

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

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

Form C-144
Revised April 3, 2017

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

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

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

BTG1

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: 4001 N. Butler, BLBG 7101 Farmington, NM 87401
Facility or well name: Yockey #006
API Number: 30-045-29857 OCD Permit Number: _____
U/L or Qtr/Qtr I Section 20 Township 27N Range 11W County: San Juan
Center of Proposed Design: Latitude 36.5575333 Longitude -108.0218124 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: Fiberglass
☐ 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 Per BLM Specifications _____

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

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

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

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

<u>General siting</u>	
<u>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</u>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
- <input type="checkbox"/> NM Office of the State Engineer - iWATERS database search; <input type="checkbox"/> USGS; <input type="checkbox"/> Data obtained from nearby wells	<input type="checkbox"/> NA
<u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .</u>	<input type="checkbox"/> Yes <input type="checkbox"/> No
NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> 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)	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Written confirmation or verification from the municipality; Written approval obtained from the municipality	
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	
Within an unstable area. (Does not apply to below grade tanks)	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	
Within a 100-year floodplain. (Does not apply to below grade tanks)	<input type="checkbox"/> Yes <input type="checkbox"/> No
- FEMA map	
<u>Below Grade Tanks</u>	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	
<u>Temporary Pit using Low Chloride Drilling Fluid</u> (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.)	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Topographic map; Visual inspection (certification) of the proposed site	
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	<input type="checkbox"/> Yes <input type="checkbox"/> No
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	
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.	<input type="checkbox"/> Yes <input type="checkbox"/> No
NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	

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: _____

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12.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC

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

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including 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 regard to the proposed closure plan.

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

14.

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

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

15.

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

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

- | | |
|---|---|
| Ground water is less than 25 feet below the bottom of the buried waste.
- 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: **Victoria Venegas** Approval Date: **02/16/2022**

Title: **Environmental Specialist** OCD Permit Number: **BTG1**

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: June 15, 2021

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 36.5575333 Longitude -108.0218124 NAD: ☐ 1927 ☒ 1983

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): Vanessa Fields Agent Title: Agent/ Reg Manager

Signature:  Date: 6/29/2021

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

Vanessa Fields

From: Adeloey, Abiodun A <aadeloey@blm.gov>
Sent: Tuesday, June 29, 2021 3:35 PM
To: Vanessa Fields; Smith, Cory, EMNRD
Cc: Jeremy Divine
Subject: Re: [EXTERNAL] Final Analytical results Roddy Production Lucerne Fed # 006 30-045-29282 & Yockey #006 30-045-29857

Hi Vanessa, BLM approves Roddy Production for the backfilling of Lucerne Fed #6 and Yockey #6 where the BGT were removed from. BLM acceptance of this notification to collect final samples does not relieve Logos of any other requirements imposed by other regulatory agencies.

Please send the new Facility Security Diagram to the BLM FFO as soon as possible per 43-CFR 3173.11.

Please let me know if you have any questions.

Thank you.

Abiodun Adeloey (Emmanuel), NRS

Bureau of Land Management

Farmington Field Office

6251 College Blvd., Suite A

Farmington, NM 87402

Office Phone: 505-564-7665

Cell Phone: 505-635-0984

From: Vanessa Fields <vanessa@walsheng.net>
Sent: Tuesday, June 29, 2021 8:56 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>; Adeloey, Abiodun A <aadeloey@blm.gov>
Cc: Jeremy Divine <jdivine@crowquest.com>
Subject: [EXTERNAL] Final Analytical results Roddy Production Lucerne Fed # 006 30-045-29282 & Yockey #006 30-045-29857

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

Good morning everyone,

Please find attached the final analytical results for the removal of the BGTS on the Lucerne Fed # 006 30-045-29282 & Yockey #006 30-045-29857.

Roddy Production will proceed with backfill and the final C-144's will be submitted through E-Permitting.

Thank you,

Vanessa Fields

Regulatory Compliance Manager

Walsh Engineering /Epic Energy LLC.

