

District I
1625 N French Dr, Hobbs, NM 88240
District II
1301 W Grand Avenue, 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
June 16, 2008

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office

BGT1
Closure Report Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action: Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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

Operator: Dugan Production Corp. OGRID #: 006515
Address: 709 East Murray Drive, Farmington, New Mexico 87401 RCVD JUL 29 '08
Facility or well name: Squaw Valley #1 OIL CONS. DIV.
API Number: 30-045-26629 OCD Permit Number: DIST. 3
U/L or Qtr/Qtr K Section 4 Township 23N Range 10W County: San Juan
Center of Proposed Design: Latitude 36.25484 North Longitude 107.90232 West NAD: 1927 1983
Surface Owner: Federal State Private Tribal Trust or Indian Allotment

<input type="checkbox"/> Pit: Subsection F or G of 19.15.17.11 NMAC Temporary: <input type="checkbox"/> Drilling <input type="checkbox"/> Workover <input type="checkbox"/> Permanent <input type="checkbox"/> Emergency <input type="checkbox"/> Cavitation <input type="checkbox"/> Lined <input type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____ <input type="checkbox"/> String-Reinforced Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____	<input type="checkbox"/> Closed-loop System: Subsection H of 19.15.17.11 NMAC <input type="checkbox"/> Drying Pad <input type="checkbox"/> Tanks <input type="checkbox"/> Haul-off Bins <input type="checkbox"/> Other _____ <input type="checkbox"/> Lined <input type="checkbox"/> Unlined Liner type: Thickness _____ mil <input type="checkbox"/> LLDPE <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____ Seams: <input type="checkbox"/> Welded <input type="checkbox"/> Factory <input type="checkbox"/> Other _____ Volume: _____ bbl _____ yd ³ Dimensions: Length _____ x Width _____
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<input checked="" type="checkbox"/> Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume: <u>95</u> bbl Type of fluid: <u>Produced H2O</u> Tank Construction material: <u>Steel</u> <input type="checkbox"/> Secondary containment with leak detection <input type="checkbox"/> Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off <input type="checkbox"/> Visible sidewalls and liner <input type="checkbox"/> Visible sidewalls only <input checked="" type="checkbox"/> Other <u>No visible sidewalls, Leak detection</u> Liner type: Thickness _____ mil <input type="checkbox"/> HDPE <input type="checkbox"/> PVC <input type="checkbox"/> Other _____	Fencing: Subsection D of 19.15.17.11 NMAC <input type="checkbox"/> Chain link, six feet in height, two strands of barbed wire at top <input type="checkbox"/> Four foot height, four strands of barbed wire evenly spaced between one and four feet Other Fencing <u>4'=3' Hog wire + 1 Strand barbed wire</u> Netting: Subsection E of 19.15.17.11 NMAC <input type="checkbox"/> Screen <input type="checkbox"/> Netting <input checked="" type="checkbox"/> Other <u>Expanded metal</u> <input checked="" type="checkbox"/> Monthly inspections Signs: Subsection C of 19.15.17.11 NMAC <input checked="" type="checkbox"/> 12'x24', 2' lettering, providing Operator's name, site location, and emergency telephone numbers <input type="checkbox"/> Signed in compliance with 19.15.3.103 NMAC
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<input type="checkbox"/> Alternative Method: Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval	Administrative Approvals and Exceptions: Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance. <i>Please check a box if one or more of the following is requested, if not leave blank:</i> <input checked="" type="checkbox"/> Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval <input type="checkbox"/> Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.
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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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other 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 checked="" type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (Applies to temporary, emergency, or cavitation pits and below-grade tanks) - Visual inspection (certification) of the proposed site; Aerial photo, Satellite image	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application (Applies to permanent pits) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" 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 checked="" 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 checked="" type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

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 19.15.17.15 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.15 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 - 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: 30-045- or Permit Number: _____

Closed-loop Systems 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.

