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District I  
625 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  
BGT 1 ☒ 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: M&G Drilling CO INC OGRID #: 141852  
Address: P.O. Box 5940 Farmington, NM 87499  
Facility or well name: Marron #042  
API Number: 30-045-06312 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr./Qtr. M Section 22 Township 27N Range 08W County: San Juan  
Center of Proposed Design: Latitude 36.5543747 Longitude -107.6764526 NAD83  
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: 100 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 \_\_\_\_\_ mil ☐ 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 Four Foot height with mesh T-Post

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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, lakebed, 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	<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). - 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. - 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. - 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. - 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). - 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. - 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. - 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. - 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: \_\_\_\_\_

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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 regard 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.

- 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:** CR Whitehead **Approval Date:** June 22, 2021

**Title:** Environmental Specialist **OCD Permit Number:** BGT 1

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:** 10/20/2020

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 36.5543747 Longitude -107.6764526 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): Agent Vanessa Fields Title: Agent/ Regulatory Compliance Manger

Signature:  Date: 12/14/2020

e-mail address: vanessa@walsheng.net Telephone: 505-787-9100



**Vanessa Fields**

---

**From:** Vanessa Fields  
**Sent:** Friday, October 16, 2020 7:49 AM  
**To:** Smith, Cory, EMNRD; Adeloye, Abiodun A  
**Cc:** Diane Montano; Pat Gottlieb; aatencio@qwestoffice.net; bjaramillo@qwestoffice.net; Bonnie Vistica  
**Subject:** 72 Hour Notification BGT Removal Tuesday October 20, 2020 9:30 am start at Marron 23-3 API 30-045-32008

Good morning,

Walsh Engineering on behalf of M&G Drilling is providing 72 hour notification for the Removal of the BGT's on the referenced locations. M&G Drilling will start at the Marron 23-3, API #30-045-32008 Tuesday October 20, 2020 9:30 am

Marron 23-3, API #30-045-32008

Marron 46A, API #30-045-21734

Marron 42, API #30-045-06312

Please let me know if you should have any questions and/or concerns.

Thank you,

**Vanessa Fields**

Regulatory Compliance Manager

Walsh Engineering /Epic Energy LLC.

O: 505-327-4892

C: 505-787-9100

[vanessa@walsheng.net](mailto:vanessa@walsheng.net)

Report to:  
Alfonso Atencio  
PO Box 5940  
Farmington, NM 87499



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

M & G Drilling

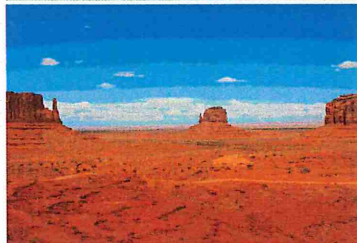
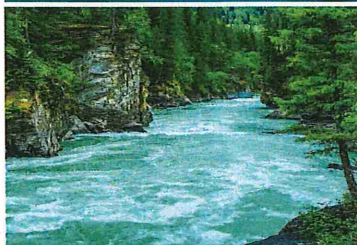
Project Name: Marron 23 #003  
Work Order: E010112  
Job Number: 04033-0002  
Received: 10/21/2020

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
10/28/20

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 NM009792018-1 for data reported.  
Envirotech Inc, holds the Texas TNI certification T104704557-19-2 for data reported.



5796 U.S. Hwy 64  
Farmington, NM 87401

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





Date Reported: 10/28/20

Alfonso Atencio  
PO Box 5940  
Farmington, NM 87499



Project Name: Marron 23 #003  
Workorder: E010112  
Date Received: 10/21/2020 11:49:00AM

Alfonso Atencio,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 10/21/2020 11:49:00AM, under the Project Name: Marron 23 #003.

