

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

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

Form C-144
Revised April 3, 2017

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

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

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

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

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

1.
Operator: Dugan Production Corp. OGRID #:006515
Address: PO Box 420, Farmington, NM 87499-0420
Facility or well name: Dome Navajo 12-26-13 #90
API Number: 30-045-29433 OCD Permit Number: BGT # 1
U/L or Qtr/Qtr NE/4 SW/4 Section 12 Township 26N Range 13W County: San Juan
Center of Proposed Design: Latitude 36.5001564 Longitude -108.1710739NAD83 1700' FSL & 2500' FWL
Surface Owner: [] Federal [] State [] Private [X] 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.
[X] Below-grade tank: Subsection I of 19.15.17.11 NMAC
Volume: 55 bbl Type of fluid: Produced Water
Tank Construction material: Fiberglass
[] Secondary containment with leak detection [] Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
[] Visible sidewalls and liner [X] Visible sidewalls only [] Other
Liner type: Unlined [] HDPE [] PVC [] Other

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

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

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

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

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

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

General siting

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

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

Yes No
 NA

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

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

Yes No
 NA

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

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

Yes No

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

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

Yes No

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

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

Yes No

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

- FEMA map

Yes No

Below Grade Tanks

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

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

Yes No

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

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

Yes No

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

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

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

Yes No

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

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

Yes No

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

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

Yes No

Within 100 feet of a wetland.
 - 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 H₂S, 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	<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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

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

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

Signature: _____ Date: 1/29/2026

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

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

OCD Representative Signature: Joel Stone Approval Date: 02/03/2026

Title: Senior Environmental Scientist OCD Permit Number: ycon0821706321

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: 1/28/2026

20.
Closure Method:
 Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)
 If different from approved plan, please explain.

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

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

On-site Closure Location: Latitude 36.5001564 Longitude -108.1710739 NAD: 1927 1983

22.

Operator Closure Certification:

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

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

Signature: *Eileen Yates* Date: January 29, 2026

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

Dugan Production Corp.

Dome Navajo 12-26-13 #90

BGT Closure Report

API# 30-045-29433

K-12-26N-13W

1700 FSL 2500 FWL

Surface Owner: Indian

Dugan Production Corp. has successfully closed the BGT located at the Dome Navajo 12-26-13 #90 well location.

The closure activities conducted by Dugan were included in the Below Grade Tank Closure Plan Application, Waste Excavation and Removal Closure Plan approved 08/04/2008 by the NM OCD:

Closure Criteria for Soils Beneath Below-Grade Tanks.		
Constituent ¹	Method	Limit
Chloride	EPA 300.0 or SM4500 C1 B	20,000 mg/kg
TPH	EPA SW-846 Method 8015M	2,500 mg/kg
GRO + DRO	EPA SW-846 Method 8015M	1,000 mg/kg
BTEX ³	EPA SW-846 Method 8021B or 8260B	50 mg/kg
Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

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

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

³ - Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX).

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

Dugan provided email notification to the Bureau of Land Management (BLM), New Mexico Oil Conservation Division (NM OCD) and FIMO regarding the planned soil sampling, meeting the requirement for a minimum 72-hour advance notice. Notification was issued on January 5th, 2026. Refer to Appendix A for documentation.

The contents and the fiberglass pit were removed, and soil samples were taken below the BGT on January 7th 2026. The soil samples were collected using a five-point composite sample to include any obvious stained, wet soils, or evidence of contamination. Soil

samples were collected at a depth of 6' below grade surface. Soil samples were taken to Envirotech Inc. in Farmington, NM and analyzed for chlorides, benzene, toluene, ethyl benzene, xylene and total petroleum hydrocarbons.

- The laboratory analytical results for the composite soil samples did not detect any benzene, or ethyl benzene. Total xylene was found to be 0.0554 mg/kg, tph and chloride was found to be 567 mg/kg well below the threshold found in the closure criteria for soils beneath below-grade tanks.

The below-grade tank vault area was cleared following the removal of the existing tank. Because a replacement below-grade pit will be installed at this location, no backfilling, recontouring, or re-vegetation activities were conducted at this time. The site has been left in a stable condition appropriate for the planned installation.

Seeding and reclamation requirements outlined in NMAC 19.15.17.13.H.(5) do not apply in this instance, as the location will remain an active below-grade tank and will not be returned to final reclamation status.

