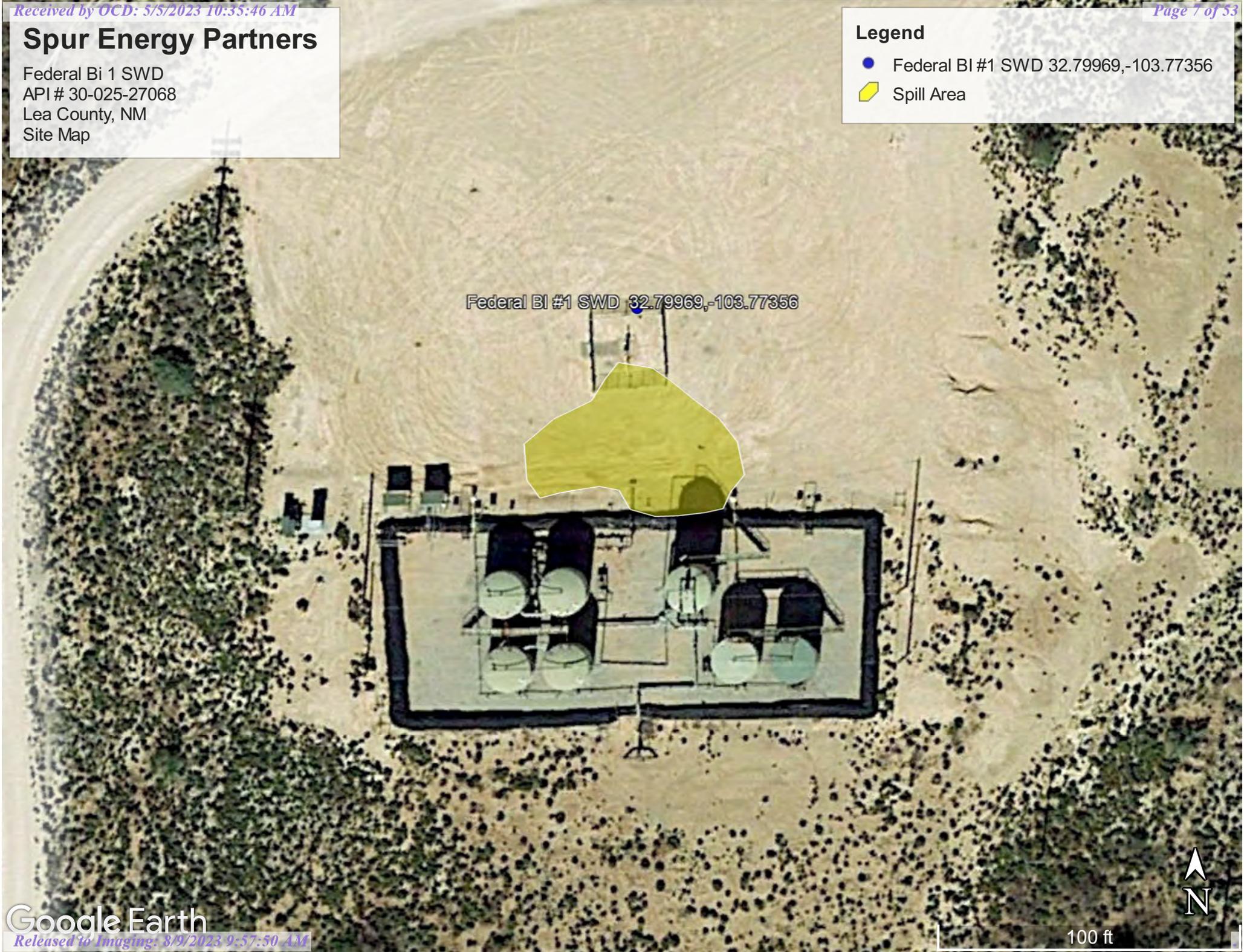
# Spur Energy Partners

Federal Bi 1 SWD  
API # 30-025-27068  
Lea County, NM  
Site Map

## Legend

- Federal BI #1 SWD 32.79969,-103.77356
- Spill Area

Federal BI #1 SWD 32.79969,-103.77356



100 ft