The analytical test results summarized in this report with the Project Name: Marron 23 #003 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 Lopez**  
Laboratory Administrator  
Office: 505-632-1881  
[rlopez@envirotech-inc.com](mailto:rlopez@envirotech-inc.com)

**Alexa Michaels**  
Sample Custody Officer  
Office: 505-632-1881  
[labadmin@envirotech-inc.com](mailto:labadmin@envirotech-inc.com)

Envirotech Web Address: [www.envirotech-inc.com](http://www.envirotech-inc.com)

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### Sample Summary

M & G Drilling	Project Name:	Marron 23 #003	Reported:
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/20 14:20

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Marron 23 #003 Comp BGT 5 Point	E010112-01A	Soil	10/20/20	10/21/20	Glass Jar, 4 oz.
Marron 46A Comp BGT 5 Point	E010112-02A	Soil	10/20/20	10/21/20	Glass Jar, 4 oz.
Marron 42 Comp BGT 5 Point	E010112-03A	Soil	10/20/20	10/21/20	Glass Jar, 4 oz.



## Sample Data

M & G Drilling	Project Name:	Marron 23 #003	<b>Reported:</b> 10/28/2020 2:20:13PM
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	

### Marron 23 #003 Comp BGT 5 Point

E010112-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organic Compounds by EPA 8260B</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Benzene	ND	0.0250	1	10/23/20	10/27/20	
Toluene	ND	0.0250	1	10/23/20	10/27/20	
Ethylbenzene	ND	0.0250	1	10/23/20	10/27/20	
p,m-Xylene	ND	0.0500	1	10/23/20	10/27/20	
o-Xylene	ND	0.0250	1	10/23/20	10/27/20	
Total Xylenes	ND	0.0250	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	102 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	95.5 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	102 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	95.5 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg		Analyst: JL		Batch: 2043036
Diesel Range Organics (C10-C28)	30.9	25.0	1	10/23/20	10/23/20	
Oil Range Organics (C28-C35)	ND	50.0	1	10/23/20	10/23/20	
Surrogate: n-Nonane	107 %	50-200		10/23/20	10/23/20	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg		Analyst: NE		Batch: 2043038
Chloride	ND	20.0	1	10/23/20	10/23/20	





## Sample Data

M & G Drilling	Project Name:	Marron 23 #003	<b>Reported:</b> 10/28/2020 2:20:13PM
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	

### Marron 46A Comp BGT 5 Point

E010112-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organic Compounds by EPA 8260B</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Benzene	ND	0.0250	1	10/23/20	10/27/20	
Toluene	ND	0.0250	1	10/23/20	10/27/20	
Ethylbenzene	ND	0.0250	1	10/23/20	10/27/20	
p,m-Xylene	ND	0.0500	1	10/23/20	10/27/20	
o-Xylene	ND	0.0250	1	10/23/20	10/27/20	
Total Xylenes	ND	0.0250	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	103 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	97.8 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	103 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	97.8 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg		Analyst: JL		Batch: 2043036
Diesel Range Organics (C10-C28)	ND	25.0	1	10/23/20	10/23/20	
Oil Range Organics (C28-C35)	60.1	50.0	1	10/23/20	10/23/20	
Surrogate: n-Nonane	100 %	50-200		10/23/20	10/23/20	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg		Analyst: NE		Batch: 2043038
Chloride	ND	20.0	1	10/23/20	10/23/20	



## Sample Data

M & G Drilling	Project Name:	Marron 23 #003	<b>Reported:</b> 10/28/2020 2:20:13PM
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	

### Marron 42 Comp BGT 5 Point

E010112-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organic Compounds by EPA 8260B</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Benzene	ND	0.0250	1	10/23/20	10/27/20	
Toluene	ND	0.0250	1	10/23/20	10/27/20	
Ethylbenzene	ND	0.0250	1	10/23/20	10/27/20	
p,m-Xylene	ND	0.0500	1	10/23/20	10/27/20	
o-Xylene	ND	0.0250	1	10/23/20	10/27/20	
Total Xylenes	ND	0.0250	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	97.2 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	96.7 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg		Analyst: IY		Batch: 2043035
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/23/20	10/27/20	
Surrogate: 1,2-Dichloroethane-d4	97.2 %	70-130		10/23/20	10/27/20	
Surrogate: Toluene-d8	110 %	70-130		10/23/20	10/27/20	
Surrogate: Bromofluorobenzene	96.7 %	70-130		10/23/20	10/27/20	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg		Analyst: JL		Batch: 2043036
Diesel Range Organics (C10-C28)	ND	25.0	1	10/23/20	10/23/20	
Oil Range Organics (C28-C35)	ND	50.0	1	10/23/20	10/23/20	
Surrogate: n-Nonane	91.9 %	50-200		10/23/20	10/23/20	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg		Analyst: NE		Batch: 2043038
Chloride	ND	20.0	1	10/23/20	10/23/20	





