

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 NMOC District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC 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  
BGT1 Closure ☒ Closure of a pit, below-grade tank, or proposed alternative method  
Report ☐ 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: Roddy Production Co., Inc. OGRID #: 36845  
Address: PO Box 2221, Farmington, New Mexico 87499  
Facility or well name: Owen 2A  
API Number: 30-045-30235 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr A Section 19 Township 31N Range 12W County: San Juan  
Center of Proposed Design: Latitude 36.88901 Longitude -108.13130 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: 95 bbl Type of fluid: Produced Water  
Tank Construction material: Single Walled 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 Field Fence hung on Steel Tee Posts

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variations and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

***Please check a box if one or more of the following is requested, if not leave blank:***

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

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

☐ Yes ☐ No  
☐ NA

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

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

☐ Yes ☐ No  
☐ NA

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

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

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

- FEMA map

☐ Yes ☐ No

**Below Grade Tanks**

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

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

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

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

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

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

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

☐ Yes ☐ No

Within 100 feet of a wetland.

- 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<sub>2</sub>S, Prevention Plan  
☐ Emergency Response Plan  
☐ Oil Field Waste Stream Characterization  
☐ Monitoring and Inspection Plan  
☐ Erosion Control Plan  
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

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

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

14.

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

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

15.

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

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

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No <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). - 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 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	<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. 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	

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: Jaclyn Burdine Approval Date: 07/27/2022

Title: Environmental Specialist-A OCD Permit Number: BGT1

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: May 11, 2022

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): James McDaniel Title: Project Manager – JAKD Solutions

Signature:  Date: 6/12/2022

e-mail address: james@jaksolutions.com Telephone: 505-860-1666

**Roddy Production Co., Inc.  
San Juan Basin  
Below Grade Tank  
Closure Narrative**

**Well Name: Owen 2A**

**API No.: 30-045-30235**

**Description: Unit A, Section 19, Township 31N, Range 12W, San Juan County**

**4/18/2022**

Roddy Production operations personnel noticed that there was a discrepancy in the water volume in the BGT at the Owen 2A well location. Approximately 19 bbls of water was unaccounted for in the BGT. A leak in the BGT was suspected, and the BGT was immediately emptied to prevent additional water from being lost.

**4/25/2022**

Notification of BGT closure activities was made to the NMOCD and the BLM.

**4/29/2022**

JAKD Personnel, Roddy Production personnel, Knock-Out Construction and Emanuel Adeloye with the BLM were on-site for BGT closure activities. Approximately 1 foot of soil was excavated from the BGT cellar beneath the former location of the BGT due to visual salt staining on the surface. A hard sandstone layer was encountered at 3' below ground surface (1' below the BGT bottom), and additional excavation could not take place. A composite sample was collected at 3' below ground surface of the sandstone material beneath the former location of the BGT. The sample was analyzed at Hall Environmental Laboratory.

**5/11/2022**

Sample results from the BGT composite demonstrated that all constituents analyzed were below the closure requirements approved in the BGT registration approved by the NMOCD on March 9, 2022.

**5/18/2022**

The former BGT area was backfilled using soil from on-site and compacted. The area will continue to be used for the operation of the Owen 2A wellsite.