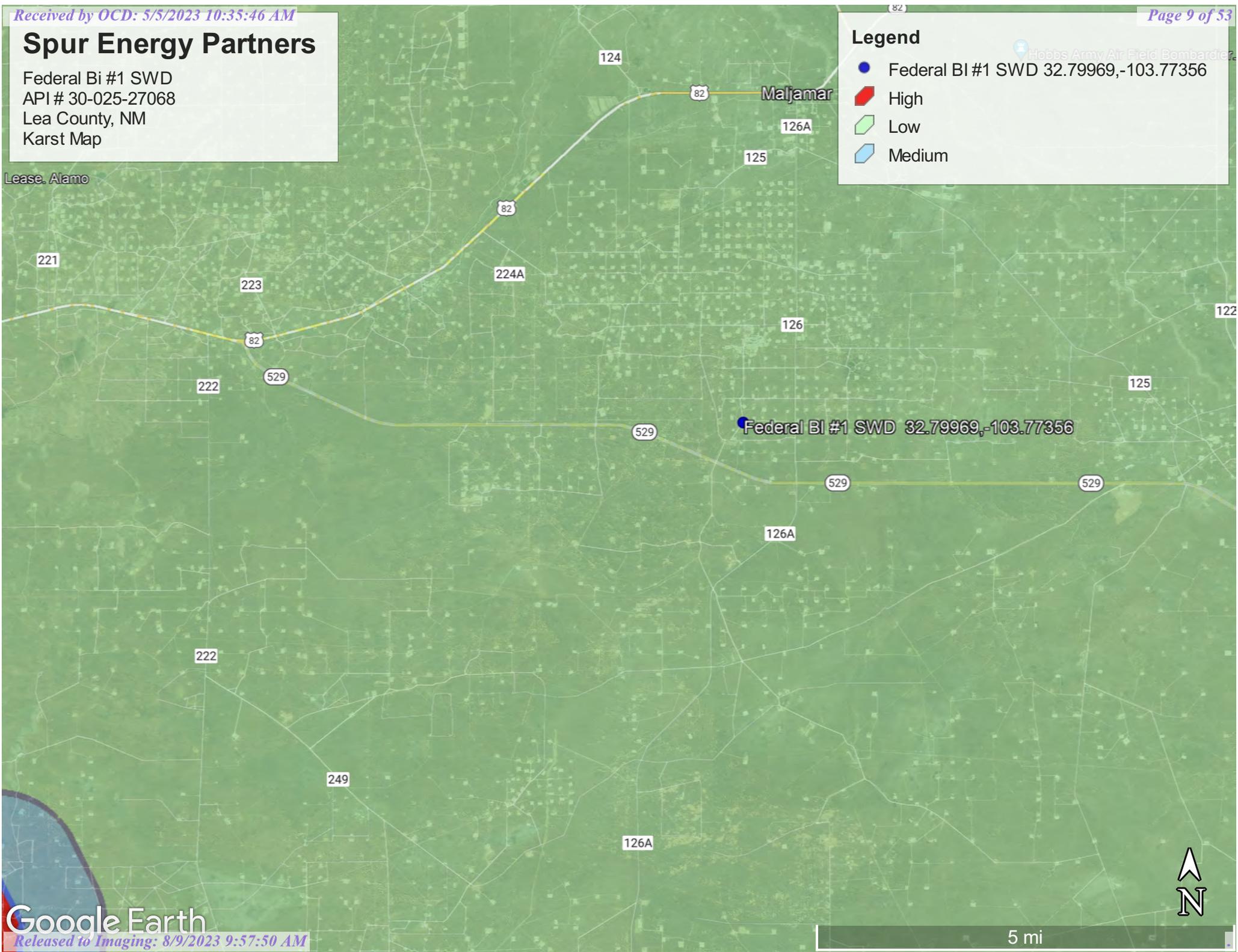
# Spur Energy Partners

Federal Bi #1 SWD  
API # 30-025-27068  
Lea County, NM  
Karst Map

## Legend

- Federal BI #1 SWD 32.79969,-103.77356
- High
- Low
- Medium

Lease. Alamo



Federal BI #1 SWD 32.79969,-103.77356

