

District I  
1625 N. French Dr., Hobbs, NM 88240  
District II  
811 S. First St., Artesia, NM 88210  
District III  
1000 Rio Brazos Road, Aztec, NM 87410  
District IV  
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144  
Revised April 3, 2017

**For temporary pits, below-grade tanks, and multi-well fluid management pits**, submit to the appropriate NMOCD District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or  
Proposed Alternative Method Permit or Closure Plan Application

- Type of action:  Below grade tank registration  
 Permit of a pit or proposed alternative method  
 Closure of a pit, below-grade tank, or proposed alternative method  
 Modification to an existing permit/or registration  
 Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

**Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request**

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1.  
Operator: Dugan Production Corp. OGRID #: 006515  
Address: PO Box 420, Farmington, NM 87499-0420  
Facility or well name: Guinness Com 90  
API Number: 30-045-29490 OCD Permit Number: BGT 1  
U/L or Qtr/Qtr K Section 13 Township 26N Range 13W County: San Juan  
Center of Proposed Design: Latitude 36.4860611 Longitude -108.1710434 NAD83 1850' FSL & 2510' FWL  
Surface Owner:  Federal  State  Private  Tribal Trust or Indian Allotment

2.  
 **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary:  Drilling  Workover  
 Permanent  Emergency  Cavitation  P&A  Multi-Well Fluid Management Low Chloride Drilling Fluid  yes  no  
 Lined  Unlined Liner type: Thickness \_\_\_\_\_ mil  LLDPE  HDPE  PVC  Other \_\_\_\_\_  
 String-Reinforced  
Liner Seams:  Welded  Factory  Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
 **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
Volume: 30 bbl Type of fluid: Water  
Tank Construction material: Steel  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other \_\_\_\_\_  
Liner type: Unlined  HDPE  PVC  Other \_\_\_\_\_

4.  
 **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
 Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)  
 Four foot height, four strands of barbed wire evenly spaced between one and four feet  
 Alternate. Please specify \_\_\_\_\_

6.  
**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)  
 Screen  Netting  Other \_\_\_\_\_  
 Monthly inspections (If netting or screening is not physically feasible)

7.  
**Signs:** Subsection C of 19.15.17.11 NMAC  
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  
 Signed in compliance with 19.15.16.8 NMAC

8.  
**Variations and Exceptions:**  
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
 Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.  
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC  
**Instructions:** *The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

**General siting**

**Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- NM Office of the State Engineer - iWATERS database search;  USGS;  Data obtained from nearby wells

Yes  No  
 NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

Yes  No  
 NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

Yes  No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

Yes  No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

Yes  No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

Yes  No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

Yes  No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

Yes  No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

Yes  No

|   |  |
|---|--|
| Within 100 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <b><u>Temporary Pit Non-low chloride drilling fluid</u></b>   |  |
| Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| 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, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 300 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| <b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b>  |  |
| Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No |

10.  
**Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.  
**Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- A List of wells with approved application for permit to drill associated with the pit.
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

Previously Approved Design (attach copy of design)    API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Multi-well Fluid Management Pit  
 Alternative
- Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method

14.

**Waste Excavation and Removal Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

|   |   |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 25-50 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).<br>- Topographic map; Visual inspection (certification) of the proposed site                        | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Written confirmation or verification from the municipality; Written approval obtained from the municipality   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within 300 feet of a wetland.<br>US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance   | <input type="checkbox"/> Yes <input type="checkbox"/> No                                |

|   |  |
|---|--|
| adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division                                 | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map     | <input type="checkbox"/> Yes <input type="checkbox"/> No |
| Within a 100-year floodplain.<br>- FEMA map   | <input type="checkbox"/> Yes <input type="checkbox"/> No |

16.  
**On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) *Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.*

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.  
**Operator Application Certification:**  
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Eileen Yates Title: EHS Manager

Signature: Eileen Yates Date: 1/15/2026

e-mail address: Eileen.Yates@duganproduction.com Telephone: 505-787-9832

18.  
**OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)

OCD Representative Signature: Joel Stone Approval Date: 02/10/2026

Title: Senior Environmental Scientist OCD Permit Number: yJZS2601556368

19.  
**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC  
*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: 2/2/2026

20.  
**Closure Method:**

Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)

If different from approved plan, please explain.

21.  
**Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure for private land only)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.4860611 Longitude -108.1710434 NAD:  1927  83

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): Eileen Yates Title: Environmental Health and Safety Manager

Signature: Eileen Yates Date: February 2, 2026

e-mail address: Eileen.Yates@duganproduction.com Telephone: 505-787-9832

# Dugan Production Corp.

## Guinness Com 90

BGT # 1

30-045-29490

K-13-26N-13W

1850 FSL 2510 FWL

Surface Owner: Indian

Dugan Production Corp. has successfully closed the BGT located at the Guinness Com 90 well location. The closure procedures executed by Dugan were outlined in the Below Grade Tank Closure Plan, which received approval from the New Mexico Oil Conservation Division (NM OCD) on January 15th, 2026 and was found depth to groundwater at this site is more than 100 feet below the base of the BGT.

| Tier I Closure Criteria for Soils Impacted by a Release |                                  |              |
|---|----------------------------------|--------------|
| Constituent <sup>1</sup>                                | Method                           | Limit        |
| Chloride  | EPA 300.0 or SM4500 C1 B         | 20,000 mg/kg |
| TPH   | EPA SW-846 Method 8015M          | 2,500 mg/kg  |
| GRO-DRO   | EPA SW-846 Method 8021B or 8015M | 1,000 mg/kg  |
| BTEX <sup>3</sup>                                       | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
| Benzene   | EPA SW-846 Method 8021B or 8260B | 10 mg/kg     |

<sup>1</sup> - Constituent concentrations are in milligrams per kilogram (mg/kg).