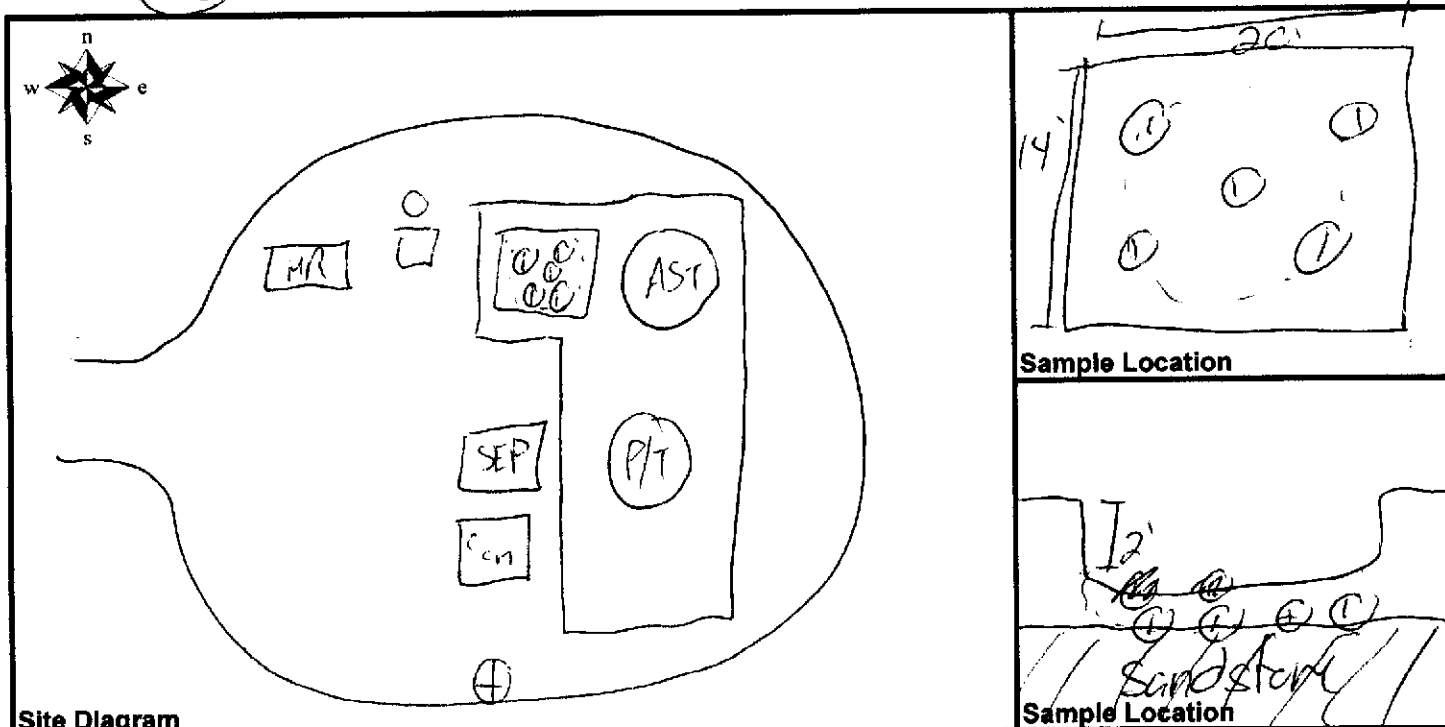




# JAKD SOLUTIONS

## ON-SITE FORM

Well Name Owen 2A API # 30-045-30235  
 Section 18 Township 24N Range 2W County San Juan State NM  
 Contractors On-Site Knockout Time On-Site 7:30 AM Time Off-Site 9:32 AM  
 Spill Amount 19 bbls Spilled ( Oil/Produced Water/Other            ) Recovered 0  
 Land Use ( Range / Residential / Tribe            ) Spill Area            x            x            deep



Site Diagram

Sample Location

Sample Location

\* Emmanuel w/ ISLPI  
 on-site to witness

SF-078243

Sandstone @ 3'

Comments

\* Excavated  $\approx$  6"-1' off Bottom. Sandstone Encountered

Samples

Time	Sample #	Sample Description	Characteristics	OVM (ppm)	Analysis Requested
	NA	100 Standard	NA		NA
9:15	1	Bottom Composite @ 3'	Sandy, some stone, no odor		BOIS, EOZ1, CI

Name (Print) James McDaniel

Date 4/29/2022

Name (Signature) MOil

Company JAKD Solutions





Drawn By: James McDaniel  
Date: 4/20/2022



### AERIAL MAP

Company: **Roddy Production**  
Well Name: **Owen 2A**  
API: **30-045-30235**  
Sec **19**, Twn **31N**, Rge **12W**  
San Juan County, New Mexico  
Lease: **SF-078243**  
Lat: **36.889009** Long: **-108.131296**

### LEGEND





**Bottom Composite @ 3'**  
**4/29/2022**  
DRO: 32 mg/kg  
GRO: ND  
MRO: 94 mg/kg  
TPH: 126 mg/kg  
Benzene: ND  
BTEX: ND  
Chloride: 880 mg/kg