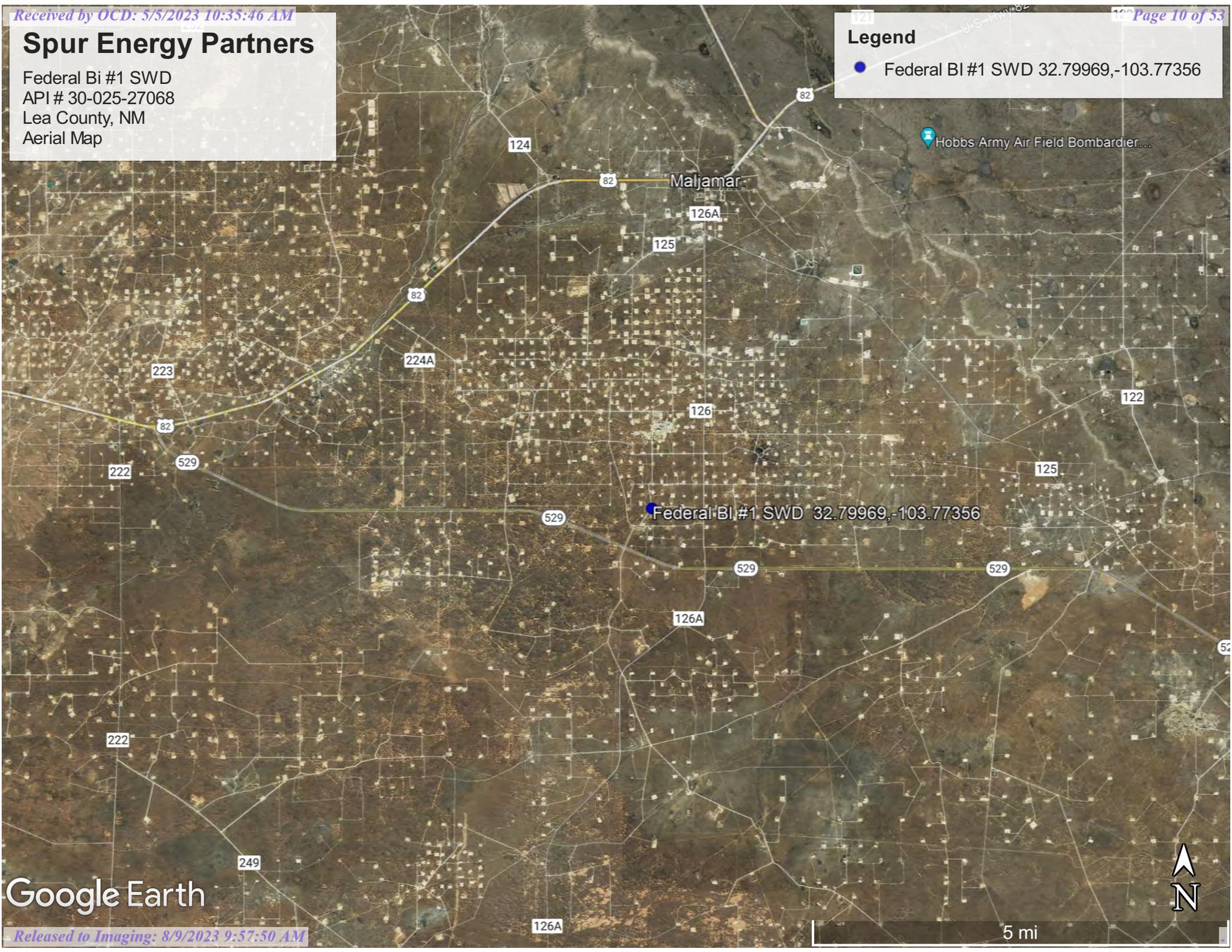


# Spur Energy Partners

Federal Bi #1 SWD  
API # 30-025-27068  
Lea County, NM  
Aerial Map

**Legend**

- Federal BI #1 SWD 32.79969,-103.77356



Hobbs Army Air Field Bombardier...

