



Skelly Unit 605 Battery

Incident ID NAPP2405328548

PREPARED BY:
PIMA ENVIRONMENTAL SERVICES, LLC

PREPARED FOR:
Spur Energy

Liner Inspection and Closure Report

March 11, 2025



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

FACILITY NAME	Skelly Unit 605 Battery
DATE OF RELEASE	2/19/2024
INCIDENT NO.	nAPP2405328548

Site Characterization	
DTGWWhat is the shallowest DTGW beneath the area affected by the release in ft below ground surface (ft bgs)?	Between 100 and 500 ft.
GW Depth DeterminationWhat method was used to determine the DTGW?	NM OSE I Waters Database Search
Ground or Surface Water ImpactedDid this release impact GW or Surface Water?	No
What is the min. distance between the closest lateral extents of the release and the following surace areas?	
Distance to WatercourseA continuously flowing watercourse or any other significant watercourse?	> 5 mi.
Distance to LakebedAny lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	> 5 mi.
Distance to PublicAn occupied permanent residence, school, hospital, institution, or church?	Between 1 mi. and 5 mi.
Distance to PrivateA spring or a private domestic FW well used by less than five households for domestic or stock watering purposes?	> 5 mi.
Distance to Fresh WaterAny other FW well spring?	> 5 mi.
Within Municipal BoundariesIncorporated municipal boundaries or a defined municipal FW well field?	> 5 mi.
Distance to WetlandA wetland?	Between 1 mi. and 5 mi.
Overlying Subsurface MineA subsurface mine?	> 5 mi.
Overlying (Non-Karst) Unstable AreaAn (non-karst) unstable area?	> 5 mi.
Risk of Karst GeologyCategorize the risk of this well/site being in a karst geology?	Low
Distance to or Within 100 yr FloodplainA 100-year floodplain?	> 5 mi.
Areas NOT Other SiteDid the release impact areas not on exploration, development, production, or storage site?	No
Remediation Plan	
Have the lateral and vertical extents of contamination been fully delineated?	Yes
Lined Containment Area OnlyWas this release entirely contained within a lined containment area?	Yes
Soil Containment Sampling	
ChlorideConstituent Chloride (mg/kg)	576
	(EPA SW-846 Method 8015M)?
TPH (GRO+DRO+MRO)Constituent TPH (mg/kg)	111
	(EPA SW-846 Method 8015M)?
GRO + DROConstituent GRO-DRO (mg/kg)	89
	(EPA SW-846 Method 8021B or 8260B)?
BTEXConstituent BTEX (mg/kg)	0
	(EPA SW-846 Method 8021B or 8260B)?
BenzeneConstituent Benzene (mg/kg)	0
Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29 NMAC, which includes the anticipated timelines for beginning and completing the remediation.	
Start of RemediationOn what estimated date will remediation commence?	2/11/2025
Start of Sampling or Liner InspectionOn what date will (or did) the final sampling or liner inspection occur?	2/18/2025
Finish of RemediationOn what date will (or was) the remediation complete(d)?	2/19/2025
Surface Area (sq ft) To Be ReclaimedWhat is the estimated surface area (in sq ft) that will be reclaimed?	0
Surface Area (sq ft) To Be RemediatedWhat is the estimated surface area (in sq ft) that will be remediated?	2,650
Volume (cu yd) To Be RemediatedWhat is the estimated volume (in cubic yds) that will be remediated?	15
Remediation Plan (Cont.)Please answer all that apply	
Ex Situ Excavation Off-Site(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc)?	Yes
Ex Situ Excavation On-Site(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)?	No
In Situ Soil Vapor Extraction (SVE)?	No
In Situ Chemical Processing(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)?	No
In Situ Biological Processing(In Situ) Biological processing (i.e. Microbes/Fertilizer, etc.)?	No
In Situ Physical Processing (In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)?	No
In Situ Ground Water AbatementGW Abatement pursuant to 19.15.30 NMAC?	No
Remediation OtherOther (Non-listed remedial process)?	No
Deferral Request Only	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

Remediation Closure Request	
Requesting a remediation closure approval with this submission?	Yes
Have the lateral and vertical extents of contamination been fully delineated?	Yes
Was this release entirely contained within a lined containment area?	Yes
Restored Areas For Production Use All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion?	Yes
Total Surface Area (sq ft) Remediated What was the total surface area (sq ft) remediated?	2,650
Total Volume (cu yd) Remediated What was the total volume (cubic yards) remediated?	15
Reclaimed to Condition Prior Release All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four ft of non waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX and 10 mg/kg Benzene?	No
Total Surface Area (sq ft) Reclaimed What was the total surface area (in sq ft) reclaimed?	0
Remediation Summary Summarize any additional remediation activities not included by answers (above).	



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

March 11, 2025

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

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

RE: Liner Inspection and Closure Report
Skelly Unit 605 Battery
API No. N/A
GPS: Latitude 32.8341 Longitude -103.8396
UL- J, Section 14, Township 17S, Range 31E
NMOCD Reference No. NAPP2405328548

Spur Energy Partners (Spur) engaged Pima Environmental Services, LLC (Pima) to conduct a liner inspection and prepare this closure report addressing the release of crude oil at the Skelly Unit 605 Battery (Skelly). An initial C-141 form was submitted on February 22, 2024, and the New Mexico Oil Conservation Division (NMOCD) assigned the incident ID NAPP2405328548 to this event.

Site Information and Site Characterization

The Skelly is located approximately 4.72 miles southwest of Maljamar, NM. This spill site is in Unit J, Section 14, Township 17S, Range 31E, Latitude 32.8341 Longitude -103.8396, Eddy County, NM. A Location Map can be found in Figure 1.

Based on the well water data from the New Mexico Office of the State Engineer, the depth to the nearest groundwater in this vicinity measures 101 feet below grade surface (BGS), positioned roughly 0.02 miles away from the Skelly, with the last meter reading being completed on November 21, 2024. Conversely, as per the United States Geological Survey well water data, the nearest groundwater depth in this region is recorded at 122.14 feet BGS, situated approximately 4.56 miles away from the Skelly, with the last gauge conducted on December 11, 2010. For detailed references to water surveys and the precise locations of water wells, please refer to Appendix A, inclusive of the relevant maps. Notably, the Skelly is situated within an area with a low potential for karst, as illustrated in Figure 3. Additionally, a comprehensive Topographic Map is available for reference in Figure 2.

Table 1 NMAC and Closure Criteria 19.15.29					
Depth to Groundwater (Appendix A)	Constituent & Limits				
	Chlorides	Total TPH	GRO+DRO	BTEX	Benzene
<50'	600 mg/kg	100 mg/kg		50 mg/kg	10 mg/kg
51-100'	10,000 mg/kg	2,500 mg/kg	1,000 mg/kg	50 mg/kg	10 mg/kg
>100' (RA 13521 POD1)	20,000 mg/kg	2,500 mg/kg	1,000 mg/kg	50 mg/kg	10 mg/kg

Release Information

NAPP2405328548: On February 19, 2024, an oil tank was switched instead of being equalized, causing an overflow into the lined containment and resulting in the release of approximately 15 barrels of crude oil. Spur personnel were immediately deployed to stop the release and successfully recovered all 15 barrels of crude oil. All fluid remained contained within the lined area.

A Site Map can be found in Figure 4.

Site Assessment and Soil Sampling Results

During the initial assessment of the lined containment, Pima personnel identified a compromise in the liner's integrity on the eastern extent of the containment. Approximately 400 square feet of the liner was compromised, and a sampling event was conducted to determine the horizontal and vertical extent of the contamination.

On February 11, 2025, Spur Energy proactively submitted a 48-hour sampling notification as part of the preliminary preparations leading up to the sampling event. This precautionary step was taken with the expectation that all sampling results would fall below the closure criteria established by the New Mexico Oil Conservation Division (NMOCD). Should the results confirm compliance, the plan is to move forward with the closure process. For additional details, the 48-hour notification can be referenced in Appendix C.

On February 18, 2025, two soil samples (S1 and S2) were collected from the base of the impacted area beneath the plastic liner inside the secondary containment to assess vertical delineation. Additionally, three soil samples (SW1–SW3) were collected from outside the lined containment to evaluate horizontal delineation.

02-18-2025 Soil Sample Results

NMOCD Table 1 Closure Criteria 19.15.29 NMAC (Depth to Groundwater is >101')								
Spur Energy Skelly Unit 605 Battery								
Date: 2-18-25		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
S1	2'	ND	ND	ND	89.2	21.8	111	384
S1	4'	ND	ND	ND	23.4	ND	23.4	208
S1	6'	ND	ND	ND	ND	ND	0	32
S1	8'	ND	ND	ND	ND	ND	0	32
S2	2'	ND	ND	ND	16.2	ND	0	576
S2	4'	ND	ND	ND	53.4	ND	0	176
S2	6'	ND	ND	ND	ND	ND	ND	ND
S2	8'	ND	ND	ND	ND	ND	ND	32
SW1	0.5'	ND	ND	ND	ND	ND	ND	32
SW2	0.5'	ND	ND	ND	ND	ND	ND	96
SW3	0.5'	ND	ND	ND	ND	ND	ND	576

ND- Analyte Not Detected

A total of eleven (11) samples were collected for laboratory analysis for total chloride using EPA Method 300.0; benzene, toluene, ethylbenzene and total xylenes (BTEX) using EPA Method 8021B; and motor, diesel, and gasoline range organics (MRO, DRO, & GRO) by EPA Method 8015D. All samples were placed into laboratory supplied glassware, labeled, and maintained on ice until delivery to Cardinal Laboratories in Hobbs, New Mexico (Appendix E).