Drawn By: James McDaniel  
Date: 5/18/2022



### SAMPLING MAP

Company: **Roddy Production**  
Well Name: **Owen 2A**  
API: **30-045-30235**  
Sec **19**, Twn **31N**, Rge **12W**  
San Juan County, New Mexico  
Lease: **SF-078243**  
Lat: **36.88901** Long: **-108.13130**

### LEGEND

**X** Sample Point

**Roddy Production Co., Inc.  
San Juan Basin  
Below Grade Tank (BGT)  
Closure Report**

**Well Name: Owen 2A**

**API No.: 30-045-30235**

**Description: Unit A, Section 19, Township 31N, Range 12W, San Juan County**

The following information outlines the closure activities completed in accordance with the closure plan for this BGT approved by the NMOCD on March 9, 2015. This is Roddy Production's standard closure plan for all BGT's under Rule 19.15.17 NMAC and operated by Roddy Production Co. For closures that do not conform to this standard closure plan, a separate BGT specific closure plan will be developed and utilized.

**General Plan Requirements**

1. Prior to initiating any BGT closure except in case of emergency, Roddy Production will notify the surface owner of the intent to close the BGT by certified mail no later than 72 hrs or 1 week before closure and a copy of this notification will be included in the closure report. In case of emergency, the surface owner of record will be notified as soon as practical.

**Notification was provided to the BLM via email by James McDaniel, JAKD Solutions, on April 25, 2022; see attached *Proof of Notification*.**

2. Notice of the closure will be given to the Aztec District office between 72 hrs and 1 week of the scheduled closure via email or phone. The notification of closure will include the following. a. Operators Name (Roddy Production) b. Well name and API number c. Location (USTR)

**Notification was provided to the NMOCD via email by James McDaniel, JAKD Solutions, on April 25, 2022; see attached *Proof of Notification*.**

3. All liquids will be removed from the BGT following cessation of operation. Produced water will be disposed of at one of the following NMOCD approved facilities depending on the proximity to the BGT site: Agua Moss Pretty Lady SWD #1 (Permit# 1034-A), Agua Moss Sunco SWD #1 (Permit# CLI-005) or Basin Disposal (Permit #-NM 01-005).  
**Liquids were removed and disposed of accordance with the requirements above.**
4. Solids and sludge's will be shoveled or vacuumed out for disposal at Envirotech (Permit # - NM01-0011) or JFJ Land Farm/ Industrial Ecosystems Inc. (Permit # NM 01-0010B)  
**After removal, the BGT was cleaned out, and tank bottoms were taken to Envirotech for disposal.**
5. Roddy Production will obtain prior approval from NMOCD to dispose, recycle, reuse or reclaim the BGT and provide documentation of the disposition of the BGT in the closure report. Steel materials will be recycled or reused as approved by the Division. Fiberglass

tanks will be empty, cut up or shredded and EPA cleaned without soils or contaminated material for disposal as solid waste. Fiberglass and liner materials will meet the conditions of 19.15.35 NMAC. Disposal will be at a licensed disposal facility, presently San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426

**The below grade tank will be repaired and reused for oil and gas production activities as needed on Roddy Production facilities.**

6. Any Equipment associated with the BGT that is no longer required for some other purpose, following the closure will be removed from location.  
**All equipment will remain on-site for the continued production of oil and gas at the Owen 2A wellsite.**
7. Following the removal of the tank and any liner material, Roddy Production will test the soils beneath the BGT as follows:

TABLE I Closure criteria for soils beneath Below Grade Tanks, Drying pads associated with Closed Loop systems and pits where contents are removed			
Depth below bottom of pit to groundwater less than 10,000 mg/L TDS	Constituent	Method*	Limit**
≤ 50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 801B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	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	EPA SW-846 Method 801B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 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	EPA SW-846 Method 801B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

\* Or test method approved by the division

\*\* Numerical limits or natural background, whichever is greater

a) At a minimum, a five point composite sample will be taken to include any obvious stained or wet soils or any other evidence of contamination.

b) The laboratory sample shall be analyzed for the constituents listed in Table I of 19.15.17.13

(1) Or other test methods approved by the Division

(2) Numerical limits or natural background level, whichever is greater  
(19.15.17.13 NMAC-Ro, 19.15.17.13 NMAC 3/28/2013)