Federal BI #1 SWD 32.79969,-103.77356

Google Earth

5 mi

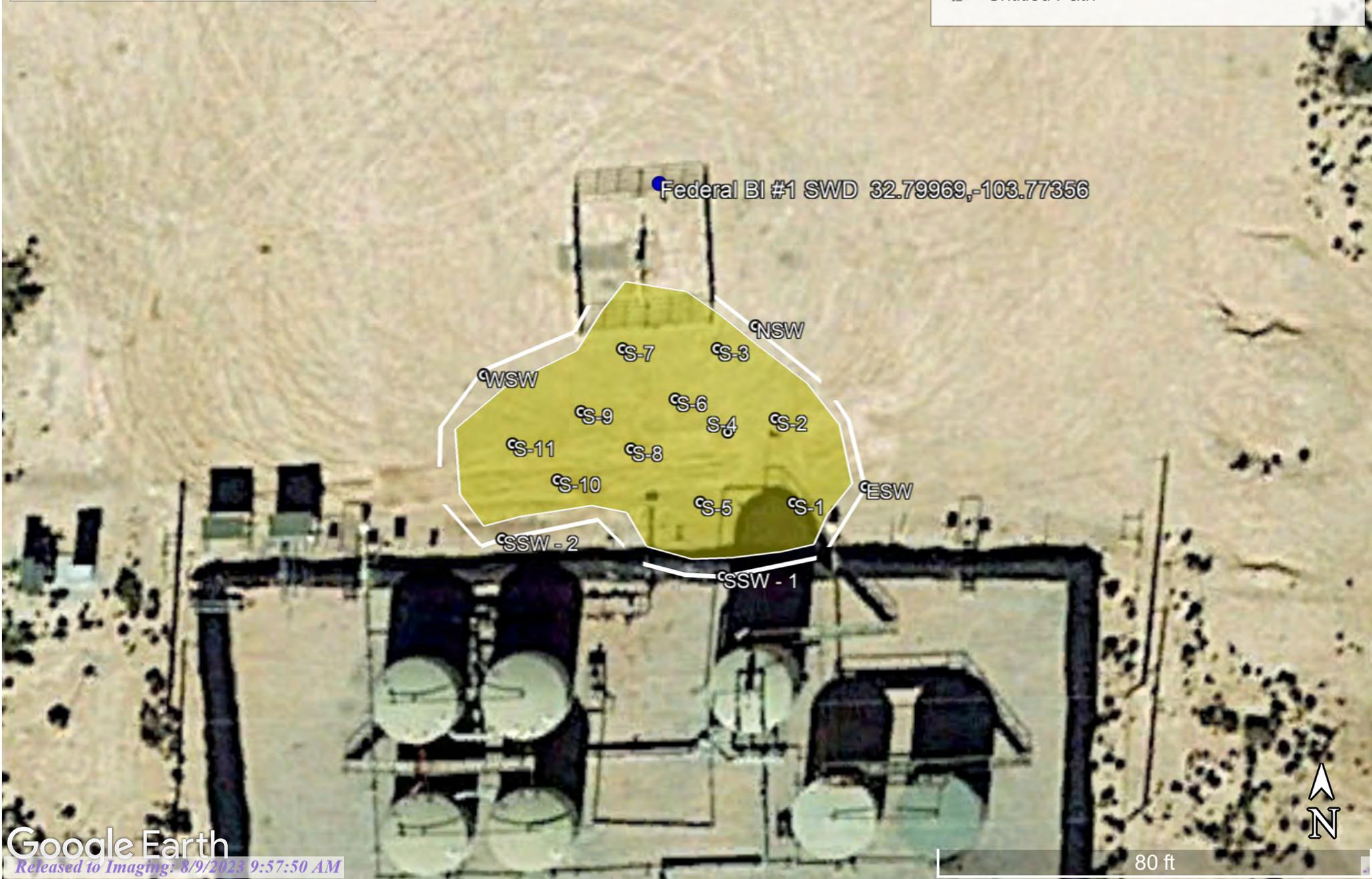


# Spur Energy Partners

Federal Bi #1 SWD  
API # 30-025-27068  
Lea County, NM  
Confirmation Sample Map

## Legend

- Feature 1
- Federal BI #1 SWD 32.79969,-103.77356
- Spill Area
- ⋯ Untitled Path





Appendix A  
Referenced Water Data:

New Mexico State of Engineers Office





# 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)	
<b>Well Tag</b>	<b>POD Number</b>	<b>Q64</b>	<b>Q16</b>	<b>Q4</b>	<b>Sec</b>	<b>Tws</b>	<b>Rng</b>	<b>X</b>	<b>Y</b>
NA	RA 12721 POD8	1	2	1	33	17S	32E	614640	3629463