<sup>2</sup> - Total Petroleum Hydrocarbons (TPH). Gasoline Range Organics (GRO). Diesel Range Organics (DRO). Mother Oil/Lube Oil Range Organics (MRO).

<sup>3</sup> - Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX).

As Directed by NMAC 19.15.17, and NM OCD approved, the following closing procedures have been accomplished for the closure of the below grade tank identified on the associated C-144.

- Dugan notified via email the BLM and the New Mexico Oil Conservation Division (NM OCD) of the closure within 72 hours of the BGT closure.
- The contents and the steel pit were removed on December 30<sup>th</sup>, 2025. The soil samples were collected January 5<sup>th</sup>, 2026, using a five-point composite sample to include any obvious stained, wet soils, or evidence of contamination. Soil samples were collected at a depth of 10' below grade surface. Soil samples were taken to Envirotech in Farmington, NM and analyzed for chlorides, benzene, toluene, ethyl benzene, xylene and total petroleum hydrocarbons.

- The laboratory analytical results for the composite soil samples did not detect any benzene, ethyl benzene, xylene, THP, or chloride.
- The below-grade tank vault area was backfilled with uncontaminated soil following the removal of the tank. The reclamation efforts conducted by Dugan included stabilizing the site, contouring the land to align with the natural topography, and re-vegetating the area to ensure seamless integration with the surrounding undisturbed environment. These measures were implemented to promote long-term environmental stability and restore the site to its natural condition.
- Dugan complied with the seeding requirements found in NMAC 19.15.17.13.H.(5).
- This report has been completed to comply with the 60 days of closure completion closure report required by the 19.15.17 NMAC Rule.

The table below provides a summary of the soil sample laboratory analysis. The full laboratory analytical report is included with this document and can be found in **Appendix B**.

| Analyte   | Result |
|---|--------|
| <b>Volatile Organics by EPA 8021B</b>                 | mg/kg  |
| Benzene   | ND     |
| Ethylbenzene  | ND     |
| Toluene   | ND     |
| o-Xylene  | ND     |
| p,m-Xylene  | ND     |
| Total Xylenes   | ND     |
| <b>Nonhalogenated Organics by EPA 8015D - GRO</b>     |        |
| Gasoline Range Organics (C6-C10)                      | ND     |
| <b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b> |        |
| Diesel Range Organics (C10-C28)                       | ND     |
| Oil Range Organics (C28-C36)                          | ND     |
| <b>Anions by EPA 300.0/9056A</b>                      |        |
| Chloride  | ND     |

\*\* ND – Not Detected

**Reclamation**

Dugan has restored the impacted surface area to the condition that existed prior to the below-grade tank installation. Restoration of the Site includes the replacement of soil to the relative positions and contoured to the topography of the area. The topsoil cover includes a top layer, which is suitable material to establish vegetation at the Site. The disturbed area was reseeded with

a uniformed vegetative cover. Seed mixtures are included in **Appendix C**. Reclamation photos are included in **Appendix D**.

Below is a list of disposal facilities.

Solid waste will be hauled to Envirotech:

Envirotech: Permit #NM01-0011

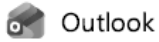
Liquid waste would have been hauled to Dugan's SOB SWD facility:

Dugan's Sanchez O'Brien SWD #1 (Permit # SWD-694)

Please see **Appendix D** for Site Photos.

**Appendix A: Notification**

**BGT Closure Notification**



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**BGT CLOSURES SOIL SAMPLING NOTIFICATION**

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**From** Eileen Yates <Eileen.Medrano@duganproduction.com>  
**Date** Wed 12/31/2025 10:59 AM  
**To** Adeloje, Abiodun A <aadeloje@blm.gov>; Stone, Joel, EMNRD <joel.stone@emnrd.nm.gov>; Jaquez, Laverna A <lavernajaquez@bia.gov>  
**Cc** Erin Aas <Erin.Aas@duganproduction.com>; Tyra Feil <Tyra.Feil@duganproduction.com>; Matthew Wilcox <Matthew.Wilcox@duganproduction.com>; Mario Ulibarri <Mario.Ulibarri@duganproduction.com>; Cameron Collier <Cameron.Collier@duganproduction.com>; Amber Baca <Amber.Baca@duganproduction.com>

Good morning,

Dugan Production Corp. will be closing the below-grade tanks (BGT) located at the following well sites on **Monday January 5, 2025**. As part of the closure process, we will be collecting soil samples in accordance with regulatory requirements.

