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
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

BGT 1

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: Stewart A Com B # 003
API Number: 30-045-20858 OCD Permit Number:
U/L or Qtr/Qtr M Section 32 Township 30N Range 10W County: San Juan
Center of Proposed Design: Latitude 36.763514 Longitude -107.91254 NAD83 (800’ FSL & 1180’ 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: 45 bbl Type of fluid: Produced 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: Thickness 60 ☐ 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.

Variances 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. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
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). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a 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 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; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
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). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a 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 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. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ 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_2S, 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. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ 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). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a 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 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. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
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. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - 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. - FEMA map	☐ Yes ☐ 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): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

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

OCD Representative Signature: _____ **Approval Date:** _____

Title: _____ **OCD Permit Number:** _____

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: 04.20.2024**

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 _____ Longitude _____ NAD: ☐1927 ☐ 1983

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: EHS Manager

Signature: Eileen Yates Date: 03/17/2026

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

Dugan Production Corp.

Lease Name: Stewart A Com B # 003

Below Grade Tank Closure Report

API No.: 30-045-20858
State Lease: B107960009
NM OCD Tank ID: YCON2409349339
M-32-30N-10W
800 FSL 1180 FWL
Surface Owner: State

Below-Grade Tank Closure Summary:

Dugan Production Corp. completed closure of the below-grade tank located at the Stewart A Com B #003 well location (API No. 30-045-20858). Closure activities were conducted in accordance with the Below-Grade Tank Closure Plan approved by the New Mexico Oil Conservation Division on April 2, 2024, and in compliance with the substantive technical requirements of 19.15.17 NMAC.

Closure activities included removal of liquids and sludge, removal and disposal of the below-grade tank, soil sampling and analysis, backfilling excavation, recontouring of the disturbed area, and tank site reclamation.

Below-Grade Tank Permit History:

An initial C-144 permit application for a Below-Grade Tank which included a Closure Plan, was submitted to the New Mexico Oil Conservation in 2008. The original permit application was not located by the NM OCD, Dugan Production on March 21, 2024 (Action ID 325573) submitted an additional permit application. On March 27, 2024, a copy of the C-144 submitted in 2008 was provided to J. Kennedy (OCD) via email for reference.

The 2008 C-144 Closure Plan was rejected on March 28, 2024, with the following comment from OCD: “Many requirements from 19.15.17 NMAC have been omitted. Please correct and resubmit. Also, depth to groundwater estimates are based on insufficient data.”

The C-144 was subsequently resubmitted on April 2, 2024, with an amended Closure Plan, which included topographic and iWATERS attachments. The OCD approved the Closure Plan C-144 on April 2, 2024.

In accordance with 19.15.17.13 NMAC, the following summarizes the closure of the above-referenced below-grade tank. The permit for NM OCD Tank ID YCON2409349339 was approved on April 2, 2024, which included the closure plan. The conditions of approval specified that:

1. All future C-144 Form submittals related to this below-grade tank must include OCD Permit Number BGT1 in Section 1 of the C-144 Form; and

2. Upon plugging and abandonment of Well API No. 30-045-20858 (Stewart A Com B #3) and cessation of all production in the area associated with the below-grade tank, Dugan Production Corp. shall complete the requirements of 19.15.17.13(H) NMAC for the area associated with the below-grade tank and notify the OCD when restoration, reclamation, and revegetation are complete.

Subsequent closure activities, including tank removal, soil sampling, backfilling, and site reclamation, were conducted in accordance with the substantive technical requirements of 19.15.17 NMAC.

BGT Closure:

Dugan Production Corp. has successfully closed the below-grade tank located at Stewart A Com B #003 well location. The closure procedures implemented by Dugan were conducted in accordance with the Below-Grade Tank Closure Plan submitted to the New Mexico Oil Conservation Division on April 2, 2024.

General Plan:

1. Dugan Production Corp. shall close the below-grade pit within 60 days of cessation of operations, in accordance with NMAC 19.15.17.13.G(4). This requirement applies to below-grade tanks that do not meet the requirements of NMAC 19.15.17.11.I(4) or that are not included under NMAC 19.15.17.11.I(5). Such tanks must be closed within, unless retrofitted to comply with NMAC 19.15.17.11.I(4)(b), or earlier if required by the Division due to an imminent threat to fresh water, public health, or the environment. In accordance with 19.15.17.12.D(6), a C-141 must be submitted to document any areas that are wet, discolored or showing other evidence of release.

   The above-mentioned Below-Grade Tank Permit Application was approved by the New Mexico Oil Conservation Division (NMOCD) on April 2, 2024, subject to the two conditions listed in the permit history.

2. Dugan Production shall remove liquids and sludge from a below-grade tank prior to implementing closure activities and shall dispose of the liquids and sludge in a division-approved facility. The disposal facilities to be utilized are Envirotech Landfarm (Permit # NM-01-011) for solid waste and liquid waste will be hauled to Dugan Production Corp.'s Sanchez O'Brien SWD # 001 (Permit # SWD-694).