<b>Driller License:</b> 1456	<b>Driller Company:</b> WHITE DRILLING COMPANY	
<b>Driller Name:</b> JOHN W WHITE		
<b>Drill Start Date:</b> 09/28/2020	<b>Drill Finish Date:</b> 09/28/2020	<b>Plug Date:</b>
<b>Log File Date:</b> 10/14/2020	<b>PCW Rev Date:</b>	<b>Source:</b> Shallow
<b>Pump Type:</b>	<b>Pipe Discharge Size:</b>	<b>Estimated Yield:</b> 0 GPM
<b>Casing Size:</b> 2.00	<b>Depth Well:</b> 130 feet	<b>Depth Water:</b> 108 feet

Water Bearing Stratifications:	Top	Bottom	Description
	106	115	Sandstone/Gravel/Conglomerate
	115	117	Sandstone/Gravel/Conglomerate
	117	118	Sandstone/Gravel/Conglomerate
	118	130	Sandstone/Gravel/Conglomerate

Casing Perforations:	Top	Bottom
	90	130

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.

4/13/23 12:56 PM

POINT OF DIVERSION SUMMARY



Appendix B  
Soil Data:

U.S.D.A. Soil Survey

FEMA Flood Map

Map Unit Description: Maljamar and Palomas fine sands, 0 to 3 percent slopes---Lea County,  
New Mexico

## Lea County, New Mexico

### MF—Maljamar and Palomas fine sands, 0 to 3 percent slopes

#### Map Unit Setting

*National map unit symbol:* dmqb

*Elevation:* 3,000 to 3,900 feet

*Mean annual precipitation:* 10 to 15 inches

*Mean annual air temperature:* 60 to 62 degrees F

*Frost-free period:* 190 to 205 days

*Farmland classification:* Farmland of statewide importance

#### Map Unit Composition

*Maljamar and similar soils:* 46 percent

*Palomas and similar soils:* 44 percent

*Minor components:* 10 percent

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

#### Description of Maljamar

##### Setting

*Landform:* Plains

*Landform position (three-dimensional):* Rise

*Down-slope shape:* Linear

*Across-slope shape:* Linear

*Parent material:* Sandy eolian deposits derived from sedimentary rock

##### Typical profile

*A - 0 to 24 inches:* fine sand

*Bt - 24 to 50 inches:* sandy clay loam

*Bkm - 50 to 60 inches:* cemented material

##### Properties and qualities

*Slope:* 0 to 3 percent

*Depth to restrictive feature:* 40 to 60 inches to petrocalcic

*Drainage class:* Well drained

*Runoff class:* Very low

*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:* 5 percent

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

*Sodium adsorption ratio, maximum:* 2.0

*Available water supply, 0 to 60 inches:* Low (about 5.6 inches)

##### Interpretive groups

*Land capability classification (irrigated):* 7e

Map Unit Description: Maljamar and Palomas fine sands, 0 to 3 percent slopes---Lea County,  
New Mexico

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

### Description of Palomas

#### Setting

*Landform: Plains*  
*Landform position (three-dimensional): Rise*  
*Down-slope shape: Linear*  
*Across-slope shape: Linear*  
*Parent material: Alluvium derived from sandstone*

#### Typical profile

*A - 0 to 16 inches: fine sand*  
*Bt - 16 to 60 inches: sandy clay loam*  
*Bk - 60 to 66 inches: sandy loam*

#### Properties and qualities

*Slope: 0 to 3 percent*  
*Depth to restrictive feature: More than 80 inches*  
*Drainage class: Well drained*  
*Runoff class: Low*  
*Capacity of the most limiting layer to transmit water*  
*(Ksat): Moderately high to high (0.60 to 2.00 in/hr)*  
*Depth to water table: More than 80 inches*  
*Frequency of flooding: None*  
*Frequency of ponding: None*  
*Calcium carbonate, maximum content: 45 percent*  
*Gypsum, maximum content: 1 percent*  
*Maximum salinity: Nonsaline to very slightly saline (0.0 to 2.0*  
*mmhos/cm)*  
*Sodium adsorption ratio, maximum: 2.0*  
*Available water supply, 0 to 60 inches: Moderate (about 7.5*  
*inches)*