## QC Summary Data

M & G Drilling	Project Name:	Marron 23 #003	Reported:
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/2020 2:20:13PM

### Volatile Organic Compounds by EPA 8260B

Analyst: IY

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

#### Blank (2043035-BLK1)

Prepared: 10/26/20 Analyzed: 10/27/20

Benzene	ND	0.0250							
Toluene	ND	0.0250							
Ethylbenzene	ND	0.0250							
p,m-Xylene	ND	0.0500							
o-Xylene	ND	0.0250							
Total Xylenes	ND	0.0250							
Surrogate: 1,2-Dichloroethane-d4	0.483		0.500		96.6	70-130			
Surrogate: Toluene-d8	0.545		0.500		109	70-130			
Surrogate: Bromofluorobenzene	0.470		0.500		94.0	70-130			

#### LCS (2043035-BS1)

Prepared: 10/26/20 Analyzed: 10/27/20

Benzene	2.36	0.0250	2.50		94.3	70-130			
Toluene	2.67	0.0250	2.50		107	70-130			
Ethylbenzene	2.65	0.0250	2.50		106	70-130			
p,m-Xylene	5.07	0.0500	5.00		101	70-130			
o-Xylene	2.48	0.0250	2.50		99.1	70-130			
Total Xylenes	7.55	0.0250	7.50		101	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.489		0.500		97.8	70-130			
Surrogate: Toluene-d8	0.554		0.500		111	70-130			
Surrogate: Bromofluorobenzene	0.482		0.500		96.3	70-130			

#### Matrix Spike (2043035-MS1)

Source: E010112-01 Prepared: 10/26/20 Analyzed: 10/27/20

Benzene	2.34	0.0250	2.50	ND	93.6	48-131			
Toluene	2.63	0.0250	2.50	ND	105	48-130			
Ethylbenzene	2.61	0.0250	2.50	ND	104	45-135			
p,m-Xylene	4.99	0.0500	5.00	ND	99.9	43-135			
o-Xylene	2.45	0.0250	2.50	ND	98.1	43-135			
Total Xylenes	7.45	0.0250	7.50	ND	99.3	43-135			
Surrogate: 1,2-Dichloroethane-d4	0.513		0.500		103	70-130			
Surrogate: Toluene-d8	0.545		0.500		109	70-130			
Surrogate: Bromofluorobenzene	0.478		0.500		95.5	70-130			

#### Matrix Spike Dup (2043035-MSD1)

Source: E010112-01 Prepared: 10/26/20 Analyzed: 10/27/20

Benzene	2.18	0.0250	2.50	ND	87.3	48-131	6.97	23	
Toluene	2.46	0.0250	2.50	ND	98.3	48-130	6.86	24	
Ethylbenzene	2.44	0.0250	2.50	ND	97.7	45-135	6.69	27	
p,m-Xylene	4.69	0.0500	5.00	ND	93.7	43-135	6.35	27	
o-Xylene	2.30	0.0250	2.50	ND	92.0	43-135	6.46	27	
Total Xylenes	6.99	0.0250	7.50	ND	93.1	43-135	6.39	27	
Surrogate: 1,2-Dichloroethane-d4	0.497		0.500		99.4	70-130			
Surrogate: Toluene-d8	0.551		0.500		110	70-130			
Surrogate: Bromofluorobenzene	0.482		0.500		96.4	70-130			



## QC Summary Data

M & G Drilling	Project Name:	Marron 23 #003	Reported:
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/2020 2:20:13PM

## Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2043035-BLK1)

Prepared: 10/26/20 Analyzed: 10/27/20

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1,2-Dichloroethane-d4	0.483		0.500		96.6	70-130			
Surrogate: Toluene-d8	0.545		0.500		109	70-130			
Surrogate: Bromofluorobenzene	0.470		0.500		94.0	70-130			

