



July 10, 2023

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 Closure Report
 Fir Federal Battery
 API No. 30-015-32069
 GPS: Latitude 32.8027039, Longitude -104.2376099
 UL "L", Sec. 25, T17S, R27E
 Eddy County, NM
 NMOCD Ref. No. NRM2004952392**

Paragon Environmental, LLC (Paragon) has been contracted by Spur Energy Partners (Spur) to perform a spill assessment and remediation activities for the Release Site known as the Fir Federal Battery (Fir Fed). Details of the release are summarized below:

Release Details			
Type of Release:	Crude Oil	Volume of Release:	20 bbls
		Volume Recovered:	15 bbls
Source of Release:	Wellhead	Date of Release:	2/13/20
Was Immediate Notice Given?	No	If, Yes, to Whom?	
Was a Watercourse Reached?	No	If Yes, Volume Impacting Watercourse:	N/A
Surface Owner:	Federal	Mineral Owner:	Unknown
A 1/2" brass valve coming off of the circulating pump corroded and washed out spilling approximately 20 bbls of oil in the containment.			

Topographical and Aerial Maps are provided as Figures #3 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 any 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:

Site Characteristics	
Approximate Depth to Groundwater	92'
Within 330 ft. of any continuously flowing or significant watercourse?	NO
Within 200 ft. of any lakebed, sinkhole, or playa lake?	NO
Within 300 ft. of an occupied permanent residence, school, hospital, or institution?	NO
Within 500 ft. of a spring, or private, domestic fresh water well?	NO
Within 1000 ft. of any fresh water well?	NO
Within the incorporated municipal boundaries or within a municipal well field?	NO
Within 300 ft. of a wetland?	NO
Within the area overlying a subsurface mine?	NO
Within an unstable area such as Karst?	Yes
Within a 100-year floodplain?	NO

A search of the groundwater database maintained by the New Mexico Office of the State Engineer (NMOSE) was conducted to determine the average depth to groundwater within one (1) Mile radius of the Release Site and identify any registered water wells within ½ Mile of the Release Site. If no data was identified, it was determined to follow closure criteria of depth to groundwater of less than 50 feet.

Depth to groundwater information is provided in Appendix A.

Per the New Mexico Bureau of Geology and Mineral Resources, the geology is in the Artesia Group (Guadalupean)- Shelf facies forming broad south-southeast trending outcrop from Glorieta to Artesia area: includes Tansil, Yates, Seven Rivers. Queen and Grayburg Formations. May locally include Moenkopi Formation Triassic) at the top (Pat). The soil in this area is made up of the Reeves-Gypsum complex, 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 a high potential for karst geology to be present around the Fir Fed (Figure 3).

The Soil Survey and FEMA Flood Map are provided in Appendix B. A Karst Map is provided in Figure 2.

TABLE I CLOSURE CRITERIA FOR SOILS IMPACTED BY A RELEASE			
	Constituent	Method	Limit
51-100 Feet	Chloride	EPA 300.0	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

INITIAL SITE ASSESSMENT & SOIL SAMPLING EVENT

On November 30, 2022, Paragon conducted an initial site assessment. During the initial site assessment, two (2) soil samples were collected in an effort to determine the vertical extent of soil impact. These samples were collected in accordance with NMAC 19.15.29 and submitted to an approved laboratory for analysis. A table summarizing laboratory analytical results from soil samples collected during the above-stated activities is provided below:

Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')								
Sample Date 11-30-22		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria ≤ 100 mg/kg	Closure Criteria ≤ 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S-1	0-6"	ND	ND	ND	ND	ND	ND	8800
	1'	ND	ND	ND	ND	ND	ND	5760
	2'	ND	ND	ND	ND	ND	ND	4600
	3'	ND	ND	ND	ND	ND	ND	8660
S-2	0-6"	ND	ND	ND	ND	ND	ND	688
	1'	ND	ND	ND	ND	ND	ND	256
	2'	ND	ND	ND	ND	ND	ND	320
	3'	ND	ND	ND	ND	ND	ND	272

ND-Analyte Not Detected

All Laboratory analytical reports are provided in Appendix E. A Site Map is provided in Figure 1.

REMEDIATION ACTIVITIES

On March 30, 2022, Paragon mobilized personnel and hand equipment to conduct remedial activities. Based on the analytical results, site characteristics, and field observations made during the site assessment, the following remedial activities were conducted to advance the Release Site toward an NMOCD closure:

- Utilizing hand equipment, we excavated the impacted soils that were above the NMOCD Closure Criteria in the areas categorized by soil sample S-2 to a depth of 1 foot BGS.
- In the area of S-1, we excavated to a depth of 3 feet BGS, where we met refusal with our hand tools.
- An email was sent on 3-31-23 notifying the NMOCD that we would be obtaining confirmation soil samples on 4-5-23. The labeling got flipped and was submitted backward, meaning S-1 now became S-2 and vice versa. The results of this sampling event are in the following data table.