   All recovered liquids were disposed of at Dugan Production Corp.'s Sanchez O'Briens SWD # 001 (Permit # NM-694) and any sludge or soil required to be removed to facilitate closure was hauled to Envirotech Land Farm (Permit # NM-01-011).

3. Dugan Production Corp. will receive prior approval to remove the below-grade tank and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.

The below-grade tank was disposed of in accordance with division approved method.

4. Equipment associated with the below-grade tank shall be removed by Dugan Production Corp., unless the equipment is required.

   All equipment associated with the below-grade tank that was no longer required for operations was removed from site.

5. Dugan Production Corp. will have the soil beneath the below-grade tank tested to determine whether a release has occurred. Dugan Production Corp. shall collect at a minimum, a five-point composite sample: Individual grab sampled will be collected from any area that is wet, discolored, or showing other evidence of a release, and analyzed for constituents listed in Table I of NMAC 19.15.17.13. Dugan Production Corp. shall notify the division of its results on form C-141.

The depth to groundwater at the site was greater than 50 feet and less than 100 feet below the base of the below grade tank, meeting the closure criteria for Tier II constituent levels.

Tier III Closure Criteria		
Constituent[1]	Method	Limit
Chloride	EPA 300.0	10,000 mg/kg
TPH	EPA SW-846 Method 418.1	2,500 mg/kg
GRO-DRO	EPA SW-846 Method 8015M	1,000 mg/kg
BTEX[3]	EPA SW-846 Method 8021B or 8260B	50 mg/kg
Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

[1] - Constituent concentrations are in milligrams per kilogram (mg/kg).
[2] - Total Petroleum Hydrocarbons (TPH). Gasoline Range Organics (GRO). Diesel Range Organics (DRO). Mother Oil/Lube Oil Range Organics (MRO).
[3] - Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX).

A five-point composite sample was taken of the below-grade tank using sampling tools and all samples tested per NMAC 19.15.17.1 3(B)(1)(b). **See Appendix B: Soil Analysis**

Analyte	Result
Volatile Organics by EPA 8021B	mg/kg
Benzene	ND
Ethylbenzene	ND
Toluene	ND
o-Xylene	ND
p, m-Xylene	ND
Total Xylenes	ND
Nonhalogenated Organics by EPA 8015D - GRO	
Gasoline Range Organics (GRO)	ND
Nonhalogenated Organics by EPA 8015M/D-DRO/MRO	
Diesel Range Organics (DRO)	ND
Motor Range Organics (MRO)	ND
Anions by EPA 300.0/9056A	
Chloride	88

6. If Dugan Production Corp. or the division determine that a release has occurred, then Dugan Production Corp. shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

   No evidence of a release was observed during the visual inspection or indicated by the analytical results of the soil samples

7. In the event the sampling program demonstrates that a release has not occurred or that any release does not exceed the constituent concentrations specified in NMAC 19.15.17.13 Table I, then Dugan Production Corp. Shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover; recontour and revegetate the site.

   The below-grade tank area passed all requirements of NMAC 19.15.17.13.E(4) and was backfilled with compacted, non-waste containing, earthen material.

8. Notice of Closure will be given prior to closure to the Aztec District Division office between 72 hours and one week via email or verbally. The notification of closure will include the following:
   i. Operators name
   ii. Location by Unit Letter, Section, Township, and Range.
   iii. Well Name
   iv. API Number

   Notification is included in A**ppendix A: Notifications**

9. The surface owner shall be notified of Dugan Production Corp.'s closing of the below-grade tank 72 hours, but not more than one week, prior to closure as per approved closure plan via certified mail, return receipt requested.

   The closure process notification to the landowner was sent via email. **See Appendix A: Notifications.**

10. Re-contouring of location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control, prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface, fitting the natural topography.

    The below-grade tank area was recontoured to achieve a uniform appearance with a smooth surface. Drainage controls were incorporated to prevent ponding and erosion and to ensure the area aligns with the existing well pad. Natural drainage was not impeded. Water bars and silt traps were installed, where necessary, to minimize erosion.

11. Dugan shall seed the disturbed areas the first favorable growing season following closure of a below-grade tank. Seeding will be accomplished via drilling on the contour whenever practical or by other division-approved methods. BLM stipulated seed mixes will be used on federally regulated lands and division-approved seed mixtures (administratively approved if required) will be utilized on all State or private lands. A uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, approval if needed. Dugan will repeat seeding or planting will be continued until successful vegetative growth occurs.

    Final reclamation will be completed by Dugan Production Corp. upon plugging and abandonment of the well using Division-approved seed mixes.

12. A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material, with chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.

    The below-grade tank area was backfilled, and more than four feet of cover was achieved and the cover included one foot of suitable material to establish vegetation at the site.

13. All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the below-grade tank. Closure report will be filed on C-144 and incorporate the following:

    - Soil Backfilling and Cover Installation, included in this report.