Approximately 1 foot of soil was excavated from beneath the BGT after the tank was removed, and a 5-point composite sample was collected beneath the former location of the BGT. Additional information can be found on the attached *Field Sheet* and the attached *Sample Map*. The composite sample was analyzed at Hall Analytical Laboratory for TPG (DRO/GRO/ORO) via USEPA Method 8015, benzene and total BTEX via USEPA Method 8021, and for Chlorides via USEPA Method 300.0. The sample returned results of 880 mg/kg total chlorides, 32 mg/kg DRO+GRO and 126 mg/kg TPH. The sample returned results of non-detect (ND) for both benzene and total BTEX. The sample results were below the closure standards approved in the BGT registration approved by the NMOCD on March 9, 2015.

8. If the Division and/or Roddy Production determine there is a release, Roddy Production will comply with 19.15.17.13.C.3b,  
**Analytical results indicate that constituent levels are below the closure requirements outlined in the closure plan included with the BGT registration that was approved by the NMOCD on March 9, 2015.**
9. Upon completion of the tank removal, the excavation will be backfilled with non-waste earthen material and covered with a minimum of one foot of topsoil or background thickness whichever is greater and to existing grade. The surface will be re-contoured to match the native grade and prevent ponding.  
**The BGT area was backfilled according to the above standards; see attached Photo Page.**

For those portions of the former BGT area that are no longer required for production activities, Roddy Production will seed the disturbed areas the first favorable growing season after the BGT is covered. Seeding will be accomplished via drilling on the contour whenever practical, or by other Division approved methods.

**The area where the former BGT was located will be used for the continued production of oil and gas at the Owen 2A wellsite.**

Roddy Production will notify the Division when reclamation a re-vegetation is complete. Reclamation of the BGT shall be considered complete when:

- a. Vegetative cover reflects a life form ratio of +/- 50% of pre disturbance levels.
- b. Total percentage plant cover of at least 70% of pre disturbance levels (excluding noxious weeds) OR
- c. Pursuant to 19.15.17.13.H.5d Roddy Production will comply with obligations imposed by other applicable federal or tribal agencies in which their re-vegetation and reclamation requirements provide equal or better protection of fresh water, human health and the environment.

**The wellsite will be reclaimed pursuant to BLM requirements upon the plugging and abandoning of the Owen 2A location.**

10. For those portions of the former BGT area required for production activities, reseeding will be done at well abandonment, and following the procedure noted above.

**The wellsite will be reclaimed pursuant to BLM requirements upon the plugging and abandoning of the Owen 2A location.**

11. Closure Report: All closure activities will include proper documentation and will be submitted to the NMOCD within 60 days of the BGT closure on a Closure Report Using Division Form C-144.

The report will include the following:

- Proof of Closure Notice (Surface Owner & NMOCD) (**Email attached**)
- Backfilling and cover installation (**See above**)
- Confirmation sampling analytical results (**attached**)
- Disposal Facility Name(s) and permit number(s) **Envirotech (Permit # - NM01-0011)**
- Application Rate & seeding techniques (**NA**)
- Photo documentation of reclamation (**attached**)



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: <b>Roddy Production</b>	OGRID: <b>36845</b>
Contact Name: <b>Jeremy Divine</b>	Contact Telephone: <b>(432) 557-6778</b>
Contact email: <b>jdivine@crowquest.com</b>	Incident # (assigned by OCD) <b>nAPP2211260998</b>
Contact mailing address: <b>4001 N. BUTLER, BLDG 7101</b>	<b>Farmington, New Mexico, 87401</b>

### Location of Release Source

Latitude 36.88900 Longitude -108.131296  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: <b>Owen 2A</b>	Site Type: <b>Well Site</b>
Date Release Discovered: <b>4/18/2022</b>	API# (if applicable)

Unit Letter	Section	Township	Range	County
<b>A</b>	<b>19</b>	<b>31N</b>	<b>12W</b>	<b>San Juan</b>

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 checked="" type="checkbox"/> Produced Water	Volume Released (bbls) <b>19</b>	Volume Recovered (bbls) <b>0</b>
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release

**This release was remediated pursuant to the approved BGT closure plan.**



Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

## Initial Response

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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why:	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: _____	Title: _____
Signature: _____	Date: _____
email: _____	Telephone: _____
<b><u>OCD Only</u></b>	
Received by: _____	Date: _____

## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

Incident ID	
District RP	
Facility ID	
Application ID	

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

**Characterization Report Checklist:** *Each of the following items must be included in the report.*

- ☐ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☐ Depth to water determination
- ☐ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☐ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico  
Oil Conservation Division

Page 4

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

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

**OCD Only**

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- ☐ Detailed description of proposed remediation technique
- ☐ Scaled sitemap with GPS coordinates showing delineation points
- ☐ Estimated volume of material to be remediated
- ☐ Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- ☐ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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: \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

**OCD Only**

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

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: \_\_\_\_\_ 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: James McDaniel Title: Project Manager, JAKD Solutions

Signature:  Date: 6/12/2022

email: james@jakdsolutions.com Telephone: 505-860-1666

### 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: \_\_\_\_\_



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

May 11, 2022

James McDaniel  
JAKD Solutions  
3811 Crestridge Dr  
Farmington, NM 87401  
TEL: (505) 860-1666  
FAX:

RE: Owens 2A

OrderNo.: 2204D51

Dear James McDaniel:

Hall Environmental Analysis Laboratory received 1 sample(s) on 4/30/2022 for the analyses presented in the following report.

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

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

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

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman".

Andy Freeman  
Laboratory Manager  
4901 Hawkins NE  
Albuquerque, NM 87109

## Analytical Report

Lab Order 2204D51

Date Reported: 5/11/2022

## Hall Environmental Analysis Laboratory, Inc.

CLIENT: JAKD Solutions

Client Sample ID: Bottom Composite @3'

Project: Owens 2A

Collection Date: 4/29/2022 9:15:00 AM

Lab ID: 2204D51-001

Matrix: SOIL

Received Date: 4/30/2022 8:30:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
<b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b>						Analyst: <b>SB</b>
Diesel Range Organics (DRO)	32	9.7		mg/Kg	1	5/6/2022 5:40:23 PM
Motor Oil Range Organics (MRO)	94	49		mg/Kg	1	5/6/2022 5:40:23 PM
Surr: DNOP	109	51.1-141		%Rec	1	5/6/2022 5:40:23 PM
<b>EPA METHOD 300.0: ANIONS</b>						Analyst: <b>NAI</b>
Chloride	880	60		mg/Kg	20	5/6/2022 3:04:09 PM
<b>EPA METHOD 8260B: VOLATILES SHORT LIST</b>						Analyst: <b>BRM</b>
Benzene	ND	0.025		mg/Kg	1	5/5/2022 5:52:29 PM
Toluene	ND	0.049		mg/Kg	1	5/5/2022 5:52:29 PM
Ethylbenzene	ND	0.049		mg/Kg	1	5/5/2022 5:52:29 PM
Xylenes, Total	ND	0.098		mg/Kg	1	5/5/2022 5:52:29 PM
Surr: 1,2-Dichloroethane-d4	109	70-130		%Rec	1	5/5/2022 5:52:29 PM
Surr: 4-Bromofluorobenzene	101	70-130		%Rec	1	5/5/2022 5:52:29 PM
Surr: Dibromofluoromethane	113	70-130		%Rec	1	5/5/2022 5:52:29 PM
Surr: Toluene-d8	104	70-130		%Rec	1	5/5/2022 5:52:29 PM
<b>EPA METHOD 8015D MOD: GASOLINE RANGE</b>						Analyst: <b>BRM</b>
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	5/5/2022 5:52:29 PM
Surr: BFB	105	70-130		%Rec	1	5/5/2022 5:52:29 PM

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

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



**QC SUMMARY REPORT****Hall Environmental Analysis Laboratory, Inc.**

WO#: 2204D51

11-May-22

**Client:** JAKD Solutions**Project:** Owens 2A

Sample ID: <b>MB-67316</b>	SampType: <b>mblk</b>	TestCode: <b>EPA Method 300.0: Anions</b>								
Client ID: <b>PBS</b>	Batch ID: <b>67316</b>	RunNo: <b>87798</b>								
Prep Date: <b>5/6/2022</b>	Analysis Date: <b>5/6/2022</b>	SeqNo: <b>3111668</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: <b>LCS-67316</b>	SampType: <b>lcs</b>	TestCode: <b>EPA Method 300.0: Anions</b>								
Client ID: <b>LCSS</b>	Batch ID: <b>67316</b>	RunNo: <b>87798</b>								
Prep Date: <b>5/6/2022</b>	Analysis Date: <b>5/6/2022</b>	SeqNo: <b>3111669</b>	Units: <b>mg/Kg</b>							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.8	90	110			

