



**Pima Environmental Services**  
**5614 N. Lovington Highway**  
**Hobbs, NM 88240**  
**575-964-7740**

August 8<sup>th</sup>, 2023

Bureau of Land Management  
620 East Green St  
Carlsbad, NM, 88220

NMOCD District 2  
811 S. First St  
Artesia, NM, 88210

**RE: Liner Inspection and Closure Report**  
**Skelly Unit #989 Battery**  
**API No. 30-015-36498**  
**GPS: Latitude 32.821907 Longitude -103.843357**  
**UL "F", Section 23, Township 17S, Range 31E**  
**NMOCD Reference No. NAPP2113932518**

Pima Environmental Services, LLC (Pima) has been contracted by Spur Energy Partners, LLC. (Spur) to perform a liner inspection and prepare this closure report for a release that happened on the Skelly Unit #989 Battery (Skelly). An initial C141 was submitted on May 27<sup>th</sup>, 2021, and can be found in Appendix B. This incident was assigned Incident ID NAPP2113932518, by the New Mexico Oil Conservation Division (NMOCD).

#### **Site Information and Site Characterization**

The Skelly is located approximately eight (8) miles east of Loco Hills, NM. This spill site is in Unit F, Section 23, Township 17S, Range 31E, Latitude 32.821907, Longitude -103.843357, Eddy County, NM. A Location map can be found in Figure 1. A Topographic map can be found in Figure 2.

Based upon the New Mexico Office of the State Engineer water well data, depth to the nearest groundwater in this area is 96 feet below-grade surface (BGS). According to the United States Geological Survey water well data, depth to the nearest groundwater in this area is greater than 100 feet BGS. See Appendix A for referenced water surveys. The Skelly is in an area that has a low potential for karst geology (Figure 3).

#### **Release Information**

**NAPP2113932518:** On May 15<sup>th</sup>, 2021, a 4" dump valve became plugged with rubber and iron causing the production separator to be fluid packed and send fluid down the gas lines to the burner supply at the heater. A lease operator arrived on location and noticed fluid coming out of the heater fire tube. The lease op shut the gas line going to the burner and stopped the leak. The fire tube was inspected to ensure the leak was not coming from there. All production was bypassed to FWKO. The fluid released was calculated to be approximately 8 barrels (bbls) of crude oil. A vacuum truck was able to recover approximately 7 bbls of standing fluid. All fluid remained within the lined and earthen secondary containment.

#### **Site Assessment and Remediation Activities**

On June 9<sup>th</sup>, 2021, Pima mobilized to the site to conduct an assessment and clean the gravel inside the containment. We used a bioremediation chemical solution to clean the gravel and equipment, then raked the treatment into the gravel and repeated the process twice more.

**Liner Inspection**

On July 8<sup>th</sup>, 2021, after sending the 48-hour notification email, Pima Environmental conducted a liner inspection at this location. The liner inspection form and photographic documentation can be found in Appendix C. Composite samples were collected from each side of the containment to ensure no contamination escaped the containment walls. The results of this sampling event can be found in the following table. A Site map can be found in Figure 4.

7-8-21 Confirmation Composite Sample Results								
NMOCD Table 1 Closure Criteria 19.15.29 NMAC								
Spur Energy -Skelly Unit #989 H Battery								
Date 7/8/2021		NM Approved Laboratory Results						
Sample ID	Depth (BGS)	BTEX mg/kg	Benzene mg/kg	GRO mg/kg	DRO mg/kg	MRO mg/kg	Total TPH mg/kg	Cl mg/kg
North Comp	0-6"	ND	ND	ND	ND	ND	0	ND
South Comp	0-6"	ND	ND	ND	ND	ND	0	ND
East Comp	0-6"	ND	ND	ND	ND	ND	0	ND
West Comp	0-6"	ND	ND	ND	ND	ND	0	ND

ND – Analyte Not Detected

On December 3<sup>rd</sup>, 2021, Pima returned to the site to remove the gravel from inside the containment around the area of the release. The contaminated material was transported to Lea Land, a NMOCD approved disposal site.

On February 11<sup>th</sup>, 2022, after sending the 48-hour notification email, Pima Environmental conducted a liner inspection at this location. The liner inspection form and photographic documentation can be found in Appendix C.

**Countermeasures due to rejection**

On July 31<sup>st</sup>, 2023, Pima returned to the site and collected a soil sample from beneath the liner containment to ensure no contamination leached below the liner. We removed approximately 40 cubic yards of contaminated gravel and transported all contaminated material to an NMOCD approved landfill. The liner was patched and repaired after collecting soil sample (S1). The results from this sampling event can be found in the following table. Pictures of the soil sample location and liner repairs can be found in Appendix C.

7-31-23 Soil Sample Results								
NMOCD Table 1 Closure Criteria 19.15.29 NMAC								
Spur Energy -Skelly Unit #989 H Battery								
Date 7/31/2023		NM Approved Laboratory Results						
Sample ID	Depth (BGS)	BTEX mg/kg	Benzene mg/kg	GRO mg/kg	DRO mg/kg	MRO mg/kg	Total TPH mg/kg	Cl mg/kg
S-1 Surface	0-6"	ND	ND	ND	ND	ND	0	65.3
S-1	1'	ND	ND	ND	ND	ND	0	67.3

ND – Analyte Not Detected

**Closure Request**

After careful review, Pima requests that this incident, NAPP2113932518, be closed. Spur has complied with the applicable closure requirements.

Should you have any questions or need additional information, please feel free to contact Sebastian Orozco at 619-721-4813 or [sebastian@pimaoil.com](mailto:sebastian@pimaoil.com).

Respectfully,

*Sebastian Orozco*

Sebastian Orozco  
Environmental Project Manager  
Pima Environmental Services, LLC

**Attachments**

Figures:

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

Appendices:

- Appendix A – Referenced Water Surveys
- Appendix B – C-141 Form and 48-Hour Notification
- Appendix C – Liner Inspection Form & Photographic Documentation
- Appendix D – Laboratory Reports