## LCS (2043035-BS2)

Prepared: 10/28/20 Analyzed: 10/28/20

Gasoline Range Organics (C6-C10)	45.6	20.0	50.0		91.1	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.498		0.500		99.6	70-130			
Surrogate: Toluene-d8	0.551		0.500		110	70-130			
Surrogate: Bromofluorobenzene	0.476		0.500		95.1	70-130			

## Matrix Spike (2043035-MS2)

Source: E010112-01 Prepared: 10/28/20 Analyzed: 10/28/20

Gasoline Range Organics (C6-C10)	46.0	20.0	50.0	ND	92.0	70-130			
Surrogate: 1,2-Dichloroethane-d4	0.484		0.500		96.7	70-130			
Surrogate: Toluene-d8	0.552		0.500		110	70-130			
Surrogate: Bromofluorobenzene	0.475		0.500		95.0	70-130			

## Matrix Spike Dup (2043035-MSD2)

Source: E010112-01 Prepared: 10/28/20 Analyzed: 10/28/20

Gasoline Range Organics (C6-C10)	45.7	20.0	50.0	ND	91.4	70-130	0.575	20	
Surrogate: 1,2-Dichloroethane-d4	0.490		0.500		98.0	70-130			
Surrogate: Toluene-d8	0.556		0.500		111	70-130			
Surrogate: Bromofluorobenzene	0.485		0.500		97.0	70-130			



## QC Summary Data

M & G Drilling	Project Name:	Marron 23 #003	Reported:
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/2020 2:20:13PM

### Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2043036-BLK1)

Prepared: 10/23/20 Analyzed: 10/23/20

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C35)	ND	50.0							
Surrogate: n-Nonane	50.1		50.0		100	50-200			

#### LCS (2043036-BS1)

Prepared: 10/23/20 Analyzed: 10/23/20

Diesel Range Organics (C10-C28)	462	25.0	500		92.4	38-132			
Surrogate: n-Nonane	49.0		50.0		98.1	50-200			

#### Matrix Spike (2043036-MS1)

Source: E010062-01 Prepared: 10/23/20 Analyzed: 10/23/20

Diesel Range Organics (C10-C28)	528	25.0	500	39.4	97.6	38-132			
Surrogate: n-Nonane	48.6		50.0		97.2	50-200			

#### Matrix Spike Dup (2043036-MSD1)

Source: E010062-01 Prepared: 10/23/20 Analyzed: 10/23/20

Diesel Range Organics (C10-C28)	514	25.0	500	39.4	94.8	38-132	2.68	20	
Surrogate: n-Nonane	50.0		50.0		100	50-200			





## QC Summary Data

M & G Drilling	Project Name:	Marron 23 #003	<b>Reported:</b>
PO Box 5940	Project Number:	04033-0002	
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/2020 2:20:13PM

### Anions by EPA 300.0/9056A

Analyst: NE

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2043038-BLK1)**

Prepared: 10/23/20 Analyzed: 10/23/20

Chloride ND 20.0

**LCS (2043038-BS1)**

Prepared: 10/23/20 Analyzed: 10/23/20

Chloride 248 20.0 250 99.3 90-110

**Matrix Spike (2043038-MS1)**

Source: E010112-01 Prepared: 10/23/20 Analyzed: 10/23/20

Chloride 249 20.0 250 ND 99.6 80-120

**Matrix Spike Dup (2043038-MSD1)**

Source: E010112-01 Prepared: 10/23/20 Analyzed: 10/23/20

Chloride 247 20.0 250 ND 98.9 80-120 0.798 20

## QC Summary Report Comment:

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



## Definitions and Notes

M & G Drilling	Project Name:	Marron 23 #003	
PO Box 5940	Project Number:	04033-0002	<b>Reported:</b>
Farmington NM, 87499	Project Manager:	Alfonso Atencio	10/28/20 14:20

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

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

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



[illegible]



# Envirotech Analytical Laboratory

Printed: 10/21/2020 1:27:09PM

## 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:	M & G Drilling	Date Received:	10/21/20 11:49	Work Order ID:	E010112
Phone:	(505)325-6779	Date Logged In:	10/21/20 13:22	Logged In By:	Alexa Michaels
Email:	aatencio@qwestoffice.net	Due Date:	10/28/20 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 |
| 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.