- Geologic and Hydrogeologic Data (required for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.15 NMAC
- Siting Criteria Compliance Demonstrations (required for on-site closure) - 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 - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

NMAC

Previously Approved Design (attach copy of design) API Number: _____

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 19.15.17.15 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

Proposed Closure: 19.15.17.13 NMAC

Type: Drilling Workover Emergency Cavitation Permanent Pit Below-grade Tank Closed-loop System Alternative

Proposed Closure Method: Waste Excavation and Removal
 On-site Closure Method (only for temporary pits and closed-loop systems)
 In-place Burial On-site Trench Burial
 Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

- Ground water is less than 50 feet below the bottom of the buried waste.
 - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes No NA
- Ground water is between 50 and 100 feet below the bottom of the buried waste
 - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes No NA
- Ground water is more than 100 feet below the bottom of the buried waste
 - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes No NA
- Within 300 feet of a continuously flowing watercourse, or 200 feet of any other watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).
 - Topographic map; Visual inspection (certification) of the proposed site Yes No
- Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.
 - Visual inspection (certification) of the proposed site, Aerial photo; Satellite image Yes No
- Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.
 - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site Yes No
- 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 500 feet of a wetland.
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site 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

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 F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

Waste Removal Closure For Closed-loop Systems That Utilize Haul-off Bins Only: (19.15.17.13.D NMAC) *Instructions: Please identify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings.*

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

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 F of 19.15.17.13 NMAC
- Construction and Design of Burial Trench (if applicable) 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 Subsection F of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

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): Kurt Fagrelius Title: Vice President, Exploration

Signature: *Kurt Fagrelius* Date: 7-29-08

e-mail address: kfagrelius@duganproduction.com Telephone: 505-325-1821 (O), 505-320-8248 (C)

OCD Approval: Permit Application (including closure plan) Closure Plan (only)

OCD Representative Signature: *B. H. Bell* Approval Date: 8-4-08

Title: *EnviroSpec* OCD Permit Number: _____

Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC

Closure Completion Date: _____

Closure Method:

- Waste Excavation and Removal On-Site Closure Method Alternative Closure Method
- If different from approved plan, please explain.

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
- Proof of Deed Notice (if applicable)
- Plot Plan
- Confirmation Sampling Analytical Results
- Waste Material Sampling Analytical Results
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude - _____ Longitude _____ NAD: 1927 1983

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): Kevin Smaka Title: Engineer

Signature: *Kevin Smaka* Date: June 2, 2022

e-mail address: Kevin.Smaka@duganproduction.com Telephone: 505-325-1821 x1049

OCD Closure Report Approval: *Jaclyn Burdine*, Environmental Specialist-A; 7/27/2022; BGT1

Squaw Valley #1 BGT Closure Report

API # 30-045-26629

K-4-23N-10W

2310 FSL & 2210 FWL

Closure Report

Dugan Production has closed the below grade tank located at Dugan's Squaw Valley #1 wellsite. To begin the process Dugan notified the NMOCD and BLM of out intentions to close the BGT and invited both agencies to witness the tank removal and associated soil sampling. Upon removal the BGT was showing signs of corrosion and imminent failure. The soil below the BGT base were sampled (a 5-point composite sample) and taken to Envirotech for laboratory analysis. For reference the sample was collected 8 feet below grade. The soils were tested for chlorides, total petroleum hydrocarbons (TPH; GRO+DRO+ORO) and BTEX.

Results from the lab were above NMOCD regulatory standards. At this point Dugan started excavating the contaminated soils and hauling the contaminated soil to the Envirotech land farm for disposal. Backfill material was hauled from Envirotech to the Squawvalley #1 in preparation for backfilling the hole.

Soil samples were again collected. In this case 6 5-point samples were collected. The four walls and bottom of the project area were sampled as well as chunk of material that sloughed off during sampling. The 6 samples were taken to Envirotech for laboratory analysis. The samples were tested for Chlorides, TPH and BTEX. The lab results indicate they meet the standards of table 1 found in NMAC 19.15.29 and NMAC 19.15.17. Under the current rules the remediation is complete. For clarity the lab results are identified as SQV B, N, S, E, W and slough. SQV stands for squaw valley. B, N, S, E, W stand for bottom, north, south, east and west. Slough represents the 5-point sample collected from material that sloughed off during sampling.

Dugan is requesting an exception to the rules for closure standards. The closure plan on file with NMOCD was based on the standards found in the applicable pit rule when the BGT was registered. Current sampling results do not meet the standards in the closure plan but do meet the standards found in NMAC 19.15.17 and NMAC 19.15.29. It is for this reason Dugan is requesting the division grant closure based on the current rules standards and not the standards listed in the closure plan.

Depth to Groundwater

Included in the BGT registration is a hydrogeologic report prepared by a geologist. In the report it was noted that ground water in the washes may be found at depths as shallow as 20 feet from surface. The report also stipulates moving away from the washes also means depth to groundwater is found much deeper (200 feet). The BGT is nearly 350 feet away from a nearby wash which means the distance to ground water is nearly 200 feet from surface. A copy of the report has been included.