4-5-23 Confirmation Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')								
Sample Date 4-5-23		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
WSW	3'	ND	ND	ND	ND	ND	ND	416
ESW	1'	ND	ND	ND	ND	ND	ND	4480
NSW	3'	ND	ND	ND	ND	ND	ND	576
SSW	1'	ND	ND	ND	ND	ND	ND	13000
S-1 Bottom Comp	1'	ND	ND	ND	ND	ND	ND	592
S-2 Bottom Comp	3'	ND	ND	ND	ND	ND	ND	2520

ND- Analyte Not Detected

On May 26, 2023, Paragon returned with personnel and equipment. We utilized the backhoe to further the vertical and horizontal excavation to 4-feet BGS in the area of S-2 and extended the horizontal areas of ESW and SSW an additional 1-foot. We then sampled again. Those results are as follows:

5-26-23 Confirmation Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is <50')								
Sample Date 5-26-23		Closure Criteria ≤ 50 mg/kg	Closure Criteria ≤ 10 mg/kg				Closure Criteria 100 mg/kg	Closure Criteria 600 mg/kg
Sample ID	Depth (BGS)	BTEX	Benzene	GRO	DRO	MRO	Total TPH	CHLORIDES
S-2 Comp	4'	--	--	--	--	--	--	176
ESW Comp	1'	--	--	--	--	--	--	128
SSW Comp	1'	--	--	--	--	--	--	176

-- Analyte Not Tested

With below closure level bottom and sidewall sample results, we backfilled the area, utilizing hand tools and equipment, we compacted and contoured the area to match the location.

CLOSURE REQUEST

After careful review, Paragon requests that this incident, NRM2004952392, be closed. SPUR has complied with the applicable closure requirements set forth in rule 19.15.19.12 NMAC.

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

Respectfully,



Chris Jones
Environmental Professional
Paragon Environmental, LLC

Attachments

Figures:

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

Appendices:

- Appendix A – Referenced Water Surveys
- Appendix B – Soil Survey and FEMA Flood Map
- Appendix C – C-141
- Appendix D – 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