Please find the site information and times below for your records:

1. **Operator:** Dugan Production Corp.
2. **API Number:** 30-045-29490
3. **Well Name:** GUINNESS COM # 090
4. **Status:** Active
5. **Surface Location:** K-13-26N-13W 1850 FSL, 2510 FWL
6. **Lat/Long:** 36.4860611,-108.1710434 NAD83
7. **GL Elevation:** 6030
8. **Well Type:** Gas
9. **Closure Activity:** BGT closure soil sampling
10. **Sampling Date:** *Monday January 5, 2026, 11:30 am*
11. **Surface Owner:** Federal
12. **Point of Contact:**  
Eileen Yates  
Environmental Health and Safety Manager  
[eileen.yates@duganproduction.com](mailto:eileen.yates@duganproduction.com)  
505-787-9832

Appendix B: Lab Results

Figure A: Soil Sample Laboratory Results

Report to:  
Eileen Yates



5796 U.S. Hwy 64  
Farmington, NM 87401

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




# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

Dugan Production Corp.

Project Name: Guinness Com #090

Work Order: E601006

Job Number: 06097-0177

Received: 1/5/2026

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
1/12/26

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.  
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.  
Envirotech Inc. holds the Utah TNi certification NM00979 for data reported.  
Envirotech Inc. holds the Texas TNi certification T104704557 for data reported.

**Appendix B: Lab Results**

Date Reported: 1/12/26

Eileen Yates  
PO Box 420  
Farmington, NM 87499



Project Name: Guinness Com #090  
Workorder: E601006  
Date Received: 1/5/2026 12:21:00PM

Eileen Yates,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 1/5/2026 12:21:00PM, under the Project Name: Guinness Com #090.

The analytical test results summarized in this report with the Project Name: Guinness Com #090 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,

**Walter Hinchman**  
Laboratory Director  
Office: 505-632-1881  
Cell: 775-287-1762  
[whinchman@envirotech-inc.com](mailto:whinchman@envirotech-inc.com)

**Raina Schwanz**  
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**Michelle Gonzales**  
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Envirotech Web Address: [www.envirotech-inc.com](http://www.envirotech-inc.com)

## Appendix B: Lab Results

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### Appendix B: Lab Results

#### Sample Summary

|  |  |                             |
|--|--|-----------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name: Guinness Com #090<br>Project Number: 06097-0177<br>Project Manager: Eileen Yates | Reported:<br>01/12/26 11:59 |
|--|--|-----------------------------|

| Client Sample ID | Lab Sample ID | Matrix | Sampled  | Received | Container        |
|------------------|---------------|--------|----------|----------|------------------|
| BGT Composite    | E601006-01A   | Soil   | 01/05/26 | 01/05/26 | Glass Jar, 2 oz. |

**Appendix B: Lab Results**

Date Reported: 1/12/26

Eileen Yates  
PO Box 420  
Farmington, NM 87499



Project Name: Guinness Com #090  
Workorder: E601006  
Date Received: 1/5/2026 12:21:00PM

Eileen Yates,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 1/5/2026 12:21:00PM, under the Project Name: Guinness Com #090.

The analytical test results summarized in this report with the Project Name: Guinness Com #090 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,

**Walter Hinchman**  
Laboratory Director  
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## Appendix B: Lab Results

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### Appendix B: Lab Results

#### Sample Summary

|  |  |                             |
|--|--|-----------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name: Guinness Com #090<br>Project Number: 06097-0177<br>Project Manager: Eileen Yates | Reported:<br>01/12/26 11:59 |
|--|--|-----------------------------|

| Client Sample ID | Lab Sample ID | Matrix | Sampled  | Received | Container        |
|------------------|---------------|--------|----------|----------|------------------|
| BGT Composite    | E601006-01A   | Soil   | 01/05/26 | 01/05/26 | Glass Jar, 2 oz. |

Appendix B: Lab Results

Sample Data

|  |  |                                   |
|--|--|-----------------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name: Guinness Com #090<br>Project Number: 06097-0177<br>Project Manager: Eileen Yates | Reported:<br>1/12/2026 11:59:23AM |
|--|--|-----------------------------------|

BGT Composite

E601006-01

| Analyte   | Result | Reporting Limit | Dilution | Prepared    | Analyzed | Notes          |
|---|--------|-----------------|----------|-------------|----------|----------------|
| <b>Volatile Organics by EPA 8021B</b>                 |        |                 |          |             |          |                |
|   | mg/kg  | mg/kg           |          | Analyst: MB |          | Batch: 2602037 |
| Benzene   | ND     | 0.0250          | 1        | 01/06/26    | 01/06/26 |                |
| Ethylbenzene  | ND     | 0.0250          | 1        | 01/06/26    | 01/06/26 |                |
| Toluene   | ND     | 0.0250          | 1        | 01/06/26    | 01/06/26 |                |
| o-Xylene  | ND     | 0.0250          | 1        | 01/06/26    | 01/06/26 |                |
| p,m-Xylene  | ND     | 0.0500          | 1        | 01/06/26    | 01/06/26 |                |
| Total Xylenes   | ND     | 0.0250          | 1        | 01/06/26    | 01/06/26 |                |
| <i>Surrogate: 4-Bromochlorobenzene-PID</i>            |        |                 |          |             |          |                |
|   |        | 106 %           | 70-130   | 01/06/26    | 01/06/26 |                |
| <b>Nonhalogenated Organics by EPA 8015D - GRO</b>     |        |                 |          |             |          |                |
|   | mg/kg  | mg/kg           |          | Analyst: MB |          | Batch: 2602037 |
| <b>Gasoline Range Organics (C6-C10)</b>               |        |                 |          |             |          |                |
|   | ND     | 20.0            | 1        | 01/06/26    | 01/06/26 |                |
| <i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>        |        |                 |          |             |          |                |
|   |        | 88.9 %          | 70-130   | 01/06/26    | 01/06/26 |                |
| <b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b> |        |                 |          |             |          |                |
|   | mg/kg  | mg/kg           |          | Analyst: KH |          | Batch: 2602032 |
| <b>Diesel Range Organics (C10-C28)</b>                |        |                 |          |             |          |                |
|   | ND     | 25.0            | 1        | 01/06/26    | 01/06/26 |                |
| <b>Oil Range Organics (C28-C36)</b>                   |        |                 |          |             |          |                |
|   | ND     | 50.0            | 1        | 01/06/26    | 01/06/26 |                |
| <i>Surrogate: n-Nonane</i>                            |        |                 |          |             |          |                |
|   |        | 98.3 %          | 61-141   | 01/06/26    | 01/06/26 |                |
| <b>Anions by EPA 300.0/9056A</b>                      |        |                 |          |             |          |                |
|   | mg/kg  | mg/kg           |          | Analyst: TP |          | Batch: 2602036 |
| Chloride  | ND     | 20.0            | 1        | 01/06/26    | 01/06/26 |                |