Since all soil sample results received from the laboratory were below the NMOCD closure criteria, no excavation activities were deemed necessary. Additionally, the presence of groundwater was taken into consideration during the assessment. The analytical results confirmed that contaminant concentrations were within acceptable regulatory limits, indicating that the impacted soil did not require removal or further remedial action. As a result, the site remained undisturbed, and no additional soil remediation efforts, such as excavation or disposal, were required. This determination was made in accordance with NMOCD guidelines to ensure compliance with environmental regulations and site restoration standards.

Site Assessment and Liner Inspection

On February 11, 2025, Spur Energy proactively submitted a 48-hour liner inspection notification. Additional details regarding this notification can be found in Appendix C.

On February 19, 2025, Pima Environmental conducted a comprehensive inspection of the lined containment area. The assessment included power washing the liner and utilizing a vacuum truck to remove any residual fluids. The inspection confirmed that the liner remained intact west of the sampled area. A detailed report, including photographic documentation, is provided in Appendices C and D.

Closure Request

After careful review, Pima requests that this incident NAPP2405328548 be closed. Spur has complied with the applicable closure requirements.

For questions or additional information, please feel free to contact:

Spur Energy – Katherine Purvis at 575-441-8619 or katherine.purvis@spurenergy.com

Pima Environmental Services – Sebastian Orozco at 619-721-4813 or Sebastian@pimaoil.com.

Attachments

Figures:

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

Appendices:

Appendix A- Referenced Water Surveys

Appendix B- Soil Survey, Geological Data, FEMA Flood Map, Wetland Map

Appendix C- 48 Hour Liner Inspection and Sampling Notification, Liner Inspection Form

Appendix D- Photographic Documentation

Appendix E – Laboratory Reports

Figures:

Figure 1- Location Map

Figure 2- Topographic Map

Figure 3- Karst Map

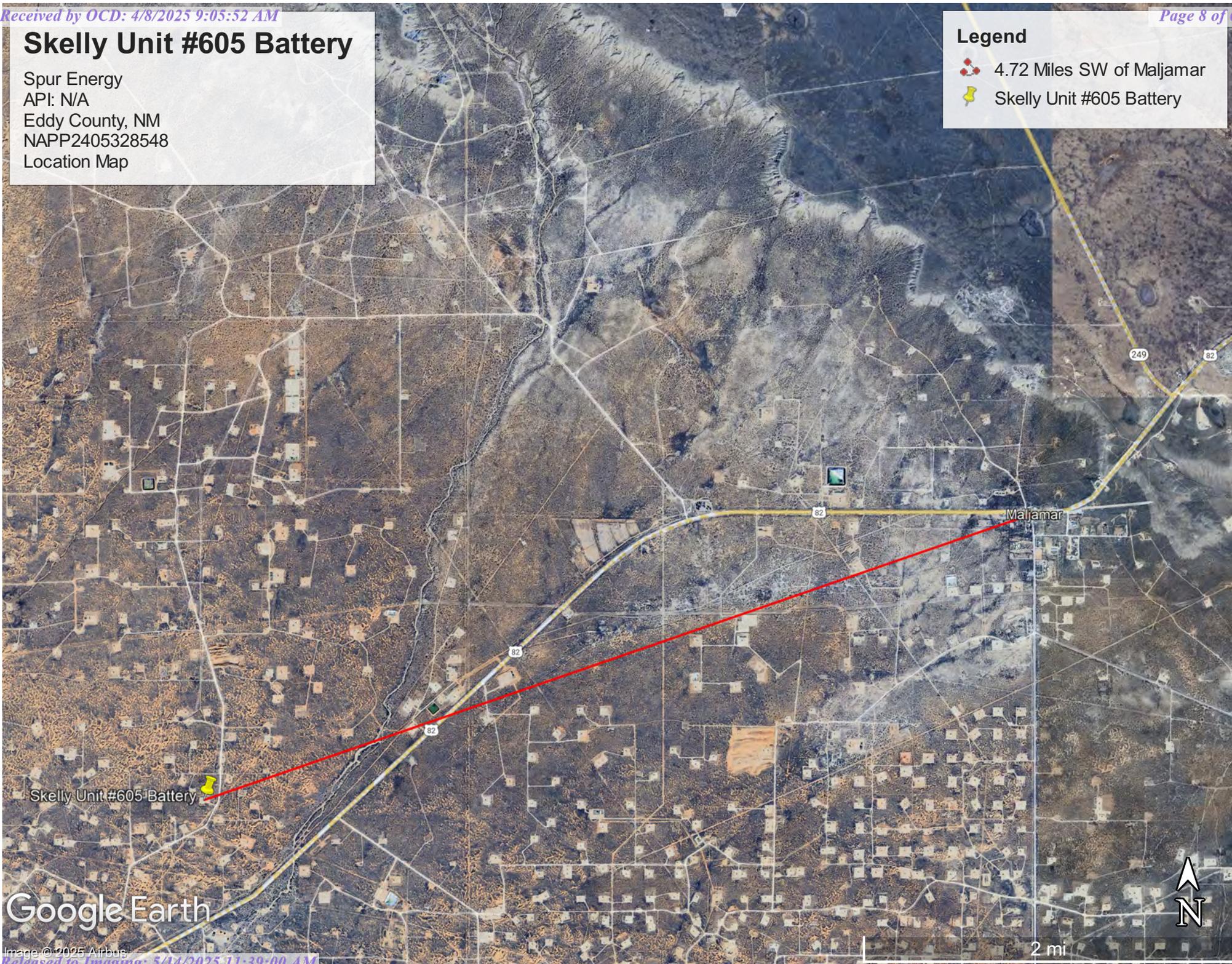
Figure 4- Site Map

Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
Location Map

Legend

-  4.72 Miles SW of Maljamar
-  Skelly Unit #605 Battery



Google Earth

Image © 2025 Airbus

2 mi

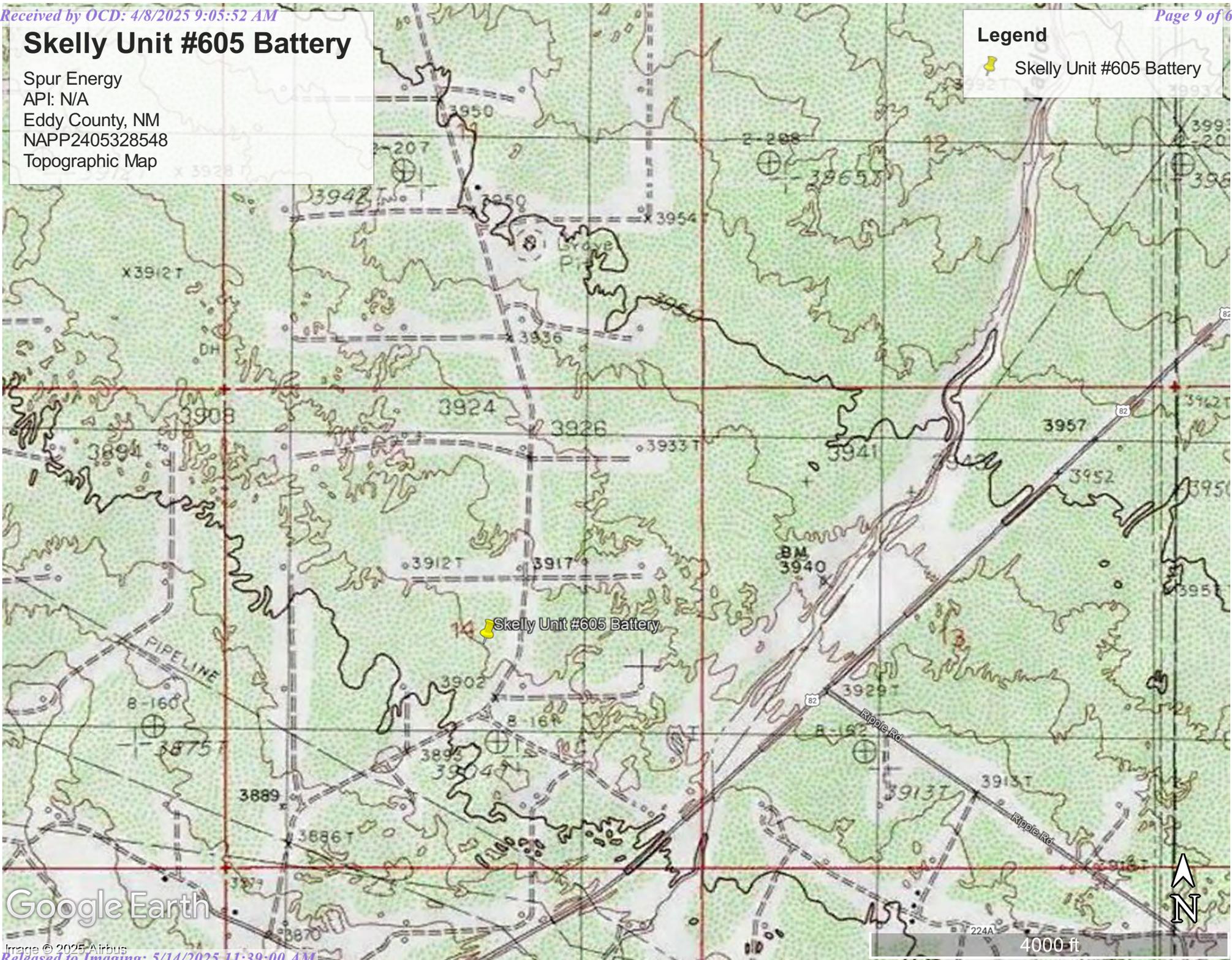


Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
Topographic Map

Legend

 Skelly Unit #605 Battery



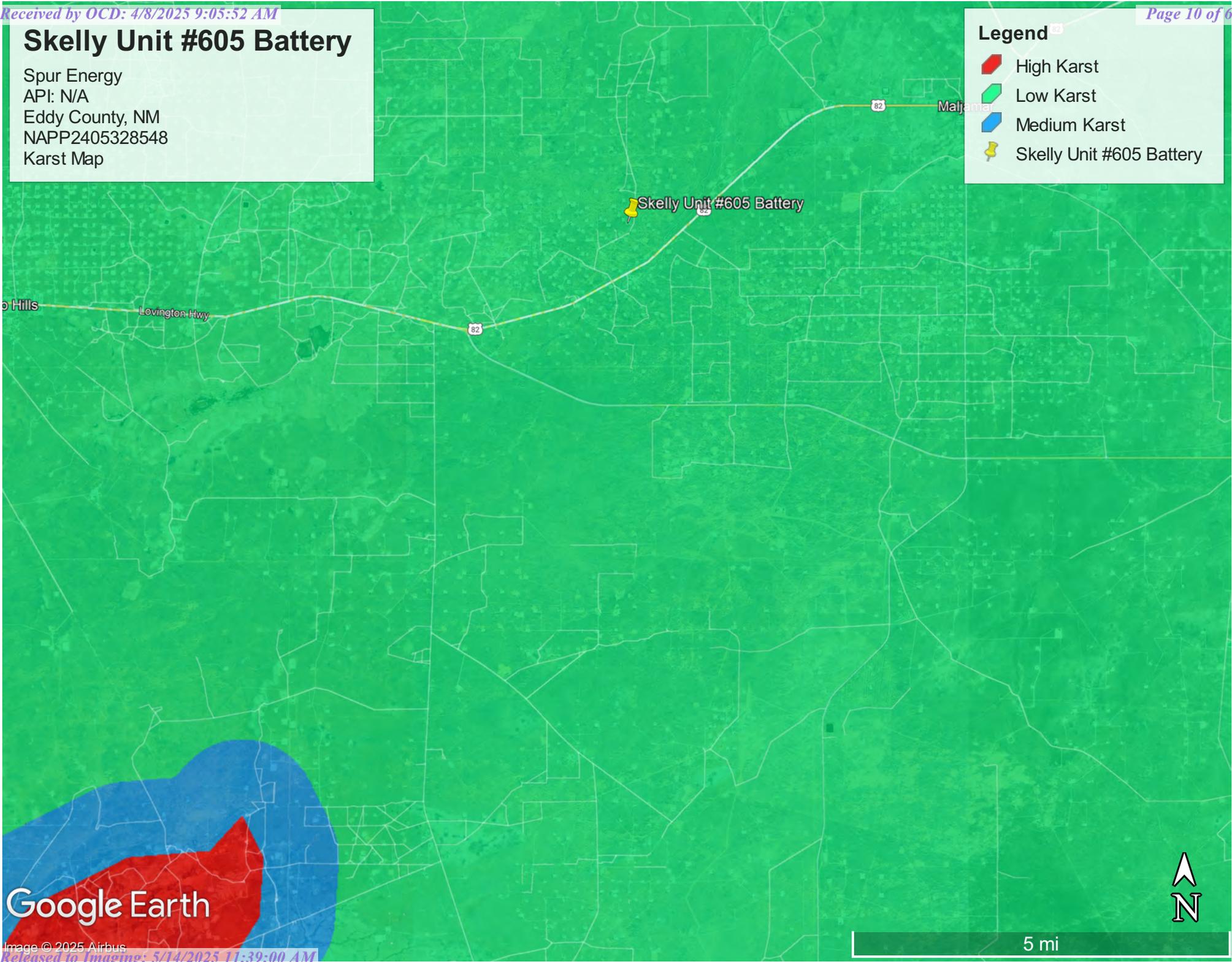
Google Earth

Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
Karst Map

Legend

-  High Karst
-  Low Karst
-  Medium Karst
-  Skelly Unit #605 Battery



Google Earth

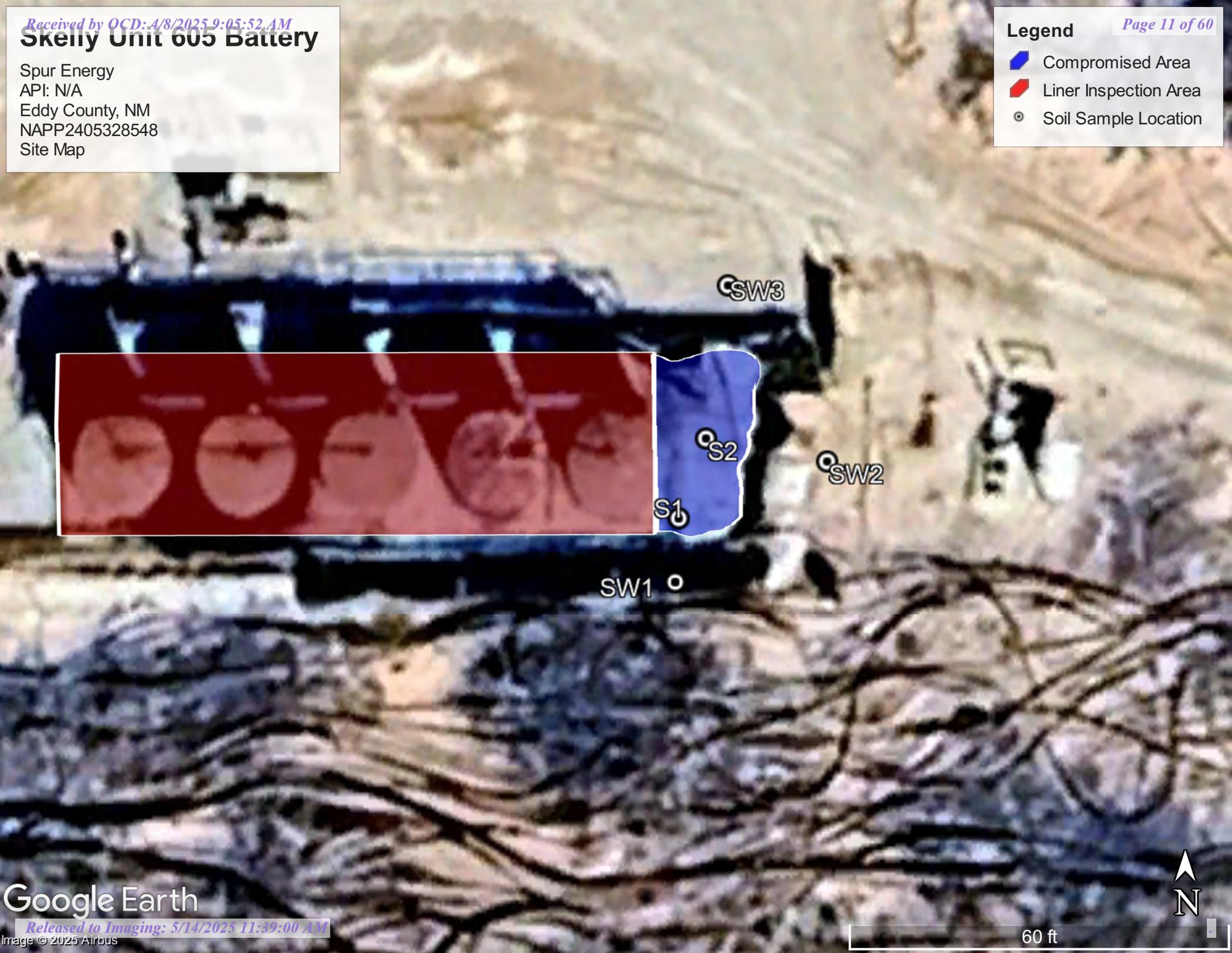


Skelly Unit 605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
Site Map

Legend

-  Compromised Area
-  Liner Inspection Area
-  Soil Sample Location



Appendix A

Water Surveys:

- OSE
- USGS
- Surface Water Map

Point of Diversion Summary

quarters are 1=NW 2=NE 3=SW 4=SE
quarters are smallest to largest

NAD83 UTM in meters

Well Tag	POD Nbr	Q64	Q16	Q4	Sec	Tws	Rng	X	Y	Map
NA	RA 13521 POD1	NW	NW	SE	14	17S	31E	608575.6	3633493.1	

* UTM location was derived from PLSS - see Help

Driller License:	1249	Driller Company:	ATKINS ENGINEERING ASSOC. INC.		
Driller Name:	ATKINS, JACKIE D.UELRODNEY				
Drill Start Date:	2024-11-21	Drill Finish Date:	2024-11-21	Plug Date:	2024-11-25
Log File Date:	2024-12-18	PCW Rcv Date:		Source:	
Pump Type:		Pipe Discharge Size:		Estimated Yield:	
Casing Size:		Depth Well:	101	Depth Water:	

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

2/10/25 10:42 AM MST

Point of Diversion Summary

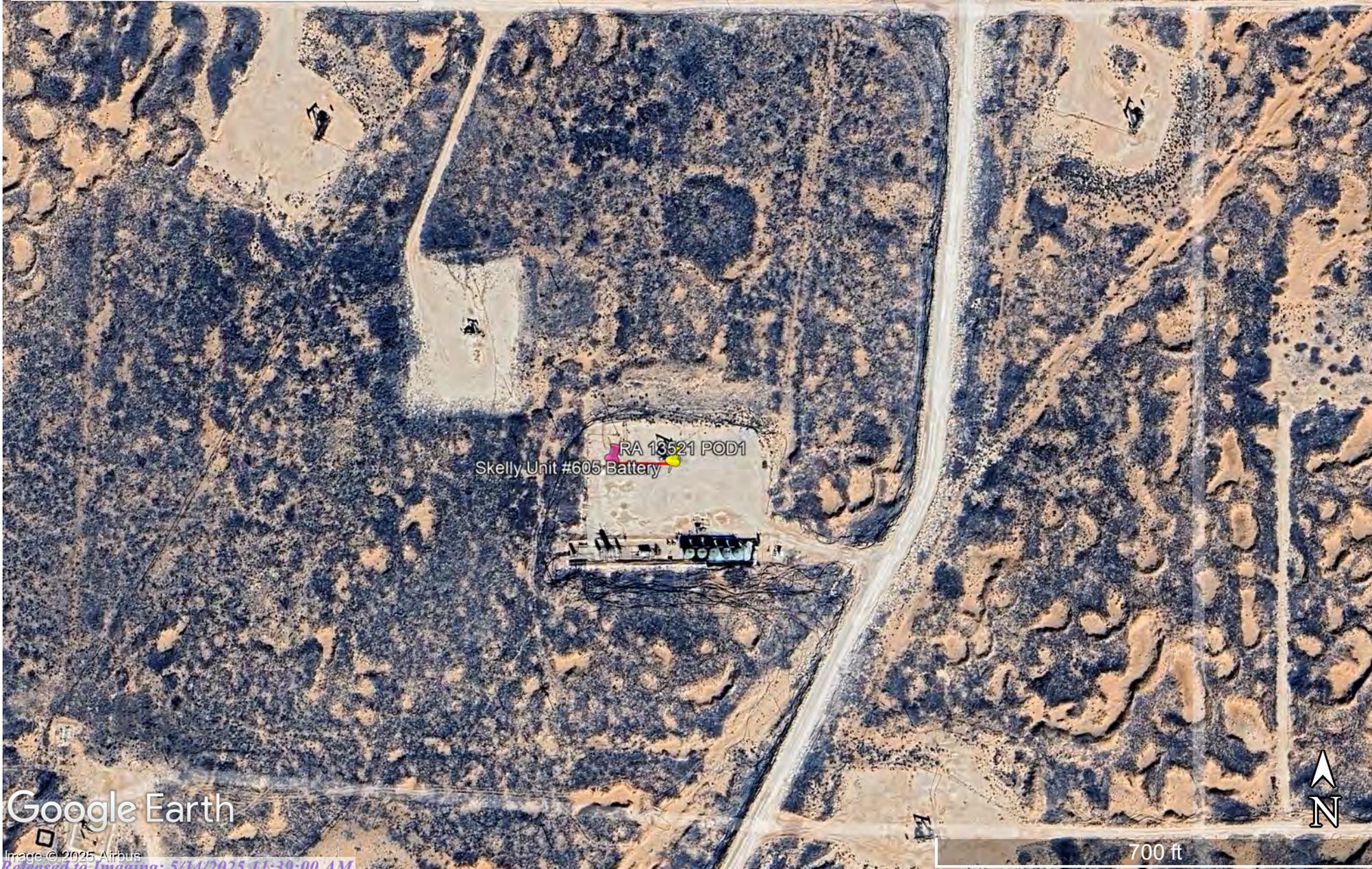
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Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
OSE POD Map

Legend

-  0.02 Miles
-  RA 13521 POD1
-  Skelly Unit #605 Battery



Google Earth



700 ft



USGS Home
Contact USGS
Search USGS

National Water Information System: Web Interface

USGS Water Resources

Data Category: Geographic Area:

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.

Groundwater levels for the Nation

i Important: [Next Generation Monitoring Location Page](#)

Search Results -- 1 sites found

site_no list =
• 325223103462501

Minimum number of levels = 1

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

USGS 325223103462501 16S.32E.33.33212

Available data for this site

Lea County, New Mexico

Hydrologic Unit Code 13060011

Latitude 32°52'26", Longitude 103°46'37" NAD27

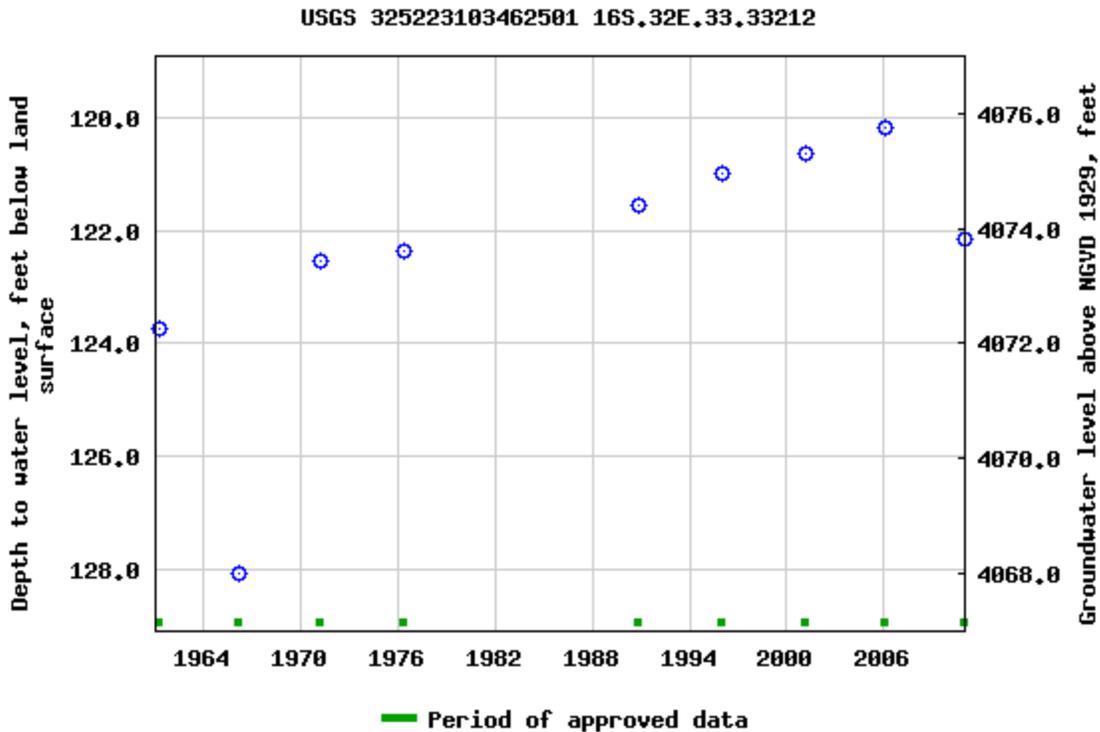
Land-surface elevation 4,196.00 feet above NGVD29

This well is completed in the High Plains aquifer (N100HGHPN) national aquifer.

This well is completed in the Ogallala Formation (121OGLL) local aquifer.