Fir Fed Battery
API# 30-015-32069
Eddy County, NM
Site Map

Legend

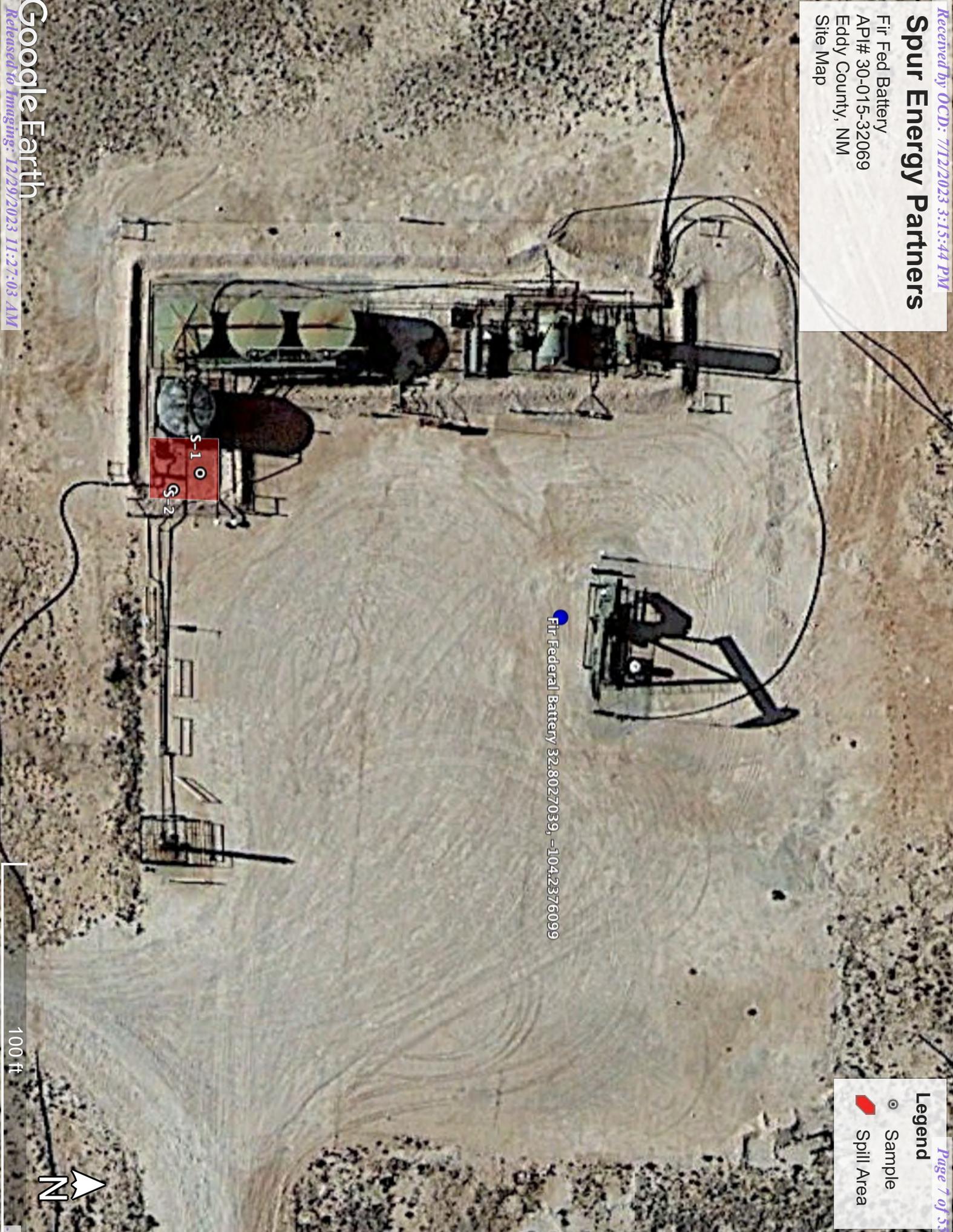
- Sample
- Spill Area

Fir Federal Battery 32.8027039, -104.2376099

S-1 ○