Sensitive Areas

As part of preparing this report Dugan generated maps of the surrounding area in an attempt to find and water courses, domestic water wells, homes, etc. (All sensitive areas listed in NMAC 19.15.29.12.C.4.a-h). Dugan's investigation into this matter shows that the BGT release area is not within the distances identified in the rule. Based on this information Dugan is seeking closure of the spill based on a distance to groundwater greater than 100 feet. The standards are listed below:

>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

A copy of the maps have been included for reference.

Reclamation

This BGT is part of an active production facility. As such Dugan will be addressing contouring and reseeded when the well is plugged and the facility is dismantled. As stipulated in NMAC 19.15.17 Dugan will fill the top of the BGT with top soil and seed the facility to ensure the project area is restored to conditions that existed prior to the wells existence. The area will be monitored and treated for weeds. Once adequate revegetation has occurred the division will be supplied with pictures of the finished rehabilitation.

In addition some of the sample results are reporting values that are higher than permitted for reclamation in NMAC 19.15.29. When the well is abandoned, Dugan will sample the top 4 feet of the project area to ensure revegetation will safely occur. If the sampling lab results indicate chlorides are less than 600 and TPH is less than 100 Dugan will proceed with reclamation. If the lab results are higher Dugan will remove the contaminated soil and replace it with soil that will support plant growth.

Squaw Valley #1 Hydrogeologic Report

The Squaw Valley #1 is located on Navajo Indian Allotted land on the Chaco Slope area in San Juan County, New Mexico. The region is characterized as a high arid mesa broken by numerous, deep cutting arroyos.

A records search of the NM Office of the State Engineer –iWATERS database was conducted on a three square mile area centered on the Squaw Valley #1 location (Exhibit 2). One water well 4,200 feet to the north and east of the subject tank was located. This well was drilled to a depth of 373 feet. The top of water was not reported, however, the well was tested at 3.5 gallons per minute. No other information was available on this well. The results of the search are shown on Exhibit 1.

The main source of stock water in the region is encountered in valley-fill deposits in existing arroyos at shallow depths of approximately 15 – 50 feet below the surface. The proposed below grade tank is not located in an arroyo, the closest arroyo is over 400 feet away.

The Nacimiento Formation extends from the surface down to a depth of approximately 125 feet. Thin silty sands can occur near the base. However, the sands are discontinuous, have high silt content and would not be expected to contain any water.

The underlying Ojo Alamo Sandstone ranges from approximately 125 feet down to a depth of approximately 215 feet and is comprised of a coarse grained alluvial sandstone inter-bedded with lenses of mudstone and occasional conglomeratic sandstone. The Ojo Alamo may yield marginal quantities of water for livestock, however, the water quality is typically greater than 1,000 ppm total dissolved solids and high in sulfate.

The Nacimiento and Ojo Alamo are potential sources of water in the area, however, nearby arroyos have breached the surface down to a depth of approximately 60 feet, there are no springs in the area and the zones are not expected to contain water in the area.

Based on electric open hole logs, the iWATERS database and literature reviewed, a water well in the area encountered groundwater at 373 feet, lesser amounts of poor quality ground water might be found at a depth of approximately 200 feet from the basal, Ojo Alamo Sandstone.

Stone, W.J., Lyford, F.P., Frenzel, P.F., Mizell, N.H., and Padgett, E.T., 1983,
Hydrogeology and water resources of San Juan Basin, New Mexico: New Mexico
Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p.

Brown, D.R., and Stone, W.J., 1979, Hydrogeology of Aztec quadrangle, San Juan
County, New Mexico: New Mexico Bureau of Mines and Mineral Resources
Hydrogeologic Sheet 1.

Levings, G.W., Craig, S.D., Dam, W.L. Kernodle, J.M., and Thorn, C.R., 1990,
Hydrogeology of the San Jose, Nacimiento, and Animas Formations in the San Juan
Structural Basin, New Mexico, Colorado, Arizona and Utah: U.S. Geological
Survey, Atlas HA-720-A, Sheet 1 and 2.

Thorn, C.R., Levings, G.W., Craig, S.D., Dam, W.L., and Kernodle, J.M., 1990,
Hydrogeology of the Ojo Alamo Sandstone in the San Juan Structural Basin, New
Mexico, Colorado, Arizona and Utah: U.S. Geological Survey, Atlas HA-720-B,
Sheet 1 and 2.