Carrier: Alfonso Atencio

### Sample Turn Around Time (TAT)

- |   |    |
|---|----|
| 6. Did the COC indicate standard TAT, or Expedited TAT? | No |
|---|----|

### Sample Cooler

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

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

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

### Sample Container

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

### Field Label

- |   |     |
|---|-----|
| 20. Were field sample labels filled out with the minimum information: |     |
| Sample ID?  | Yes |
| Date/Time Collected?  | Yes |
| Collectors name?  | 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

email : aatencio@qwestoffice.net

### Comments/Resolution

email : aatencio@qwestoffice.net

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

Date



envirotech Inc.

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party M&G Drilling CO INC.	OGRID 141852
Contact Name Agent/ Vanessa Fields	Contact Telephone 505-787-9100
Contact email <a href="mailto:vanessa@walsheng.net">vanessa@walsheng.net</a>	Incident # (assigned by OCD) N/A
Contact mailing address 7415 East Main Street Farmington, NM 87402	

### Location of Release Source

Latitude 36.5543747 \_\_\_\_\_ Longitude -107.6764526 \_\_\_\_\_  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Marron #042	Site Type Gas
Date Release Discovered N/A	API# (if applicable) 30-045-06312

Unit Letter	Section	Township	Range	County
M	22	27N	08W	San Juan

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Cause of Release On October 20, 2020 M&G Drilling removed the steel below grade tank on the Marron #042. When the BGT was removed no visible signs of staining or wet soil was observed. M&G Drilling collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. All analytical results were non-detect.

**Analytical Results:**

**Benzene:** Non-Detect

**BTEX:** Non-Detect

**GRO:** Non-Detect

**DRO:** Non-Detect

**ORO:** Non-Detect

**Chloride:** Non-Detect

Was this a major release as defined by 19.15.29.7(A) NMAC?

☐ Yes ☒ No

If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

## Initial Response

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

- ☐ The source of the release has been stopped.
- ☐ The impacted area has been secured to protect human health and the environment.
- ☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☐ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

N/A no release occurred

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



State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: Agent/ Vanessa Fields Title: Agent/ Regulatory Compliance Manager

Signature:  Date: 12/14/2020

email: vanessa@walshemg.net Telephone: 505-787-9100

**OCD Only**

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

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

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- ☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- ☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- ☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- ☐ Description of remediation activities

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

Printed Name: Agent/ Vanessa Fields Title: Agent/ Regulatory Compliance Manager  
 Signature: [Signature] Date: 12/14/2020  
 email: vanessa@walsheng.net Telephone: 505-787-9100

**OCD Only**

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

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

## M&G Drilling CO INC San Juan Basin Below Grade Tank Closure Plan

**Lease Name:** Marron #042

**API No.:** 30-045-06312

**Description:** Unit M, Section 22, Township 27N, Range 08W, San Juan County

In accordance with Rule 19.15.17.13 NMAC the following information describes the closure requirements of below-grade tanks on M&G Drilling CO INC locations. This is M&G Drilling CO INC standard procedure for all below-grade tanks. A separate plan will be submitted for any below-grade tank which does not conform to this plan.

### **General Plan**

1. M&G DRILLING CO INC will obtain approval of this closure plan prior to commencing closure of the below grade tank at this location pursuant to 19.15.17.13.C (1) NMAC
2. M&G DRILLING CO INC will notify the surface owner by certified mail, return receipt requested, that the M&G Drilling CO INC plans closure operations at least 72 hours, but no more than one week, prior to any closure operation. Notice will include:
  - a. Well Name
  - b. API #
  - c. Well Location

**72 Hour Notice was provided to the NMOCD District III Office and to the Farmington BLM Field Office. Attached is a copy of the notification. A BLM representative was onsite to witness the sampling confirmation.**