#### Interpretive groups

*Land capability classification (irrigated): None specified*  
*Land capability classification (nonirrigated): 7e*  
*Hydrologic Soil Group: B*  
*Ecological site: R070BD003NM - Loamy Sand*  
*Hydric soil rating: No*

### Minor Components

#### Kermit

*Percent of map unit: 5 percent*  
*Ecological site: R070BC022NM - Sandhills*  
*Hydric soil rating: No*

#### Wink

*Percent of map unit: 5 percent*  
*Ecological site: R070BD003NM - Loamy Sand*

Map Unit Description: Maljamar and Palomas fine sands, 0 to 3 percent slopes---Lea County,  
New Mexico

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*Hydric soil rating:* No

## Data Source Information

Soil Survey Area: Lea County, New Mexico  
Survey Area Data: Version 19, Sep 8, 2022

# National Flood Hazard Layer FIRMMette



103°46'44"W 32°48'14"N



## Legend

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

- SPECIAL FLOOD HAZARD AREAS**
  - Without Base Flood Elevation (BFE) Zone A, V, A99
  - With BFE or Depth Zone AE, AO, AH, VE, AR
  - Regulatory Floodway
- OTHER AREAS OF FLOOD HAZARD**
  - 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X
  - Future Conditions 1% Annual Chance Flood Hazard Zone X
  - Area with Reduced Flood Risk due to Levee. See Notes. Zone X
  - Area with Flood Risk due to Levee Zone D
- OTHER AREAS**
  - NO SCREEN Area of Minimal Flood Hazard Zone X
  - Effective LOMRs
  - Area of Undetermined Flood Hazard Zone D
- GENERAL STRUCTURES**
  - Channel, Culvert, or Storm Sewer
  - Levee, Dike, or Floodwall
- OTHER FEATURES**
  - Cross Sections with 1% Annual Chance 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



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 4/13/2023 at 2:58 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	nAPP2234734667
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party	Spur Energy Partners LLC	OGRID	328947
Contact Name	Katherine Purvis	Contact Telephone	(575) 441-8619
Contact email	katherine.purvis@spurenergy.com	Incident # (assigned by OCD)	nAPP2234734667
Contact mailing address	9655 Katy Freeway; Houston, TX 77024		

### Location of Release Source

Latitude 32.79969 Longitude -103.77356  
*(NAD 83 in decimal degrees to 5 decimal places)*

Site Name	Federal BI #1 SWD	Site Type	SWD
Date Release Discovered	12/12/2022	API# (if applicable)	30-025-27068

Unit Letter	Section	Township	Range	County
N	28	17S	32E	LEA

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

### Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 45 BBLS	Volume Recovered (bbls) 3 BBLS
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

HIGH PRESSURE ON A FLOW LINE CAUSED THE INJECTION LINE TO RELEASE PRODUCED WATER ONTO THE PAD

State of New Mexico  
Oil Conservation Division

Incident ID	nAPP2234734667
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? <b>THE RELEASE WAS GREATER THAN 25 BBLS</b>
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? <b>BY KATHY PURVIS OF SPUR ENERGY TO NMOCD PERMITTING PORTAL VIA NOTICE OF RELEASE</b>	

### Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: N/A	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Katherine Purvis</u>	Title: <u>EHS Coordinator</u>
Signature: <u>Katherine Purvis</u>	Date: <u>12/15/2022</u>
email: <u>katherine.purvis@spurenergy.com</u>	Telephone: <u>(575) 441-8619</u>
<b><u>OCD Only</u></b>	
Received by: <u>Jocelyn Harimon</u>	Date: <u>12/15/2022</u>

State of New Mexico  
Oil Conservation Division

Form C-141

Incident ID	NAPP2234734667
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?	<u>    &gt;100    </u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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

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

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 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