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
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1000 Rio Brazos Road, Aztec, NM 87410
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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 Dugan Production Corp.	OGRID 006515
Contact Name Kevin Smaka	Contact Telephone 505-325-1821 x1049
Contact email Kevin.Smaka@duganproduction.com	Incident # (assigned by OCD) nAPP2213748461
Contact mailing address PO Box 420, Farmington, NM 87499	

Location of Release Source

Latitude 36.2547684 Longitude -107.9029388
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Squaw Valley #1	Site Type Oil Well
Date Release Discovered 5/17/22	API# (if applicable) 30-045-26629

Unit Letter	Section	Township	Range	County
K	4	23N	10W	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 checked="" type="checkbox"/> Crude Oil	Volume Released (bbls) 10	Volume Recovered (bbls) 0
<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)

Cause of Release

Below grade tank corrosion

Form C-141

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	NAPP2213748461
District RP	
Facility ID	
Application ID	

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

Initial Response

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

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input checked="" type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
If all the actions described above have <u>not</u> been undertaken, explain why:
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.
Printed Name: <u>Kevin Smaka</u> Title: <u>Regulatory Engineer</u> Signature: <u>[Signature]</u> Date: <u>May 17, 2022</u> email: <u>Kevin.Smaka@duganproduction.com</u> Telephone: <u>505-325-1821 x1049</u>
<u>OCD Only</u> Received by: <u>Jocelyn Harimon</u> Date: <u>05/17/2022</u>

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

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

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

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

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

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

Form C-141

State of New Mexico
Oil Conservation Division

Page 4

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: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

Form C-141

State of New Mexico
Oil Conservation Division

Page 5

Incident ID	
District RP	
Facility ID	
Application ID	

Remediation Plan

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

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

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

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

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: 505-325-1821 x1049

OCD Only

Received by: _____ Date: _____

- Approved Approved with Attached Conditions of Approval Denied Deferral Approved

Signature: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

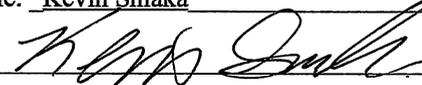
Closure

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

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

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

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

Printed Name: Kevin Smaka Title: Regulatory Engineer
 Signature:  Date: June 2, 2022
 email: Kevin.Smaka@duganproduction.com Telephone: 505-325-1821 x1049

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: _____

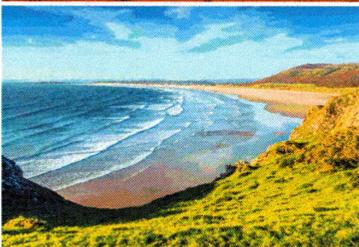
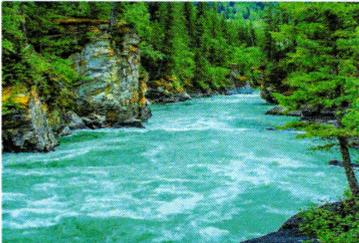
Printed Name: _____ Title: _____

Report to:
Kevin Smaka



envirotech

Practical Solutions for a Better Tomorrow



Analytical Report

Dugan Production Corp.

Project Name: Squaw Valley BGT

Work Order: E205153

Job Number: 06094-0177

Received: 5/27/2022

5796 U.S. Hwy 64
Farmington, NM 87401

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

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
6/1/22



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.
Envirotech Inc. holds the NM SDWA certification for data reported. (Lab #NM00979)

Date Reported: 6/1/22

Kevin Smaka
PO Box 420
Farmington, NM 87499



Project Name: Squaw Valley BGT
Workorder: E205153
Date Received: 5/27/2022 2:20:00PM

Kevin Smaka,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 5/27/2022 2:20:00PM, under the Project Name: Squaw Valley BGT.

The analytical test results summarized in this report with the Project Name: Squaw Valley BGT 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

Alexa Michaels
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Office: 505-632-1881
labadmin@envirotech-inc.com

Field Offices:

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Lynn Jarboe
Technical Representative/Client Services
Office: 505-421-LABS(5227)
Cell: 505-320-4759
ljjarboe@envirotech-inc.com

West Texas Midland/Odessa Area
Rayny Hagan
Technical Representative
Office: 505-421-LABS(5227)

Envirotech Web Address: www.envirotech-inc.com

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Sample Summary

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 06/01/22 15:12
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SQV B	E205153-01A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.
SQV N	E205153-02A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.
SQV S	E205153-03A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.
SQV E	E205153-04A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.
SQV W	E205153-05A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.
SQV Slough	E205153-06A	Soil	05/27/22	05/27/22	Glass Jar, 4 oz.