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**Figures:**

1-Location Map

2-Topo Map

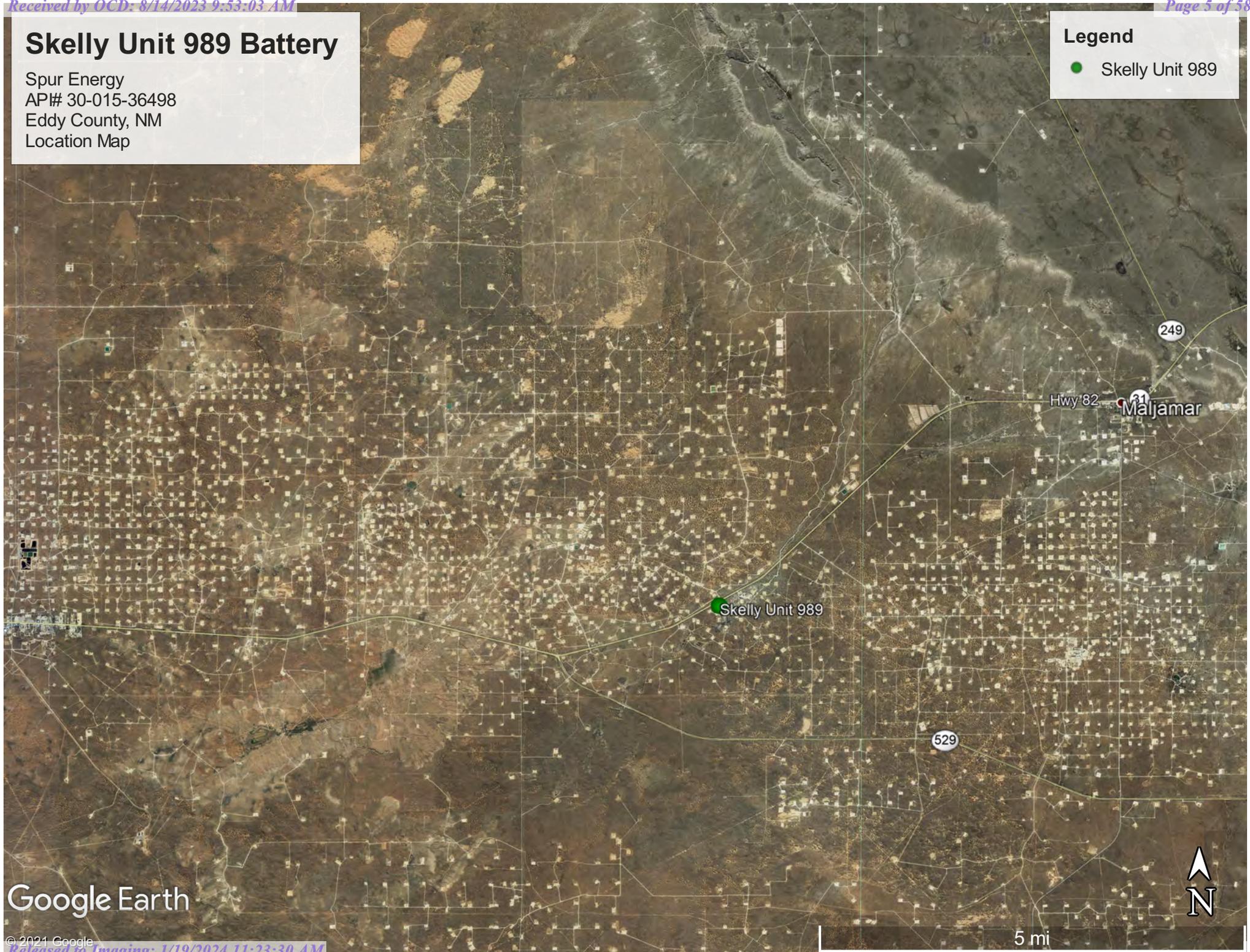
3-Karst Map

4-Site Map

**Skelly Unit 989 Battery**  
Spur Energy  
AP# 30-015-36498  
Eddy County, NM  
Location Map

**Legend**

- Skelly Unit 989



Google Earth

# Skelly Unit 989 Battery

Spur Energy  
AP# 30-015-36498  
Eddy County, NM  
Topographic Map

**Legend**

- Skelly Unit 989



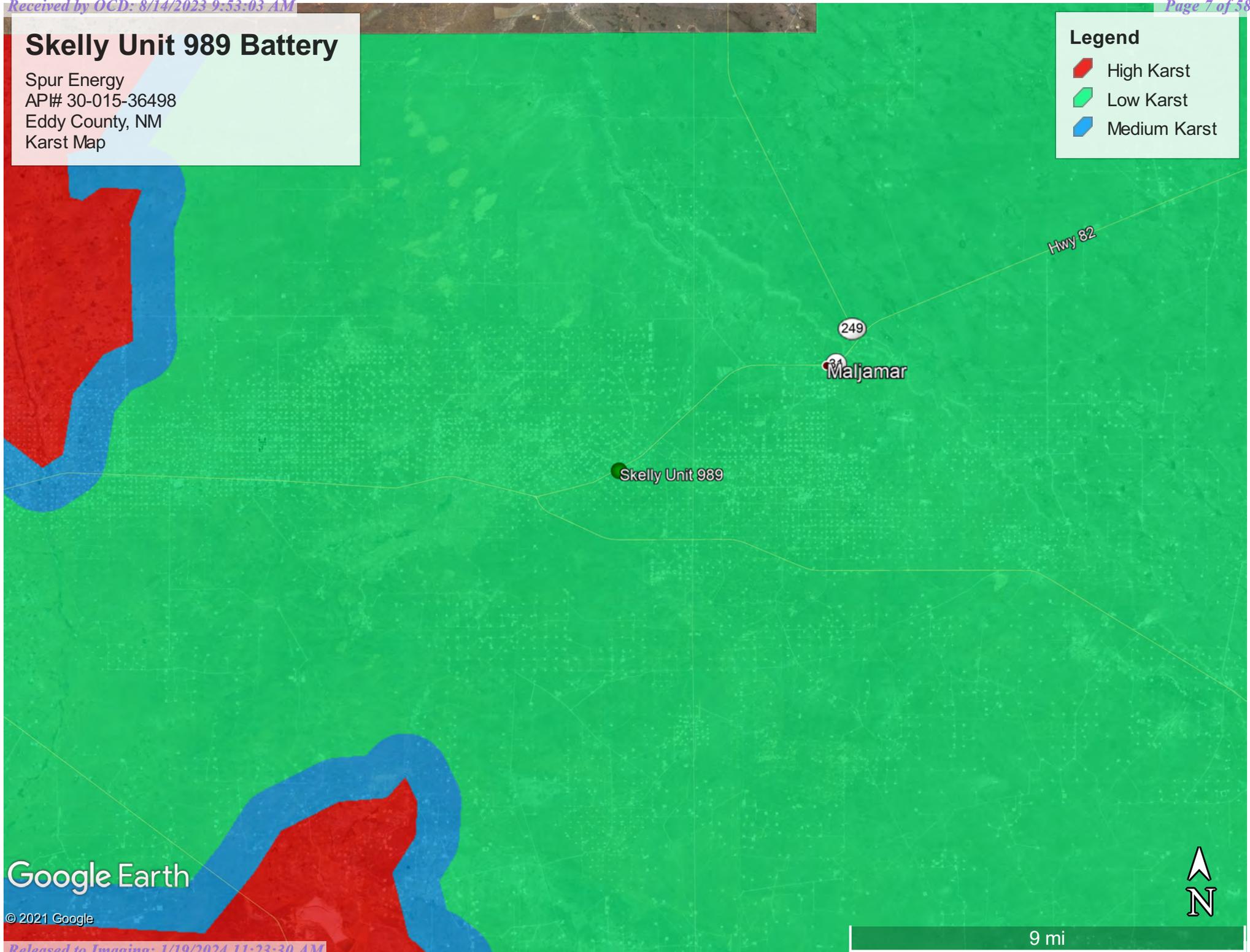
Google Earth

1000 ft

**Skelly Unit 989 Battery**  
 Spur Energy  
 API# 30-015-36498  
 Eddy County, NM  
 Karst Map

**Legend**

-  High Karst
-  Low Karst
-  Medium Karst



Google Earth

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**Skelly Unit 989 Battery**  
 Spur Energy  
 AP# 30-015-36498  
 Eddy County, NM  
 Site Map

**Legend**

- Comp Samples
- Spill Area



Google Earth

200 ft





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**Appendix A**

Water Surveys:

OSE

USGS



# New Mexico Office of the State Engineer

## Water Column/Average Depth to Water

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

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

(quarters are 1=NW 2=NE 3=SW 4=SE)

(quarters are smallest to largest) (NAD83 UTM in meters)

(In feet)

POD Number	Code	POD Sub-basin	County	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Distance	DepthWell	DepthWater	Water Column
<a href="#">RA 11590 POD3</a>		RA	ED	3	1	2	32	17S	31E	603932	3629260	5233	60		
<a href="#">L 14207 POD3</a>		L	LE	2	3	3	31	16S	37E	606117	3636977	5318	240	96	144
<a href="#">RA 11590 POD4</a>		RA	ED	4	1	1	32	17S	31E	603308	3629253	5769	55		

Average Depth to Water: **96 feet**  
 Minimum Depth: **96 feet**  
 Maximum Depth: **96 feet**

**Record Count:** 3

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 608307.96

**Northing (Y):** 3632130.93

**Radius:** 6000

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.

7/6/21 11:59 AM

WATER COLUMN/ AVERAGE DEPTH TO WATER



USGS Home  
Contact USGS  
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## National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

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

Groundwater levels for the Nation

\* IMPORTANT: [Next Generation Station Page](#)

### Search Results -- 1 sites found

site\_no list =

- 325216103575701

Minimum number of levels = 1

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

### USGS 325216103575701 16S.30E.33.42443

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°52'16", Longitude 103°57'57" NAD27

Land-surface elevation 3,729 feet above NAVD88

The depth of the well is 385 feet below land surface.