3. Within 60 days of cessation of operations, M&G DRILLING CO INC will remove liquids and sludge from below-grade tanks prior to implementing a closure method and will dispose of the liquids and sludge in a division-approved facility. Approved facilities and waste streams include:
  - a. Soils, tank bottoms, produced sand, pit sludge and other exempt wastes impacted by petroleum hydrocarbons will be disposed of at:  
*Envirotech: Permit #NM01-0011 and IEI: Permit # NM01-0010B*
  - b. Produced Water will be disposed of at:  
*Basin Disposal: Permit # NM01-005 and M&G DRILLING CO INC owned saltwater Disposal Facilities*

**All liquids that were in the BGT were removed and sent to one of their referenced Division approved facilities.**



4. Within six (6) months of cessation of operations, M&G DRILLING CO INC will 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. If there is any equipment associated with a below-grade tank, then the M&G Drilling CO INC shall remove the equipment, unless the equipment is required for some other purpose.

**All referenced equipment associated with the BGT removal has been removed and utilized for reuse.**

5. M&G DRILLING CO INC will collect a closure sample of the soil beneath the location of the below grade tank that is being closed. The closure sample will consist of a five-point composite sample to include any obvious stained or wet soils, or other evidence of contamination. The closure sample will be analyzed for all constituents listed in Table I below, including DRO+GRO, Chlorides, TPH, benzene and BTEX.

**On October 20, 2020 M&G Drilling removed the steel below grade tank on the Marron #042. When the BGT was removed no visible signs of staining or wet soil was observed. M&G Drilling collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. All Analytical results were non-detect**

#### **Analytical Results:**

**Benzene: Non-Detect**

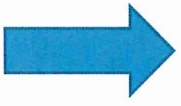
**BTEX: Non-Detect**

**GRO: Non-Detect**

**DRO: Non-Detect**

**ORO: Non-Detect**

**Chloride: Non-Detect**

Minimum depth below any point within the horizontal boundary of the release to ground water less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤ 50 feet 	Chloride***	EPA 300.0 or SM4500 C1 B	600 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg
51 feet-100 feet	Chloride***	EPA 300.0 or SM4500 C1 B	10,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg
>100 feet	Chloride***	EPA 300.0 or SM4500 C1 B	20,000 mg/kg
	TPH (GRO+DRO+MRO)	EPA SW-846 Method 8015M	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg



6. If any contaminant concentration is higher than the parameters listed in Table I of 19.15.17.13 NMAC, the division may require additional delineation upon review of the results and the M&G Drilling CO INC must receive approval before proceeding with closure. If all contaminant concentrations are less than or equal to the parameters listed in Table I of 19.15.17.13 NMAC, then the M&G Drilling CO INC can proceed to backfill the pit, pad, or excavation with non-waste containing, uncontaminated, earthen material.

**On October 20, 2020 M&G Drilling removed the steel below grade tank on the Marron #042. When the BGT was removed no visible signs of staining or wet soil was observed. M&G Drilling collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. All Analytical results were non-detect**

**Analytical Results:**

**Benzene: Non-Detect**

**BTEX: Non-Detect**

**GRO: Non-Detect**

**DRO: Non-Detect**

**ORO: Non-Detect**

**Chloride: Non-Detect**

7. After closure has occurred, M&G DRILLING CO INC will reclaim the former BGT area, if it is no longer being used for extraction of oil and gas, by substantially restoring the impacted surface area to the condition that existed prior to oil and gas operations. M&G DRILLING CO INC will construct the soil cover to the site's existing grade and prevent ponding of water and erosion of the cover materials. The soil cover shall consist of the background thickness of topsoil, or one foot of suitable materials to establish vegetation at the site, whichever is greater. All areas will be reclaimed as early as practicable, and as close to their original condition or land use as possible. They shall be maintained in a way as to control dust and minimize erosion.

**The area of the BGT removal has been returned to grade surface. The area will be reclaimed once the well has been plugged and abandoned.**

8. M&G DRILLING CO INC will complete reclamation of all disturbed areas no longer in use when the ground disturbance activities at the site have been completed. The reseeded shall take place during the first favorable growing season after closure. Reclamation activities will be considered completed when 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, excluding noxious weeds.

\*Re-vegetation and reclamation obligations imposed by other applicable federal, state or tribal agencies on lands managed by those agencies shall supersede the above

requirements, provided they provide equal or better protection of fresh water, human health and the environment.