Appendix B: Lab Results

QC Summary Data

|  |  |   |                                       |
|--|--|---|---------------------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name:<br>Project Number:<br>Project Manager: | Guinness Com #090<br>06097-0177<br>Eileen Yates | Reported:<br><br>1/12/2026 11:59:23AM |
|--|--|---|---------------------------------------|

Volatile Organics by EPA 8021B

Analyst: MB

| Analyte | Result<br>mg/kg | Reporting<br>Limit<br>mg/kg | Spike<br>Level<br>mg/kg | Source<br>Result<br>mg/kg | Rec<br>%<br>% | Rec<br>Limits<br>% | RPD<br>% | RPD<br>Limit<br>% | Notes |
|---------|-----------------|-----------------------------|-------------------------|---------------------------|---------------|--------------------|----------|-------------------|-------|
|---------|-----------------|-----------------------------|-------------------------|---------------------------|---------------|--------------------|----------|-------------------|-------|

Blank (2602037-BLK1)

Prepared: 01/06/26 Analyzed: 01/06/26

|                                     |      |        |      |  |     |  |        |  |  |
|-------------------------------------|------|--------|------|--|-----|--|--------|--|--|
| Benzene                             | ND   | 0.0250 |      |  |     |  |        |  |  |
| Ethylbenzene                        | ND   | 0.0250 |      |  |     |  |        |  |  |
| Toluene                             | ND   | 0.0250 |      |  |     |  |        |  |  |
| o-Xylene                            | ND   | 0.0250 |      |  |     |  |        |  |  |
| p,p'-Xylene                         | ND   | 0.0500 |      |  |     |  |        |  |  |
| Total Xylenes                       | ND   | 0.0250 |      |  |     |  |        |  |  |
| Surrogate: 4-Bromochlorobenzene-PID | 8.22 |        | 8.00 |  | 104 |  | 70-130 |  |  |

LCS (2602037-BS1)

Prepared: 01/06/26 Analyzed: 01/06/26

|                                     |      |        |      |  |     |  |        |  |  |
|-------------------------------------|------|--------|------|--|-----|--|--------|--|--|
| Benzene                             | 5.99 | 0.0250 | 5.00 |  | 120 |  | 70-130 |  |  |
| Ethylbenzene                        | 5.75 | 0.0250 | 5.00 |  | 115 |  | 70-130 |  |  |
| Toluene                             | 5.89 | 0.0250 | 5.00 |  | 118 |  | 70-130 |  |  |
| o-Xylene                            | 5.80 | 0.0250 | 5.00 |  | 116 |  | 70-130 |  |  |
| p,p'-Xylene                         | 11.7 | 0.0500 | 10.0 |  | 117 |  | 70-130 |  |  |
| Total Xylenes                       | 17.5 | 0.0250 | 15.0 |  | 117 |  | 70-130 |  |  |
| Surrogate: 4-Bromochlorobenzene-PID | 8.42 |        | 8.00 |  | 103 |  | 70-130 |  |  |

Matrix Spike (2602037-MS1)

Source: E601005-01

Prepared: 01/06/26 Analyzed: 01/06/26

|                                     |      |        |      |    |     |  |        |  |  |
|-------------------------------------|------|--------|------|----|-----|--|--------|--|--|
| Benzene                             | 6.02 | 0.0250 | 5.00 | ND | 120 |  | 70-130 |  |  |
| Ethylbenzene                        | 5.79 | 0.0250 | 5.00 | ND | 116 |  | 70-130 |  |  |
| Toluene                             | 5.92 | 0.0250 | 5.00 | ND | 118 |  | 70-130 |  |  |
| o-Xylene                            | 5.83 | 0.0250 | 5.00 | ND | 117 |  | 70-130 |  |  |
| p,p'-Xylene                         | 11.8 | 0.0500 | 10.0 | ND | 118 |  | 70-130 |  |  |
| Total Xylenes                       | 17.6 | 0.0250 | 15.0 | ND | 117 |  | 70-130 |  |  |
| Surrogate: 4-Bromochlorobenzene-PID | 8.44 |        | 8.00 |    | 103 |  | 70-130 |  |  |