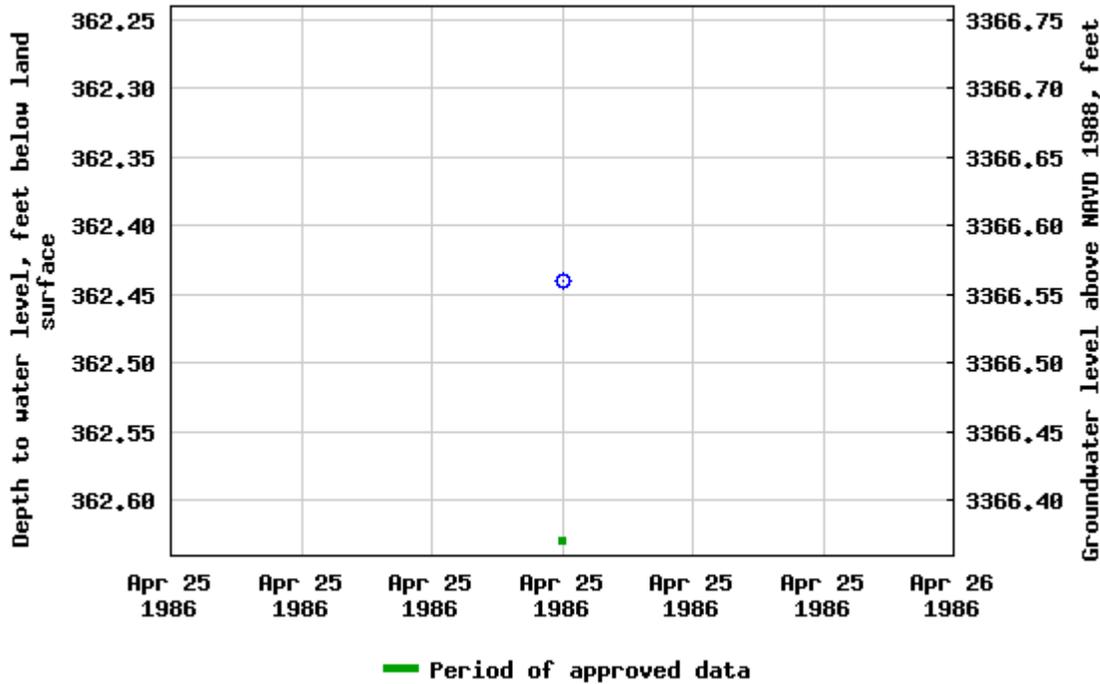
This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Santa Rosa Sandstone (231SNRS) local aquifer.

#### Output formats

<a href="#">Table of data</a>
<a href="#">Tab-separated data</a>
<a href="#">Graph of data</a>
<a href="#">Reselect period</a>

USGS 325216103575701 16S.30E.33.42443



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

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**Title: Groundwater for USA: Water Levels**

**URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>**



Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2021-07-06 14:02:00 EDT

0.59 0.52 nadww02



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Contact USGS  
Search USGS

## National Water Information System: Web Interface

USGS Water Resources

Data Category:

Groundwater

Geographic Area:

United States

GO

Click to hide News Bulletins

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

Groundwater levels for the Nation

\* IMPORTANT: [Next Generation Station Page](#)

### Search Results -- 1 sites found

site\_no list =

- 324600103484601

Minimum number of levels = 1

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

### USGS 324600103484601 18S.31E.01.44432

Available data for this site

Groundwater: Field measurements

GO

Eddy County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°46'00", Longitude 103°48'46" NAD27

Land-surface elevation 3,790 feet above NAVD88

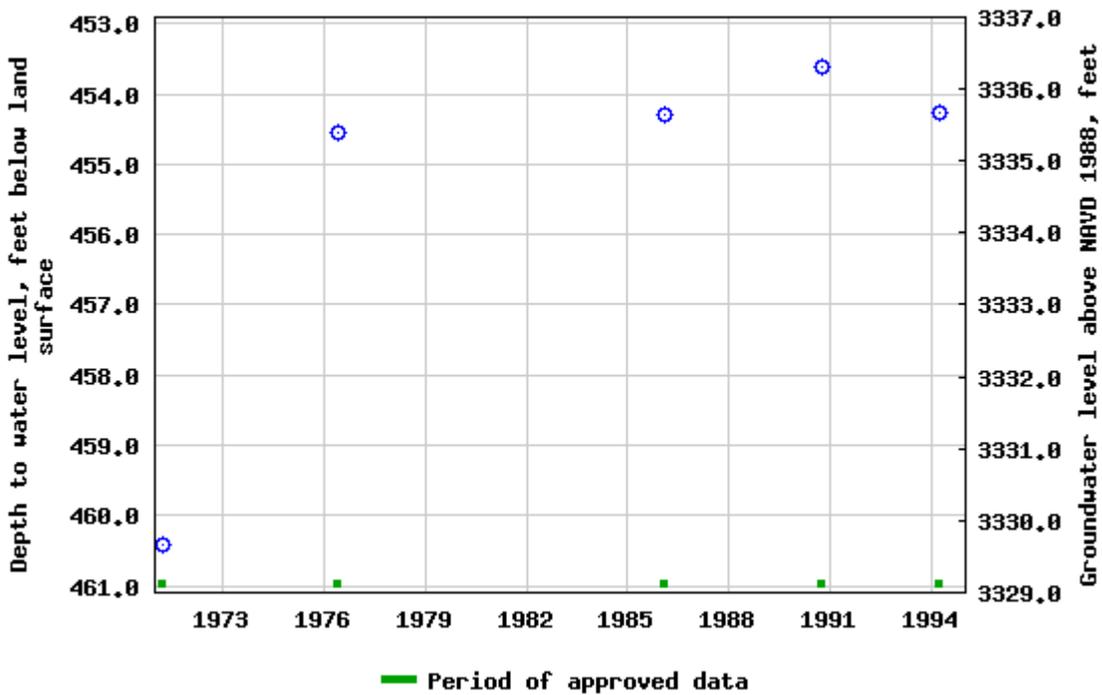
This well is completed in the Other aquifers (N9999OTHER) national aquifer.

This well is completed in the Santa Rosa Sandstone (231SNRS) local aquifer.

#### Output formats

<a href="#">Table of data</a>
<a href="#">Tab-separated data</a>
<a href="#">Graph of data</a>
<a href="#">Reselect period</a>

USGS 324600103484601 18S.31E.01.44432



Breaks in the plot represent a gap of at least one year between field measurements.  
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**Title: Groundwater for USA: Water Levels**

**URL: <https://nwis.waterdata.usgs.gov/nwis/gwlevels?>**



Page Contact Information: [USGS Water Data Support Team](#)

Page Last Modified: 2021-07-06 14:02:29 EDT

0.62 0.54 nadww02



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**Appendix B**

C-141 Form  
48-Hour Notification

istrict I  
 25 N. French Dr., Hobbs, NM 88240  
 istrict II  
 1 S. First St., Artesia, NM 88210  
 istrict III  
 1000 Rio Brazos Road, Aztec, NM 87410  
 istrict 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	NAPP2113932518
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)	NAPP2113932518
Contact mailing address	2407 Pecos Avenue, Artesia, NM 88210		

### Location of Release Source

Latitude 32.821907 Longitude 103.843357  
 (NAD 83 in decimal degrees to 5 decimal places)

Site Name	Skelly Unit #989	Site Type	Production
Date Release Discovered	5/15/2021	API# (if applicable)	30-015-36498

Unit Letter	Section	Township	Range	County
F	23	17S	31E	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) <b>g</b>	Volume Recovered (bbls) <b>7</b>
<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  
 Rubber and iron plugged up 4" dump causing production separator to fluid pack and send fluid down gas lines to burner supply at heater.

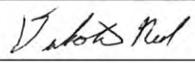
Page 1 of 58  
 Received by OCD: 8/14/2023 9:53:03 AM  
 Released to Imaging: 1/19/2024 11:23:30 AM

Incident ID	NAPP2113932518
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 <u>not</u> 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: <u>Dakota Neel</u> Title: <u>HSE Coordinator</u> Signature: <u></u> Date: <u>5/27/2021</u> email: <u>dneel@spurepllc.com</u> Telephone: <u>832-849-7837</u>
<b><u>OCD Only</u></b> Received by: _____ Date: _____

Form C-141

State of New Mexico  
Oil Conservation Division

Page 3

Incident ID	NAPP2113932518
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?	<50(ft bgs) <input type="checkbox"/>
Did this release impact groundwater or surface water?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
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 <input type="checkbox"/>
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
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 <input type="checkbox"/>

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 1/2-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.