S-2 ○

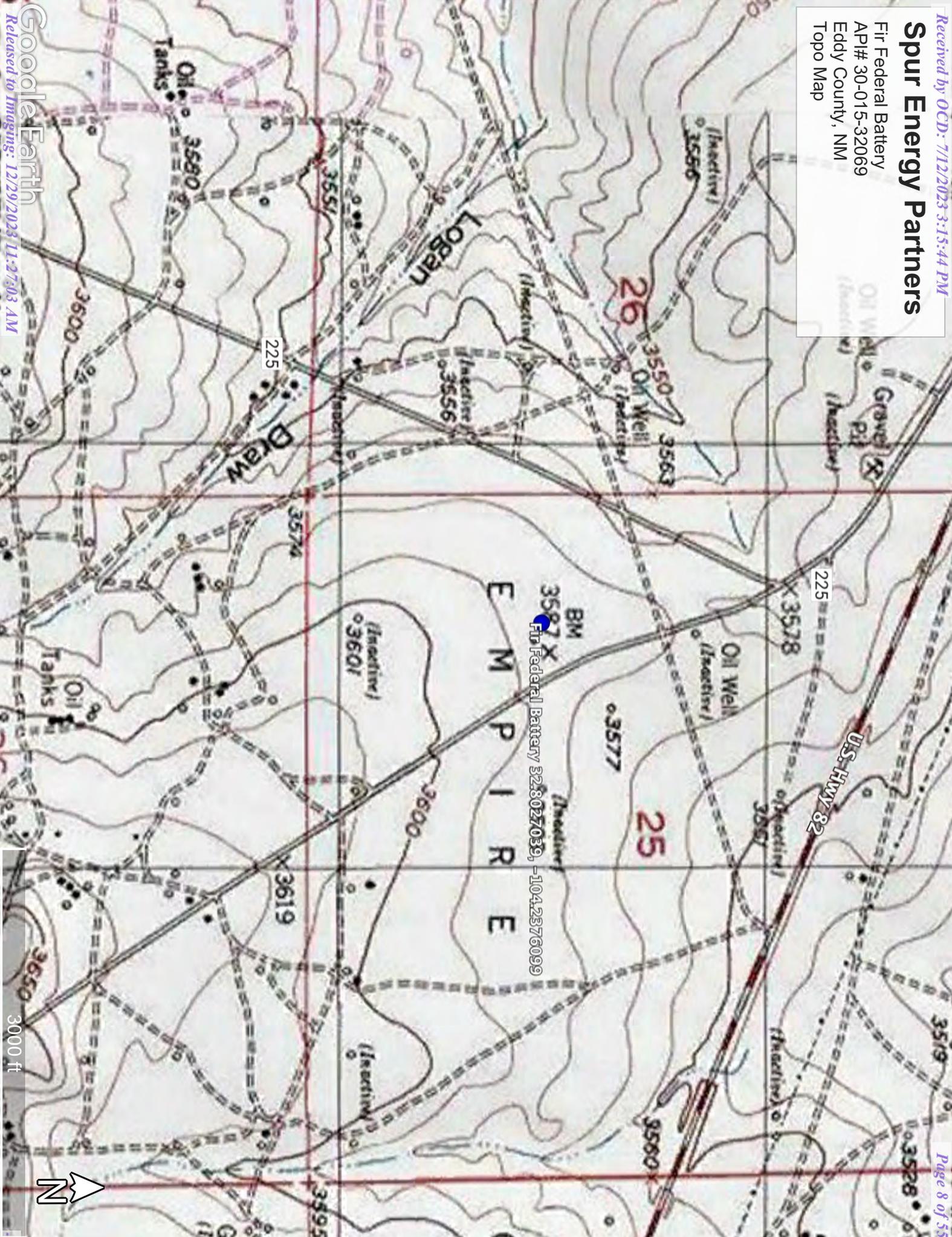
100 ft



Spur Energy Partners

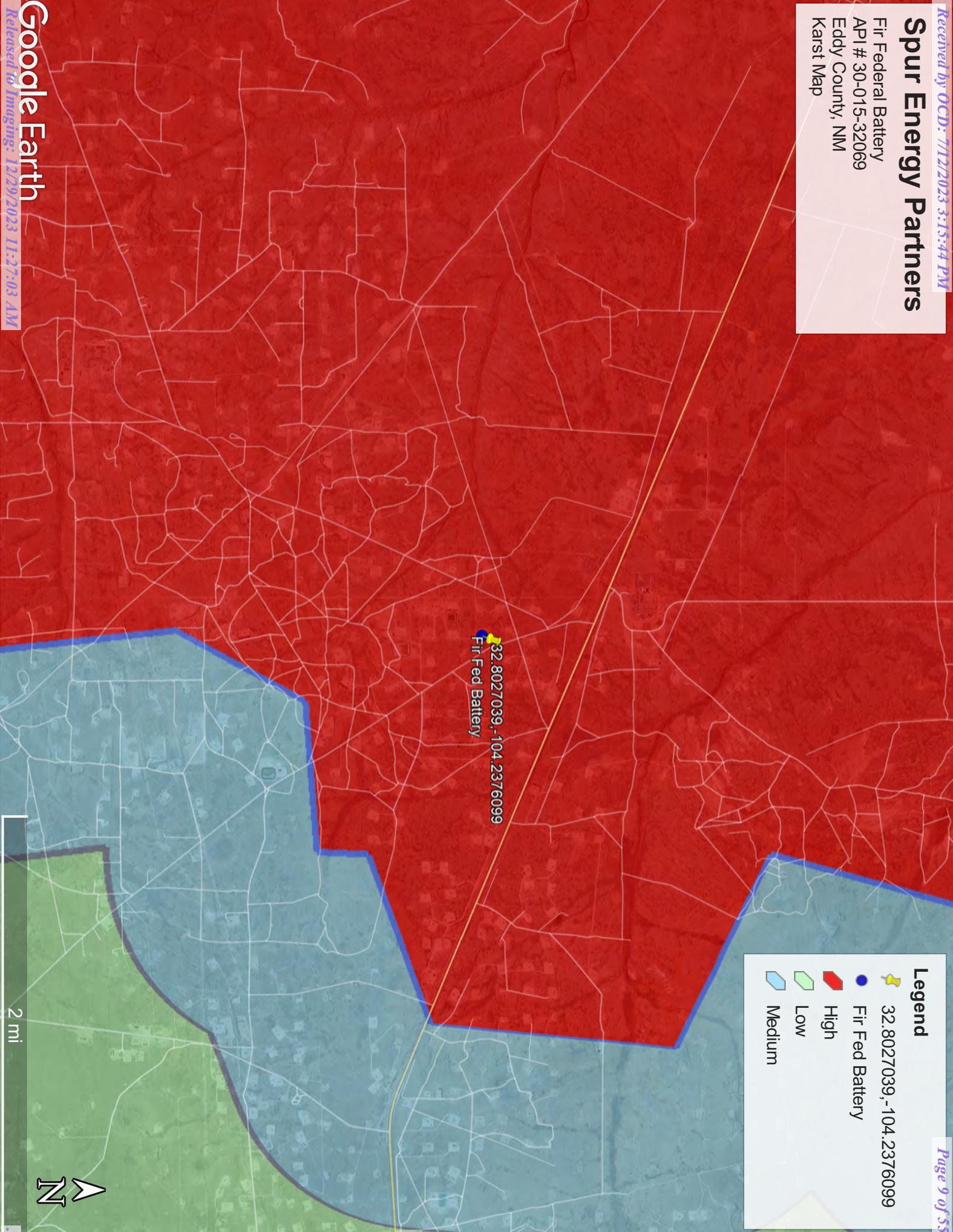
Fir Federal Battery
API# 30-015-32069
Eddy County, NM
Topo Map