Matrix Spike Dup (2602037-MSD1)

Source: E601005-01

Prepared: 01/06/26 Analyzed: 01/06/26

|                                     |      |        |      |    |     |  |        |       |    |
|-------------------------------------|------|--------|------|----|-----|--|--------|-------|----|
| Benzene                             | 6.07 | 0.0250 | 5.00 | ND | 121 |  | 70-130 | 0.825 | 27 |
| Ethylbenzene                        | 5.85 | 0.0250 | 5.00 | ND | 117 |  | 70-130 | 1.09  | 26 |
| Toluene                             | 5.98 | 0.0250 | 5.00 | ND | 120 |  | 70-130 | 0.939 | 20 |
| o-Xylene                            | 5.91 | 0.0250 | 5.00 | ND | 118 |  | 70-130 | 1.35  | 25 |
| p,p'-Xylene                         | 11.9 | 0.0500 | 10.0 | ND | 119 |  | 70-130 | 1.31  | 23 |
| Total Xylenes                       | 17.8 | 0.0250 | 15.0 | ND | 119 |  | 70-130 | 1.32  | 26 |
| Surrogate: 4-Bromochlorobenzene-PID | 8.36 |        | 8.00 |    | 104 |  | 70-130 |       |    |

Appendix B: Lab Results

QC Summary Data

|  |  |   |                                       |
|--|--|---|---------------------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name:<br>Project Number:<br>Project Manager: | Guinness Com #090<br>06097-0177<br>Eileen Yates | Reported:<br><br>1/12/2026 11:59:23AM |
|--|--|---|---------------------------------------|

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: MB

| Analyte | Result | Reporting | Spike | Source | Rec | Rec    | RPD | RPD   | Notes |
|---------|--------|-----------|-------|--------|-----|--------|-----|-------|-------|
|         | mg/kg  | Limit     | Level | Result | %   | Limits | %   | Limit |       |

**Blank (2602037-BLK1)**

Prepared: 01/06/26 Analyzed: 01/06/26

|   |      |      |      |  |      |        |  |  |
|---|------|------|------|--|------|--------|--|--|
| Gasoline Range Organics (C6-C10)        | ND   | 20.0 |      |  |      |        |  |  |
| Surrogate: 1-Chloro-4-fluorobenzene-FID | 7.07 |      | 8.00 |  | 88.4 | 70-130 |  |  |

**LCS (2602037-B52)**

Prepared: 01/06/26 Analyzed: 01/06/26

|   |      |      |      |  |      |        |  |  |
|---|------|------|------|--|------|--------|--|--|
| Gasoline Range Organics (C6-C10)        | 52.0 | 20.0 | 50.0 |  | 104  | 70-130 |  |  |
| Surrogate: 1-Chloro-4-fluorobenzene-FID | 7.16 |      | 8.00 |  | 89.4 | 70-130 |  |  |

**Matrix Spike (2602037-MS2)**

Source: E601005-01

Prepared: 01/06/26 Analyzed: 01/06/26

|   |      |      |      |    |      |        |  |  |
|---|------|------|------|----|------|--------|--|--|
| Gasoline Range Organics (C6-C10)        | 52.6 | 20.0 | 50.0 | ND | 105  | 70-130 |  |  |
| Surrogate: 1-Chloro-4-fluorobenzene-FID | 7.07 |      | 8.00 |    | 88.4 | 70-130 |  |  |

**Matrix Spike Dup (2602037-MSD2)**

Source: E601005-01

Prepared: 01/06/26 Analyzed: 01/06/26

|   |      |      |      |    |      |        |      |    |
|---|------|------|------|----|------|--------|------|----|
| Gasoline Range Organics (C6-C10)        | 61.4 | 20.0 | 50.0 | ND | 123  | 70-130 | 15.5 | 20 |
| Surrogate: 1-Chloro-4-fluorobenzene-FID | 7.20 |      | 8.00 |    | 90.0 | 70-130 |      |    |

Appendix B: Lab Results

QC Summary Data

|  |  |   |                                       |
|--|--|---|---------------------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name:<br>Project Number:<br>Project Manager: | Guinness Com #090<br>06097-0177<br>Eileen Yates | Reported:<br><br>1/12/2026 11:59:23AM |
|--|--|---|---------------------------------------|

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

| Analyte | Result<br>mg/kg | Reporting<br>Limit<br>mg/kg | Spike<br>Level<br>mg/kg | Source<br>Result<br>mg/kg | Rec<br>% | Rec<br>Limits<br>% | RPD<br>% | RPD<br>Limit<br>% | Notes |
|---------|-----------------|-----------------------------|-------------------------|---------------------------|----------|--------------------|----------|-------------------|-------|
|---------|-----------------|-----------------------------|-------------------------|---------------------------|----------|--------------------|----------|-------------------|-------|

Blank (2602032-BLK1)