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV B

E205153-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		98.3 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		89.4 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	718	250	10	05/31/22	05/31/22	
Oil Range Organics (C28-C36)	704	500	10	05/31/22	05/31/22	
<i>Surrogate: n-Nonane</i>		94.1 %	50-200	05/31/22	05/31/22	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	646	20.0	1	05/31/22	05/31/22	



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV N

E205153-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		100 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		89.3 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	420	50.0	2	05/31/22	06/01/22	
Oil Range Organics (C28-C36)	475	100	2	05/31/22	06/01/22	
<i>Surrogate: n-Nonane</i>		102 %	50-200	05/31/22	06/01/22	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	685	20.0	1	05/31/22	05/31/22	



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV S

E205153-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	96.6 %		70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	90.2 %		70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	786	250	10	05/31/22	05/31/22	
Oil Range Organics (C28-C36)	1140	500	10	05/31/22	05/31/22	
<i>Surrogate: n-Nonane</i>						
	99.8 %		50-200	05/31/22	05/31/22	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	392	20.0	1	05/31/22	05/31/22	



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV E

E205153-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		96.2 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		90.2 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	ND	25.0	1	05/31/22	05/31/22	
Oil Range Organics (C28-C36)	ND	50.0	1	05/31/22	05/31/22	
<i>Surrogate: n-Nonane</i>		97.5 %	50-200	05/31/22	05/31/22	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	326	20.0	1	05/31/22	05/31/22	



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV W
E205153-05

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		97.7 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		87.8 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	302	25.0	1	05/31/22	06/01/22	
Oil Range Organics (C28-C36)	450	50.0	1	05/31/22	06/01/22	
<i>Surrogate: n-Nonane</i>						
		100 %	50-200	05/31/22	06/01/22	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	936	20.0	1	05/31/22	05/31/22	



Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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SQV Slough
E205153-06

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatiles by EPA 8021B						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Benzene	ND	0.0250	1	05/28/22	05/28/22	
Ethylbenzene	ND	0.0250	1	05/28/22	05/28/22	
Toluene	ND	0.0250	1	05/28/22	05/28/22	
o-Xylene	ND	0.0250	1	05/28/22	05/28/22	
p,m-Xylene	ND	0.0500	1	05/28/22	05/28/22	
Total Xylenes	ND	0.0250	1	05/28/22	05/28/22	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		102 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: IY		Batch: 2222089
Gasoline Range Organics (C6-C10)	ND	20.0	1	05/28/22	05/28/22	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		88.7 %	70-130	05/28/22	05/28/22	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: JL		Batch: 2223006
Diesel Range Organics (C10-C28)	64.4	25.0	1	05/31/22	05/31/22	
Oil Range Organics (C28-C36)	57.8	50.0	1	05/31/22	05/31/22	
<i>Surrogate: n-Nonane</i>						
		93.9 %	50-200	05/31/22	05/31/22	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: KL		Batch: 2223008
Chloride	315	20.0	1	05/31/22	05/31/22	



QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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Volatile Organics by EPA 8021B

Analyst: IY

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

Blank (2222089-BLK1)

Prepared: 05/28/22 Analyzed: 05/31/22

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							

Surrogate: 4-Bromochlorobenzene-PID 8.17 8.00 102 70-130

LCS (2222089-BS1)

Prepared: 05/28/22 Analyzed: 05/31/22

Benzene	5.08	0.0250	5.00		101	70-130			
Ethylbenzene	4.74	0.0250	5.00		94.7	70-130			
Toluene	4.98	0.0250	5.00		99.5	70-130			
o-Xylene	4.93	0.0250	5.00		98.6	70-130			
p,m-Xylene	9.77	0.0500	10.0		97.7	70-130			
Total Xylenes	14.7	0.0250	15.0		98.0	70-130			

Surrogate: 4-Bromochlorobenzene-PID 8.07 8.00 101 70-130

LCS Dup (2222089-BSD1)