O: 505-327-4892
C: 505-787-9100
vanessa@walsheng.net

Vanessa Fields

From: Jeremy Divine <jdivine@crowquest.com>
Sent: Thursday, June 10, 2021 10:03 AM
To: Smith, Cory, EMNRD; aadeloye@blm.gov
Cc: Vanessa Fields
Subject: 72 hour notification for BGT removal on Roddy Production's Lucerne Fed. #6 30-045-29282 and Yockey #6 30-045-29857

Good Morning,

Roddy Production is providing 72 hour notification for the removal of BGT's from the Lucerne Federal #6 30-045-29282 and the Yockey #6 30-045-29857. We plan on starting on Tuesday June 15th 10:00am. Please let me know if you have questions or need more information.

Thank you

Jeremy Divine
Cell. 432 557 6778
jdivine@crowquest.com
4001 N. Butler, Building 7101
Farmington, NM 87499

CrownQuest Operating

Roddy Production Co.

Vanessa Fields

From: Vanessa Fields
Sent: Tuesday, June 29, 2021 8:57 AM
To: Smith, Cory, EMNRD; Adeloye, Abiodun A
Cc: Jeremy Divine
Subject: Final Analytical results Roddy Production Lucerne Fed # 006 30-045-29282 & Yockey # 006 30-045-29857
Attachments: 2106152 FINAL 062821 1221 RE3.pdf

Good morning everyone,

Please find attached the final analytical results for the removal of the BGTS on the Lucerne Fed # 006 30-045-29282 & Yockey #006 30-045-29857.

Roddy Production will proceed with backfill and the final C-144's will be submitted through E-Permitting.

Thank you,

Vanessa Fields

Regulatory Compliance Manager

Walsh Engineering /Epic Energy LLC.

O: 505-327-4892

C: 505-787-9100

vanessa@walsheng.net



75 Suttle Street
Durango, CO 81303
970.247.4220 Phone
970.247.4227 Fax
www.greenanalytical.com

28 June 2021

Jeremy Divine
Roddy Production
P.O. Box 2221
Farmington, NM 87499
RE: BTEX, TPH, CI

Enclosed are the results of analyses for samples received by the laboratory on 06/15/21 14:20. This data replaces the previous report (See case narrative). The data to follow was performed, in whole or in part, by a subcontract laboratory with an additional report attached.

If you need any further assistance, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Debbie Zufelt'.

Debbie Zufelt
Reports Manager

All accredited analytes contained in this report are denoted by an asterisk (*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at <http://greenanalytical.com/certifications/>

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water through the Colorado Department of Public Health and Environment and EPA region 8.



dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

www.GreenAnalytical.com

Roddy Production	Project: BTEX, TPH, Cl	Reported:
P.O. Box 2221	Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT	06/28/21 12:21
Farmington NM, 87499	Project Manager: Jeremy Divine	

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
Lucerne Fed #6	2106152-01	Solid	06/15/21 11:10	06/15/21 14:20	
Yockey #6	2106152-02	Solid	06/15/21 13:30	06/15/21 14:20	

Green Analytical Laboratories

A handwritten signature in black ink that reads 'Debbie Zufelt'.

Debbie Zufelt, Reports Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.

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dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

www.GreenAnalytical.com

Roddy Production	Project: BTEX, TPH, Cl	
P.O. Box 2221	Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT	Reported:
Farmington NM, 87499	Project Manager: Jeremy Divine	06/28/21 12:21

1) Spelling errors by GAL were corrected in the following report. This RE report is revised and replaces the original report dated 06/23/21.

2) BTEX analysis was missed on the original report. This RE3 report replaces the original and first 2 RE reports dated 06/23/21 & 06/24/21.

Green Analytical Laboratories

A handwritten signature in black ink that reads 'Debbie Zufelt'.