**Qualifiers:**

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
PQL Practical Quantitative Limit  
S % Recovery outside of range due to dilution or matrix interference

B Analyte detected in the associated Method Blank  
E Estimated value  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Limit

Page 2 of 5

**QC SUMMARY REPORT****Hall Environmental Analysis Laboratory, Inc.**

WO#: 2204D51

11-May-22

**Client:** JAKD Solutions**Project:** Owens 2A

Sample ID: <b>LCS-67260</b>	SampType: <b>LCS</b>		TestCode: <b>EPA Method 8015M/D: Diesel Range Organics</b>							
Client ID: <b>LCSS</b>	Batch ID: <b>67260</b>		RunNo: <b>87762</b>							
Prep Date: <b>5/4/2022</b>	Analysis Date: <b>5/5/2022</b>		SeqNo: <b>3109550</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	45	10	50.00	0	90.1	68.9	135			
Surr: DNOP	3.7		5.000		73.5	51.1	141			

Sample ID: <b>MB-67260</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8015M/D: Diesel Range Organics</b>							
Client ID: <b>PBS</b>	Batch ID: <b>67260</b>		RunNo: <b>87762</b>							
Prep Date: <b>5/4/2022</b>	Analysis Date: <b>5/5/2022</b>		SeqNo: <b>3109554</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	8.4		10.00		84.4	51.1	141			

**Qualifiers:**

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
PQL Practical Quantitative Limit  
S % Recovery outside of range due to dilution or matrix interference

B Analyte detected in the associated Method Blank  
E Estimated value  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Limit

Page 3 of 5

**QC SUMMARY REPORT****Hall Environmental Analysis Laboratory, Inc.**

WO#: 2204D51

11-May-22

**Client:** JAKD Solutions**Project:** Owens 2A

Sample ID: <b>ics-67232</b>	SampType: <b>LCS4</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>BatchQC</b>	Batch ID: <b>67232</b>		RunNo: <b>87782</b>							
Prep Date: <b>5/3/2022</b>	Analysis Date: <b>5/5/2022</b>		SeqNo: <b>3109258</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	1.1	0.025	1.000	0	112	80	120			
Toluene	0.99	0.050	1.000	0	98.8	80	120			
Ethylbenzene	1.0	0.050	1.000	0	103	80	120			
Xylenes, Total	2.9	0.10	3.000	0	97.0	80	120			
Surr: 1,2-Dichloroethane-d4	0.60		0.5000		120	70	130			
Surr: 4-Bromofluorobenzene	0.48		0.5000		95.6	70	130			
Surr: Dibromofluoromethane	0.57		0.5000		113	70	130			
Surr: Toluene-d8	0.51		0.5000		103	70	130			

Sample ID: <b>mb-67232</b>	SampType: <b>MBLK</b>		TestCode: <b>EPA Method 8260B: Volatiles Short List</b>							
Client ID: <b>PBS</b>	Batch ID: <b>67232</b>		RunNo: <b>87782</b>							
Prep Date: <b>5/3/2022</b>	Analysis Date: <b>5/5/2022</b>		SeqNo: <b>3109259</b>		Units: <b>mg/Kg</b>					
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 1,2-Dichloroethane-d4	0.55		0.5000		110	70	130			
Surr: 4-Bromofluorobenzene	0.47		0.5000		94.3	70	130			
Surr: Dibromofluoromethane	0.55		0.5000		110	70	130			
Surr: Toluene-d8	0.52		0.5000		104	70	130			