- Revegetation application rates and seeding techniques, to be submitted upon final plugging and abandonment of the well.
- Closure notifications, see **Appendix A: Notification**.
- Soil sampling analytical results, see **Appendix B: Soil Analysis**.

Appendix A: Notifications

BGT Closure Notification

From: Kevin Smaka <Kevin.Smaka@duganproduction.com>
Sent: Tuesday, April 2, 2024 2:59 PM
To: "Barr; Leigh; EMNRD" <leighp.barr@emnrd.nm.gov>; "eco@slo.state.nm.us" <eco@slo.state.nm.us>
Cc: "Knight; Tami C." <tknight@slo.state.nm.us>; James McDaniel <james@jakdsolutions.com>; Carlos Ramos <Carlos.Ramos@duganproduction.com>; Mario Ulibarri <Mario.Ulibarri@duganproduction.com>; Tyra Feil <Tyra.Feil@duganproduction.com>; Marty Foutz <Marty.Foutz@duganproduction.com>
Subject: Notice of Sampling

Dugan will be commencing closure activities at the Stewart A Com B #3 below grade tank this coming Friday, 4/5/2024 at 9:00 AM. As part of closure we will be collecting soil samples.

30-045-20858 STEWART A COM B #003 [17389]

General Well Information

Operator:	[6515] DUGAN PRODUCTION CORP
Status:	Active
Well Type:	Gas
Work Type:	New
Surface Location:	M-32-30N-10W 800 FSL 1180 FWL
Lat/Long:	36.763485,-107.912468 NAD83

If you have questions please contact me.

Kevin Smaka P.E.
Regulatory Engineer
Dugan Production Corp
505-486-6207

Appendix B: Soil Analysis

Figure A: On-Site Form

JAKD SOLUTIONS

ON-SITE FORM

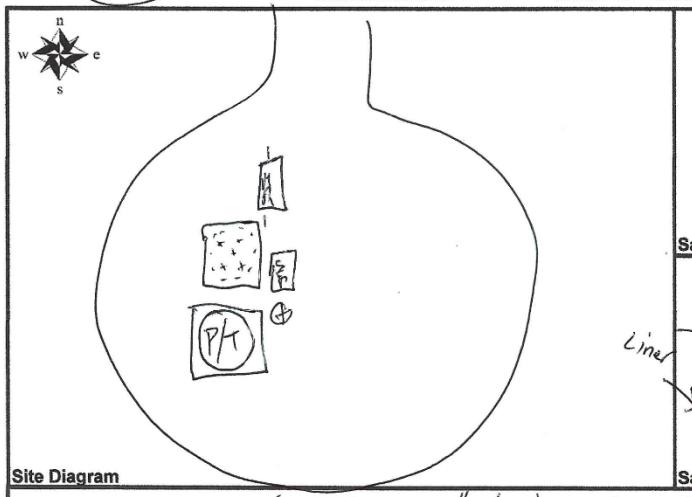
Well Name Stewart A Com B #3 API # 30-045-20858

Section 32 Township 30N Range 10W County San Juan State NM

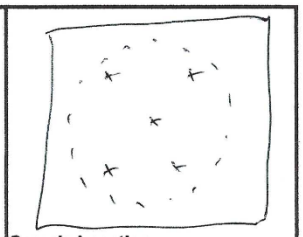
Contractors On-Site None Time On-Site 8:10 AM Time Off-Site 915

Spill Amount — bbls Spilled (Oil/Produced Water/Other —) Recovered —

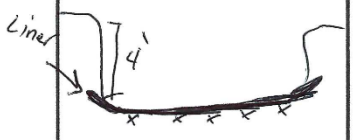
Land Use (Range / Residential / Tribe —) Spill Area — x — x — deep