Incident ID	NAPP2113932518
District RP	
Facility ID	
Application ID	

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

Printed Name: Braidy Moulder Title: HSE Coordinator  
 Signature: *Braidy Moulder* Date: 3/16/2022  
 email: bmoulder@spurepllc.com Telephone: 713-264-2517

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
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: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: Katherine Purvis Date: \_\_\_\_\_

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: Shelly Wells Date: 8/14/2023

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: Scott Rodgers Date: 01/19/2024

Printed Name: Scott Rodgers Title: Environmental Specialist Adv.



Gio PimaOil <gio@pimaoil.com>

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## NAPP2103541864 - Liner Inspection

2 messages

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Gio PimaOil <gio@pimaoil.com>

Tue, Mar 8, 2022 at 4:20 PM

To: ocdonline@state.nm.us, Tom Pima Oil <tom@pimaoil.com>

Good afternoon,

Pima Environmental would like to notify you that we will be conducting a liner Inspection at the HT 18 Federal #001 for incident NAPP2103541864. Pima personnel are scheduled to be on site for this Inspection event at approximately 9:00 a.m. on Friday, February 11<sup>th</sup>, 2022. If you have any questions or concerns, please let me know. Thank you.

Gio Gomez  
Environmental Project Manager  
cell-806-782-1151  
Office- 575-964-7740  
**Pima Environmental Services, LLC.**

---

Gio PimaOil <gio@pimaoil.com>

Mon, Mar 14, 2022 at 9:49 AM

To: ocdonline@state.nm.us, Tom Pima Oil <tom@pimaoil.com>

Good morning,

I want to apologize for a clerical error, Pima Enviromental conducted a liner inspection at the Skelly Unit #989 Battery, Incident NAPP2113932518 on Friday, February 11<sup>th</sup>, 2022. Not the HT 18 Federal #001. Do we need reschedule this inspection? If you have any questions or concerns, please let me know. Thank you.

[Quoted text hidden]

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[Quoted text hidden]



Pima Environmental Services

**Appendix C**

Liner Inspection Form

Photographic Documentation



Pima Environmental Services, LLC

**Liner Inspection Form**

Company Name: Spur Energy Partners

Site: Skelly Unit #989 Battery

Lat/Long: 32.82166,-103.843797

NMOCD Incident ID & Incident Date: NAPP2113932518 // 5-15-2021

2-Day Notification Sent: 2/08/2022 via email from Gio Gomez

Inspection Date: 2/11/2022

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

Other: \_\_\_\_\_

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

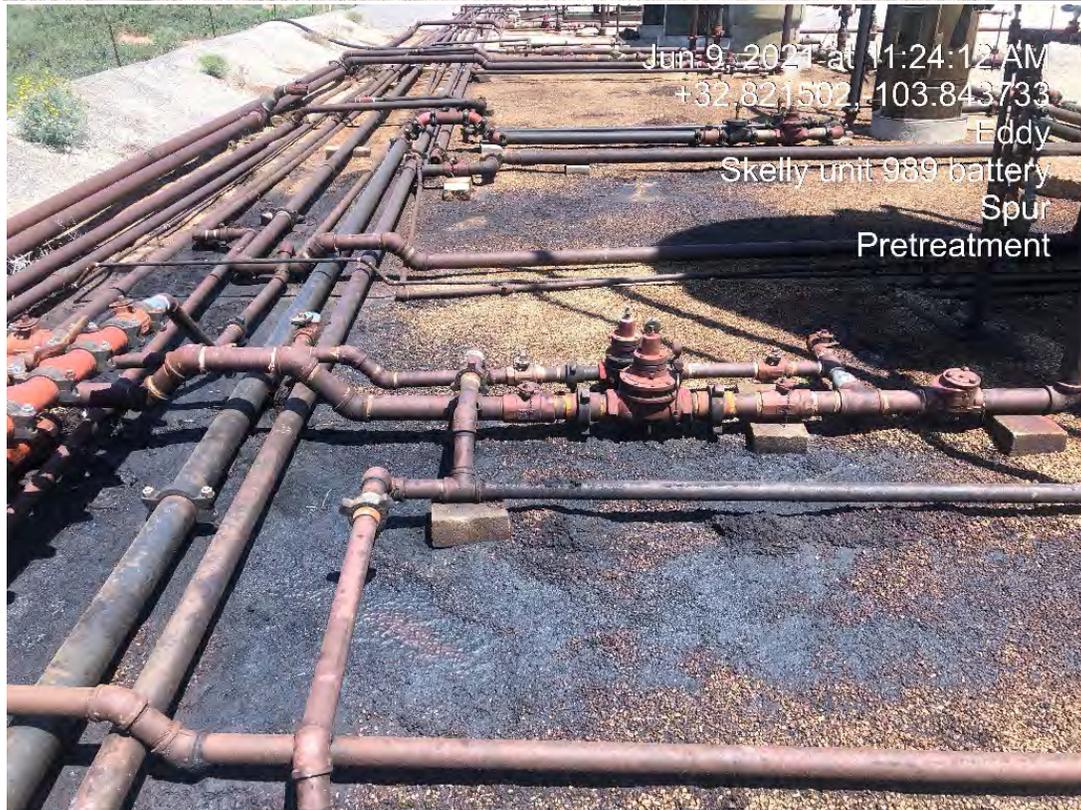
Comments: \_\_\_\_\_

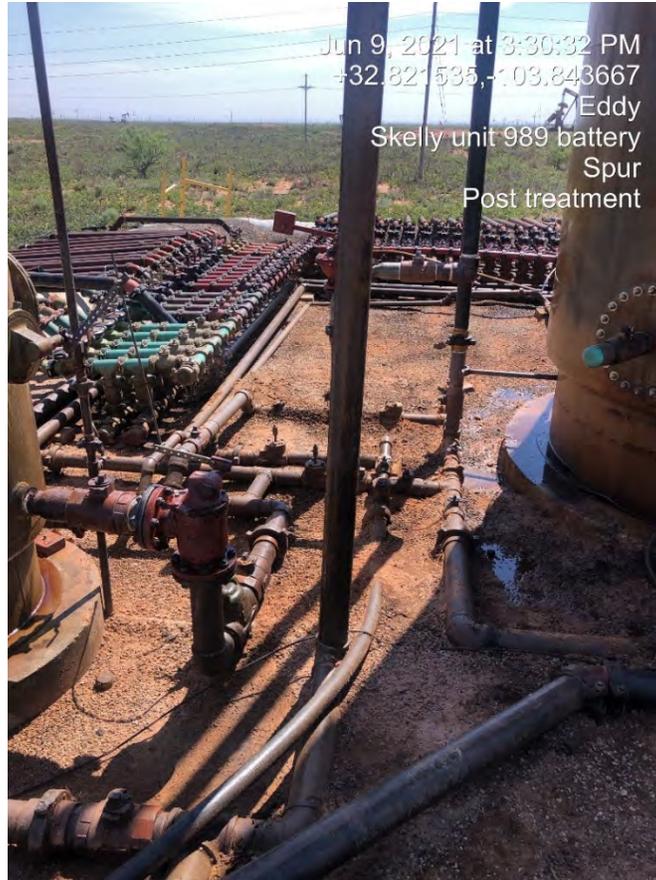
Inspector Name: Sebastian Orozco Inspector Signature:

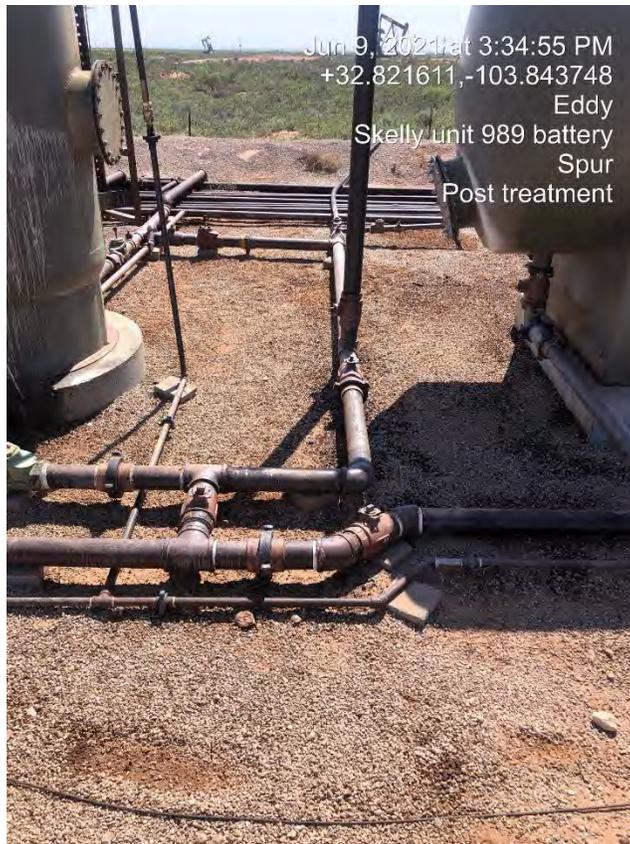


### SITE PHOTOGRAPHS





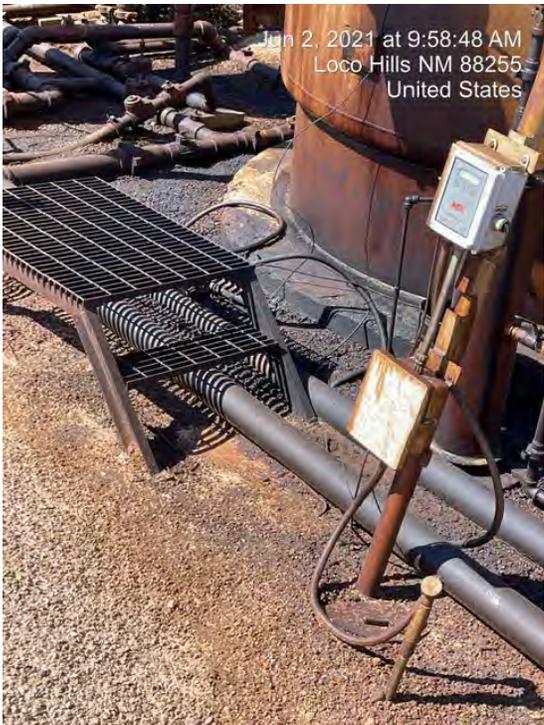


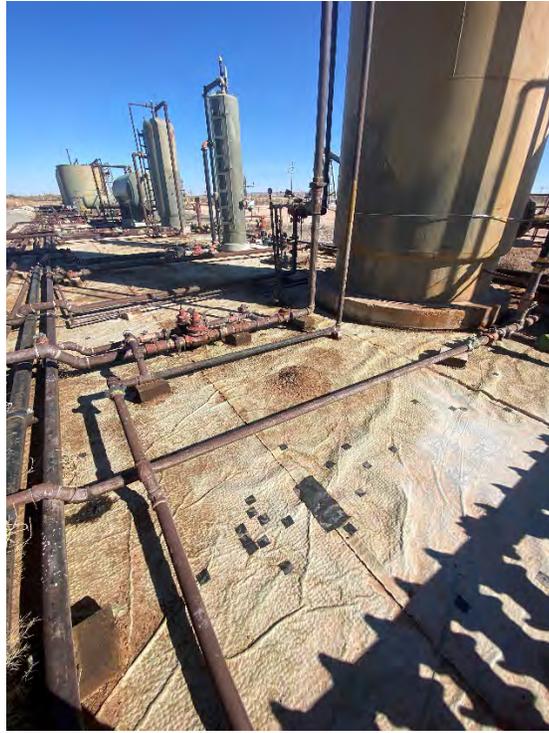




### Liner Inspection

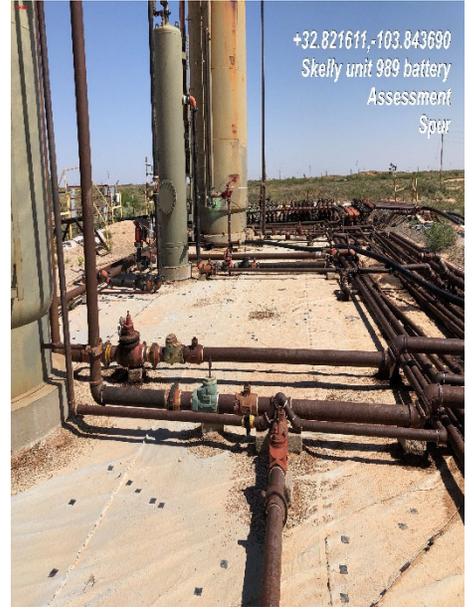








### SITE PHOTOGRAPHS POST GRAVEL REMOVAL AND LINER REPAIR







Pima Environmental Services

**Appendix D**

Laboratory Reports



Hall Environmental Analysis Laboratory  
4901 Hawkins NE  
Albuquerque, NM 87109  
TEL: 505-345-3975 FAX: 505-345-4107  
Website: [clients.hallenvironmental.com](http://clients.hallenvironmental.com)

July 19, 2021

Tom Bynum  
Pima Environmental Services LLC  
1601 N. Turner Ste 500  
Hobbs, NM 88240  
TEL: (575) 631-6977  
FAX:

RE: Skelly Unit 989 Battery

OrderNo.: 2107470

Dear Tom Bynum:

Hall Environmental Analysis Laboratory received 4 sample(s) on 7/10/2021 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to [www.hallenvironmental.com](http://www.hallenvironmental.com) or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a light blue horizontal line.

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

**Analytical Report**

Lab Order **2107470**

Date Reported: **7/19/2021**

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Pima Environmental Services LLC

**Client Sample ID:** North Comp

**Project:** Skelly Unit 989 Battery

**Collection Date:** 7/8/2021 1:25:00 PM

**Lab ID:** 2107470-001

**Matrix:** SOIL

**Received Date:** 7/10/2021 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>VP</b>
Chloride	ND	60		mg/Kg	20	7/14/2021 1:11:38 PM	61287
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>SB</b>
Diesel Range Organics (DRO)	ND	8.4		mg/Kg	1	7/15/2021 11:21:28 AM	61259
Motor Oil Range Organics (MRO)	ND	42		mg/Kg	1	7/15/2021 11:21:28 AM	61259
Surr: DNOP	101	70-130		%Rec	1	7/15/2021 11:21:28 AM	61259
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	7/13/2021 12:38:45 PM	61241
Surr: BFB	97.9	70-130		%Rec	1	7/13/2021 12:38:45 PM	61241
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.024		mg/Kg	1	7/13/2021 12:38:45 PM	61241
Toluene	ND	0.048		mg/Kg	1	7/13/2021 12:38:45 PM	61241
Ethylbenzene	ND	0.048		mg/Kg	1	7/13/2021 12:38:45 PM	61241
Xylenes, Total	ND	0.097		mg/Kg	1	7/13/2021 12:38:45 PM	61241
Surr: 4-Bromofluorobenzene	102	70-130		%Rec	1	7/13/2021 12:38:45 PM	61241

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	PQL Practical Quantitative Limit	RL Reporting Limit
	S % Recovery outside of range due to dilution or matrix	

**Analytical Report**

Lab Order **2107470**

Date Reported: 7/19/2021

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Pima Environmental Services LLC