**Qualifiers:**

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

**QC SUMMARY REPORT****Hall Environmental Analysis Laboratory, Inc.**

WO#: 2204D51

11-May-22

**Client:** JAKD Solutions**Project:** Owens 2A

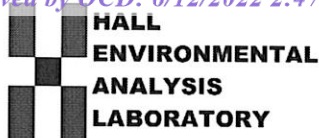
Sample ID: <b>ics-67232</b>	SampType: <b>LCS</b>			TestCode: <b>EPA Method 8015D Mod: Gasoline Range</b>						
Client ID: <b>LCSS</b>	Batch ID: <b>67232</b>			RunNo: <b>87782</b>						
Prep Date: <b>5/3/2022</b>	Analysis Date: <b>5/5/2022</b>			SeqNo: <b>3109233</b>		Units: <b>mg/Kg</b>				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	27	5.0	25.00	0	107	70	130			
Surr: BFB	540		500.0		108	70	130			

Sample ID: <b>mb-67232</b>	SampType: <b>MBLK</b>			TestCode: <b>EPA Method 8015D Mod: Gasoline Range</b>						
Client ID: <b>PBS</b>	Batch ID: <b>67232</b>			RunNo: <b>87782</b>						
Prep Date: <b>5/3/2022</b>	Analysis Date: <b>5/5/2022</b>			SeqNo: <b>3109234</b>		Units: <b>mg/Kg</b>				
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	510		500.0		102	70	130			

**Qualifiers:**

\* Value exceeds Maximum Contaminant Level.  
D Sample Diluted Due to Matrix  
H Holding times for preparation or analysis exceeded  
ND Not Detected at the Reporting Limit  
PQL Practical Quantitative Limit  
S % Recovery outside of range due to dilution or matrix interference

B Analyte detected in the associated Method Blank  
E Estimated value  
J Analyte detected below quantitation limits  
P Sample pH Not In Range  
RL Reporting Limit



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

## Sample Log-In Check List

Client Name: JAKD Solutions

Work Order Number: 2204D51

RcptNo: 1

Received By: Juan Rojas

4/30/2022 8:30:00 AM

*Juan Rojas*

Completed By: Juan Rojas

4/30/2022 10:12:56 AM

*Juan Rojas*

Reviewed By: KDC

5-2-22

### Chain of Custody

1. Is Chain of Custody complete? Yes ☒ No ☐ Not Present ☐
2. How was the sample delivered? Courier

### Log In

3. Was an attempt made to cool the samples? Yes ☒ No ☐ NA ☐
4. Were all samples received at a temperature of  $>0^{\circ}\text{C}$  to  $6.0^{\circ}\text{C}$ ? Yes ☒ No ☐ NA ☐
5. Sample(s) in proper container(s)? Yes ☒ No ☐
6. Sufficient sample volume for indicated test(s)? Yes ☒ No ☐
7. Are samples (except VOA and ONG) properly preserved? Yes ☒ No ☐
8. Was preservative added to bottles? Yes ☐ No ☒ NA ☐
9. Received at least 1 vial with headspace  $<1/4"$  for AQ VOA? Yes ☐ No ☐ NA ☒
10. Were any sample containers received broken? Yes ☐ No ☒
11. Does paperwork match bottle labels?  
(Note discrepancies on chain of custody) Yes ☒ No ☐
12. Are matrices correctly identified on Chain of Custody? Yes ☒ No ☐
13. Is it clear what analyses were requested? Yes ☒ No ☐
14. Were all holding times able to be met?  
(If no, notify customer for authorization.) Yes ☒ No ☐

# of preserved  
bottles checked  
for pH:

( $<2$  or  $>12$  unless noted)

Adjusted? \_\_\_\_\_

Checked by: *JN4/30/22*

### Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☒

Person Notified: \_\_\_\_\_

Date: \_\_\_\_\_

By Whom: \_\_\_\_\_

Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: \_\_\_\_\_

Client Instructions: \_\_\_\_\_

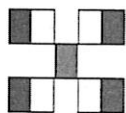
16. Additional remarks:

### 17. Cooler Information

Cooler No	Temp $^{\circ}\text{C}$	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	0.5	Good				