Prepared: 05/28/22 Analyzed: 05/31/22

Benzene	5.21	0.0250	5.00		104	70-130	2.62	20	
Ethylbenzene	4.85	0.0250	5.00		97.0	70-130	2.40	20	
Toluene	5.10	0.0250	5.00		102	70-130	2.43	20	
o-Xylene	5.04	0.0250	5.00		101	70-130	2.20	20	
p,m-Xylene	9.99	0.0500	10.0		99.9	70-130	2.25	20	
Total Xylenes	15.0	0.0250	15.0		100	70-130	2.24	20	

Surrogate: 4-Bromochlorobenzene-PID 7.76 8.00 97.0 70-130



QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

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

Blank (2222089-BLK1)

Prepared: 05/28/22 Analyzed: 05/31/22

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.38		8.00		92.2	70-130			

LCS (2222089-BS2)

Prepared: 05/28/22 Analyzed: 05/31/22

Gasoline Range Organics (C6-C10)	45.3	20.0	50.0		90.6	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.46		8.00		93.2	70-130			

LCS Dup (2222089-BSD2)

Prepared: 05/28/22 Analyzed: 05/31/22

Gasoline Range Organics (C6-C10)	48.4	20.0	50.0		96.8	70-130	6.63	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.22		8.00		90.3	70-130			



QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: JL

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

Blank (2223006-BLK1)

Prepared: 05/31/22 Analyzed: 05/31/22

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	44.0		50.0		88.0	50-200			

LCS (2223006-BS1)

Prepared: 05/31/22 Analyzed: 05/31/22

Diesel Range Organics (C10-C28)	504	25.0	500		101	38-132			
Surrogate: n-Nonane	47.5		50.0		95.0	50-200			

Matrix Spike (2223006-MS1)

Source: E205152-03

Prepared: 05/31/22 Analyzed: 05/31/22

Diesel Range Organics (C10-C28)	513	25.0	500	27.2	97.3	38-132			
Surrogate: n-Nonane	48.0		50.0		96.1	50-200			

Matrix Spike Dup (2223006-MSD1)

Source: E205152-03

Prepared: 05/31/22 Analyzed: 05/31/22

Diesel Range Organics (C10-C28)	514	25.0	500	27.2	97.3	38-132	0.0822	20	
Surrogate: n-Nonane	45.7		50.0		91.4	50-200			



QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 6/1/2022 3:12:09PM
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Anions by EPA 300.0/9056A

Analyst: KL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
Blank (2223008-BLK1)						Prepared: 05/31/22 Analyzed: 05/31/22			
Chloride	ND	20.0							
LCS (2223008-BS1)						Prepared: 05/31/22 Analyzed: 05/31/22			
Chloride	240	20.0	250		96.0	90-110			
Matrix Spike (2223008-MS1)				Source: E205153-01		Prepared: 05/31/22 Analyzed: 05/31/22			
Chloride	893	20.0	250	646	98.9	80-120			
Matrix Spike Dup (2223008-MSD1)				Source: E205153-01		Prepared: 05/31/22 Analyzed: 05/31/22			
Chloride	882	20.0	250	646	94.6	80-120	1.20	20	

QC Summary Report Comment:

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



Definitions and Notes

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: Squaw Valley BGT Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 06/01/22 15:12
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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

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

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



Project Information

Chain of Custody

Client: Dugan
 Project: Sq Valley 1861
 Project Manager: Kenn Straka
 Address: _____
 City, State, Zip: _____
 Phone: _____
 Email: _____

Report due by: _____

Bill To: _____
 Attention: _____
 Address: _____
 City, State, Zip: _____
 Phone: _____
 Email: _____

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO/DRO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0	Analysis and Method	Lab Use Only	Lab W/O#	Job Number	IP	2D	3D	TAT	Standard	EPA Program		
10:00	5-27-22	S	1	SQV B	1	X	X	X			X			E205153	06094-0177	X							
				SQV N	2																		
				SQV S	3																		
				SQV E	4																		
				SQV W	5																		
				SQV Slough	6																		

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.

Relinquished by: (Signature) [Signature] Date 5-22 Time 2:20
 Relinquished by: (Signature) _____ Date _____ Time _____

Received by: (Signature) [Signature] Date 5-27-22 Time 14:20
 Received by: (Signature) _____ Date _____ Time _____

Received on Ice: Y N
 T1 _____ T2 _____ T3 _____
 AVG Temp °C 4

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA
 Note: Samples are discarded 30 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 liability of the laboratory is limited to the amount paid for on the report.