Site Diagram



Sample Location



Sample Location

Comments

*Samples collected under liner
*P/T was removed prior to arrival

Samples

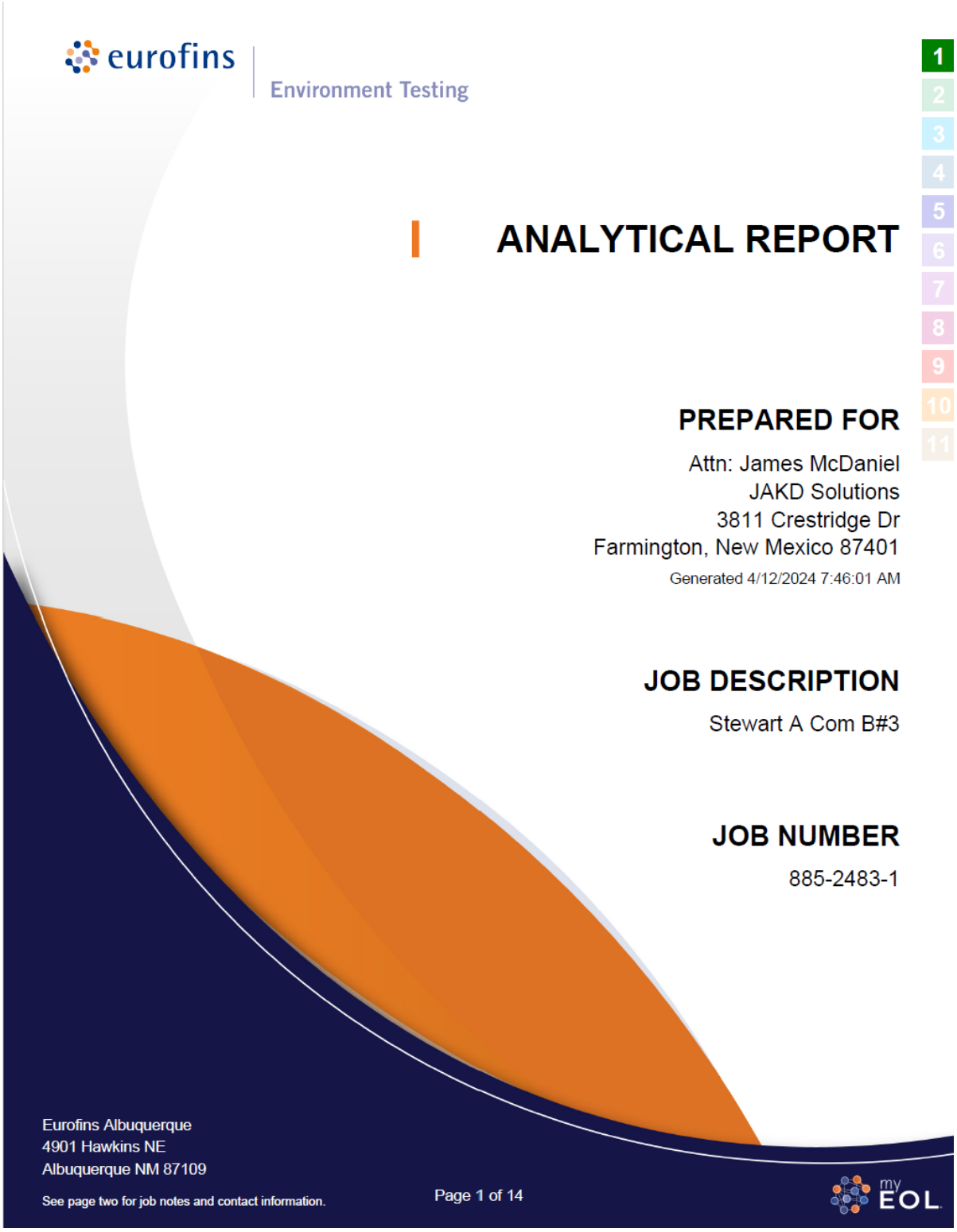
Time	Sample #	Sample Description	Characteristics	OVM (ppm)	Analysis Requested
—	NA	100 Standard	NA	—	NA
905	1	BGT Composite	Sandy w Rock, no odor	—	8015, 8021, cl

Name (Print) James McDaniel Date 4/5/2024

Name (Signature) [signature] Company Dugan

Appendix B: Soil Analysis

Figure B: Soil Laboratory Analysis



Appendix B: Soil Analysis

Eurofins Albuquerque

Job Notes

The test results in this report relate only to the samples as received by the laboratory and will meet all requirements of the methodology, with any exceptions noted. This report shall not be reproduced except in full, without the express written approval of the laboratory. All questions should be directed to the Eurofins Environment Testing South Central, LLC Project Manager.

Authorization

Generated
4/12/2024 7:46:01 AM

Authorized for release by
Andy Freeman, Business Unit Manager
andy.freeman@et.eurofinsus.com
(505)345-3975

Appendix B: Soil Analysis

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Laboratory Job ID: 885-2483-1

Table of Contents

Appendix B: Soil Analysis

Definitions/Glossary

Client: JAKD Solutions
Job ID: 885-2483-1
Project/Site: Stewart A Com B#3

Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
¤	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count

Eurofins Albuquerque

Page 4 of 14 4/12/2024

Appendix B: Soil Analysis

Case Narrative

Client: JAKD Solutions
Project: Stewart A Com B#3

Job ID: 885-2483-1

Job ID: 885-2483-1 **Eurofins Albuquerque**

Job Narrative
885-2483-1

Analytical test results meet all requirements of the associated regulatory program listed on the Accreditation/Certification Summary Page unless otherwise noted under the individual analysis. Data qualifiers are applied to indicate exceptions. Noncompliant quality control (QC) is further explained in narrative comments.

- Matrix QC may not be reported if insufficient sample or site-specific QC samples were not submitted. In these situations, to demonstrate precision and accuracy at a batch level, a LCS/LCSD may be performed, unless otherwise specified in the method.
- Surrogate and/or isotope dilution analyte recoveries (if applicable) which are outside of the QC window are confirmed unless attributed to a dilution or otherwise noted in the narrative.

Regulated compliance samples (e.g. SDWA, NPDES) must comply with the associated agency requirements/permits.