- This report has been completed to comply with the 60 days of closure completion closure report required by the 19.15.17 NMAC Rule.

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

Analyte	Result
Volatile Organics by EPA 8021B	
	mg/kg
Benzene	ND
Ethylbenzene	ND
Toluene	ND
o-Xylene	0.0554
p,m-Xylene	ND
Total Xylenes	0.0554
Nonhalogenated Organics by EPA 8015D - GRO	
Gasoline Range Organics (C6-C10)	ND
Nonhalogenated Organics by EPA 8015D - DRO/ORO	
Diesel Range Organics (C10-C28)	ND
Oil Range Organics (C28-C36)	ND
Anions by EPA 300.0/9056A	
Chloride	567

** ND – Not Detected

Reclamation

Dugan has cleared and stabilized the impacted surface area following the removal of the existing below-grade tank. Because a replacement unit will be installed at this location, the site has not been backfilled, recontoured, or re-vegetated. The area has been left in a condition appropriate for continued construction and installation activities, consistent with requirements for an active facility rather than a final closure.

Before and After photos are included in **Appendix D**.

Below is a list of disposal facilities.

Solid waste will be hauled to Envirotech:

Envirotech: Permit #NM01-0011

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

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

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

Appendix A: Notification

BGT Closure Notification

From: Erin Aas <Erin.Aas@duganproduction.com>
Sent: Monday, January 5, 2026 1:10 PM
To: Adeloje, Abiodun A <aadeloje@blm.gov>; Stone, Joel, EMNRD <joel.stone@emnrd.nm.gov>;
 Jaquez, Laverna A <laverna.jaquez@bia.gov>
Cc: Eileen Yates <Eileen.Medrano@duganproduction.com>; Tyra Feil
 <Tyra.Feil@duganproduction.com>; Matthew Wilcox <Matthew.Wilcox@duganproduction.com>; Mario
 Ulibarri <Mario.Ulibarri@duganproduction.com>; Cameron Collier
 <Cameron.Collier@duganproduction.com>; Amber Baca <Amber.Baca@duganproduction.com>
Subject: [EXTERNAL] BGT Replacement Soil Sampling Notification.

This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.

Good afternoon,

Dugan Production Corp. will be replacing the below-grade tank (BGT) located at the following well site on **Wednesday January 7th, 2026**. A Crack in the Pit was discovered 1/5/2026. The pit has been removed and remediation has taken place. Before replacement Soil Sampling will be conducted.

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

1. **Operator:** Dugan Production Corp.
2. **API Number:** 30-045-29433
3. **Well Name:** DOME NAVAJO 12 26 13 90
4. **Status:** Active
5. **Surface Location:** K-12-26N-13W 1700 FSL 2500 FWL
6. **Lat/Long:** 36.5001564, -108.1710739 NAD83
7. **GL Elevation:** 6035
8. **Well Type:** BGT
9. **Closure Activity:** BGT replacement soil sampling

-
10. **Sampling Date:** *January 7th, 2026, 8:00 am*
 11. **Surface Owner:** Indian
 12. **Point of Contact:**
 Eileen Yates
 Environmental Health and Safety Manager
eileen.yates@duganproduction.com
 505-787-9832

Appendix B: Lab Results

Figure A: Soil Sample Laboratory Results

Report to:
Eileen Yates



5796 U.S. Hwy 64
Farmington, NM 87401

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




envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Dugan Production Corp.

Project Name: Dome Navajo 12-26-13 #90

Work Order: E601025

Job Number: 06094-0177

Received: 1/7/2026

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
1/13/26

Envirotech Inc. certifies the test results meet all requirements of TNi unless noted otherwise.
Statement of Data Authenticity: Envirotech Inc. attests the data reported has not been altered in any way.
Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.
Envirotech Inc. holds the Utah TNi certification NM00979 for data reported.
Envirotech Inc. holds the Texas TNi certification T104704557 for data reported.

Appendix B: Lab Results

Date Reported: 1/13/26

Eileen Yates
PO Box 420
Farmington, NM 87499



Project Name: Dome Navajo 12-26-13 #90
Workorder: E601025
Date Received: 1/7/2026 9:44:00AM

Eileen Yates,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 1/7/2026 9:44:00AM, under the Project Name: Dome Navajo 12-26-13 #90.