Debbie Zufelt, Reports Manager

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dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

www.GreenAnalytical.com

Roddy Production	Project: BTEX, TPH, CI	Reported:
P.O. Box 2221	Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT	06/28/21 12:21
Farmington NM, 87499	Project Manager: Jeremy Divine	

Lucerne Fed #6

2106152-01 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
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Subcontracted -- Cardinal Laboratories

Inorganic Compounds

Chloride	304	16.0		mg/kg	4	06/21/21 08:42	4500-Cl-B		GM
----------	-----	------	--	-------	---	----------------	-----------	--	----

Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	0.003	mg/kg	50	06/25/21 14:46	8021B		MS
Toluene*	<0.050	0.050	0.006	mg/kg	50	06/25/21 14:46	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	06/25/21 14:46	8021B		MS
Total Xylenes*	<0.150	0.150	0.022	mg/kg	50	06/25/21 14:46	8021B		MS
Total BTEX	<0.300	0.300	0.039	mg/kg	50	06/25/21 14:46	8021B		MS

Surrogate: 4-Bromofluorobenzene (PID) 112 % 69.9-140 06/25/21 14:46 8021B MS

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	1.84	mg/kg	1	06/21/21 14:40	8015B		MS
DRO >C10-C28*	<10.0	10.0	1.45	mg/kg	1	06/21/21 14:40	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	1.45	mg/kg	1	06/21/21 14:40	8015B		MS

Surrogate: 1-Chlorooctane 93.1 % 44.3-133 06/21/21 14:40 8015B MS

Surrogate: 1-Chlorooctadecane 90.1 % 38.9-142 06/21/21 14:40 8015B MS

Green Analytical Laboratories

Debbie Zufelt

Debbie Zufelt, Reports Manager

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Roddy Production	Project: BTEX, TPH, CI	Reported:
P.O. Box 2221	Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT	06/28/21 12:21
Farmington NM, 87499	Project Manager: Jeremy Divine	

Yockey #6**2106152-02 (Solid)**

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
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Subcontracted -- Cardinal Laboratories**Inorganic Compounds**

Chloride	16.0	16.0		mg/kg	4	06/21/21 08:42	4500-Cl-B		GM
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Volatile Organic Compounds by EPA Method 8021

Benzene*	<0.050	0.050	0.003	mg/kg	50	06/25/21 15:01	8021B		MS
Toluene*	<0.050	0.050	0.006	mg/kg	50	06/25/21 15:01	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	06/25/21 15:01	8021B		MS
Total Xylenes*	<0.150	0.150	0.022	mg/kg	50	06/25/21 15:01	8021B		MS
Total BTEX	<0.300	0.300	0.039	mg/kg	50	06/25/21 15:01	8021B		MS

Surrogate: 4-Bromofluorobenzene (PID)		112 %	69.9-140			06/25/21 15:01	8021B		MS
---------------------------------------	--	-------	----------	--	--	----------------	-------	--	----

Petroleum Hydrocarbons by GC FID

GRO C6-C10*	<10.0	10.0	1.84	mg/kg	1	06/21/21 15:05	8015B		MS
DRO >C10-C28*	<10.0	10.0	1.45	mg/kg	1	06/21/21 15:05	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	1.45	mg/kg	1	06/21/21 15:05	8015B		MS

Surrogate: 1-Chlorooctane		90.2 %	44.3-133			06/21/21 15:05	8015B		MS
---------------------------	--	--------	----------	--	--	----------------	-------	--	----

Surrogate: 1-Chlorooctadecane		88.1 %	38.9-142			06/21/21 15:05	8015B		MS
-------------------------------	--	--------	----------	--	--	----------------	-------	--	----

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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Roddy Production
P.O. Box 2221
Farmington NM, 87499

Project: BTEX, TPH, Cl
Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT
Project Manager: Jeremy Divine

Reported:
06/28/21 12:21

Inorganic Compounds - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1061821 - 1:4 DI Water										
Blank (1061821-BLK1)										
				Prepared & Analyzed: 06/18/21						
Chloride	ND	16.0	mg/kg							
LCS (1061821-BS1)										
				Prepared & Analyzed: 06/18/21						
Chloride	400	16.0	mg/kg	400		100	80-120			
LCS Dup (1061821-BSD1)										
				Prepared & Analyzed: 06/18/21						
Chloride	432	16.0	mg/kg	400		108	80-120	7.69	20	