Google Earth
Released to Imaging: 12/29/2023 11:27:03 AM



Spur Energy Partners

Fir Federal Battery
API # 30-015-32069
Eddy County, NM
Karst Map



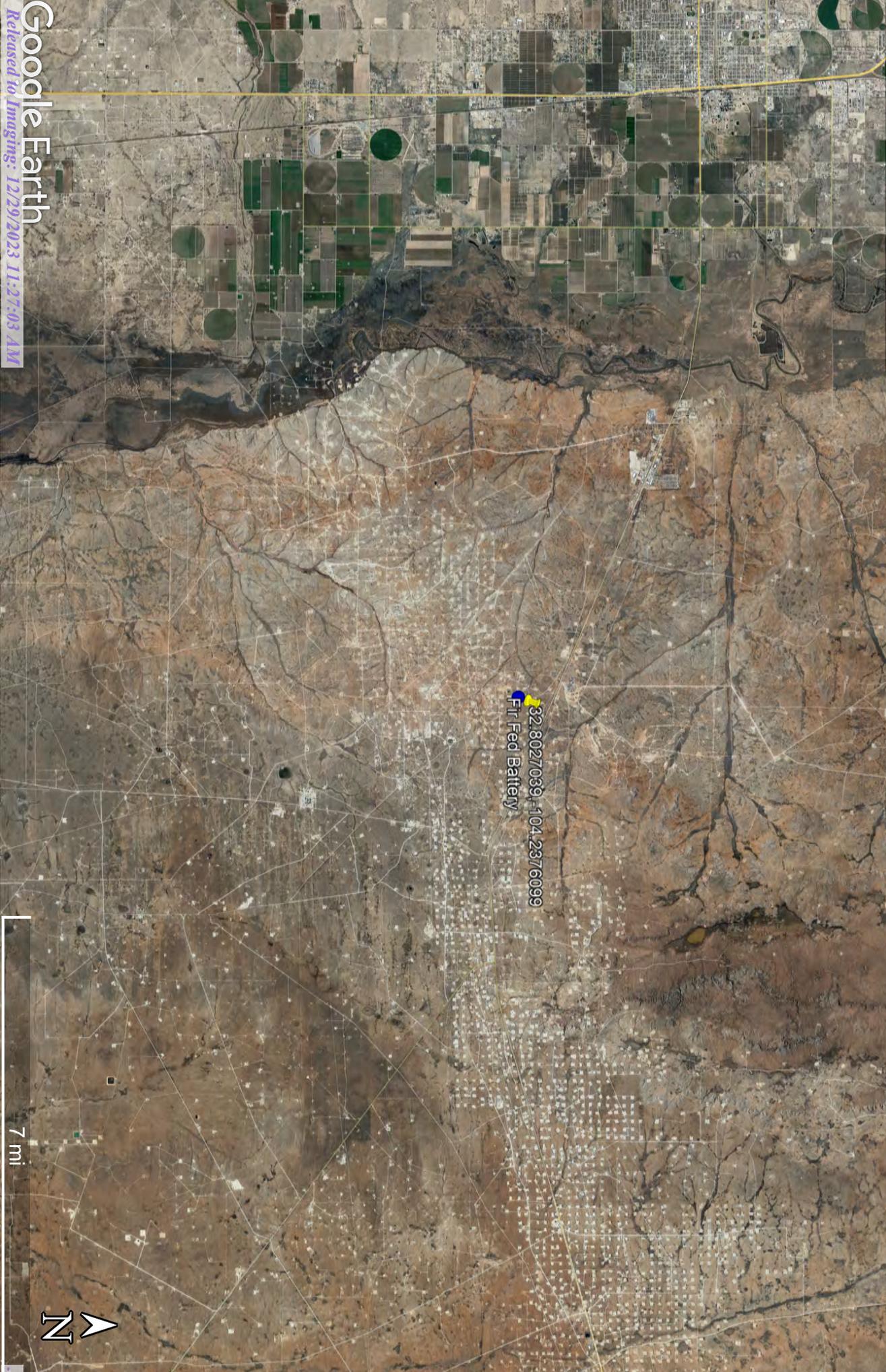
Legend

-  32.8027039, -104.2376099
-  Fir Fed Battery
-  High
-  Low
-  Medium



Spur Energy Partners

Fir Federal Battery
API # 30-015-32069
Eddy County, NM
Aerial Map



Legend

-  32.8027039, -104.2376099
-  Fir Fed Battery

 32.8027039, -104.2376099
Fir Fed Battery



Spur Energy Partners

Fir Federal Battery
API# 30-015-32069
Eddy County, NM
Confirmation Map

Legend

-  Samples
-  Spill Area

Fir Federal Battery 32.8027039, -104.2376099



100 ft





Appendix A
Referenced Water Data:

New Mexico State of Engineers Office



New Mexico Office of the State Engineer

Water Column/Average Depth to Water

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

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

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

(In feet)

POD Number	Code	basin	County	64	16	4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
				Q	Q	Q									
RA04561	RA	ED	4	2	26	17S	27E	570871	3630142*		692	250			
RA12456 POD1	RA	ED	1	4	24	17S	27E	572348	3630969		1619	220	92	128	
RA12612 POD1	RA	ED	2	4	23	17S	27E	570161	3631140		1908	300			

Average Depth to Water: **92 feet**

Minimum Depth: **92 feet**

Maximum Depth: **92 feet**

Record Count: 3

UTMNAD83 Radius Search (in meters):

Easting (X): 571379.164

Northing (Y): 3629671.709

Radius: 2000

*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.

12/27/22 8:32 AM

WATER COLUMN/ AVERAGE DEPTH TO
WATER



Appendix B
Soil Survey:

U.S.D.A.

FEMA Flood Map

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

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

Map Unit Setting

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

Map Unit Composition

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

Description of Reeves

Setting

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

Typical profile

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

Properties and qualities

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

Map Unit Description: Reeves-Gypsum land complex, 0 to 3 percent slopes---Eddy Area, New Mexico

Interpretive groups

Land capability classification (irrigated): 3s
Land capability classification (nonirrigated): 7s
Hydrologic Soil Group: B
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Description of Gypsum Land

Setting

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

Interpretive groups

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

Minor Components

Largo

Percent of map unit: 5 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Reagan

Percent of map unit: 5 percent
Ecological site: R070BC007NM - Loamy
Hydric soil rating: No

Cottonwood

Percent of map unit: 5 percent
Ecological site: R070BC033NM - Salty Bottomland
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 18, Sep 8, 2022



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

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

- 20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
- 17.5 Coastal Transect Base Flood Elevation Line (BFE)
- Limit of Study
- Jurisdiction Boundary
- Coastal Transect Baseline
- Profile Baseline
- Hydrographic Feature

OTHER FEATURES

- Digital Data Available
- No Digital Data Available
- Unmapped

MAP PANELS

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 **1/9/2023 at 1:20:2 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 undrilled 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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party	Spur Energy Partners LLC	OGRID	328947
Contact Name	Braidy Moulder	Contact Telephone	(713) 264-2517
Contact email	bmoulder@spurepllc.com	Incident #	(assigned by OCD)
Contact mailing address:	919 Milam Street Suite 2475 Houston Texas 77002		

Location of Release Source

Latitude 32.8027039 _____ Longitude -104.2376099 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name	Fir Federal Battery	Site Type	Well Pad
Date Release Discovered	February 13, 2020	API# (if applicable)	30-015-32069

Unit Letter	Section	Township	Range	County
L	25	17 South	27 East	Eddy

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

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

<input checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 20	Volume Recovered (bbls) 15
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (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: A 1/2" brass valve off circulating pump washed out spilling approximately 20bbls oil into an unlined containment. Dimensions are 26' X 38' - 1/2" deep.

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

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 not been undertaken, explain why:

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

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

Printed Name: Joseph Guenier Title: Staff Scientist
 Signature: [Signature] Date: 2-18-20
 email: Joseph.Guenier@Terracon.com Telephone: 806 544 9276

OCD Only
 Received by: _____ Date: _____

Incident ID	NRM2004952392
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?	_____ 92 (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 checked="" type="checkbox"/> Yes <input 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 not 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 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.

State of New Mexico
Oil Conservation Division

Page 4

Incident ID	NRM2004952392
District RP	
Facility ID	
Application ID	

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

Printed Name: Kathy Purvis.