## Chain-of-Custody Record

Client: <u>SAKD Solutions</u>		Turn-Around Time: <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Rush	
Mailing Address: <u>3811 Crestridge Dr.</u>		Project Name: <u>Owens 2A</u>	
Phone #: <u>505-880-1666</u>		Project #: <u>—</u>	
email or Fax#: <u>www.sakdsolutions.com</u>		Project Manager: <u>Samuel McDaniel</u>	
QA/QC Package: <input checked="" type="checkbox"/> Standard <input type="checkbox"/> Level 4 (Full Validation)		Sampler: <u>Samuel McDaniel</u>	
Accreditation: <input type="checkbox"/> AZ Compliance <input type="checkbox"/> NELAC <input type="checkbox"/> Other		On Ice: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> EDD (Type)		# of Coolers: <u>1</u>	
		Cooler Temp (including CF): <u>0.6-0.120.5 (°C)</u>	
Date	Time	Matrix	Sample Name
4/29/22	9:15	Soil	Bottom Composite 031-0107
Date: <u>4/29/22</u> Time: <u>10:12</u>		Relinquished by: <u>AK</u>	
Date: <u>4/29/22</u> Time: <u>1740</u>		Relinquished by: <u>AK</u>	



# HALL ENVIRONMENTAL ANALYSIS LABORATORY

www.hallenvironmental.com

4901 Hawkins NE - Albuquerque, NM 87109

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

## Analysis Request

☒ TPH:8015D(GRO / DRO / MRO) ☐ BTX / MTBE / TMB's (8021)  
☐ 8081 Pesticides/8082 PCB's ☐ EDB (Method 504.1)  
☐ PAHs by 8310 or 8270SIMS ☐ RCRA 8 Metals ☒ Cl<sup>-</sup>, F<sup>-</sup>, Br<sup>-</sup>, NO<sub>3</sub><sup>-</sup>, NO<sub>2</sub><sup>-</sup>, PO<sub>4</sub><sup>3-</sup>, SO<sub>4</sub><sup>2-</sup>  
☐ 8260 (VOA) ☐ 8270 (Semi-VOA) ☐ Total Coliform (Present/Absent)

Remarks:

Received by: AK Date: 4/29/22 Time: 10:12  
 Received by: AK Date: 4/29/22 Time: 8:30





Roddy Production  
Owen 2A  
30-045-30235



Photo 1: BGT Cellar after BGT was Removed



Photo 2: BGT Cellar after BGT Removed (View 2)





Roddy Production  
Owen 2A  
30-045-30235



Photo 3: BGT Area after Backfill



Roddy Production  
Owen 2A  
30-045-30235

## James McDaniel

---

**From:** James McDaniel  
**Sent:** Monday, April 25, 2022 1:27 PM  
**To:** cory.smith@state.nm.us; Velez, Nelson, EMNRD; Adeloye, Abiodun A; Joyner, Ryan N  
**Cc:** Jeremy Divine; Orel Browning  
**Subject:** Owen 2A Below Grade Tank Closure Notification

Gentlemen,

Please accept this email as the required 72 hour notice for below grade tank closure activities occurring at the Owen 2A wellsite operated by Roddy Production. The API for the Owen 2A is 30-045-30235 and is located in Section 19, Township 31N, Range 12W, San Juan County, New Mexico. GPS - 36.889009, -108.131296. This tank is being closed due to a leak, reported as NMOCD Incident Number nAPP2211260998. Below Grade Tank sampling is scheduled for Friday, April 29, 2022 at 8:00 AM at the Owen 2A wellsite. Thank you for your time in regard to this matter.

James McDaniel, CSP, CHMM, CIT  
Project Manager  
505-860-1666  
[james@jaksolutions.com](mailto:james@jaksolutions.com)



**District I**  
1625 N. French Dr., Hobbs, NM 88240  
Phone:(575) 393-6161 Fax:(575) 393-0720  
**District II**  
811 S. First St., Artesia, NM 88210  
Phone:(575) 748-1283 Fax:(575) 748-9720  
**District III**  
1000 Rio Brazos Rd., Aztec, NM 87410  
Phone:(505) 334-6178 Fax:(505) 334-6170  
**District IV**  
1220 S. St Francis Dr., Santa Fe, NM 87505  
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS  
  
Action 116022

CONDITIONS

Operator: RODDY PRODUCTION CO INC 4001 N. BUTLER, BLDG 7101 Farmington, NM 87401	OGRID: 36845
	Action Number: 116022
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Release was confirmed, remediation required per 19.15.29 NMAC see incident # NAPP2211260998, BGT Closure report approved.	7/27/2022