Output formats

Table of data
Tab-separated data
Graph of data
Reselect period



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

[Download a presentation-quality graph](#)

- [Questions or Comments](#)
- [Help](#)
- [Data Tips](#)
- [Explanation of terms](#)
- [Subscribe for system changes](#)

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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: 2025-02-10 12:21:54 EST

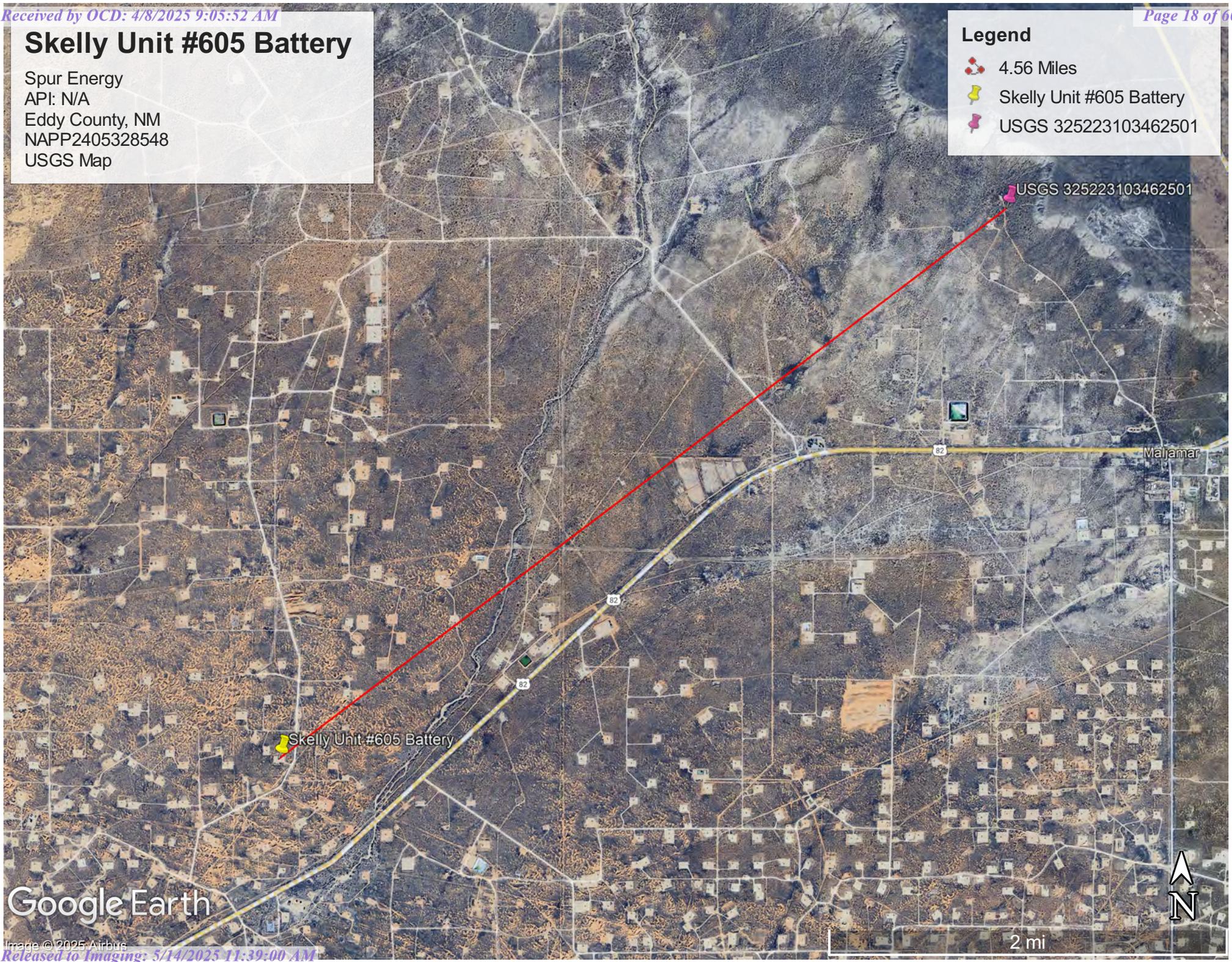
1.46 0.68 nadww01

Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
USGS Map

Legend

-  4.56 Miles
-  Skelly Unit #605 Battery
-  USGS 325223103462501



Google Earth

2 mi

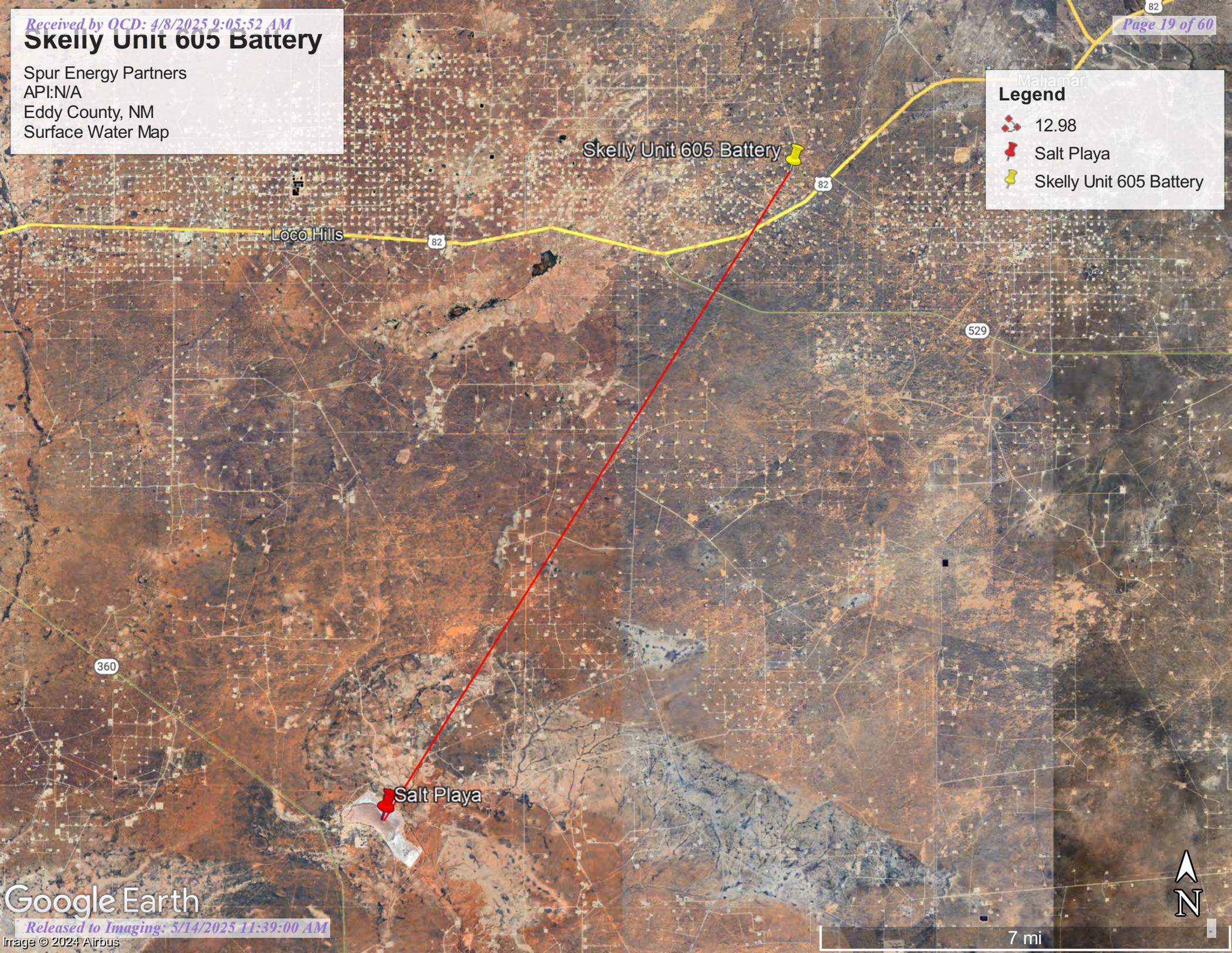


Skelly Unit 605 Battery

Spur Energy Partners
API: N/A
Eddy County, NM
Surface Water Map

Legend

-  12.98
-  Salt Playa
-  Skelly Unit 605 Battery



Appendix B

- Soil Survey & Soil Maps
- Geological Data
- FEMA Flood Map
- Wetlands Map

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

Eddy Area, New Mexico

KM—Kermit-Berino fine sands, 0 to 3 percent slopes

Map Unit Setting

National map unit symbol: 1w4q
Elevation: 3,100 to 4,200 feet
Mean annual precipitation: 10 to 14 inches
Mean annual air temperature: 60 to 64 degrees F
Frost-free period: 190 to 230 days
Farmland classification: Not prime farmland

Map Unit Composition

Kermit and similar soils: 50 percent
Berino and similar soils: 35 percent
Minor components: 15 percent
Estimates are based on observations, descriptions, and transects of the mapunit.