The analytical test results summarized in this report with the Project Name: Dome Navajo 12-26-13 #90 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

Raina Schwanz
Laboratory Administrator
Office: 505-632-1881
rainaschwanz@envirotech-inc.com

Field Offices:
Southern New Mexico Area
Lynn Jarboe
Laboratory Technical Representative
Office: 505-421-LABS(5227)
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Appendix B: Lab Results

Table of Contents

Title Page	1
Cover Page	2
Table of Contents	3
Sample Summary	4
Sample Data	5
Dome Navajo 12-26-13 #90	5
QC Summary Data	6
QC - Volatile Organics by EPA 8021B	6
QC - Nonhalogenated Organics by EPA 8015D - GRO	7
QC - Nonhalogenated Organics by EPA 8015D - DRO/ORO	8
QC - Anions by EPA 300.0/9056A	9
Definitions and Notes	10
Chain of Custody etc.	11

Appendix B: Lab Results

Sample Summary

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Dome Navajo 12-26-13 #90 Project Number: 06094-0177 Project Manager: Eileen Yates	Reported: 01/13/26 08:12
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Dome Navajo 12-26-13 #90	E601025-01A	Soil	01/07/26	01/07/26	Glass Jar, 2 oz.

Appendix B: Lab Results

Sample Data

Dugan Electric Corp. PO Box 420 Farmington NM, 87499	Project Name: Dome Navajo 12-26-13 #90 Project Number: 06094-0177 Project Manager: Eileen Yates	Reported: 1/13/2026 8:12:41AM
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Dome Navajo 12-26-13 #90

E601025-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: SL		Batch: 2602085
Benzene	ND	0.0250	1	01/07/26	01/08/26	
Ethylbenzene	ND	0.0250	1	01/07/26	01/08/26	
Toluene	ND	0.0250	1	01/07/26	01/08/26	
o-Xylene	0.0554	0.0250	1	01/07/26	01/08/26	
p,m-Xylene	ND	0.0500	1	01/07/26	01/08/26	
Total Xylenes	0.0554	0.0250	1	01/07/26	01/08/26	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		98.4 %	70-130	01/07/26	01/08/26	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: SL		Batch: 2602085
Gasoline Range Organics (C6-C10)	ND	20.0	1	01/07/26	01/08/26	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		84.3 %	70-130	01/07/26	01/08/26	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: KH		Batch: 2602091
Diesel Range Organics (C10-C28)	ND	25.0	1	01/08/26	01/08/26	
Oil Range Organics (C28-C36)	ND	50.0	1	01/08/26	01/08/26	
<i>Surrogate: n-Nonane</i>						
		94.0 %	61-141	01/08/26	01/08/26	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: DT		Batch: 2602086
Chloride	567	20.0	1	01/07/26	01/07/26	

Appendix B: Lab Results

QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Dome Navajo 12-26-13 #90 Project Number: 06094-0177 Project Manager: Eileen Yates	Reported: 1/13/2026 8:12:41AM
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Volatile Organics by EPA 8021B

Analyst: SL

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 (2602085-BLK1)

Prepared: 01/07/26 Analyzed: 01/08/26

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Sarrigate: 4-Bromochlorobenzene-PID	7.94		8.00		99.3		70-130		

LCS (2602085-BS1)

Prepared: 01/07/26 Analyzed: 01/08/26

Benzene	6.13	0.0250	5.00		123		70-130		
Ethylbenzene	5.95	0.0250	5.00		119		70-130		
Toluene	6.06	0.0250	5.00		121		70-130		
o-Xylene	6.00	0.0250	5.00		120		70-130		
p,m-Xylene	12.1	0.0500	10.0		121		70-130		
Total Xylenes	18.1	0.0250	15.0		121		70-130		
Sarrigate: 4-Bromochlorobenzene-PID	8.30		8.00		104		70-130		

Matrix Spike (2602085-MS1)

Source: E601026-06

Prepared: 01/07/26 Analyzed: 01/08/26

Benzene	6.27	0.0250	5.00	ND	125		70-130		
Ethylbenzene	6.04	0.0250	5.00	ND	121		70-130		
Toluene	6.18	0.0250	5.00	ND	124		70-130		
o-Xylene	6.05	0.0250	5.00	ND	121		70-130		
p,m-Xylene	12.3	0.0500	10.0	ND	123		70-130		
Total Xylenes	18.3	0.0250	15.0	ND	122		70-130		
Sarrigate: 4-Bromochlorobenzene-PID	7.57		8.00		94.6		70-130		