**Client Sample ID:** South Comp

**Project:** Skelly Unit 989 Battery

**Collection Date:** 7/8/2021 1:25:00 PM

**Lab ID:** 2107470-002

**Matrix:** SOIL

**Received Date:** 7/10/2021 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>VP</b>
Chloride	ND	60		mg/Kg	20	7/14/2021 1:24:03 PM	61287
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>SB</b>
Diesel Range Organics (DRO)	ND	9.5		mg/Kg	1	7/14/2021 2:23:49 PM	61259
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	7/14/2021 2:23:49 PM	61259
Surr: DNOP	89.7	70-130		%Rec	1	7/14/2021 2:23:49 PM	61259
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	7/13/2021 1:02:28 PM	61241
Surr: BFB	97.1	70-130		%Rec	1	7/13/2021 1:02:28 PM	61241
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.023		mg/Kg	1	7/13/2021 1:02:28 PM	61241
Toluene	ND	0.047		mg/Kg	1	7/13/2021 1:02:28 PM	61241
Ethylbenzene	ND	0.047		mg/Kg	1	7/13/2021 1:02:28 PM	61241
Xylenes, Total	ND	0.094		mg/Kg	1	7/13/2021 1:02:28 PM	61241
Surr: 4-Bromofluorobenzene	101	70-130		%Rec	1	7/13/2021 1:02:28 PM	61241

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Limit
	S	% Recovery outside of range due to dilution or matrix		

**Analytical Report**

Lab Order **2107470**

Date Reported: 7/19/2021

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Pima Environmental Services LLC

**Client Sample ID:** East Comp

**Project:** Skelly Unit 989 Battery

**Collection Date:** 7/8/2021 1:25:00 PM

**Lab ID:** 2107470-003

**Matrix:** SOIL

**Received Date:** 7/10/2021 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>VP</b>
Chloride	ND	60		mg/Kg	20	7/14/2021 1:36:28 PM	61287
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>SB</b>
Diesel Range Organics (DRO)	ND	10		mg/Kg	1	7/14/2021 2:47:37 PM	61259
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	7/14/2021 2:47:37 PM	61259
Surr: DNOP	93.5	70-130		%Rec	1	7/14/2021 2:47:37 PM	61259
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	7/13/2021 1:26:11 PM	61241
Surr: BFB	99.5	70-130		%Rec	1	7/13/2021 1:26:11 PM	61241
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.024		mg/Kg	1	7/13/2021 1:26:11 PM	61241
Toluene	ND	0.048		mg/Kg	1	7/13/2021 1:26:11 PM	61241
Ethylbenzene	ND	0.048		mg/Kg	1	7/13/2021 1:26:11 PM	61241
Xylenes, Total	ND	0.096		mg/Kg	1	7/13/2021 1:26:11 PM	61241
Surr: 4-Bromofluorobenzene	102	70-130		%Rec	1	7/13/2021 1:26:11 PM	61241

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Limit
	S	% Recovery outside of range due to dilution or matrix		

**Analytical Report**

Lab Order **2107470**

Date Reported: **7/19/2021**

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Pima Environmental Services LLC

**Client Sample ID:** West Comp

**Project:** Skelly Unit 989 Battery

**Collection Date:** 7/8/2021 1:25:00 PM

**Lab ID:** 2107470-004

**Matrix:** SOIL

**Received Date:** 7/10/2021 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
<b>EPA METHOD 300.0: ANIONS</b>							Analyst: <b>VP</b>
Chloride	ND	60		mg/Kg	20	7/14/2021 2:13:42 PM	61287
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>							Analyst: <b>SB</b>
Diesel Range Organics (DRO)	ND	8.6		mg/Kg	1	7/14/2021 3:11:27 PM	61259
Motor Oil Range Organics (MRO)	ND	43		mg/Kg	1	7/14/2021 3:11:27 PM	61259
Surr: DNOP	91.9	70-130		%Rec	1	7/14/2021 3:11:27 PM	61259
<b>EPA METHOD 8015D: GASOLINE RANGE</b>							Analyst: <b>NSB</b>
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	7/13/2021 1:49:58 PM	61241
Surr: BFB	98.9	70-130		%Rec	1	7/13/2021 1:49:58 PM	61241
<b>EPA METHOD 8021B: VOLATILES</b>							Analyst: <b>NSB</b>
Benzene	ND	0.024		mg/Kg	1	7/13/2021 1:49:58 PM	61241
Toluene	ND	0.048		mg/Kg	1	7/13/2021 1:49:58 PM	61241
Ethylbenzene	ND	0.048		mg/Kg	1	7/13/2021 1:49:58 PM	61241
Xylenes, Total	ND	0.095		mg/Kg	1	7/13/2021 1:49:58 PM	61241
Surr: 4-Bromofluorobenzene	103	70-130		%Rec	1	7/13/2021 1:49:58 PM	61241

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

<b>Qualifiers:</b>	*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
	D	Sample Diluted Due to Matrix	E	Value above quantitation range
	H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
	ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
	PQL	Practical Quantitative Limit	RL	Reporting Limit
	S	% Recovery outside of range due to dilution or matrix		

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2107470

19-Jul-21

**Client:** Pima Environmental Services LLC

**Project:** Skelly Unit 989 Battery

Sample ID: <b>MB-61287</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 300.0: Anions</b>								
Client ID: <b>PBS</b>	Batch ID: <b>61287</b>	RunNo: <b>79791</b>								
Prep Date: <b>7/14/2021</b>	Analysis Date: <b>7/14/2021</b>	SeqNo: <b>2808214</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: <b>LCS-61287</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 300.0: Anions</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>61287</b>	RunNo: <b>79791</b>								
Prep Date: <b>7/14/2021</b>	Analysis Date: <b>7/14/2021</b>	SeqNo: <b>2808215</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	91.8	90	110			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2107470

19-Jul-21

**Client:** Pima Environmental Services LLC

**Project:** Skelly Unit 989 Battery

Sample ID: <b>MB-61259</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 8015M/D: Diesel Range Organics</b>								
Client ID: <b>PBS</b>	Batch ID: <b>61259</b>	RunNo: <b>79789</b>								
Prep Date: <b>7/13/2021</b>	Analysis Date: <b>7/14/2021</b>	SeqNo: <b>2806762</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	9.2		10.00		91.6	70	130			

Sample ID: <b>LCS-61259</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 8015M/D: Diesel Range Organics</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>61259</b>	RunNo: <b>79789</b>								
Prep Date: <b>7/13/2021</b>	Analysis Date: <b>7/14/2021</b>	SeqNo: <b>2806763</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	42	10	50.00	0	83.1	68.9	141			
Surr: DNOP	4.5		5.000		90.9	70	130			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

# QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2107470

19-Jul-21

**Client:** Pima Environmental Services LLC

**Project:** Skelly Unit 989 Battery

Sample ID: <b>mb-61241</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 8015D: Gasoline Range</b>								
Client ID: <b>PBS</b>	Batch ID: <b>61241</b>	RunNo: <b>79767</b>								
Prep Date: <b>7/12/2021</b>	Analysis Date: <b>7/13/2021</b>	SeqNo: <b>2805977</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	960		1000		96.1	70	130			

Sample ID: <b>lcs-61241</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 8015D: Gasoline Range</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>61241</b>	RunNo: <b>79767</b>								
Prep Date: <b>7/12/2021</b>	Analysis Date: <b>7/13/2021</b>	SeqNo: <b>2805978</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	22	5.0	25.00	0	89.0	78.6	131			
Surr: BFB	1100		1000		105	70	130			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: 2107470

19-Jul-21

**Client:** Pima Environmental Services LLC

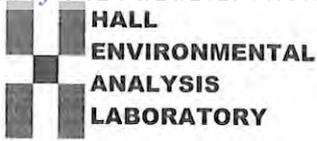
**Project:** Skelly Unit 989 Battery

Sample ID: <b>mb-61241</b>	SampType: <b>MBLK</b>	TestCode: <b>EPA Method 8021B: Volatiles</b>								
Client ID: <b>PBS</b>	Batch ID: <b>61241</b>	RunNo: <b>79767</b>								
Prep Date: <b>7/12/2021</b>	Analysis Date: <b>7/13/2021</b>	SeqNo: <b>2806025</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	1.0		1.000		101	70	130			