9. M&G DRILLING CO INC will notify the Aztec Office of the NMOCD by email when reclamation and closure activities are completed.
10. Within 60 days of closure, M&G DRILLING CO INC will submit a closure report to the Aztec office of the NMOCD, filed on Form C-144. The report will include the following:
  - a. Proof of closure notice to NMOCD and surface owner
  - b. Confirmation sampling analytical results
  - c. Soil backfill and cover installation information
  - d. Photo documentation of site reclamation

**The area has been backfilled and returned to grade surface. The area will be reclaimed once the well has been plugged and abandoned.**



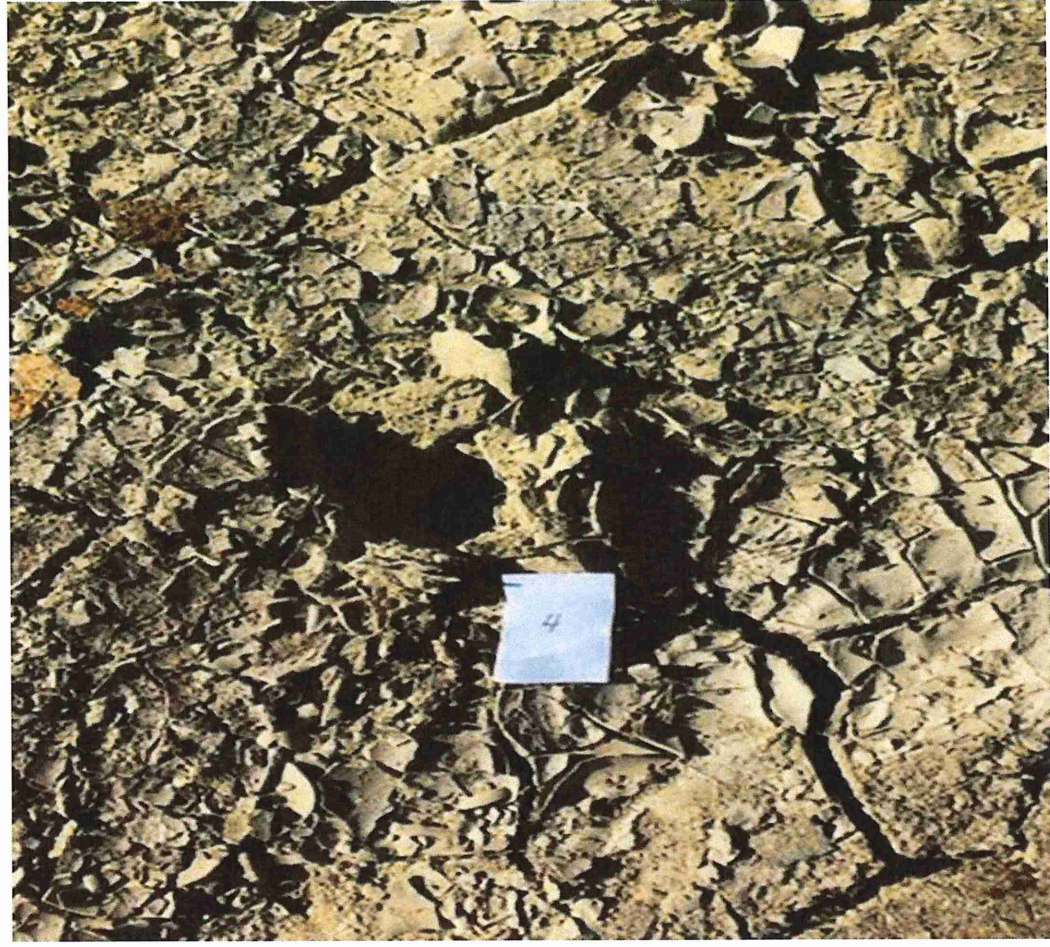






















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Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
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Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 12710

CONDITIONS

Operator: M & G DRLG CO INC P.O. Box 5940 Farmington, NM 87499	OGRID: 141852
	Action Number: 12710
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	6/22/2021