Prepared: 01/06/26 Analyzed: 01/06/26

|                                 |      |      |      |  |      |  |        |  |  |
|---------------------------------|------|------|------|--|------|--|--------|--|--|
| Diesel Range Organics (C10-C28) | ND   | 25.0 |      |  |      |  |        |  |  |
| Oil Range Organics (C28-C36)    | ND   | 50.0 |      |  |      |  |        |  |  |
| Surrogate: n-Nonane             | 45.2 |      | 50.0 |  | 90.4 |  | 61-141 |  |  |

LCS (2602032-BS1)

Prepared: 01/06/26 Analyzed: 01/06/26

|                                 |      |      |      |  |      |  |        |  |  |
|---------------------------------|------|------|------|--|------|--|--------|--|--|
| Diesel Range Organics (C10-C28) | 231  | 25.0 | 250  |  | 92.6 |  | 66-144 |  |  |
| Surrogate: n-Nonane             | 44.8 |      | 50.0 |  | 89.3 |  | 61-141 |  |  |

Matrix Spike (2602032-MS1)

Source: E601002-03

Prepared: 01/06/26 Analyzed: 01/06/26

|                                 |      |      |      |    |     |  |        |  |  |
|---------------------------------|------|------|------|----|-----|--|--------|--|--|
| Diesel Range Organics (C10-C28) | 296  | 25.0 | 250  | ND | 118 |  | 56-156 |  |  |
| Surrogate: n-Nonane             | 56.3 |      | 50.0 |    | 113 |  | 61-141 |  |  |

Matrix Spike Dup (2602032-MSD1)

Source: E601002-03

Prepared: 01/06/26 Analyzed: 01/06/26

|                                 |      |      |      |    |     |  |        |      |    |
|---------------------------------|------|------|------|----|-----|--|--------|------|----|
| Diesel Range Organics (C10-C28) | 268  | 25.0 | 250  | ND | 107 |  | 56-156 | 10.1 | 20 |
| Surrogate: n-Nonane             | 51.7 |      | 50.0 |    | 103 |  | 61-141 |      |    |

Appendix B: Lab Results

QC Summary Data

|  |  |                                   |
|--|--|-----------------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name: Guinness Com #090<br>Project Number: 06097-0177<br>Project Manager: Eileen Yates | Reported:<br>1/12/2026 11:59:23AM |
|--|--|-----------------------------------|

Anions by EPA 300.0/9056A

Analyst: TP

| Analyte                                | Result<br>mg/kg | Reporting<br>Limit<br>mg/kg | Spike<br>Level<br>mg/kg | Source<br>Result<br>mg/kg | Rec<br>% | Rec<br>Limits<br>% | RPD<br>% | RPD<br>Limit<br>% | Notes  |
|--|-----------------|-----------------------------|-------------------------|---------------------------|----------|--------------------|----------|-------------------|--|
| <b>Blank (2602036-BLK1)</b>            |                 |                             |                         |                           |          |                    |          |                   |  |
| Chloride                               | ND              | 20.0                        |                         |                           |          |                    |          |                   | Prepared: 01/06/26 Analyzed: 01/06/26                    |
| <b>LCS (2602036-BS1)</b>               |                 |                             |                         |                           |          |                    |          |                   |  |
| Chloride                               | 257             | 20.0                        | 250                     |                           | 103      | 96-110             |          |                   | Prepared: 01/06/26 Analyzed: 01/06/26                    |
| <b>Matrix Spike (2602036-MS1)</b>      |                 |                             |                         |                           |          |                    |          |                   |  |
| Chloride                               | 272             | 20.0                        | 250                     | ND                        | 109      | 80-120             |          |                   | Source: E601005-01 Prepared: 01/06/26 Analyzed: 01/06/26 |
| <b>Matrix Spike Dup (2602036-MSD1)</b> |                 |                             |                         |                           |          |                    |          |                   |  |
| Chloride                               | 273             | 20.0                        | 250                     | ND                        | 109      | 80-120             | 0.262    | 20                | Prepared: 01/06/26 Analyzed: 01/06/26                    |

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.

### Appendix B: Lab Results

#### Definitions and Notes

|  |  |                             |
|--|--|-----------------------------|
| Dugan Production Corp.<br>PO Box 420<br>Farmington NM, 87499 | Project Name: Guinness Com #090<br>Project Number: 06097-0177<br>Project Manager: Eileen Yates | Reported:<br>01/12/26 11:59 |
|--|--|-----------------------------|

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

DNR Did not react with the addition of acid or base.