Title: HSE Coordinator

Signature: Katherine Purvis

Date: 7/12/23

email: katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: Shelly Wells

Date: 7/13/2023

Incident ID	NRM2004952392
District RP	
Facility ID	
Application ID	

Remediation Plan

Remediation Plan Checklist: *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Deferral Requests Only: *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: 7/12/23

email: katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: Shelly Wells Date: 7/13/2023

- Approved
 Approved with Attached Conditions of Approval
 Denied
 Deferral Approved

Signature: _____

Date: _____

Incident ID	NRM2004952392
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: 7/12/23

email: katherine.purvis@spurenergy.com

Telephone: 575-441-8619

OCD Only

Received by: Shelly Wells

Date: 7/13/2023

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: _____ Date: _____

Printed Name: _____ Title: _____



Appendix D:

Email Notification

Photographic Documentation

Tuesday, July 11, 2023 at 18:15:34 Mountain Daylight Time

Subject: Fir Fed 48 hour notification

Date: Friday, March 31, 2023 at 8:09:36 AM Mountain Daylight Time

From: Angel Pena

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

All,

Good morning ! This is to inform you all we will be collecting confirmation samples at the Fir Fed battery ,04-05-23 at 9:00 AM . If you have any questions or concerns, please let me know.

Incident number~ NRM2004952392

Thank You,

Angel Peña

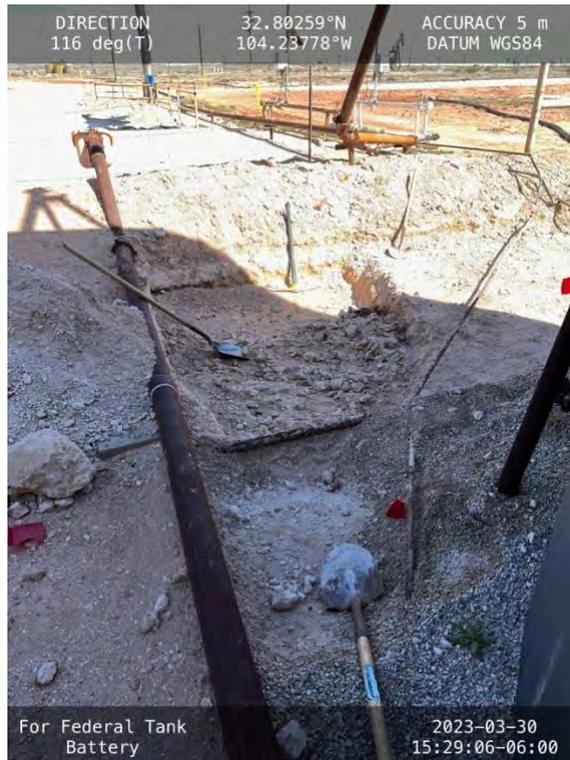
575-605-0773

Paragon Environmental LLC.



Photographic Documentation

Excavation





Completed







Appendix E:
Laboratory Results



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

December 05, 2022

CASON SPURLOCK
PARAGON ENVIROMENTAL
5002 CARRAIGE RD
HOBBS, NM 88242

RE: FER FED

Enclosed are the results of analyses for samples received by the laboratory on 11/30/22 16:18.

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.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style.

Celey D. Keene
Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 1 0-6" (H225618-01)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 69.9-140

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	8800	16.0	12/02/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 70.4 % 45.3-161

Surrogate: 1-Chlorooctadecane 76.0 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 1 1' (H225618-02)

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	12/03/2022	ND	2.12	106	2.00	15.7		
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9		
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1		
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6		
Total BTEX	<0.300	0.300	12/03/2022	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	5760	16.0	12/02/2022	ND	416	104	400	3.77		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	12/03/2022	ND	188	94.2	200	1.63		
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76		
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND						

Surrogate: 1-Chlorooctane 80.6 % 45.3-161

Surrogate: 1-Chlorooctadecane 86.6 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 1 2' (H225618-03)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4600	16.0	12/02/2022	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 97.3 % 45.3-161

Surrogate: 1-Chlorooctadecane 103 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 1 3' (H225618-04)

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	12/03/2022	ND	2.12	106	2.00	15.7		
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9		
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1		
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6		
Total BTEX	<0.300	0.300	12/03/2022	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	8660	16.0	12/02/2022	ND	432	108	400	0.00	QM-07	

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	12/03/2022	ND	188	94.2	200	1.63		
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76		
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND						

Surrogate: 1-Chlorooctane 102 % 45.3-161

Surrogate: 1-Chlorooctadecane 110 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 2 0-6" (H225618-05)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	688	16.0	12/02/2022	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	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 77.0 % 45.3-161

Surrogate: 1-Chlorooctadecane 82.5 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 2 1' (H225618-06)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 112 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	256	16.0	12/02/2022	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	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 113 % 45.3-161

Surrogate: 1-Chlorooctadecane 122 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 2 2' (H225618-07)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	320	16.0	12/02/2022	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	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 105 % 45.3-161

Surrogate: 1-Chlorooctadecane 114 % 46.3-178

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 and 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 damages, 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
 CASON SPURLOCK
 5002 CARRAIGE RD
 HOBBS NM, 88242
 Fax To:

Received:	11/30/2022	Sampling Date:	11/30/2022
Reported:	12/05/2022	Sampling Type:	Soil
Project Name:	FER FED	Sampling Condition:	Cool & Intact
Project Number:	SPUR ENERGY	Sample Received By:	Tamara Oldaker
Project Location:	RURAL EDDY		