Receipt
The sample was received on 4/6/2024 7:00 AM. Unless otherwise noted below, the sample arrived in good condition, and, where required, properly preserved and on ice. The temperature of the cooler at receipt time was 2.7°C.

Gasoline Range Organics
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

GC VOA
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Diesel Range Organics
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

HPLC/IC
No additional analytical or quality issues were noted, other than those described above or in the Definitions/ Glossary page.

Appendix B: Soil Analysis

Client Sample Results

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Client Sample ID: BGT Composite
Date Collected: 04/05/24 09:05
Date Received: 04/06/24 07:00

Lab Sample ID: 885-2483-1
Matrix: Solid

Method: SW846 8015D - Gasoline Range Organics (GRO) (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics [C6 - C10]	ND		4.7		mg/Kg		04/08/24 15:32	04/10/24 17:35	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*104*		*15 - 244*	*04/08/24 15:32*	*04/10/24 17:35*	*1*

Method: SW846 8021B - Volatile Organic Compounds (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.023		mg/Kg		04/08/24 15:32	04/10/24 17:35	1
Ethylbenzene	ND		0.047		mg/Kg		04/08/24 15:32	04/10/24 17:35	1
Toluene	ND		0.047		mg/Kg		04/08/24 15:32	04/10/24 17:35	1
Xylenes, Total	ND		0.093		mg/Kg		04/08/24 15:32	04/10/24 17:35	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*87*		*39 - 146*	*04/08/24 15:32*	*04/10/24 17:35*	*1*

Method: SW846 8015D - Diesel Range Organics (DRO) (GC)

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	ND		9.7		mg/Kg		04/09/24 13:09	04/10/24 14:17	1
Motor Oil Range Organics [C28-C40]	ND		48		mg/Kg		04/09/24 13:09	04/10/24 14:17	1

Surrogate	*%Recovery*	*Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Di-n-octyl phthalate (Surr)	*107*		*62 - 134*	*04/09/24 13:09*	*04/10/24 14:17*	*1*

Method: EPA 300.0 - Anions, Ion Chromatography - Soluble

Analyte	Result	Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Chloride	88		5.0		mg/Kg			04/10/24 22:43	1

Eurofins Albuquerque

Page 6 of 14

4/12/2024

Appendix B: Soil Analysis

QC Sample Results

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Method: 8015D - Gasoline Range Organics (GRO) (GC)

Lab Sample ID: MB 885-2924/1-A
Matrix: Solid
Analysis Batch: 3090

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 2924

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Gasoline Range Organics [C6 - C10]	ND		5.0		mg/Kg		04/08/24 15:32	04/10/24 11:19	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*102*		*15 - 244*	*04/08/24 15:32*	*04/10/24 11:19*	*1*

Lab Sample ID: LCS 885-2924/2-A
Matrix: Solid
Analysis Batch: 3090

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 2924

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Gasoline Range Organics [C6 - C10]			25.0	25.5		mg/Kg		102	70 - 130		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
4-Bromofluorobenzene (Surr)	*204*		*15 - 244*

Method: 8021B - Volatile Organic Compounds (GC)

Lab Sample ID: MB 885-2924/1-A
Matrix: Solid
Analysis Batch: 3091

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 2924

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Benzene	ND		0.025		mg/Kg		04/08/24 15:32	04/10/24 11:19	1
Ethylbenzene	ND		0.050		mg/Kg		04/08/24 15:32	04/10/24 11:19	1
Toluene	ND		0.050		mg/Kg		04/08/24 15:32	04/10/24 11:19	1
Xylenes, Total	ND		0.10		mg/Kg		04/08/24 15:32	04/10/24 11:19	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
4-Bromofluorobenzene (Surr)	*87*		*39 - 146*	*04/08/24 15:32*	*04/10/24 11:19*	*1*

Lab Sample ID: LCS 885-2924/3-A
Matrix: Solid
Analysis Batch: 3091

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 2924

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Benzene			1.00	0.786		mg/Kg		79	70 - 130		
Ethylbenzene			1.00	0.804		mg/Kg		80	70 - 130		
Toluene			1.00	0.795		mg/Kg		80	70 - 130		
Xylenes, Total			3.00	2.44		mg/Kg		81	70 - 130		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
4-Bromofluorobenzene (Surr)	*88*		*39 - 146*

Eurofins Albuquerque

Page 7 of 14

4/12/2024

Appendix B: Soil Analysis

QC Sample Results

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Method: 8015D - Diesel Range Organics (DRO) (GC)

Lab Sample ID: MB 885-2975/1-A
Matrix: Solid
Analysis Batch: 3129

Client Sample ID: Method Blank
Prep Type: Total/NA
Prep Batch: 2975

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Diesel Range Organics [C10-C28]	ND		10		mg/Kg		04/09/24 13:09	04/10/24 11:23	1
Motor Oil Range Organics [C28-C40]	ND		50		mg/Kg		04/09/24 13:09	04/10/24 11:23	1