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

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

Appendix B: Lab Results



Chain of Custody

| Client Information  |              |        |                   | Invoice Information |      |       |        | Lab Use Only             |                 |                     |             | TAT            |                |              | State      |   |      |     |      |  |  |
|---|--------------|--------|-------------------|---------------------|------|-------|--------|--------------------------|-----------------|---------------------|-------------|----------------|----------------|--------------|------------|---|------|-----|------|--|--|
| Client: Dugan Production  |              |        |                   | Company: Dugan      |      |       |        | Lab WQ#                  |                 |                     |             | 1D             | 2D             | 3D           | Std        | NM  | CO   | UT  | TX   |  |  |
| Project Name: Guinness Com # 090  |              |        |                   | Address:            |      |       |        | E 160000                 |                 |                     |             | 10097-0177     |                |              |            |   |      |     |      |  |  |
| Project Manager: Eileen Yates   |              |        |                   | City, State, Zip:   |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Address:  |              |        |                   | Phone:              |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| City, State, Zip:   |              |        |                   | Email:              |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Phone:  |              |        |                   | Miscellaneous:      |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Email:  |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Sample Information  |              |        |                   |                     |      |       |        |                          |                 | Analysis and Method |             |                |                |              |            | EPA Program   |      |     |      |  |  |
| Time Sampled  | Date Sampled | Matrix | No. of Containers | Sample ID           | FRIG | Label | Number | DW/DORO by B015          | GHG/THO by B015 | PTX by B023         | VOC by E200 | Chloride 800.0 | TECH 190C - TR | PCMA 8 MPHHS | INOC - HET | WQOC - TR   | SDWA | CWA | RCRA |  |  |
| 11:30   | 01.05.2025   | Soil   | 1 - 4oz           | BGT Composite       |      |       | 1      |                          |                 |                     |             |                |                |              | X          |   |      |     |      |  |  |
|   |              |        |                   |                     |      |       |        |                          |                 | Compliance          |             |                |                |              |            | Y   | or   | N   |      |  |  |
|   |              |        |                   |                     |      |       |        |                          |                 | PWSID #             |             |                |                |              |            |   |      |     |      |  |  |
|   |              |        |                   |                     |      |       |        |                          |                 | Sample Temp         |             |                |                |              |            | 2.1   |      |     |      |  |  |
|   |              |        |                   |                     |      |       |        |                          |                 | Remarks             |             |                |                |              |            |   |      |     |      |  |  |
| Additional Instructions:  |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.  |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Sampled by: <i>Eileen Yates</i>   |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Relinquished by: (Signature)  |              |        |                   | Date                |      | Time  |        | Received by: (Signature) |                 |                     |             | Date           |                | Time         |            | Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days.<br>Lab Use Only<br>Received on ice:<br> |      |     |      |  |  |
| <i>[Signature]</i>  |              |        |                   | 1/5/2025            |      | 12:21 |        | <i>Carthman</i>          |                 |                     |             | 1.5.26         |                | 12:21        |            |   |      |     |      |  |  |
| Relinquished by: (Signature)  |              |        |                   | Date                |      | Time  |        | Received by: (Signature) |                 |                     |             | Date           |                | Time         |            |   |      |     |      |  |  |
| Relinquished by: (Signature)  |              |        |                   | Date                |      | Time  |        | Received by: (Signature) |                 |                     |             | Date           |                | Time         |            |   |      |     |      |  |  |
| Relinquished by: (Signature)  |              |        |                   | Date                |      | Time  |        | Received by: (Signature) |                 |                     |             | Date           |                | Time         |            |   |      |     |      |  |  |
| Sample Matrix: S - Sed, Sl - Solid, Sg - Sludge, A - Asbestos, O - Other  |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA  |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |
| Note: Samples are discarded 14 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. |              |        |                   |                     |      |       |        |                          |                 |                     |             |                |                |              |            |   |      |     |      |  |  |

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Appendix B: Lab Results

Envirotech Analytical Laboratory

Printed: 1/5/2026 3:30:25PM

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: Dugan Production Corp.          | Date Received: 01/05/26 12:21        | Work Order ID: E601006     |
| Phone: (505) 325-1821                   | Date Logged In: 01/05/26 15:28       | Logged In By: Caitlin Mars |
| Email: eileen.yates@duganproduction.com | Due Date: 01/12/26 17:00 (5 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 Carrier: Eileen Yates
- 4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
- 5. Were all samples received within holding time? Yes

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? Yes

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

- 13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

**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? Yes

**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



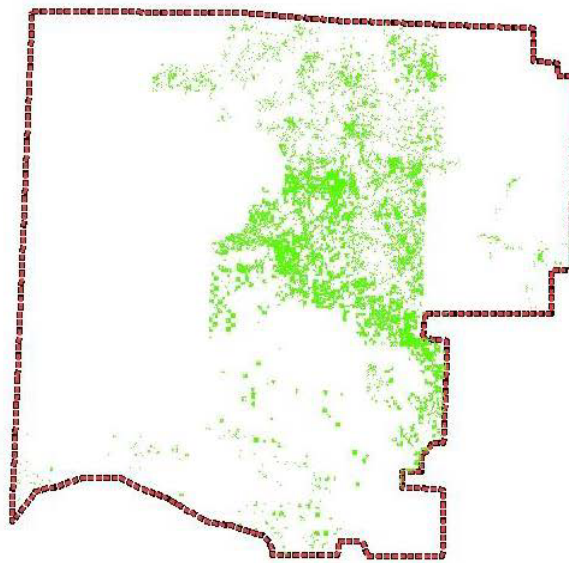
envirotech Inc.

## Appendix C: Seed Mix

### Remediation Seed Mixture

#### SAGEBRUSH COMMUNITY

The sagebrush/grass vegetation community comprises approximately 551,198 acres (approximately 39%) of the Farmington Field Office (FFO) Area (Map 1). This community is comprised primarily of Wyoming big sage with lesser amounts of basin big sage and minor areas of black sage. This plant community occupies vast areas of relatively open rolling hills to the south of Farmington and numerous mesas and canyon bottoms to the east and north. It is found on all aspects from about 5,000 to 7,200 feet but is most common on southerly and western aspects. Soils vary from clayey to fine sandy loam to loamy in texture with loamy sites being more pervasive. In general, the soils underlying this plant community are moderately deep (20 to 54 inches thick) and well drained. Typical soil series in the FFO area where the sagebrush/grass plant community is found include Penistaja, Buckle, Doak, Blancot and Orlie. The precipitation regime varies from 7 to 14 inches.