State of New Mexico  
Oil Conservation Division

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Application ID	

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

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 05/05/2023

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

Telephone: 575-441-8619

**OCD Only**

Received by: Jocelyn Harimon

Date: 05/08/2023

Incident ID	NAPP2234734667
District RP	
Facility ID	
Application ID	

## Closure

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

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

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

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 05/05/2023

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

Telephone: 575-441-8619

**OCD Only**

Received by: Jocelyn Harimon

Date: 05/08/2023

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

Closure Approved by: Nelson Velez

Date: 08/09/2023

Printed Name: Nelson Velez

Title: Environmental Specialist - Adv



Appendix D:

Email Notification

Photographic Documentation

Wednesday, May 3, 2023 at 12:16:03 Central Daylight Time

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**Subject:** Federal Bi SWD

**Date:** Tuesday, March 14, 2023 at 9:42:26 AM Central Daylight Time

**From:** Angel Pena

**To:** Bratcher, Michael, EMNRD, Chris Jones, Hamlet, Robert, EMNRD, Harimon, Jocelyn, EMNRD, Nobui, Jennifer, EMNRD, Tristan Jones

All,

This is to inform you all we will be collecting confirmation samples at the Federal BI SWD , 03-16-23 at 9:00 AM . If you have any questions or concerns, please let me know.

Incident number~ napp2234734667

Thank You,

Angel Peña

575-605-0773

Paragon Environmental LLC.



Photographic Documentation

Before Remediation





Photographic Documentation

During Remediation





Photographic Documentation

Post Remediation





Appendix E:  
Laboratory Results



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

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March 23, 2023

CHRIS JONES  
PARAGON ENVIROMENTAL  
5002 CARRAIGE RD  
HOBBS, NM 88242

RE: FEDERAL BI

Enclosed are the results of analyses for samples received by the laboratory on 03/17/23 16:42.

Cardinal Laboratories is accredited through Texas NELAP under certificate number T104704398-22-15. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (\*). For a complete list of accredited analytes and matrices visit the TCEQ website at [www.tceq.texas.gov/field/qa/lab\\_accred\\_certif.html](http://www.tceq.texas.gov/field/qa/lab_accred_certif.html).

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

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

Celey D. Keene  
Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 1 (H231236-01)**

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	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 123 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	400	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 103 % 48.2-134

Surrogate: 1-Chlorooctadecane 120 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 2 (H231236-02)**

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	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 126 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 102 % 48.2-134

Surrogate: 1-Chlorooctadecane 120 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 3 (H231236-03)**

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	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 128 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 118 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 4 (H231236-04)**

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	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 133 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>576</b>	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 97.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 113 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 5 (H231236-05)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 121 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	768	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 117 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 6 (H231236-06)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 128 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1010</b>	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 117 % 49.1-148

Cardinal Laboratories

\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 7 (H231236-07)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/22/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/22/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/22/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/22/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/22/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 117 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>624</b>	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
<b>DRO &gt;C10-C28*</b>	<b>78.1</b>	10.0	03/21/2023	ND	160	80.1	200	7.72	
<b>EXT DRO &gt;C28-C36</b>	<b>36.3</b>	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 99.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 121 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 8 (H231236-08)**

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/23/2023	ND	2.29	115	2.00	1.21	
Toluene*	<0.050	0.050	03/23/2023	ND	2.34	117	2.00	0.348	
Ethylbenzene*	<0.050	0.050	03/23/2023	ND	2.49	125	2.00	0.895	
Total Xylenes*	<0.150	0.150	03/23/2023	ND	7.70	128	6.00	0.520	
Total BTEX	<0.300	0.300	03/23/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 124 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
<b>Chloride</b>	<b>1310</b>	16.0	03/21/2023	ND	432	108	400	0.00	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
<b>DRO &gt;C10-C28*</b>	<b>16.6</b>	10.0	03/21/2023	ND	160	80.1	200	7.72	
<b>EXT DRO &gt;C28-C36</b>	<b>14.3</b>	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 97.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 116 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 9 (H231236-09)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	96.0	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	174	87.1	200	1.45	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	160	80.1	200	7.72	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 118 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 10 (H231236-10)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 96.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 112 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: S - 11 (H231236-11)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	80.0	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 97.4 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: SSW - 1 (H231236-12)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	512	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 118 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: SSW - 2 (H231236-13)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	288	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 104 % 48.2-134

Surrogate: 1-Chlorooctadecane 118 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: ESW - 1 (H231236-14)**