Volatile Organic Compounds by EPA Method 8021 - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1062414 - Volatiles										
Blank (1062414-BLK1)										
				Prepared: 06/24/21 Analyzed: 06/25/21						
Surrogate: 4-Bromofluorobenzene (PID)	0.0555		mg/kg	0.0500		111	69.9-140			
Benzene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
LCS (1062414-BS1)										
				Prepared: 06/24/21 Analyzed: 06/25/21						
Surrogate: 4-Bromofluorobenzene (PID)	0.0543		mg/kg	0.0500		109	69.9-140			
Benzene	1.99	0.050	mg/kg	2.00		99.3	89.9-120			
Ethylbenzene	1.83	0.050	mg/kg	2.00		91.7	88.9-116			
m,p-Xylene	3.71	0.100	mg/kg	4.00		92.8	85.5-118			
o-Xylene	1.86	0.050	mg/kg	2.00		92.8	85.5-118			
Toluene	1.90	0.050	mg/kg	2.00		95.1	90.8-117			
Total Xylenes	5.57	0.150	mg/kg	6.00		92.8	85.5-118			
LCS Dup (1062414-BSD1)										
				Prepared: 06/24/21 Analyzed: 06/25/21						
Surrogate: 4-Bromofluorobenzene (PID)	0.0543		mg/kg	0.0500		109	69.9-140			
Benzene	2.08	0.050	mg/kg	2.00		104	89.9-120	4.51	10.3	
Ethylbenzene	1.91	0.050	mg/kg	2.00		95.6	88.9-116	4.14	10.8	
m,p-Xylene	3.86	0.100	mg/kg	4.00		96.5	85.5-118	3.87	10.7	

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Debbie Zufelt, Reports Manager

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www.GreenAnalytical.com

Roddy Production
P.O. Box 2221
Farmington NM, 87499

Project: BTEX, TPH, Cl
Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT
Project Manager: Jeremy Divine

Reported:
06/28/21 12:21

**Volatile Organic Compounds by EPA Method 8021 - Quality Control
(Continued)**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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Batch 1062414 - Volatiles (Continued)

LCS Dup (1062414-BSD1) (Continued)

Prepared: 06/24/21 Analyzed: 06/25/21

o-Xylene	1.92	0.050	mg/kg	2.00		96.0	85.5-118	3.31	10.7	
Toluene	2.00	0.050	mg/kg	2.00		100	90.8-117	5.29	10.5	
Total Xylenes	5.78	0.150	mg/kg	6.00		96.3	85.5-118	3.68	10.7	

Petroleum Hydrocarbons by GC FID - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

Batch 1061806 - General Prep - Organics

Blank (1061806-BLK1)

Prepared: 06/18/21 Analyzed: 06/21/21

Surrogate: 1-Chlorooctadecane	47.2		mg/kg	50.0		94.4	38.9-142			
Surrogate: 1-Chlorooctane	48.1		mg/kg	50.0		96.3	44.3-133			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							

LCS (1061806-BS1)

Prepared: 06/18/21 Analyzed: 06/21/21

Surrogate: 1-Chlorooctadecane	50.2		mg/kg	50.0		100	38.9-142			
Surrogate: 1-Chlorooctane	51.5		mg/kg	50.0		103	44.3-133			
DRO >C10-C28	205	10.0	mg/kg	200		102	79.3-136			
GRO C6-C10	213	10.0	mg/kg	200		106	83.4-129			
Total TPH C6-C28	417	10.0	mg/kg	400		104	85.3-130			

LCS Dup (1061806-BSD1)

Prepared: 06/18/21 Analyzed: 06/21/21

Surrogate: 1-Chlorooctadecane	46.5		mg/kg	50.0		93.0	38.9-142			
Surrogate: 1-Chlorooctane	48.0		mg/kg	50.0		96.1	44.3-133			
DRO >C10-C28	210	10.0	mg/kg	200		105	79.3-136	2.36	12.1	
GRO C6-C10	217	10.0	mg/kg	200		109	83.4-129	2.07	12.6	
Total TPH C6-C28	427	10.0	mg/kg	400		107	85.3-130	2.21	11.6	