Sample ID: <b>LCS-61241</b>	SampType: <b>LCS</b>	TestCode: <b>EPA Method 8021B: Volatiles</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>61241</b>	RunNo: <b>79767</b>								
Prep Date: <b>7/12/2021</b>	Analysis Date: <b>7/13/2021</b>	SeqNo: <b>2806026</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.025	1.000	0	93.4	80	120			
Toluene	0.96	0.050	1.000	0	95.6	80	120			
Ethylbenzene	0.96	0.050	1.000	0	96.0	80	120			
Xylenes, Total	2.9	0.10	3.000	0	95.9	80	120			
Surr: 4-Bromofluorobenzene	1.0		1.000		101	70	130			

**Qualifiers:**

- \* Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

Sample Log-In Check List

Client Name: Pima Environmental Services LLC
Work Order Number: 2107470
RcptNo: 1

Received By: Cheyenne Cason 7/10/2021 8:00:00 AM
Completed By: Cheyenne Cason 7/10/2021 9:25:08 AM
Reviewed By: @ 07/10/2021 - client contacted re: dates

Chain of Custody

- 1. Is Chain of Custody complete? Yes [checked] No [ ] Not Present [ ]
2. How was the sample delivered? Courier

Log In

- 3. Was an attempt made to cool the samples? Yes [checked] No [ ] NA [ ]
4. Were all samples received at a temperature of >0° C to 6.0°C Yes [checked] No [ ] NA [ ]
5. Sample(s) in proper container(s)? Yes [checked] No [ ]
6. Sufficient sample volume for indicated test(s)? Yes [checked] No [ ]
7. Are samples (except VOA and ONG) properly preserved? Yes [checked] No [ ]
8. Was preservative added to bottles? Yes [ ] No [checked] NA [ ]
9. Received at least 1 vial with headspace <1/4" for AQ VOA? Yes [ ] No [ ] NA [checked]
10. Were any sample containers received broken? Yes [ ] No [checked]
11. Does paperwork match bottle labels? Yes [checked] No [ ]
12. Are matrices correctly identified on Chain of Custody? Yes [checked] No [ ]
13. Is it clear what analyses were requested? Yes [checked] No [ ]
14. Were all holding times able to be met? Yes [checked] No [ ]

# of preserved bottles checked for pH: (<2 or >12 unless noted) Adjusted?
Checked by Cec 7/10/21

Special Handling (if applicable)

- 15. Was client notified of all discrepancies with this order? Yes [ ] No [ ] NA [checked]

Person Notified: [ ] Date: [ ]
By Whom: [ ] Via: [ ] eMail [ ] Phone [ ] Fax [ ] In Person [ ]
Regarding: [ ]
Client Instructions: [ ]

16. Additional remarks:

17. Cooler Information

Table with 7 columns: Cooler No, Temp °C, Condition, Seal Intact, Seal No, Seal Date, Signed By. Row 1: 1, 0.5, Good, [ ], [ ], [ ]



Report to:  
Tom Bynum



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

### Pima Environmental Services-Carlsbad

Project Name: Skelly Unit #989

Work Order: E308007

Job Number: 21068-0001

Received: 8/2/2023

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
8/7/23

5796 U.S. Hwy 64  
Farmington, NM 87401

Phone: (505) 632-1881  
Envirotech-inc.com



Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.  
Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.  
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Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.  
Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.



Date Reported: 8/7/23

Tom Bynum  
PO Box 247  
Plains, TX 79355-0247

Project Name: Skelly Unit #989  
Workorder: E308007  
Date Received: 8/2/2023 6:32:00AM

Tom Bynum,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 8/2/2023 6:32:00AM, under the Project Name: Skelly Unit #989.

The analytical test results summarized in this report with the Project Name: Skelly Unit #989 apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues regarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

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### Sample Summary

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 08/07/23 08:22
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
S1 - Surface	E308007-01A	Soil	07/31/23	08/02/23	Glass Jar, 2 oz.
S1 - 1'	E308007-02A	Soil	07/31/23	08/02/23	Glass Jar, 2 oz.



### Sample Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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**S1 - Surface**

**E308007-01**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2331048
Benzene	ND	0.0250	1	08/02/23	08/02/23	
Ethylbenzene	ND	0.0250	1	08/02/23	08/02/23	
Toluene	ND	0.0250	1	08/02/23	08/02/23	
o-Xylene	ND	0.0250	1	08/02/23	08/02/23	
p,m-Xylene	ND	0.0500	1	08/02/23	08/02/23	
Total Xylenes	ND	0.0250	1	08/02/23	08/02/23	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		94.2 %	70-130	08/02/23	08/02/23	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2331048
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/02/23	08/02/23	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		87.9 %	70-130	08/02/23	08/02/23	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg		Analyst: KM		Batch: 2331039
Diesel Range Organics (C10-C28)	ND	25.0	1	08/01/23	08/02/23	
Oil Range Organics (C28-C36)	ND	50.0	1	08/01/23	08/02/23	
<i>Surrogate: n-Nonane</i>		86.7 %	50-200	08/01/23	08/02/23	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg		Analyst: BA		Batch: 2331051
Chloride	63.3	20.0	1	08/02/23	08/04/23	



### Sample Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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S1 - 1'

E308007-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg		Analyst: IY		Batch: 2331048
Benzene	ND	0.0250	1	08/02/23	08/03/23	
Ethylbenzene	ND	0.0250	1	08/02/23	08/03/23	
Toluene	ND	0.0250	1	08/02/23	08/03/23	
o-Xylene	ND	0.0250	1	08/02/23	08/03/23	
p,m-Xylene	ND	0.0500	1	08/02/23	08/03/23	
Total Xylenes	ND	0.0250	1	08/02/23	08/03/23	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		93.6 %	70-130	08/02/23	08/03/23	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg		Analyst: IY		Batch: 2331048
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/02/23	08/03/23	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		91.9 %	70-130	08/02/23	08/03/23	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg		Analyst: KM		Batch: 2331039
Diesel Range Organics (C10-C28)	ND	25.0	1	08/01/23	08/02/23	
Oil Range Organics (C28-C36)	ND	50.0	1	08/01/23	08/02/23	
<i>Surrogate: n-Nonane</i>		87.7 %	50-200	08/01/23	08/02/23	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg		Analyst: BA		Batch: 2331051
Chloride	67.3	20.0	1	08/02/23	08/04/23	



### QC Summary Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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#### Volatile Organics by EPA 8021B

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2331048-BLK1)

Prepared: 08/02/23 Analyzed: 08/02/23

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.61		8.00		95.1	70-130			

#### LCS (2331048-BS1)

Prepared: 08/02/23 Analyzed: 08/02/23

Benzene	4.98	0.0250	5.00		99.7	70-130			
Ethylbenzene	4.95	0.0250	5.00		99.0	70-130			
Toluene	5.01	0.0250	5.00		100	70-130			
o-Xylene	4.94	0.0250	5.00		98.8	70-130			
p,m-Xylene	10.1	0.0500	10.0		101	70-130			
Total Xylenes	15.0	0.0250	15.0		100	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.54		8.00		94.2	70-130			

#### Matrix Spike (2331048-MS1)

Source: E308007-01

Prepared: 08/02/23 Analyzed: 08/02/23

Benzene	5.21	0.0250	5.00	ND	104	54-133			
Ethylbenzene	5.19	0.0250	5.00	ND	104	61-133			
Toluene	5.25	0.0250	5.00	ND	105	61-130			
o-Xylene	5.19	0.0250	5.00	ND	104	63-131			
p,m-Xylene	10.6	0.0500	10.0	ND	106	63-131			
Total Xylenes	15.8	0.0250	15.0	ND	105	63-131			
Surrogate: 4-Bromochlorobenzene-PID	7.63		8.00		95.4	70-130			

#### Matrix Spike Dup (2331048-MSD1)

Source: E308007-01

Prepared: 08/02/23 Analyzed: 08/02/23

Benzene	5.05	0.0250	5.00	ND	101	54-133	3.21	20	
Ethylbenzene	5.02	0.0250	5.00	ND	100	61-133	3.25	20	
Toluene	5.08	0.0250	5.00	ND	102	61-130	3.34	20	
o-Xylene	5.03	0.0250	5.00	ND	101	63-131	3.22	20	
p,m-Xylene	10.2	0.0500	10.0	ND	102	63-131	3.21	20	
Total Xylenes	15.3	0.0250	15.0	ND	102	63-131	3.21	20	
Surrogate: 4-Bromochlorobenzene-PID	7.53		8.00		94.1	70-130			