Envirotech Analytical Laboratory

Printed: 5/27/2022 2:27:02PM

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: 05/27/22 14:20 Work Order ID: E205153
Phone: 505-486-6207 Date Logged In: 05/27/22 14:22 Logged In By: Caitlin Christian
Email: kevin.smaka@duganproduction.com Due Date: 06/06/22 17:00 (5 day TAT)

Chain of Custody (COC)

- 1. Does the sample ID match the COC? Yes
2. Does the number of samples per sampling site location match the COC? Yes
3. Were samples dropped off by client or carrier? Yes
4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
5. Were all samples received within holding time? Yes
Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this discussion.

Carrier: Kevin Smaka

Comments/Resolution

Large empty rectangular box for comments and 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? If yes, the recorded temp is 4°C, i.e., 6±2°C Yes
Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling
13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

Large empty rectangular box for client instructions.

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

Date



envirotech Inc.

Kevin Smaka

From: Kevin Smaka
Sent: Wednesday, May 25, 2022 11:37 AM
To: 'Velez, Nelson, EMNRD'; 'Adeloye, Abiodun A'; 'Joyner, Ryan N'
Cc: Carlos Ramos; Dalvin Harrison
Subject: Notice of Sampling

Dugan will be sampling soils at Dugan's Squaw Valley #1 this Friday, 5/27/22 @ 10:00 AM.
Please see the following for the wells information;

Squaw Valley #1
30-045-26629
K-04-23N-10W
2310 FSL 2210 FWL

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

Kevin Smaka

From: Kevin Smaka
Sent: Monday, May 9, 2022 10:18 AM
To: Emmanuel Adeloje; Velez, Nelson, EMNRD
Cc: Carlos Ramos; Marty Foutz; Mario Ulibarri
Subject: BGT Soil Sampling

Dugan will be gathering soil samples this Thursday 5/12/2022 @ 10:00 AM at the Squaw Valley 1. The below grade tank at the site is showing signs of failure. To our knowledge nothing has been spilled.

We will sample under the BGT to verify the soil is in good condition. If this is the case a new pit will be installed and a C-144 filed with OCD.

Squaw Valley 1
API# 30-045-26629
K-04-23N-10W
2310 FSL 2210 FWL

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

GOLD MEDAL 4
T24N - R10W

033

MONTREAL 1

MONTREAL 2

MARATHON 2

004

SQUAW VALLEY 1

T23N - R10W

SQUAW VALLEY 2



Legend

- DPC_Oil_Wells
- 300 Foot Buffer
- 1000 Foot Buffer

ST. LOUIS 12

009

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

GOLD MEDAL 4

T24N - R10W

033

MONTREAL 1

6627 ft

MONTREAL 2

MARATHON 2

004

SQUAW VALLEY 1

T23N--R10W

SQUAW VALLEY 2

ST. LOUIS 12

009

Legend

● DPC_Oil_Wells

□ 300 Foot Buffer

□ 1000 Foot Buffer

Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community

National Flood Hazard Layer FIRMette



Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT.

<p>SPECIAL FLOOD HAZARD AREAS</p> <ul style="list-style-type: none"> Without Base Flood Elevation (BFE) Zone A, V, A99 With BFE or Depth Zone AE, AO, AH, VE, A1 Regulatory Floodway 	<p>OTHER AREAS OF FLOOD HAZARD</p> <ul style="list-style-type: none"> 0.2% Annual Chance Flood Hazard, Area of 1% annual chance flood with average depth less than one foot or with draining areas of less than one square mile Future Conditions 1% Annual Chance Flood Hazard Zone X Area with Reduced Flood Risk due to Levees. See Notes, Zone X Area with Flood Risk due to Levees Zone X 	<p>OTHER AREAS</p> <ul style="list-style-type: none"> NO SCREEN Area of Minimal Flood Hazard Zone X Effective LOMIRs Area of Undetermined Flood Hazard Zone X 	<p>GENERAL STRUCTURES</p> <ul style="list-style-type: none"> Channel, Culvert, or Storm Sewer Levee, Dike, or Floodwall 	<p>OTHER FEATURES</p> <ul style="list-style-type: none"> Cross Sections with 1% Annual Chance Water Surface Elevation Coastal Transect Base Flood Elevation Line (BFE) Limit of Study Jurisdiction Boundary Coastal Transect Baseline Profile Baseline Hydrographic Feature 	<p>MAP PANELS</p> <ul style="list-style-type: none"> Digital Data Available No Digital Data Available Unmapped
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The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards.