Sample ID: S - 2 3' (H225618-08)

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	12/03/2022	ND	2.12	106	2.00	15.7	
Toluene*	<0.050	0.050	12/03/2022	ND	2.12	106	2.00	15.9	
Ethylbenzene*	<0.050	0.050	12/03/2022	ND	2.08	104	2.00	15.1	
Total Xylenes*	<0.150	0.150	12/03/2022	ND	6.44	107	6.00	15.6	
Total BTEX	<0.300	0.300	12/03/2022	ND					

Surrogate: 4-Bromofluorobenzene (PID) 110 % 69.9-140

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	272	16.0	12/02/2022	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	12/03/2022	ND	188	94.2	200	1.63	
DRO >C10-C28*	<10.0	10.0	12/03/2022	ND	199	99.3	200	1.76	
EXT DRO >C28-C36	<10.0	10.0	12/03/2022	ND					

Surrogate: 1-Chlorooctane 75.4 % 45.3-161

Surrogate: 1-Chlorooctadecane 81.4 % 46.3-178

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 and 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 damages, 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

Notes and Definitions

- QR-04 The RPD for the BS/BSD was outside of historical limits.
QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
** Samples not received at proper temperature of 6°C or below.
*** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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 and 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 damages, 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

Celey D. Keene, Lab Director/Quality Manager



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

April 13, 2023

CHRIS JONES
PARAGON ENVIROMENTAL
5002 CARRAIGE RD
HOBBS, NM 88242

RE: FIR FED TANK BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 04/06/23 16:50.

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.

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

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

Accreditation applies to public drinking water matrices.

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

Sincerely,

A handwritten signature in black ink that reads "Celey D. Keene". The signature is written in a cursive style with a large, flowing "C" and "K".

Celey D. Keene
Lab Director/Quality Manager



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

Analytical Results For:

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: WSW - 1 (H231655-01)

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	04/12/2023	ND	1.90	94.8	2.00	1.85	
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03	
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51	
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08	
Total BTEX	<0.300	0.300	04/12/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 118 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	416	16.0	04/12/2023	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/12/2023	ND	188	94.0	200	1.99	
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957	
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND					

Surrogate: 1-Chlorooctane 98.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 104 % 49.1-148

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: ESW - 1 (H231655-02)

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	04/12/2023	ND	1.90	94.8	2.00	1.85	
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03	
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51	
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08	
Total BTEX	<0.300	0.300	04/12/2023	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	4480	16.0	04/12/2023	ND	416	104	400	3.77	

TPH 8015M		mg/kg		Analyzed By: MS					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
GRO C6-C10*	<10.0	10.0	04/12/2023	ND	188	94.0	200	1.99	
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957	
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND					

Surrogate: 1-Chlorooctane 95.7 % 48.2-134

Surrogate: 1-Chlorooctadecane 101 % 49.1-148

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: NSW - 1 (H231655-03)

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	04/12/2023	ND	1.90	94.8	2.00	1.85		
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03		
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51		
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08		
Total BTEX	<0.300	0.300	04/12/2023	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	576	16.0	04/12/2023	ND	416	104	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	04/12/2023	ND	188	94.0	200	1.99		
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957		
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND						

Surrogate: 1-Chlorooctane 124 % 48.2-134

Surrogate: 1-Chlorooctadecane 132 % 49.1-148

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: SSW - 1 (H231655-04)

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	04/12/2023	ND	1.90	94.8	2.00	1.85		
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03		
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51		
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08		
Total BTEX	<0.300	0.300	04/12/2023	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: AC						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	13000	16.0	04/12/2023	ND	416	104	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	04/12/2023	ND	188	94.0	200	1.99		
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957		
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND						

Surrogate: 1-Chlorooctane 94.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 99.6 % 49.1-148

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: S - 1 BOTTOM (H231655-05)

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	04/12/2023	ND	1.90	94.8	2.00	1.85	
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03	
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51	
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08	
Total BTEX	<0.300	0.300	04/12/2023	ND					

Surrogate: 4-Bromofluorobenzene (PID) 116 % 71.5-134

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	592	16.0	04/12/2023	ND	416	104	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	04/12/2023	ND	188	94.0	200	1.99	
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957	
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND					

Surrogate: 1-Chlorooctane 89.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 95.4 % 49.1-148

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

Received:	04/06/2023	Sampling Date:	04/05/2023
Reported:	04/13/2023	Sampling Type:	Soil
Project Name:	FIR FED TANK BATTERY	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Tamara Oldaker
Project Location:	SPUR - EDDY COUNTY		

Sample ID: S - 2 BOTTOM (H231655-06)

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	04/12/2023	ND	1.90	94.8	2.00	1.85	
Toluene*	<0.050	0.050	04/12/2023	ND	1.94	96.9	2.00	2.03	
Ethylbenzene*	<0.050	0.050	04/12/2023	ND	2.08	104	2.00	2.51	
Total Xylenes*	<0.150	0.150	04/12/2023	ND	6.27	104	6.00	3.08	
Total BTEX	<0.300	0.300	04/12/2023	ND					

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: AC					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	2520	16.0	04/12/2023	ND	416	104	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	04/12/2023	ND	188	94.0	200	1.99	
DRO >C10-C28*	<10.0	10.0	04/12/2023	ND	194	97.2	200	0.957	
EXT DRO >C28-C36	<10.0	10.0	04/12/2023	ND					

Surrogate: 1-Chlorooctane 92.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 97.6 % 49.1-148

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 and 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 damages, 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

Notes and Definitions

- S-04 The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
** Samples not received at proper temperature of 6°C or below.
*** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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 and 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.