### QC Summary Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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#### Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2331048-BLK1)**

Prepared: 08/02/23 Analyzed: 08/02/23

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.06		8.00		88.3	70-130			

**LCS (2331048-BS2)**

Prepared: 08/02/23 Analyzed: 08/02/23

Gasoline Range Organics (C6-C10)	46.4	20.0	50.0		92.9	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.24		8.00		90.4	70-130			

**Matrix Spike (2331048-MS2)**

Source: E308007-01

Prepared: 08/02/23 Analyzed: 08/03/23

Gasoline Range Organics (C6-C10)	57.4	20.0	50.0	ND	115	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.21		8.00		90.1	70-130			

**Matrix Spike Dup (2331048-MSD2)**

Source: E308007-01

Prepared: 08/02/23 Analyzed: 08/03/23

Gasoline Range Organics (C6-C10)	47.2	20.0	50.0	ND	94.4	70-130	19.6	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.33		8.00		91.6	70-130			



### QC Summary Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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#### Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KM

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2331039-BLK1)**

Prepared: 08/01/23 Analyzed: 08/02/23

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	48.1		50.0		96.3	50-200			

**LCS (2331039-BS1)**

Prepared: 08/01/23 Analyzed: 08/02/23

Diesel Range Organics (C10-C28)	219	25.0	250		87.7	38-132			
Surrogate: n-Nonane	44.1		50.0		88.2	50-200			

**Matrix Spike (2331039-MS1)**

Source: E308004-07

Prepared: 08/01/23 Analyzed: 08/02/23

Diesel Range Organics (C10-C28)	222	25.0	250	ND	89.0	38-132			
Surrogate: n-Nonane	42.6		50.0		85.2	50-200			

**Matrix Spike Dup (2331039-MSD1)**

Source: E308004-07

Prepared: 08/01/23 Analyzed: 08/02/23

Diesel Range Organics (C10-C28)	209	25.0	250	ND	83.5	38-132	6.41	20	
Surrogate: n-Nonane	40.3		50.0		80.7	50-200			



### QC Summary Data

Pima Environmental Services-Carlsbad PO Box 247 Plains TX, 79355-0247	Project Name: Skelly Unit #989 Project Number: 21068-0001 Project Manager: Tom Bynum	<b>Reported:</b> 8/7/2023 8:22:58AM
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#### Anions by EPA 300.0/9056A

Analyst: BA

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2331051-BLK1)**

Prepared: 08/02/23 Analyzed: 08/04/23

Chloride	ND	20.0							
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**LCS (2331051-BS1)**

Prepared: 08/02/23 Analyzed: 08/04/23

Chloride	252	20.0	250		101	90-110			
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**Matrix Spike (2331051-MS1)**

Source: E307179-01

Prepared: 08/02/23 Analyzed: 08/04/23

Chloride	3030	20.0	250	2620	162	80-120			M2
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**Matrix Spike Dup (2331051-MSD1)**

Source: E307179-01

Prepared: 08/02/23 Analyzed: 08/04/23

Chloride	3250	20.0	250	2620	248	80-120	6.90	20	M2
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QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.



### Definitions and Notes

Pima Environmental Services-Carlsbad	Project Name:	Skelly Unit #989	
PO Box 247	Project Number:	21068-0001	<b>Reported:</b>
Plains TX, 79355-0247	Project Manager:	Tom Bynum	08/07/23 08:22

M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

Note (1): Methods marked with \*\* are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.



<b>Client:</b> Pima Environmental Services <b>Project:</b> Kelly Unit #989 <b>Project Manager:</b> Tom Bynum <b>Address:</b> 5614 N. Lovington Hwy. <b>City, State, Zip:</b> Hobbs, NM, 88240 <b>Phone:</b> 580-748-1613 <b>Email:</b> tom@pimaoil.com <b>Report due by:</b>		<b>Bill To</b> <b>Attention:</b> SPUR <b>Address:</b> <b>City, State, Zip:</b> <b>Phone:</b> <b>Email:</b> <b>Pima Project #</b> 6-22		<b>Lab Use Only</b> <b>Lab WO#</b> E308007 <b>Job Number</b> 21068-0001		<b>TAT</b> 1D 2D 3D Standard X				<b>EPA Program</b> CWA SDWA RCRA	
				<b>Analysis and Method</b> DRO/ORO by 8015 GRO/DRO by 8015 BTEX by 8021 VOC by 8260 Metals 6010 Chloride 300.0 BGDOC NM BGDOC TX		<b>State</b> NM CO UT AZ TX X					

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	BGDOC NM	BGDOC TX	Remarks
8:00	7/31	S	1	S1-Surface	1							X		
8:05	L	L	L	S1-1'								L		

**Additional Instructions:** Billing # 50 Bill SPUR work order #13478

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action. **Sampled by:** \_\_\_\_\_

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature) Karime Adams	Date 8/1/23	Time 12:45	Received by: (Signature) Michelle Campyds	Date 8-1-23	Time 1245	Lab Use Only Received on ice: (Y) N T1 T2 T3 AVG Temp °C 4
Relinquished by: (Signature) Michelle Campyds	Date 8-1-23	Time 1630	Received by: (Signature) Abdon M550	Date 8-1-23	Time 1730	
Relinquished by: (Signature) Abdon M550	Date 8-1-23	Time 2315	Received by: (Signature) Caitie Man	Date 8/2/23	Time 16:32	

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other  
 Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.



### Envirotech Analytical Laboratory

Printed: 8/2/2023 7:34:09AM

#### Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Pima Environmental Services-Carlsbad	Date Received:	08/02/23 06:32	Work Order ID:	E308007
Phone:	(575) 631-6977	Date Logged In:	08/01/23 16:05	Logged In By:	Caitlin Mars
Email:	tom@pimaoil.com	Due Date:	08/08/23 17:00 (4 day TAT)		

#### Chain of Custody (COC)

- 1. Does the sample ID match the COC? Yes
- 2. Does the number of samples per sampling site location match the COC? Yes
- 3. Were samples dropped off by client or carrier? Yes
- 4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
- 5. Were all samples received within holding time? Yes

Carrier: Courier

Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this discussion.

#### Comments/Resolution

#### Sample Turn Around Time (TAT)

- 6. Did the COC indicate standard TAT, or Expedited TAT? Yes

#### Sample Cooler

- 7. Was a sample cooler received? Yes
- 8. If yes, was cooler received in good condition? Yes
- 9. Was the sample(s) received intact, i.e., not broken? Yes
- 10. Were custody/security seals present? No
- 11. If yes, were custody/security seals intact? NA
- 12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling

- 13. If no visible ice, record the temperature. Actual sample temperature: 4°C

#### Sample Container

- 14. Are aqueous VOC samples present? No
- 15. Are VOC samples collected in VOA Vials? NA
- 16. Is the head space less than 6-8 mm (pea sized or less)? NA
- 17. Was a trip blank (TB) included for VOC analyses? NA
- 18. Are non-VOC samples collected in the correct containers? Yes
- 19. Is the appropriate volume/weight or number of sample containers collected? Yes

#### Field Label

- 20. Were field sample labels filled out with the minimum information:
  - Sample ID? Yes
  - Date/Time Collected? Yes
  - Collectors name? No

#### Sample Preservation

- 21. Does the COC or field labels indicate the samples were preserved? No
- 22. Are sample(s) correctly preserved? NA
- 24. Is lab filtration required and/or requested for dissolved metals? No

#### Multiphase Sample Matrix

- 26. Does the sample have more than one phase, i.e., multiphase? No
- 27. If yes, does the COC specify which phase(s) is to be analyzed? NA

#### Subcontract Laboratory

- 28. Are samples required to get sent to a subcontract laboratory? No
- 29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: NA

#### Client Instruction

Signature of client authorizing changes to the COC or sample disposition.

Date



envirotech Inc.

**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 251692

**CONDITIONS**

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 251692
	Action Type: [C-141] Release Corrective Action (C-141)

**CONDITIONS**

Created By	Condition	Condition Date
scott.rodgers	None	1/19/2024