Matrix Spike Dup (2602085-MSD1)

Source: E601026-06

Prepared: 01/07/26 Analyzed: 01/08/26

Benzene	6.28	0.0250	5.00	ND	126		70-130	0.150	27
Ethylbenzene	6.05	0.0250	5.00	ND	121		70-130	0.232	26
Toluene	6.20	0.0250	5.00	ND	124		70-130	0.444	20
o-Xylene	6.06	0.0250	5.00	ND	121		70-130	0.310	25
p,m-Xylene	12.3	0.0500	10.0	ND	123		70-130	0.0714	23
Total Xylenes	18.3	0.0250	15.0	ND	122		70-130	0.150	26
Sarrigate: 4-Bromochlorobenzene-PID	7.51		8.00		93.9		70-130		

Appendix B: Lab Results

QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Dome Navajo 12-26-13 #90 Project Number: 06094-0177 Project Manager: Eileen Yates	January 29, 2026 Reported: 1/13/2026 8:12:41AM
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Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rac %	Rac Limits %	RPD %	RPD Limit %	Notes
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Blank (2602085-BLK1)

Prepared: 01/07/26 Analyzed: 01/08/26

Gasoline Range Organics (C6-C10)	ND	20.0							
S surrogate: 1-Chloro-4-fluorobenzene-FID	7.06		8.00		88.2	70-130			

LCS (2602085-BS2)

Prepared: 01/07/26 Analyzed: 01/08/26

Gasoline Range Organics (C6-C10)	61.3	20.0	50.0		123	70-130			
S surrogate: 1-Chloro-4-fluorobenzene-FID	7.17		8.00		89.7	70-130			

Matrix Spike (2602085-MS2)

Source: E601026-06

Prepared: 01/07/26 Analyzed: 01/08/26

Gasoline Range Organics (C6-C10)	58.6	20.0	50.0	ND	117	70-130			
S surrogate: 1-Chloro-4-fluorobenzene-FID	6.82		8.00		83.3	70-130			

Matrix Spike Dup (2602085-MSD2)

Source: E601026-06

Prepared: 01/07/26 Analyzed: 01/08/26

Gasoline Range Organics (C6-C10)	63.8	20.0	50.0	ND	128	70-130	8.40	20	
S surrogate: 1-Chloro-4-fluorobenzene-FID	6.73		8.00		84.1	70-130			

Appendix B: Lab Results

QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Project Number: Project Manager:	Dome Navajo 12-26-13 #90 06094-0177 Eileen Yates 505	Reported: 1/13/2026 8:12:41AM
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Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

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 (2602091-BLK1)

Prepared: 01/08/26 Analyzed: 01/08/26

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	44.9		50.0		89.8	61-141			

LCS (2602091-BS1)

Prepared: 01/08/26 Analyzed: 01/08/26

Diesel Range Organics (C10-C28)	255	25.0	250		102	66-144			
Surrogate: n-Nonane	45.6		50.0		91.2	61-141			

Matrix Spike (2602091-MS1)

Source: E601040-01

Prepared: 01/08/26 Analyzed: 01/08/26

Diesel Range Organics (C10-C28)	291	25.0	250	25.0	106	56-156			
Surrogate: n-Nonane	49.9		50.0		99.9	61-141			

Matrix Spike Dup (2602091-MSD1)

Source: E601040-01

Prepared: 01/08/26 Analyzed: 01/08/26

Diesel Range Organics (C10-C28)	297	25.0	250	25.0	109	56-156	2.17	20	
Surrogate: n-Nonane	51.1		50.0		102	61-141			

Appendix B: Lab Results

QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Project Number: Project Manager:	Dome Navajo 12-26-13 #90 06094-0177 Eileen Yates	Reported: 1/13/2026 8:12:41AM
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Anions by EPA 300.0/9056A

Analyst: DT

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec % %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2602086-BLK1)									
Chloride	ND	20.0							Prepared: 01/07/26 Analyzed: 01/07/26
LCS (2602086-BS1)									
Chloride	258	20.0	250		103	90-110			Prepared: 01/07/26 Analyzed: 01/07/26
Matrix Spike (2602086-MS1)									
Chloride	915	40.0	250	690	89.9	80-120			Source: E601024-05 Prepared: 01/07/26 Analyzed: 01/07/26
Matrix Spike Dup (2602086-MSD1)									
Chloride	916	40.0	250	690	90.5	80-120	0.187	20	Source: E601024-05 Prepared: 01/07/26 Analyzed: 01/07/26