**Map 1. Sagebrush/Grass plant community on BLM lands within the FFO area.**

The sagebrush/grass vegetation community is a dominant component and is integral to a proper functioning watershed and ecosystem of the FFO area landscape. Maintaining proper hydrologic function of this plant community is essential to the ability of the plants to produce forage for livestock and wildlife, retention of soils on site and the minimization of the degradation of water quality due to the deposition of salts and sediment. Common species that can be expected to occur are Wyoming and basin big sagebrush, western wheatgrass, galleta, blue grama, Indian ricegrass and sand dropseed. Forbs are highly dependent upon precipitation; typical species are biscuit root, woolly plantain, astragalus spp., asters, daisies and borage spp.

Appendix C: Seed Mix

**Table 1. Reclamation Goal for Sagebrush/Grass Community**

| Functional Group  | Percent (%) Foliar Cover | Common Species  |
|---|--------------------------|---|
| Trees/Shrubs/Grasses/Forbs  | ≥35                      | Utah Juniper-Pinyon pine; big sagebrush, four-wing saltbush , antelope bitterbrush, alkali sacaton, Western wheatgrass, Indian ricegrass, galleta, sand dropseed, scarlet globemallow, woolly Indianwheat , fleabane, Penstemon spp., buckwheat, threadleaf groundsel |
| Invasive/undesirables<br><b>10% allowed toward meeting standard of 35%.</b> | ≤10                      | Plants that have the potential to become a dominant species on a site where its presence is a detriment to revegetation efforts or the native plant community. Examples of invasive species include cheatgrass, Russian thistle, kochia.                              |

**Table 2. Menu based seed mix for use in reclamation for sagebrush/grass community (minimum requirement) \*\***

| Common Name                        | Scientific Names                | Variety                 | Season | Form              | PLS lbs/acre* |
|------------------------------------|---------------------------------|-------------------------|--------|-------------------|---------------|
| <b>Plant two of the following:</b> |                                 |                         |        |                   |               |
| Fourwing saltbush                  | <i>Atriplex canescens</i>       | VNS                     | Cool   | Shrub             | 2.0           |
| Antelope bitterbrush               | <i>Purshia tridentata</i>       | VNS                     | Cool   | Shrub             | 2.0           |
| Winterfat                          | <i>Krascheninnikovia lanata</i> | VNS                     | Cool   | Shrub             | 2.0           |
| <b>And three of the following:</b> |                                 |                         |        |                   |               |
| Indian ricegrass                   | <i>Achnatherum hymenoides</i>   | Paloma or Rimrock       | Cool   | Bunch             | 4.0           |
| Blue grama                         | <i>Bouteloua gracilis</i>       | Alma or Hachita         | Warm   | Sod-forming       | 2.0           |
| Galleta                            | <i>Pleuraphis jamesii</i>       | Viva florets            | Warm   | Bunch/Sod-forming | 3.0           |
| Sand dropseed                      | <i>Sporobolus cryptandrus</i>   | VNS                     | Warm   | Bunch             | 0.5           |
| Western wheatgrass                 | <i>Pascopyrum smithii</i>       | Arriba                  | Cool   | Sod-forming       | 4.0           |
| <b>And one of the following:</b>   |                                 |                         |        |                   |               |
| Bottle brush squirreltail          | <i>Elymus elymoides</i>         | Tusas or VNS            | Cool   | Bunch             | 3.0           |
| Siberian wheatgrass                | <i>Agropyron fragile</i>        | Vavilov                 | Cool   | Bunch             | 3.0           |
| <b>And two of the following</b>    |                                 |                         |        |                   |               |
| Small burnet                       | <i>Sanguisorba minor</i>        | Delar                   | Cool   | Forb              | 2.0           |
| Rocky Mtn. bee plant               | <i>Cleome serrulata</i>         | Local collection or VNS | Cool   | Forb              | 0.25          |
| Blue flax                          | <i>Linum lewisii</i>            | Apar                    | Cool   | Forb              | 0.25          |

**\*\*Based on 60 pure live seeds (PLS) per square foot, drill seeded. Double this rate (120 PLS per square foot) if broadcast or hydroseeded.\*\*Based on 60 pure live seeds (PLS) per square foot, drill seeded. Double this rate (120 PLS per square foot) if broadcast or hydroseeded.**

**Appendix D: Site Photo**

**Photo 1: Sign**



**Photo 2: BGT before removal**



**Appendix D: Site Photo**

**Photo 3 & 4 – BGT after remediation**



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**

CONDITIONS

Action 549058

**CONDITIONS**

|  |  |
|--|--|
| Operator:<br>DUGAN PRODUCTION CORP<br>PO Box 420<br>Farmington, NM 87499 | OGRID:<br>6515   |
|  | Action Number:<br>549058                               |
|  | Action Type:<br>[C-144] Below Grade Tank Plan (C-144B) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| joel.stone | None      | 2/10/2026      |