Surrogate	*MB %Recovery*	*MB Qualifier*	*Limits*	*Prepared*	*Analyzed*	*Dil Fac*
Di-n-octyl phthalate (Surr)	*117*		*62 - 134*	*04/09/24 13:09*	*04/10/24 11:23*	*1*

Lab Sample ID: LCS 885-2975/2-A
Matrix: Solid
Analysis Batch: 3129

Client Sample ID: Lab Control Sample
Prep Type: Total/NA
Prep Batch: 2975

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Diesel Range Organics [C10-C28]			50.0	53.5		mg/Kg		107	60 - 135		

Surrogate	*LCS %Recovery*	*LCS Qualifier*	*Limits*
Di-n-octyl phthalate (Surr)	*124*		*62 - 134*

Method: 300.0 - Anions, Ion Chromatography

Lab Sample ID: MB 880-77836/1-A
Matrix: Solid
Analysis Batch: 77865

Client Sample ID: Method Blank
Prep Type: Soluble

Analyte	MB Result	MB Qualifier	RL		Unit	D	Prepared	Analyzed	Dil Fac
Chloride	ND		5.0		mg/Kg			04/10/24 19:46	1

Lab Sample ID: LCS 880-77836/2-A
Matrix: Solid
Analysis Batch: 77865

Client Sample ID: Lab Control Sample
Prep Type: Soluble

Analyte			Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec Limits		
Chloride			250	258		mg/Kg		103	90 - 110		

Lab Sample ID: LCSD 880-77836/3-A
Matrix: Solid
Analysis Batch: 77865

Client Sample ID: Lab Control Sample Dup
Prep Type: Soluble

Analyte			Spike Added	LCSD Result	LCSD Qualifier	Unit	D	%Rec	%Rec Limits	RPD	RPD Limit
Chloride			250	257		mg/Kg		103	90 - 110	1	20

Appendix B: Soil Analysis

QC Association Summary

Client: JAKD Solutions
Job ID: 885-2483-1
Project/Site: Stewart A Com B#3

GC VOA

Prep Batch: 2924

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Total/NA	Solid	5030C	
MB 885-2924/1-A	Method Blank	Total/NA	Solid	5030C	
LCS 885-2924/2-A	Lab Control Sample	Total/NA	Solid	5030C	
LCS 885-2924/3-A	Lab Control Sample	Total/NA	Solid	5030C	

Analysis Batch: 3090

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Total/NA	Solid	8015D	2924
MB 885-2924/1-A	Method Blank	Total/NA	Solid	8015D	2924
LCS 885-2924/2-A	Lab Control Sample	Total/NA	Solid	8015D	2924

Analysis Batch: 3091

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Total/NA	Solid	8021B	2924
MB 885-2924/1-A	Method Blank	Total/NA	Solid	8021B	2924
LCS 885-2924/3-A	Lab Control Sample	Total/NA	Solid	8021B	2924

GC Semi VOA

Prep Batch: 2975

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Total/NA	Solid	SHAKE	
MB 885-2975/1-A	Method Blank	Total/NA	Solid	SHAKE	
LCS 885-2975/2-A	Lab Control Sample	Total/NA	Solid	SHAKE	

Analysis Batch: 3129

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Total/NA	Solid	8015D	2975
MB 885-2975/1-A	Method Blank	Total/NA	Solid	8015D	2975
LCS 885-2975/2-A	Lab Control Sample	Total/NA	Solid	8015D	2975

HPLC/IC

Leach Batch: 77836

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Soluble	Solid	DI Leach	
MB 880-77836/1-A	Method Blank	Soluble	Solid	DI Leach	
LCS 880-77836/2-A	Lab Control Sample	Soluble	Solid	DI Leach	
LCSD 880-77836/3-A	Lab Control Sample Dup	Soluble	Solid	DI Leach	

Analysis Batch: 77865

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
885-2483-1	BGT Composite	Soluble	Solid	300.0	77836
MB 880-77836/1-A	Method Blank	Soluble	Solid	300.0	77836
LCS 880-77836/2-A	Lab Control Sample	Soluble	Solid	300.0	77836
LCSD 880-77836/3-A	Lab Control Sample Dup	Soluble	Solid	300.0	77836

Eurofins Albuquerque

Page 9 of 14

4/12/2024

Appendix B: Soil Analysis

Lab Chronicle

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Client Sample ID: BGT Composite
Date Collected: 04/05/24 09:05
Date Received: 04/06/24 07:00

Lab Sample ID: 885-2483-1
Matrix: Solid

Prep Type	Batch Type	Batch Method	Run	Dilution Factor	Batch Number	Analyst	Lab	Prepared or Analyzed
Total/NA	Prep	5030C			2924	JP	EET ALB	04/08/24 15:32
Total/NA	Analysis	8015D		1	3090	JP	EET ALB	04/10/24 17:35
Total/NA	Prep	5030C			2924	JP	EET ALB	04/08/24 15:32
Total/NA	Analysis	8021B		1	3091	JP	EET ALB	04/10/24 17:35
Total/NA	Prep	SHAKE			2975	PD	EET ALB	04/09/24 13:09
Total/NA	Analysis	8015D		1	3129	JU	EET ALB	04/10/24 14:17
Soluble	Leach	DI Leach			77836	SA	EET MID	04/10/24 14:12
Soluble	Analysis	300.0		1	77865	SMC	EET MID	04/10/24 22:43