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Debbie Zufelt

Debbie Zufelt, Reports Manager

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Roddy Production	Project: BTEX, TPH, CI	
P.O. Box 2221	Project Name / Number: Lucerne Fed 6 & Yockey 6 BGT	Reported:
Farmington NM, 87499	Project Manager: Jeremy Divine	06/28/21 12:21

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis *Results reported on as received basis unless designated as dry.
RPD	Relative Percent Difference
LCS	Laboratory Control Sample (Blank Spike)
RL	Report Limit
MDL	Method Detection Limit

Green Analytical Laboratories

A handwritten signature in black ink that reads 'Debbie Zufelt'.

Debbie Zufelt, Reports Manager

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GAL
Analytical
Laboratories

(970) 247-4220
Fax: (970) 247-4227

dzu@galanalytical.com
75 Suttle St Durango, CO 81303

FORM-006
COC - Revision 6.0

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

Company or Client: Maddy Production Co

Address: P.O. Box 2021

City: Fortington State: WY Zip: 87499

Phone #: 434.557.6778

Contact Person: Jeremy Divine

Email Report to: jdive@cremagne-st.com

Project Name(optional): Lucerne Sed to Yockey b b6T

Sampler Name (Print): Jeremy Divine

ANALYSIS REQUEST

Bill to (if different):

P.O. #:

Company:

Attn:

Address:

City:

State:

Zip:

Phone #:

Email:

Collected

Matrix (check one)

of containers

For Lab Use

Sample Name or Location

8106152-01 Lucerne Sed #6

-02 Yockey #6

Date: 6/15/21 Time: 11:10 AM

Date: 6-15-21 Time: 1:30 PM

GROUNDWATER
SURFACEWATER
WASTEWATER
PRODUCEDWATER
SOIL
DRINKING WATER
OTHER :
No preservation (general)
HNO₃
HCl
H₂SO₄
Other:
Other:

TPH & BTEX
Chlorides

X X
X X

PLEASE NOTE: GAL's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analysis. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by GAL within 30 days after completion. In no event shall GAL be liable for incidental or consequential damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by GAL, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished by:

Date: 6/15/21

Received by:

ADDITIONAL REMARKS:

Report to State? (Circle)

Yes
No

Relinquished by: Jeremy Divine

Date: 6/15/21

Received by:

Relinquished by: Justin Clark

Date: 6/15/21

Received by:

Relinquished by: Kenneth Evans

Date: 6/16/21

Received by:

Temperature at receipt:

CHECKED BY

On Ice

No Ice

4.5°C Starch #3 on 6/15/21

* Chain of Custody must be signed in "Relinquished By:" as an acceptance of services and all applicable charges.

Just Click Printing Form #17-0301

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 Roddy Production CO INC.	OGRID 36845
Contact Name Agent/ Vanessa Fields	Contact Telephone 505-787-9100
Contact email vanessa@walsheng.net	Incident # (assigned by OCD) N/A
Contact mailing address 7415 East Main Street Farmington, NM 87402	

Location of Release Source

Latitude 36.5575333 _____ Longitude -108.0218124 _____
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Yockey #006	Site Type Gas
Date Release Discovered N/A	API# (if applicable) 30-045-29857

Unit Letter	Section	Township	Range	County
I	20	27N	11W	San Juan

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

Nature and Volume of Release

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

<p>Cause of Release On June 10, 2021 Roddy Production removed the fiberglass below grade tank on the Yockey #006. When the BGT was removed no visible signs of staining or wet soil was observed. Roddy Production collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. Analytical results complied with Table 1 closure standards.</p> <p>Analytical Results:</p> <p>Benzene: <0.050 mg/kg BTEX: <0.300 mg/kg GRO: <10.0 mg/kg DRO: <10.0 mg/kg ORO: <10.0 mg/kg Chloride: 16.0 mg/kg</p>	
<p>Was this a major release as defined by 19.15.29.7(A) NMAC?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If YES, for what reason(s) does the responsible party consider this a major release?</p>
<p>If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?</p>	