QC Summary Report Comment:

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

Appendix B: Lab Results

Definitions and Notes

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Dome Navajo 12-26-13 #90 Project Number: 06094-0177 Project Manager: Eileen Yates	Reported: 01/13/26 08:12
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ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

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

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

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

Appendix B: Lab Results



Chain of Custody

Page ____ of ____

Analysis Information				Invoice Information				Lab Use Only				TAT				State			
Client: Dugan Production Corp Project Name: VCMC Nov 16 12-26-13 #90 Project Manager: Filleen Yates Address: 1280 Troy King Road City, State, Zip: Farmington, NM Phone: 505-787-9832 Email: elleen.yates@duganproduction.com				Company: Address: City, State, Zip: Phone: Email: Miscellaneous:				Lab WO# E601025 Job Number 06094077				1D 2D 3D Std IX				NM CO UT TX X			
Analysis and Method												EPA Program							
SDWA	CWA	RCRA										Compliance	Y	or	N				
PWSID #																			
Sample Information																			
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	FBG	Filter	Lab Number	SDWA/CR6 by 8015	CR6/CR60 by 8015	PTER by 8021	NOC by 8250	Chloride 300.0	1001 1000 - TX	RCRA 8 Metals	MSDC - NM	MSDC - TX	Sample Temp	Remarks	
8:30	1/7/26	S	1	Dugan Nov 16 12-26-13 #90			1								X		1.1		
		S																	
		S																	
		S																	
		S																	
		S																	
		S																	
		S																	
		S																	
		S																	
Additional Instructions:																			
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.																			
Sampled by: Leah Augustine																			
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days.													
	1-7-26	9:44	Noe S	1-7-26	0944	Lab Use Only													
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	Received on Ice:													
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	N.S. 1-7-26													
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time														
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time														
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other																			
Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA																			
Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																			

Appendix B: Lab Results

Envirotech Analytical Laboratory

Printed: 1/7/2026 11:09:39AM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	Dugan Production Corp.	Date Received:	01/07/26 09:44	Work Order ID:	E601025
Phone:	(505) 325-1821	Date Logged In:	01/07/26 10:59	Logged In By:	Noe Soto
Email:	eileen.yates@duganproduction.com	Due Date:	01/14/26 17:00 (5 day TAT)		

Chain of Custody (COC)

- 1. Does the sample ID match the COC? Yes
- 2. Does the number of samples per sampling site location match the COC? Yes
- 3. Were samples dropped off by client or carrier? Yes
- 4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
- 5. Were all samples received within holding time? Yes

Carrier: LeeRiah Augustine

Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold time, are not included in this discussion.

Comments/Resolution

Sample Turn Around Time (TAT)

- 6. Did the COC indicate standard TAT, or Expedited TAT? Yes

Sample Cooler

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

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

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

Sample Container

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

Field Label

- 20. Were field sample labels filled out with the minimum information:
 - Sample ID? Yes
 - Date/Time Collected? Yes
 - Collectors name? No

Sample Preservation

- 21. Does the COC or field labels indicate the samples were preserved? No
- 22. Are sample(s) correctly preserved? NA
- 24. Is lab filtration required and/or requested for dissolved metals? No

Multiphase Sample Matrix

- 26. Does the sample have more than one phase, i.e., multiphase? No
- 27. If yes, does the COC specify which phase(s) is to be analyzed? NA

Subcontract Laboratory

- 28. Are samples required to get sent to a subcontract laboratory? No
- 29. Was a subcontract laboratory specified by the client and if so who? NA Subcontract Lab: NA

Client Instruction

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

Date



envirotech Inc.

Appendix C: Seed Mix

Appendix D: Site Photo

Photo 1: BGT Before Remediation



Appendix D: Site Photo

Photo 2: Location Signage/After Remediation



Photo 2-4: After installation of new BGT



Appendix D: Site Photo



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

General Information
Phone: (505) 629-6116

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

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

CONDITIONS

Action 548324

CONDITIONS

Operator: DUGAN PRODUCTION CORP PO Box 420 Farmington, NM 87499	OGRID: 6515
	Action Number: 548324
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	None	2/3/2026