Laboratory References:

EET ALB = Eurofins Albuquerque, 4901 Hawkins NE, Albuquerque, NM 87109, TEL (505)345-3975
EET MID = Eurofins Midland, 1211 W. Florida Ave, Midland, TX 79701, TEL (432)704-5440

Eurofins Albuquerque

Page 10 of 14

4/12/2024

Appendix B: Soil Analysis

Accreditation/Certification Summary

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Laboratory: Eurofins Albuquerque

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
New Mexico	State	NM9425, NM0901	02-26-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
8015D	5030C	Solid	Gasoline Range Organics [C6 - C10]
8015D	SHAKE	Solid	Diesel Range Organics [C10-C28]
8015D	SHAKE	Solid	Motor Oil Range Organics [C28-C40]
8021B	5030C	Solid	Benzene
8021B	5030C	Solid	Ethylbenzene
8021B	5030C	Solid	Toluene
8021B	5030C	Solid	Xylenes, Total

Authority	Program	Identification Number	Expiration Date
Oregon	NELAP	NM100001	02-26-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
8015D	5030C	Solid	Gasoline Range Organics [C6 - C10]
8015D	SHAKE	Solid	Diesel Range Organics [C10-C28]
8015D	SHAKE	Solid	Motor Oil Range Organics [C28-C40]
8021B	5030C	Solid	Benzene
8021B	5030C	Solid	Ethylbenzene
8021B	5030C	Solid	Toluene
8021B	5030C	Solid	Xylenes, Total

Laboratory: Eurofins Midland

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704400-23-26	06-30-24

Appendix B: Soil Analysis

Accreditation/Certification Summary

Client: JAKD Solutions
Project/Site: Stewart A Com B#3

Job ID: 885-2483-1

Laboratory: Eurofins Albuquerque

Unless otherwise noted, all analytes for this laboratory were covered under each accreditation/certification below.

Authority	Program	Identification Number	Expiration Date
New Mexico	State	NM9425, NM0901	02-26-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

Analysis Method	Prep Method	Matrix	Analyte
8015D	5030C	Solid	Gasoline Range Organics [C6 - C10]
8015D	SHAKE	Solid	Diesel Range Organics [C10-C28]
8015D	SHAKE	Solid	Motor Oil Range Organics [C28-C40]
8021B	5030C	Solid	Benzene
8021B	5030C	Solid	Ethylbenzene
8021B	5030C	Solid	Toluene
8021B	5030C	Solid	Xylenes, Total

Oregon	NELAP	NM100001	02-26-25

The following analytes are included in this report, but the laboratory is not certified by the governing authority. This list may include analytes for which the agency does not offer certification.