Description of Kermit

Setting

Landform: Plains, alluvial fans
Landform position (three-dimensional): Talf, rise
Down-slope shape: Convex, linear
Across-slope shape: Linear
Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 7 inches: fine sand
H2 - 7 to 60 inches: fine sand

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Excessively drained
Runoff class: Negligible
Capacity of the most limiting layer to transmit water (Ksat): Very high (20.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Maximum salinity: Nonsaline (0.0 to 1.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Low (about 3.1 inches)

Interpretive groups

Land capability classification (irrigated): None specified
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: A
Ecological site: R070BD005NM - Deep Sand
Hydric soil rating: No

Map Unit Description: Kermit-Berino fine sands, 0 to 3 percent slopes---Eddy Area, New Mexico

Description of Berino

Setting

Landform: Plains, fan piedmonts
Landform position (three-dimensional): Riser
Down-slope shape: Convex
Across-slope shape: Linear
Parent material: Mixed alluvium and/or eolian sands

Typical profile

H1 - 0 to 17 inches: fine sand
H2 - 17 to 50 inches: fine sandy loam
H3 - 50 to 58 inches: loamy sand

Properties and qualities

Slope: 0 to 3 percent
Depth to restrictive feature: More than 80 inches
Drainage class: Well drained
Runoff class: Low
Capacity of the most limiting layer to transmit water (Ksat): Moderately high to high (0.60 to 2.00 in/hr)
Depth to water table: More than 80 inches
Frequency of flooding: None
Frequency of ponding: None
Calcium carbonate, maximum content: 40 percent
Maximum salinity: Very slightly saline to slightly saline (2.0 to 4.0 mmhos/cm)
Sodium adsorption ratio, maximum: 1.0
Available water supply, 0 to 60 inches: Moderate (about 7.2 inches)

Interpretive groups

Land capability classification (irrigated): 4e
Land capability classification (nonirrigated): 7e
Hydrologic Soil Group: B
Ecological site: R070BD003NM - Loamy Sand
Hydric soil rating: No

Minor Components

Active dune land

Percent of map unit: 15 percent
Hydric soil rating: No

Data Source Information

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

Soil Map—Eddy Area, New Mexico



Map Scale: 1:1,350 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 13N WGS84



Natural Resources Conservation Service

Web Soil Survey National Cooperative Soil Survey

2/10/2025 Page 1 of 3

Soil Map—Eddy Area, New Mexico

MAP LEGEND

Area of Interest (AOI)

 Area of Interest (AOI)

Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

Special Point Features

-  Blowout
-  Borrow Pit
-  Clay Spot
-  Closed Depression
-  Gravel Pit
-  Gravelly Spot
-  Landfill
-  Lava Flow
-  Marsh or swamp
-  Mine or Quarry
-  Miscellaneous Water
-  Perennial Water
-  Rock Outcrop
-  Saline Spot
-  Sandy Spot
-  Severely Eroded Spot
-  Sinkhole
-  Slide or Slip
-  Sodic Spot

-  Spoil Area
-  Stony Spot
-  Very Stony Spot
-  Wet Spot
-  Other
-  Special Line Features

Water Features

 Streams and Canals

Transportation

-  Rails
-  Interstate Highways
-  US Routes
-  Major Roads
-  Local Roads

Background

 Aerial Photography

MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Warning: Soil Map may not be valid at this scale.
Enlargement of maps beyond the scale of mapping can cause misunderstanding of the detail of mapping and accuracy of soil line placement. The maps do not show the small areas of contrasting soils that could have been shown at a more detailed scale.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service
Web Soil Survey URL:
Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Eddy Area, New Mexico
Survey Area Data: Version 20, Sep 3, 2024

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Feb 7, 2020—May 12, 2020

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

Soil Map—Eddy Area, New Mexico

Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
KM	Kermit-Berino fine sands, 0 to 3 percent slopes	7.4	100.0%
Totals for Area of Interest		7.4	100.0%

(<https://www.usgs.gov/>)

Mineral Resources (<https://www.usgs.gov/energy-and-minerals/mineral-resources-program>)
/ Online Spatial Data (/) / Geology (/geology/) / by state (/geology/state/)
/ New Mexico (/geology/state/state.php?state=NM)

Eolian and piedmont deposits

XML (/geology/state/xml/NMQep;0)	JSON (/geology/state/json/NMQep;0)
Shapefile (/geology/state/unit-shape.php?unit=NMQep;0)	

Interlayered eolian sands and piedmont-slope deposits along the eastern flank of the Pecos River valley, primarily between Roswell and Carlsbad. Typically capped by thin eolian deposits.

State	New Mexico (/geology/state/state.php?state=NM)
Name	Eolian and piedmont deposits
Geologic age	Holocene to middle Pleistocene
Lithologic constituents	Major Unconsolidated (Eolian) <i>Interlayered eolian sands and piedmont-slope deposits</i>
References	New Mexico Bureau of Geology and Mineral Resources, 2003, Geologic Map of New Mexico, scale 1:500,000 (includes some new polygons, faults, and attributes not in NM001 - heads up digitizing by JHorton).
NGMDB product	NGMDB product page for 22974 (https://ngmdb.usgs.gov/Prodesc/proddesc_22974.htm)
Counties	Chaves (/geology/state/fips-unit.php?code=f35005) - DeBaca (/geology/state/fips-unit.php?code=f35011) - Eddy (/geology/state/fips-unit.php?code=f35015) - Lea (/geology/state/fips-unit.php?code=f35025) - Roosevelt (/geology/state/fips-unit.php?code=f35041)

DOI Privacy Policy (<https://www.doi.gov/privacy>) | Legal (https://www.usgs.gov/laws/policies_notices.html) |
Accessibility (<https://www2.usgs.gov/laws/accessibility.html>) | Site Map (<https://www.usgs.gov/sitemap.html>) |
Contact USGS (<https://answers.usgs.gov/>)

U.S. Department of the Interior (<https://www.doi.gov/>) | DOI Inspector General (<https://www.doiog.gov/>) |

White House (<https://www.whitehouse.gov/>) | E-gov (<https://www.whitehouse.gov/omb/management/egov/>) |

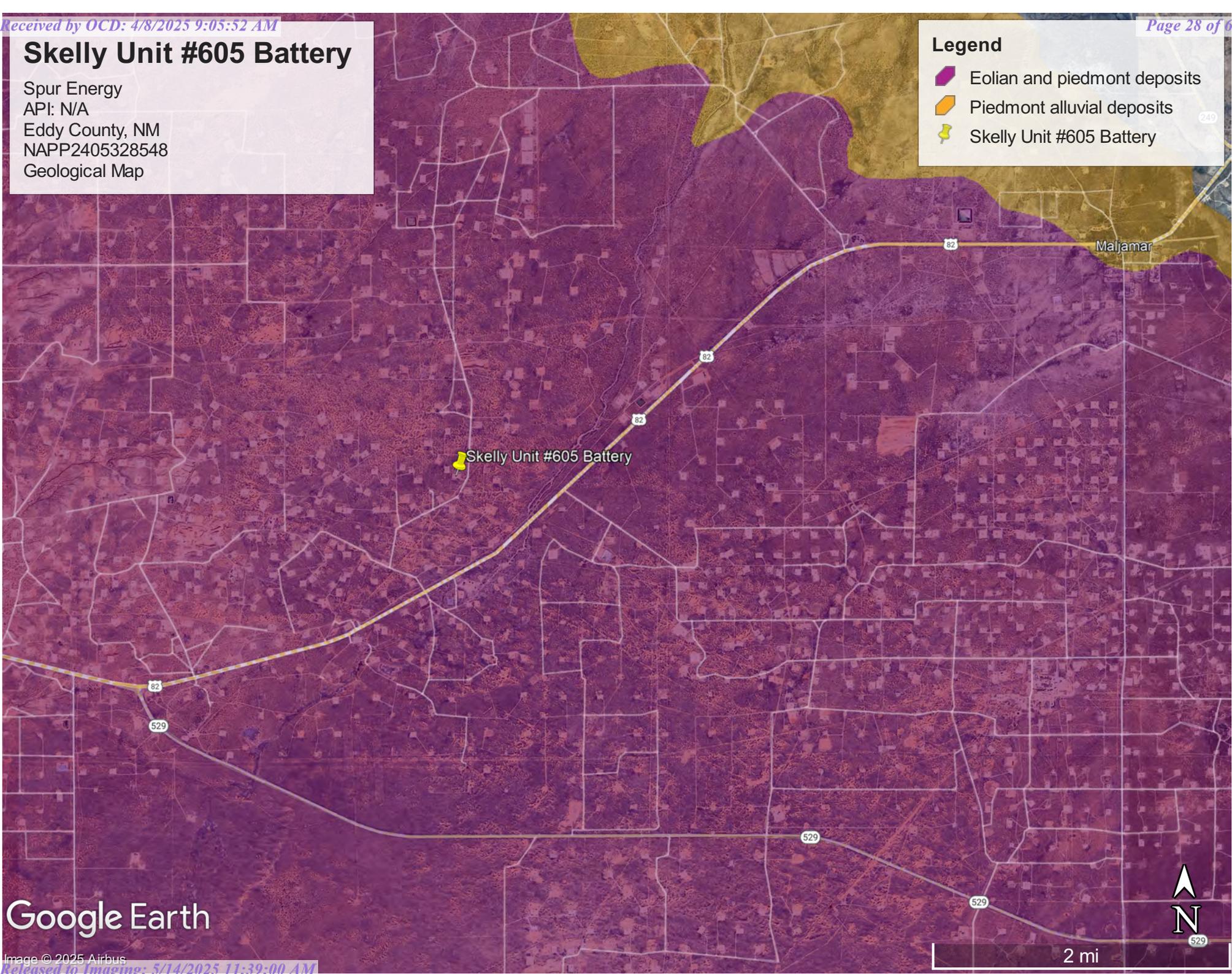
No Fear Act (<https://www.doi.gov/pmb/eeo/no-fear-act>) | FOIA (<https://www2.usgs.gov/foia>)