BTEX 8021B		mg/kg		Analyzed By: JH/					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	128	16.0	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 101 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: NSW - 1 (H231236-15)**

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	03/21/2023	ND	2.03	102	2.00	1.54	
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77	
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31	
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10	
Total BTEX	<0.300	0.300	03/21/2023	ND					

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

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	03/21/2023	ND	416	104	400	3.92	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228	
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89	
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND					

Surrogate: 1-Chlorooctane 99.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 114 % 49.1-148

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Celey D. Keene, Lab Director/Quality Manager



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

**Analytical Results For:**

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

Received:	03/17/2023	Sampling Date:	03/16/2023
Reported:	03/23/2023	Sampling Type:	Soil
Project Name:	FEDERAL BI	Sampling Condition:	Cool & Intact
Project Number:	NONE GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - RURAL EDDY		

**Sample ID: WSW - 1 (H231236-16)**

BTEX 8021B		mg/kg		Analyzed By: JH/						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	03/21/2023	ND	2.03	102	2.00	1.54		
Toluene*	<0.050	0.050	03/21/2023	ND	2.07	104	2.00	2.77		
Ethylbenzene*	<0.050	0.050	03/21/2023	ND	2.10	105	2.00	1.31		
Total Xylenes*	<0.150	0.150	03/21/2023	ND	6.36	106	6.00	1.10		
Total BTEX	<0.300	0.300	03/21/2023	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	256	16.0	03/21/2023	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	03/21/2023	ND	198	99.1	200	0.228		
DRO >C10-C28*	<10.0	10.0	03/21/2023	ND	187	93.3	200	1.89		
EXT DRO >C28-C36	<10.0	10.0	03/21/2023	ND						

Surrogate: 1-Chlorooctane 107 % 48.2-134

Surrogate: 1-Chlorooctadecane 119 % 49.1-148

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\*=Accredited Analyte

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Celey D. Keene, Lab Director/Quality Manager



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Notes and Definitions

- S-06 The recovery of this surrogate is outside control limits due to sample dilution required from high analyte concentration and/or matrix interference's.
QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
BS-3 Blank spike recovery outside of lab established statistical limits, but still within method limits. Data is not adversely affected.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
\*\* Samples not received at proper temperature of 6°C or below.
\*\*\* Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



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

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

**BILL TO**

**ANALYSIS REQUEST**

Company Name: Paragon Environmental		P.O. #:	
Project Manager: Chris Jones		Company: Spar Energy	
Address: 1601 N. Turner St., Ste 500		Attn:	
City: Hobbs		Address:	
Phone #: 575-964-7814		City:	
Fax #: _____		State: _____ Zip: _____	
Project #: _____		Project Owner: Spar Energy	
Project Name: Federal Bt		State: _____ Zip: _____	
Project Location: Rural Edg		Phone #: _____	
Sampler Name: Ben Davis		Fax #: _____	
FOR LAB USE ONLY			
Lab I.D. #A231234	Sample I.D.	(G)RAB OR (C)OMP.	DATE
1	5-1	✓	3-16
2	5-2		
3	5-3		
4	5-4		
5	5-5		
6	5-6		
7	5-7		
8	5-8		
9	5-9		
10	5-10		
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Relinquished By: [Signature]		Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Relinquished By: [Signature]		Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date: 5/17		Add'l Phone #:	
Time: 10:43		Add'l Fax #:	
Received By: [Signature]			
Date: _____			
Time: _____			
Delivered By: (Circle One) #13		Sample Condition	
Sampler - UPS - Bus - Other: 5.6c/5.0c		Cool <input checked="" type="checkbox"/> Intact <input checked="" type="checkbox"/>	
		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
		Checked BY: [Signature]	

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



**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**

COMMENTS

Action 214029

**COMMENTS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 214029
	Action Type: [C-141] Release Corrective Action (C-141)

**COMMENTS**

Created By	Comment	Comment Date
csmith	Returned to OCD Review, Operator meets Closure Requirements, but does not meet Reclamation standards.	7/27/2023

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CONDITIONS

Action 214029

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Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 214029
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
nvelez	Remediation has met Rule requirements. Contamination above Reclamation standards has been left in place and is required to be addressed once site is no longer reasonably needed for production or drilling ops.	8/9/2023