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Paragon Environmental
Project Manager: Chris Jones

Address: 1601 N. Turner St., Ste 500
City: Hobbs State: NM zip: 88240

Phone #: 575-964-7814 Fax #:
Project #:

Project Name: Fir Fed Tank battery
Project Location: Fiddy Centered

Sample Name: Mauer Centered

FOR LAB USE ONLY

BILL TO
P.O. #:
Company: SPUR
Attn: Brady Molder

Address:
City:
State: Zip:

Phone #:
Fax #:

MATRIX PRESERV SAMPLING

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:	ICE / COOL	OTHER :	DATE	TIME
HOBBSS													4-5	
WSW-1														
ESW-1														
NSW-1														
SSW-1														
S-1 Bottom														
S-2 Bottom														

ANALYSIS REQUEST
Chlorides
B-Tev
PH
TPH

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 the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors in the event of or related to the performance of services hereunder by Cardinal, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: *MV* Date: 4-6-23

Received By: *Maura Molder* Date: 4-5

Phone Result: Yes No Add'l Phone #:
 Fax Result: Yes No Add'l Fax #:
 REMARKS: E-mail Results to Chris Jones

Delivered By: (Circle One) *#13*
Sampler - UPS - Bus - Other: *190 / 1.30*

Sample Condition: Intact Cool Yes No No No
CHECKED BY: *YO*

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



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

June 01, 2023

CHRIS JONES
PARAGON ENVIROMENTAL
5002 CARRAIGE RD
HOBBS, NM 88242

RE: FIR FEDERAL

Enclosed are the results of analyses for samples received by the laboratory on 05/26/23 14:52.

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.

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:	05/26/2023	Sampling Date:	05/26/2023
Reported:	06/01/2023	Sampling Type:	Soil
Project Name:	FIR FEDERAL	Sampling Condition:	Cool & Intact
Project Number:	NOT GIVEN	Sample Received By:	Shalyn Rodriguez
Project Location:	SPUR - EDDY COUNTY		

Sample ID: S - 2 4' COMP. (H232713-01)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	05/30/2023	ND	432	108	400	3.77	

Sample ID: ESW COMP. (H232713-02)

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	05/30/2023	ND	432	108	400	3.77	

Sample ID: SSW COMP. (H232713-03)

Chloride, SM4500CI-B		mg/kg		Analyzed By: GM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	05/30/2023	ND	432	108	400	3.77	

Sample ID: WSW COMP. (H232713-04)

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	05/30/2023	ND	432	108	400	3.77	

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 and 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 damages, 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

Notes and Definitions

- QM-07 The spike recovery was outside acceptance limits for the MS and/or MSD. The batch was accepted based on acceptable LCS recovery.
ND Analyte NOT DETECTED at or above the reporting limit
RPD Relative Percent Difference
** Samples not received at proper temperature of 6°C or below.
*** Insufficient time to reach temperature.
- Chloride by SM4500Cl-B does not require samples be received at or below 6°C
Samples reported on an as received basis (wet) unless otherwise noted on report

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 and 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.

Celey D. Keene

Celey D. Keene, Lab Director/Quality Manager



CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Paragon Environmental

Project Manager: Chris Jones

Address: 1601 N. Turner St., Ste 500

City: Hobbs State: NM Zip: 88240

Phone #: 575-964-7814 Fax #:

Project #: Project Owner: Spv

Project Name: Fir Federal

Project Location: Edley County

Sampler Name: Severe Weather

FOR LAB USE ONLY

BILL TO

ANALYSIS REQUEST

P.O. #:

Company: Spv

Attn: Bradley Walker

Address:

City: State: Zip:

Phone #:

Fax #:

MATRIX

PRESERV

SAMPLING

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.		MATRIX							DATE	TIME	
		#	CONTAINERS	GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :	ACID/BASE:			ICE / COOL
H939713	S-2 4' Comp.											05/24	
2	ESW Comp.												
3	SSW Comp.												
4	WSW Comp.												

Chlorides

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 the client for the analyses. All claims, including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by Cardinal within 30 days after completion of the applicable service. In no event shall Cardinal be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by clients, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by Cardinal. Signature of Whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By: *PS.Ms*

Date: 05/24

Received By: *Speckironov*

Phone Result: Yes No

Fax Result: Yes No

Add'l Phone #: Add'l Fax #:

Delivered By: (Circle One) *1.0: UPS*

Date: 05/24

Received By: *Speckironov*

Phone Result: Yes No

Fax Result: Yes No

Add'l Phone #: Add'l Fax #:

Sampler - UPS - Bus - Other: *1.0: #113*

Sample Condition Cool Intact Yes No

CHECKED BY: *SR* (Initials)

Email results to Chris Jones

† 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

CONDITIONS

Action 239206

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 239206
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NRM2004952392 FIR FEDERAL BATTERY, thank you. This Remediation Closure Report is approved. Areas reasonably needed for production or subsequent drilling operations will need to be reclaimed and revegetated as soon as they are no longer reasonably needed. A report for reclamation and revegetation including pictures of the contoured backfilled excavation surface and a thorough discussion on reseeding mixture, vegetation ratio, timelines, etc., will need to be submitted and approved prior to this incident receiving the final status of "Restoration Complete".	12/29/2023