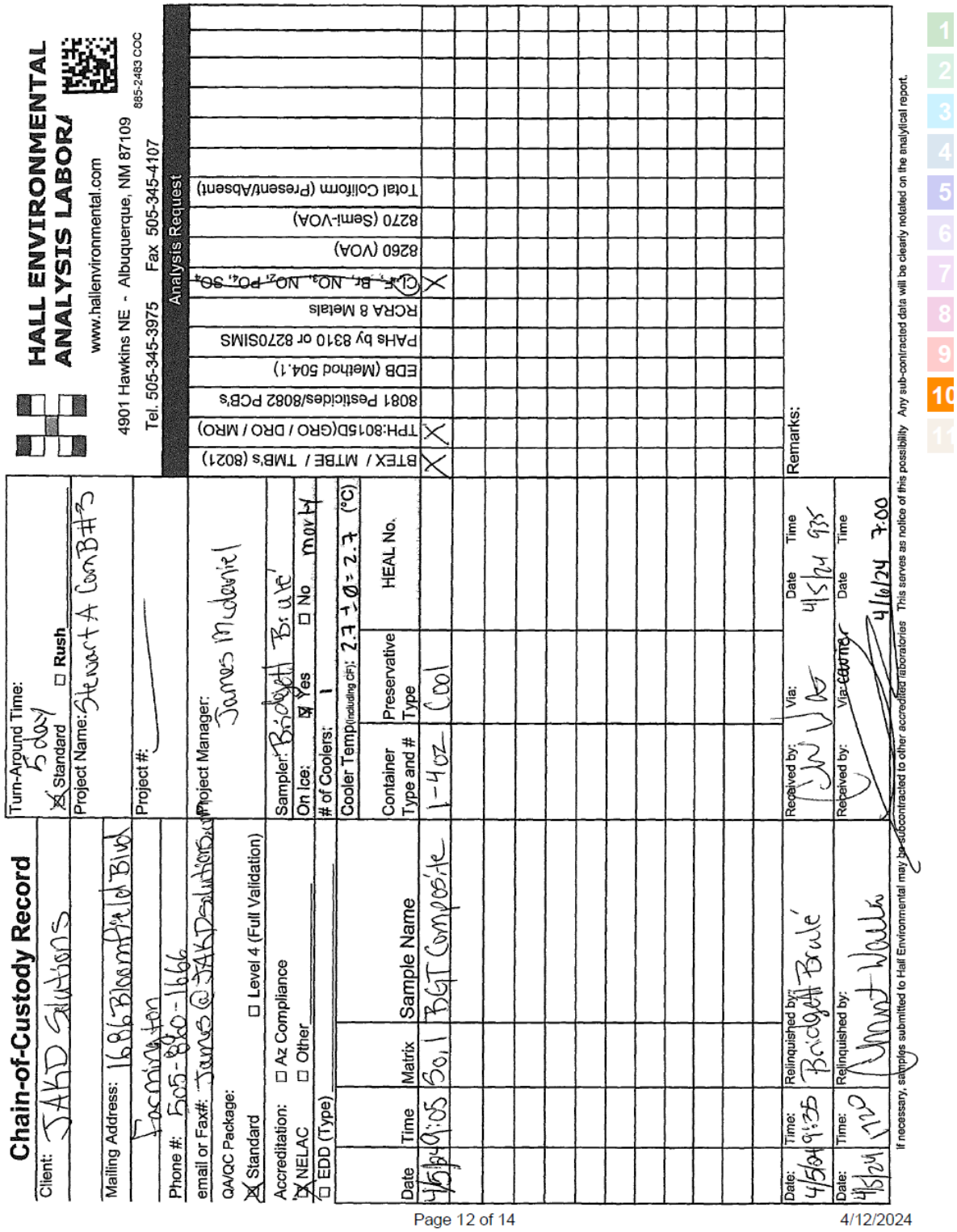
Analysis Method	Prep Method	Matrix	Analyte
8015D	5030C	Solid	Gasoline Range Organics [C6 - C10]
8015D	SHAKE	Solid	Diesel Range Organics [C10-C28]
8015D	SHAKE	Solid	Motor Oil Range Organics [C28-C40]
8021B	5030C	Solid	Benzene
8021B	5030C	Solid	Ethylbenzene
8021B	5030C	Solid	Toluene
8021B	5030C	Solid	Xylenes, Total

Laboratory: Eurofins Midland

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Texas	NELAP	T104704400-23-26	06-30-24

Appendix B: Soil Analysis



Chain-of-Custody Record

Client: JAKD Solutions

Mailing Address: 1686 Bloomfield Blvd Farmington

Phone #: 505-860-1666

email or Fax#: James@JAKDsolutions.com

QA/QC Package: ☒ Standard ☐ Level 4 (Full Validation)

Accreditation: ☐ Az Compliance ☒ NELAC ☐ Other

☐ EDD (Type) _____

Turn-Around Time: 5 day ☒ Standard ☐ Rush

Project Name: Stewart A ConB#3

Project #: _____

Project Manager: James Mclaurin

Sampler: Bridgett Boule'

On Ice: ☒ Yes ☐ No mo4

# of Coolers: 1

Cooler Temp(Including CF): 2.7 +0 = 2.7 (°C)

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No.
4/5/24	9:05	Soil	BGT Composite	1-4oz	Cool	

HALL ENVIRONMENTAL ANALYSIS LABORA

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

Tel. 505-345-3975 Fax 505-345-4107

885-2483 COC

Analysis Request

	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO3, NO2, PO4, SO4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)
	X	X					X			

Remarks:

Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time
4/5/24	9:35	Bridgett Boule'	[illegible]		4/5/24	935
Date:	Time:	Relinquished by:	Received by:	Via: courier	Date	Time
4/5/24	1720	[illegible]	[illegible]		4/6/24	7:00

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Page 12 of 14 4/12/2024

Appendix B: Soil Analysis

Login Sample Receipt Checklist

Client: JAKD Solutions

Job Number: 885-2483-1

Login Number: 2483
List Number: 2
Creator: Rodriguez, Leticia

List Source: Eurofins Midland
List Creation: 04/10/24 01:43 PM

Question	Answer	Comment
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	
COC is present	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is <6mm (1/4").	N/A	

Eurofins Albuquerque

Page 14 of 14

4/12/2024

Appendix C: Site Photos

Photo 1: BGT Before Removal – Not Available

Photo 2: BGT Berm After Removal

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 563740

CONDITIONS

Operator: DUGAN PRODUCTION CORP PO Box 420 Farmington, NM 87499	OGRID: 6515
	Action Number: 563740
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joseph.kennedy	Some of the regulatory citations in this report are from the older version of 19.15.17 NMAC. For future reports, make sure to cite from the latest version of 19.15.17 NMAC, which is dated June 28, 2013. However, the requirements for closure have been met and therefore closure is hereby approved.	3/18/2026