Initial Response

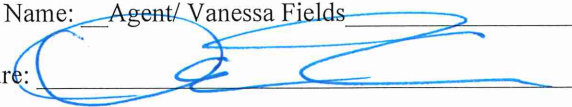
The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<p><input type="checkbox"/> The source of the release has been stopped.</p> <p><input type="checkbox"/> The impacted area has been secured to protect human health and the environment.</p> <p><input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.</p> <p><input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.</p>
<p>If all the actions described above have <u>not</u> been undertaken, explain why:</p> <p>N/A no release occurred</p>
<p>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.</p>

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: Agent/ Vanessa Fields Title: Agent/ Regulatory Compliance Manager
Signature:  Date: 6/29/2021
email: vanessa@walshemg.net Telephone: 505-787-9100

OCD Only

Received by: _____ Date: _____

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

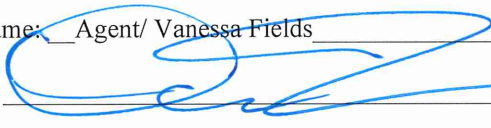
Closure

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

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

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

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

Printed Name: Agent/ Vanessa Fields Title: Agent/ Regulatory Compliance Manager
 Signature:  Date: 6/29/2021
 email: vanessa@walsheng.net Telephone: 505-787-9100

OCD Only

Received by: _____ Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____

Below Grade Tank Closure Plan

Yockey #006

API 30-045-29857

U/L: I, Section 20, TWN: 27N. RNG: 11W

San Juan County, New Mexico

As stipulated in Rule 19 .15 .17 .13 NMAC, the following information adheres to the requirements established in closing below-grade tanks (BGTs) on Roddy Production CO INC well sites. This plan will address the standard protocols and procedures for closure of BGTs.

Roddy Production CO INC proposes to close its existing BGTs that do not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or are not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC in accordance with this closure plan and the transitional provisions of Subsection E of 19.15.17.17 NMAC.

The following outline addresses all requirements for closure of Roddy Production CO INC BGTs:

1. Prior notification of Roddy Production CO INC intent to close the BGT will follow 19.15.17.13J (I) and (2).

a. Roddy Production CO INC will notify the surface owner by certified mail, return receipt requested, of closure plans. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records is enough to demonstrate compliance with this requirement.

b. Notification will also be given to the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice will include the operator's name and the well's name, number, and API number, in addition to the well's legal description, including the unit letter, section, township, and range.

72 Hour notice was provided to the NMOCD District III Office the Farmington BLM Field Office. Attached is a copy of the notification. No representatives from the BLM nor NMOCD III were present during the BGT removal.

2. RODDY PRODCUTION CO INC will remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. A list of Roddy Production CO INC approved disposal facilities is below:

Fluid disposal:

Agua Moss

Sunco well #1

U/L=E, SWNW, Section 2, T29N-R12W San Juan, New Mexico

Permit #NM-01-0009

Basin Disposal Inc.

Basin Disposal well # 1

U/L=F, SWNW, Section 3, T29N-R1 1 W San Juan, New Mexico

Permit #NM-01-0005

Solid disposal: **Envirotech Land Farm**

Disposal Facility

Section 6, T26N-R10W, County Road #7175 San Juan, New Mexico

Permit #NM-01-0011

3. RODDY PRODCUTION CO INC will remove the BGT from the pit and place it at ground level adjacent to the original BGT site and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approved. If a liner is present and must be disposed of it will be cleaned and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC.

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

4. Roddy Production CO INC will hook up necessary equipment and piping for temporary tank use. At this time, any on-site equipment not necessary to the operation of the tank will be removed from the site.