Skelly Unit #605 Battery

Spur Energy
API: N/A
Eddy County, NM
NAPP2405328548
Geological Map

Legend

-  Eolian and piedmont deposits
-  Piedmont alluvial deposits
-  Skelly Unit #605 Battery



Google Earth



2 mi

National Flood Hazard Layer FIRMMette



103°50'41"W 32°50'18"N



Legend

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

- | | | |
|-----------------------------|--|---|
| SPECIAL FLOOD HAZARD AREAS | | Without Base Flood Elevation (BFE)
Zone A, V, A99 |
| | | With BFE or Depth Zone AE, AO, AH, VE, AR |
| | | Regulatory Floodway |
| OTHER AREAS OF FLOOD HAZARD | | 0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile Zone X |
| | | Future Conditions 1% Annual Chance Flood Hazard Zone X |
| | | Area with Reduced Flood Risk due to Levee. See Notes. Zone X |
| | | Area with Flood Risk due to Levee Zone D |
| OTHER AREAS | | NO SCREEN Area of Minimal Flood Hazard Zone X |
| | | Effective LOMRs |
| GENERAL STRUCTURES | | Area of Undetermined Flood Hazard Zone D |
| | | Channel, Culvert, or Storm Sewer |
| | | Levee, Dike, or Floodwall |
| OTHER FEATURES | | 20.2 Cross Sections with 1% Annual Chance |
| | | 17.5 Water Surface Elevation |
| | | Coastal Transect |
| | | Base Flood Elevation Line (BFE) |
| | | Limit of Study |
| | | Jurisdiction Boundary |
| MAP PANELS | | Coastal Transect Baseline |
| | | Profile Baseline |
| | | Hydrographic Feature |
| | | Digital Data Available |
| | | No Digital Data Available |
| | | Unmapped |
- The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 2/10/2025 at 4:54 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

Released to Imaging: 5/14/2025 11:39:00 AM



Wetlands Map



February 10, 2025

Wetlands

- Estuarine and Marine Deepwater
- Freshwater Emergent Wetland
- Lake
- Estuarine and Marine Wetland
- Freshwater Forested/Shrub Wetland
- Other
- Freshwater Pond
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

Appendix C

- 48-Hour Liner and Sampling Notification
- Liner Inspection Form

Sebastian@pimaoil.com

From: OCDOOnline@state.nm.us
Sent: Tuesday, February 11, 2025 5:55 PM
To: sebastian@pimaoil.com
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 430973

To whom it may concern (c/o Sebastian Orozco for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release (C-141N)*, for incident ID (n#) nAPP2405328548.

The sampling event is expected to take place:

When: 02/18/2025 @ 08:00

Where: J-14-17S-31E 0 FNL 0 FEL (32.8341,-103.8396)

Additional Information: Andrew Franco
806-200-0054

Additional Instructions: 32.833764°-103.839256°

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

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

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Sebastian@pimaoil.com

From: OCDOnline@state.nm.us
Sent: Tuesday, February 11, 2025 6:00 PM
To: sebastian@pimaoil.com
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 430974

To whom it may concern (c/o Sebastian Orozco for Spur Energy Partners LLC),

The OCD has received the submitted *Notification for Liner Inspection for a Release* (C-141L), for incident ID (n#) nAPP2405328548.

The liner inspection is expected to take place:

When: 02/19/2025 @ 09:00

Where: J-14-17S-31E 0 FNL 0 FEL (32.8341,-103.8396)

Additional Information: Andrew Franco
806-200-0054

Additional Instructions: 32.833764°-103.839256°

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, liner inspection pursuant to 19.15.29.11.A(5)(a) NMAC is required. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

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

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505



Pima Environmental Services, LLC

Liner Inspection Form

Company Name: Spur Energy

Site: Skelly Unit 605 Battery

Lat/Long: 32.8341,-103.8396

NMOCD Incident ID & Incident Date: NAPP2405328548 02/19/2024

2-Day Notification Sent: via NMOCD portal 02/11/2025

Inspection Date: 02/19/2025

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		A tear is observed on the eastern extent of the lined containment. Delineation Samples were collected.
Are there holes in the liner?	X		A tear is observed on the eastern extent of the lined containment. Delineation Samples were collected.
Is the liner retaining any fluids?	X		Residual liquid is visible in the photo log from the power washing cleaning event.
Does the liner have integrity to contain a leak?		X	

Comments: _____

Inspector Name: Marisa Loya Inspector Signature: Marisa Loya

Appendix D

- Photographic Documentation

PHOTOGRAPHIC DOCUMENTATION

SITE NAME: Skelly Unit 6056 Battery

Initial Spill Assessment:



Site Information Sign.



Photo of liner taken during initial assessment.



Photo of compromised area located on the east side of the lined containment.



Photo of liner taken during initial assessment.

PHOTOGRAPHIC DOCUMENTATION

SITE NAME: Skelly Unit 6056 Battery

Sampling Event:



Site tech during assessment collecting samples facing west.



Site tech during assessment collecting samples facing north.

Liner Inspection :



Site tech during assessment collecting samples facing southeast.

PHOTOGRAPHIC DOCUMENTATION

SITE NAME: Skelly Unit 6056 Battery



Photo taken pursuant to power washing facing east.



Photo taken pursuant to power washing facing northeast.



Photo taken pursuant to power washing facing west.

Appendix E

- Laboratory Reports



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

February 21, 2025

SEBASTIAN OROZCO

PIMA ENVIROMENTAL

1601 N TURNER STE. 500

HOBBS, NM 88240

RE: SKELLY UNIT 605 BATTERY

Enclosed are the results of analyses for samples received by the laboratory on 02/20/25 8:04.

Cardinal Laboratories is accredited through Texas NELAP under certificate number TX-C24-00112. Accreditation applies to drinking water, non-potable water and solid and chemical materials. All accredited analytes are denoted by an asterisk (*). For a complete list of accredited analytes and matrices visit the TCEQ website at www.tceq.texas.gov/field/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 "Mike Snyder".

Mike Snyder For Celey D. Keene

Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 1 - 2' (H251004-01)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/20/2025	ND	2.03	102	2.00	1.86	
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15	
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24	
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26	
Total BTEX	<0.300	0.300	02/20/2025	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	384	16.0	02/20/2025	ND	448	112	400	7.41	

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	02/20/2025	ND	221	111	200	0.119	
DRO >C10-C28*	89.2	10.0	02/20/2025	ND	212	106	200	0.754	
EXT DRO >C28-C36	21.8	10.0	02/20/2025	ND					

Surrogate: 1-Chlorooctane 85.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 87.5 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 1 - 4' (H251004-02)

BTEX 8021B		mg/kg		Analyzed By: JH					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Benzene*	<0.050	0.050	02/20/2025	ND	2.03	102	2.00	1.86	
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15	
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24	
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26	
Total BTEX	<0.300	0.300	02/20/2025	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	208	16.0	02/20/2025	ND	448	112	400	7.41	

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	02/20/2025	ND	221	111	200	0.119	
DRO >C10-C28*	23.4	10.0	02/20/2025	ND	212	106	200	0.754	
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND					

Surrogate: 1-Chlorooctane 83.5 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.1 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 1 - 6' (H251004-03)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/20/2025	ND	2.03	102	2.00	1.86		
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26		
Total BTEX	<0.300	0.300	02/20/2025	ND						

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

Chloride, SM4500Cl-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/20/2025	ND	448	112	400	7.41		

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	02/20/2025	ND	221	111	200	0.119		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	212	106	200	0.754		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 85.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.6 % 49.1-148

Cardinal Laboratories

*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 1 - 8' (H251004-04)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/20/2025	ND	2.03	102	2.00	1.86		
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26		
Total BTEX	<0.300	0.300	02/20/2025	ND						

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	32.0	16.0	02/20/2025	ND	448	112	400	7.41		

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	02/20/2025	ND	221	111	200	0.119		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	212	106	200	0.754		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 84.1 % 48.2-134

Surrogate: 1-Chlorooctadecane 83.2 % 49.1-148

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*=Accredited Analyte

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 2 - 2' (H251004-05)

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	02/20/2025	ND	2.03	102	2.00	1.86		
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 71.5-134

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Chloride	576	16.0	02/20/2025	ND	448	112	400	7.41		

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	02/20/2025	ND	221	111	200	0.119		
DRO >C10-C28*	16.2	10.0	02/20/2025	ND	212	106	200	0.754		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 84.2 % 48.2-134

Surrogate: 1-Chlorooctadecane 82.8 % 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.

Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 2 - 4' (H251004-06)

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	02/20/2025	ND	2.03	102	2.00	1.86	
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15	
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24	
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26	
Total BTEX	<0.300	0.300	02/20/2025	ND					

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

Chloride, SM4500CI-B		mg/kg		Analyzed By: HM					
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier
Chloride	176	16.0	02/20/2025	ND	448	112	400	7.41	

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	02/20/2025	ND	221	111	200	0.119	
DRO >C10-C28*	53.4	10.0	02/20/2025	ND	212	106	200	0.754	
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND					

Surrogate: 1-Chlorooctane 80.0 % 48.2-134

Surrogate: 1-Chlorooctadecane 80.5 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 2 - 6' (H251004-07)

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	02/20/2025	ND	2.03	102	2.00	1.86		
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 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	<16.0	16.0	02/20/2025	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	02/20/2025	ND	221	111	200	0.119		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	212	106	200	0.754		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 84.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 84.9 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: S 2 - 8' (H251004-08)

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	02/20/2025	ND	2.03	102	2.00	1.86		
Toluene*	<0.050	0.050	02/20/2025	ND	2.16	108	2.00	3.15		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.23	111	2.00	3.24		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.83	114	6.00	2.26		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 106 % 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	32.0	16.0	02/20/2025	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	02/20/2025	ND	221	111	200	0.119		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	212	106	200	0.754		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 85.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 85.5 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: SW 1 (H251004-09)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/20/2025	ND	2.06	103	2.00	1.40		
Toluene*	<0.050	0.050	02/20/2025	ND	2.11	106	2.00	1.47		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.12	106	2.00	1.74		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.46	108	6.00	1.88		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 109 % 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	32.0	16.0	02/20/2025	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	02/20/2025	ND	227	113	200	1.98		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	233	116	200	4.44		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 96.3 % 48.2-134

Surrogate: 1-Chlorooctadecane 100 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: SW 2 (H251004-10)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/20/2025	ND	2.06	103	2.00	1.40		
Toluene*	<0.050	0.050	02/20/2025	ND	2.11	106	2.00	1.47		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.12	106	2.00	1.74		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.46	108	6.00	1.88		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 108 % 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	96.0	16.0	02/20/2025	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	02/20/2025	ND	227	113	200	1.98		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	233	116	200	4.44		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 96.9 % 48.2-134

Surrogate: 1-Chlorooctadecane 98.1 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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

Analytical Results For:

PIMA ENVIROMENTAL
 SEBASTIAN OROZCO
 1601 N TURNER STE. 500
 HOBBS NM, 88240
 Fax To:

Received:	02/20/2025	Sampling Date:	02/18/2025
Reported:	02/21/2025	Sampling Type:	Soil
Project Name:	SKELLY UNIT 605 BATTERY	Sampling Condition:	Cool & Intact
Project Number:	6 - 274	Sample Received By:	Alyssa Parras
Project Location:	SPUR - EDDY CO NM		

Sample ID: SW 3 (H251004-11)

BTEX 8021B		mg/kg		Analyzed By: JH						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
Benzene*	<0.050	0.050	02/20/2025	ND	2.06	103	2.00	1.40		
Toluene*	<0.050	0.050	02/20/2025	ND	2.11	106	2.00	1.47		
Ethylbenzene*	<0.050	0.050	02/20/2025	ND	2.12	106	2.00	1.74		
Total Xylenes*	<0.150	0.150	02/20/2025	ND	6.46	108	6.00	1.88		
Total BTEX	<0.300	0.300	02/20/2025	ND						

Surrogate: 4-Bromofluorobenzene (PID) 110 % 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	02/20/2025	ND	416	104	400	3.92		

TPH 8015M		mg/kg		Analyzed By: MS						
Analyte	Result	Reporting Limit	Analyzed	Method Blank	BS	% Recovery	True Value QC	RPD	Qualifier	
GRO C6-C10*	<10.0	10.0	02/20/2025	ND	227	113	200	1.98		
DRO >C10-C28*	<10.0	10.0	02/20/2025	ND	233	116	200	4.44		
EXT DRO >C28-C36	<10.0	10.0	02/20/2025	ND						

Surrogate: 1-Chlorooctane 86.8 % 48.2-134

Surrogate: 1-Chlorooctadecane 88.5 % 49.1-148

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Mike Snyder For Celey D. Keene, Lab Director/Quality Manager



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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

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Handwritten signature of Mike Snyder

Mike Snyder For 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: Pima Environmental Services		BILL TO	
Project Manager: Sebastian Orzco	Address: 5614 N. Lovington Hwy	P.O. #:	
City: Hobbs	State: NM zip: 88240	Company: Spur	
Phone #: 575-964-7740	Fax #:	Attn:	
Project #: 6-274	Project Owner: Spur	Address:	
Project Name: Kelly Unit 605 Battery	City:	State:	
Project Location: Eddy County	Phone #:	Zip:	
Sampler Name: Andrew Franco	Fax #:		

Lab I.D.	Sample I.D.	(G)RAB OR (C)OMP.	# CONTAINERS	MATRIX						DATE	TIME	ANALYSIS REQUEST	
				GROUNDWATER	WASTEWATER	SOIL	OIL	SLUDGE	OTHER :				
H051004													
1	S1-2'					X				2-18-25	8:00	X	BTEX
2	S1-4'							X			8:16	X	TPH
3	S1-6'										8:20	X	Chlorides
4	S1-8'										8:25		
5	S2-2'										8:29		
6	S2-4'										8:38		
7	S2-6'										8:41		
8	S2-8'										8:46		
9	SU1										8:50		
10	SU2										8:59		

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Relinquished By: <u>Karime Adams</u>	Date: <u>2-20-25</u>	Received By: <u>Adams</u>	Date: <u>2-20-25</u>
Delivered By: (Circle One) <u>-1101 / C10 31</u>	Sample Condition	CHECKED BY: <u>AP</u>	(Initials)
Sampler - UPS - Bus - Other: <u>-1071 / #110</u>	Cool - Intact <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	Phone Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Phone #:	
	Fax Result: <input type="checkbox"/> Yes <input type="checkbox"/> No	Add'l Fax #:	
REMARKS: <u>[Rush] Billing # 7010-7410</u>			
<u>Sebastian@Pimaoil.com</u>			
<u>lab@pimaoil.com</u>			

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 449511

QUESTIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2405328548
Incident Name	NAPP2405328548 SKELLY UNIT 605 BATTERY @ 0
Incident Type	Oil Release
Incident Status	Remediation Closure Report Received

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	SKELLY UNIT 605 BATTERY
Date Release Discovered	02/19/2024
Surface Owner	Federal

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

Nature and Volume of Release	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Cause: Human Error Tank (Any) Crude Oil Released: 15 BBL Recovered: 15 BBL Lost: 0 BBL.
Produced Water Released (bbls) Details	Not answered.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	OIL TANKS SWITCHED INSTEAD OF EQUALIZED CAUSING TANK OVERFLOW INTO LINED CONTAINMENT

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 2

Action 449511

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>

With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	N/A

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 02/22/2024
--	---

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 3

Action 449511

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Site Characterization
Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Greater than 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Greater than 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Greater than 5 (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	Low
A 100-year floodplain	Greater than 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan
Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	02/11/2025
On what date will (or did) the final sampling or liner inspection occur	02/18/2025
On what date will (or was) the remediation complete(d)	02/19/2025
What is the estimated surface area (in square feet) that will be remediated	2650
What is the estimated volume (in cubic yards) that will be remediated	15
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS, Page 4

Action 449511

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Remediation Plan (continued)

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)

Is (or was) there affected material present needing to be removed	Yes
Is (or was) there a power wash of the lined containment area (to be) performed	Yes
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	THE LINER HAD AFFECTED MATERIAL TO BE MOVED (15CY). ONCE THE MATERIAL WAS REMOVED, ONE SECTION OF THE LINER APPEARED TO HAVE BEEN COMPROMISED SO PIMA SAMPLED THAT AREA AND FOUND THE MATERIAL CONCENTRATIONS BELOW THE NMOCDD STANDARD. THE OTHER PART OF THE LINER WAS STILL INTACT AND FOUND TO HAVE THE ABILITY TO CONTAIN FLUIDS.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 04/08/2025
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The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 6

Action 449511

QUESTIONS (continued)

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Liner Inspection Information	
Last liner inspection notification (C-141L) recorded	430974
Liner inspection date pursuant to Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC	02/19/2025
Was all the impacted materials removed from the liner	Yes
What was the liner inspection surface area in square feet	2600

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	Yes
What was the total surface area (in square feet) remediated	2650
What was the total volume (cubic yards) remediated	15
Summarize any additional remediation activities not included by answers (above)	15 CY OF AFFECTED MATERIAL WAS REMOVED FROM ON TOP OF THE LINER. DURING INSPECTION OF THE LINER, IT WAS FOUND THAT ONE SECTION OF THE LINER WAS COMPROMISED. THEREFORE IT WAS SAMPLED AND FOUND TO BE BELOW THE NMOCD STANDARD FOR THIS LOCATION. THE OTHER SECTION OF THE LINER REMAINED INTACT AND WAS FOUND TO HAVE THE ABILITY TO CONTAIN FLUIDS.

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

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

I hereby agree and sign off to the above statement	Name: Katherine Purvis Title: EHS Coordinator Email: katherine.purvis@spurenergy.com Date: 04/08/2025
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CONDITIONS

Action 449511

CONDITIONS

Operator: Spur Energy Partners LLC 9655 Katy Freeway Houston, TX 77024	OGRID: 328947
	Action Number: 449511
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2405328548 SKELLY UNIT 605 BATTERY, thank you. This Remediation Closure Report is approved.	5/14/2025