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

5.Roddy Production CO INC will test the soils beneath the original BGT location to determine whether a release has occurred. At a minimum, a five (5) point composite sample will be collected in addition to individual grab samples from areas that are wet, discolored, or showing other evidence of a release. The samples will be analyzed for BTEX, TPH (GRO DRO MRO, and chlorides to demonstrate that they do not exceed certain concentrations. The testing methods and closure standards for those constituents are as follows:

On June 15, 2021, Roddy Production removed the steel below grade tank on the Yockey #006 When the BGT was removed no visible signs of staining or wet soil was observed. Roddy Production collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. Analytical results complied with Table 1 closure standards.

Analytical Results:

Benzene: <0.050 mg/kg
BTEX: <0.300 mg/kg
GRO: <10.0 mg/kg
DRO: <10.0 mg/kg
ORO: <10.0 mg/kg
Chloride: 16.0 mg/kg

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

Notes: mg/Kg= milligram per kilogram; BTEX = benzene, toluene, ethylbenzene, and total xylenes; TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. The Chlorides closure standards will be determined by whichever concentration level is greatest.

6. Roddy Production CO INC will notify the division District III office of the soil test results on Form C-14 I. It is understood that the NMOCD may require additional delineation upon review of the results.

On June 15, 2021, Roddy Production removed the steel below grade tank on the Yockey #006 When the BGT was removed no visible signs of staining or wet soil was observed. Roddy Production collected (1) (5) point composite sample from where the BGT was removed. The closure samples were analyzed by Envirotech Labs in referenced to Table 1 Closure standards. Analytical results complied with Table 1 closure standards.

Analytical Results:

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BTEX: <0.300 mg/kg
GRO: <10.0 mg/kg
DRO: <10.0 mg/kg
ORO: <10.0 mg/kg
Chloride: 16.0 mg/kg

7. If it is determined that a release has occurred, then Roddy Production CO INC will comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

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

8. If the confirmation sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then Roddy Production CO INC will backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; re-contour the site; and move the fiberglass tank onto the newly backfilled and compacted site. The division-prescribed soil cover, re-contouring, and re-vegetation requirements shall comply with Subsections G, H, and I of 19.15.17.13 NMAC.

9. Reclamation will follow 19.15.17.130 (1) and (2).

a. The BGT location and all areas associated with the BGT, including associated access roads, if applicable, will be reclaimed to a safe and stable condition that blends with the surrounding undisturbed area. It is understood that Roddy Production CO INC shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC and re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography.

b. Re-vegetation will not be completed at the time the BGT pit is reclaimed but will instead be applied for as part of the P&A process when the well is plugged and abandoned.

10. Soil cover will follow 19.15.17.13H (1) and (3).

a. The soil cover for closures where the BGT has been removed or contaminated soil has been remediated to the NMOCD's satisfaction will consist of the background thickness of topsoil or one (1) foot of suitable material to establish vegetation at the site, whichever is greater.

b. The soil cover will be constructed to the site's existing grade, and all possible efforts will be conducted to prevent ponding of water and erosion of the cover material.

11. Within 60 days of closure completion, Roddy Production CO INC will submit a closure report on NMOCD's Form C-144, with necessary attachments to document all closure activities,

including sampling results; information required by 19.15.17 NMAC; and details on backfilling, capping, and covering, where applicable. Roddy Production CO INC will certify that all information in the report and attachments is correct, and that Roddy Production CO INC has complied with all applicable closure requirements and conditions specified in the approved closure plan.

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

RODDY PRODUCTION CO., INC.

YOCKEY NO. 6

NM-020496

API NO. 30-045-29857

1495' FSL & 1060' FEL

SEC.20,T-27-N,R-11-W,NMPM

SAN JUAN COUNTY, NM











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 36561

CONDITIONS

Operator: RODDY PRODUCTION CO INC 4001 N. BUTLER, BLDG 7101 Farmington, NM 87401	OGRID: 36845
	Action Number: 36561
	Action Type: [C-144] PIT Generic Plan (C-144)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	None	2/16/2022