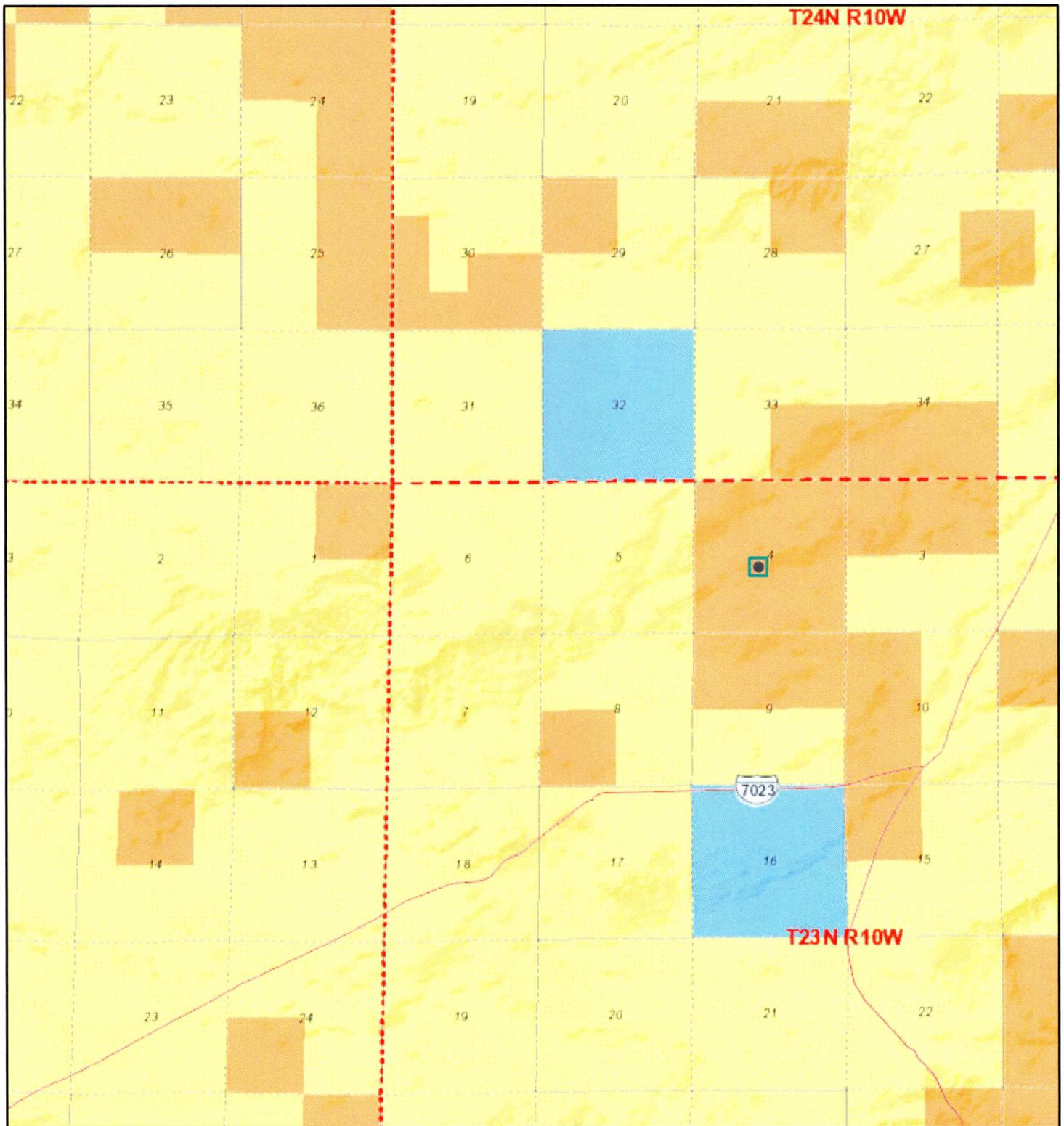
The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on 6/1/2022 at 1:15 PM and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

107°54'29"W 36°15'32"N

107°53'52"W 36°15'33"N

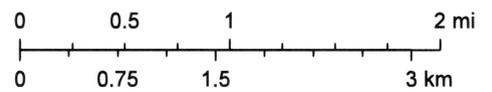
Active Mines in New Mexico



6/1/2022, 11:24:10 AM

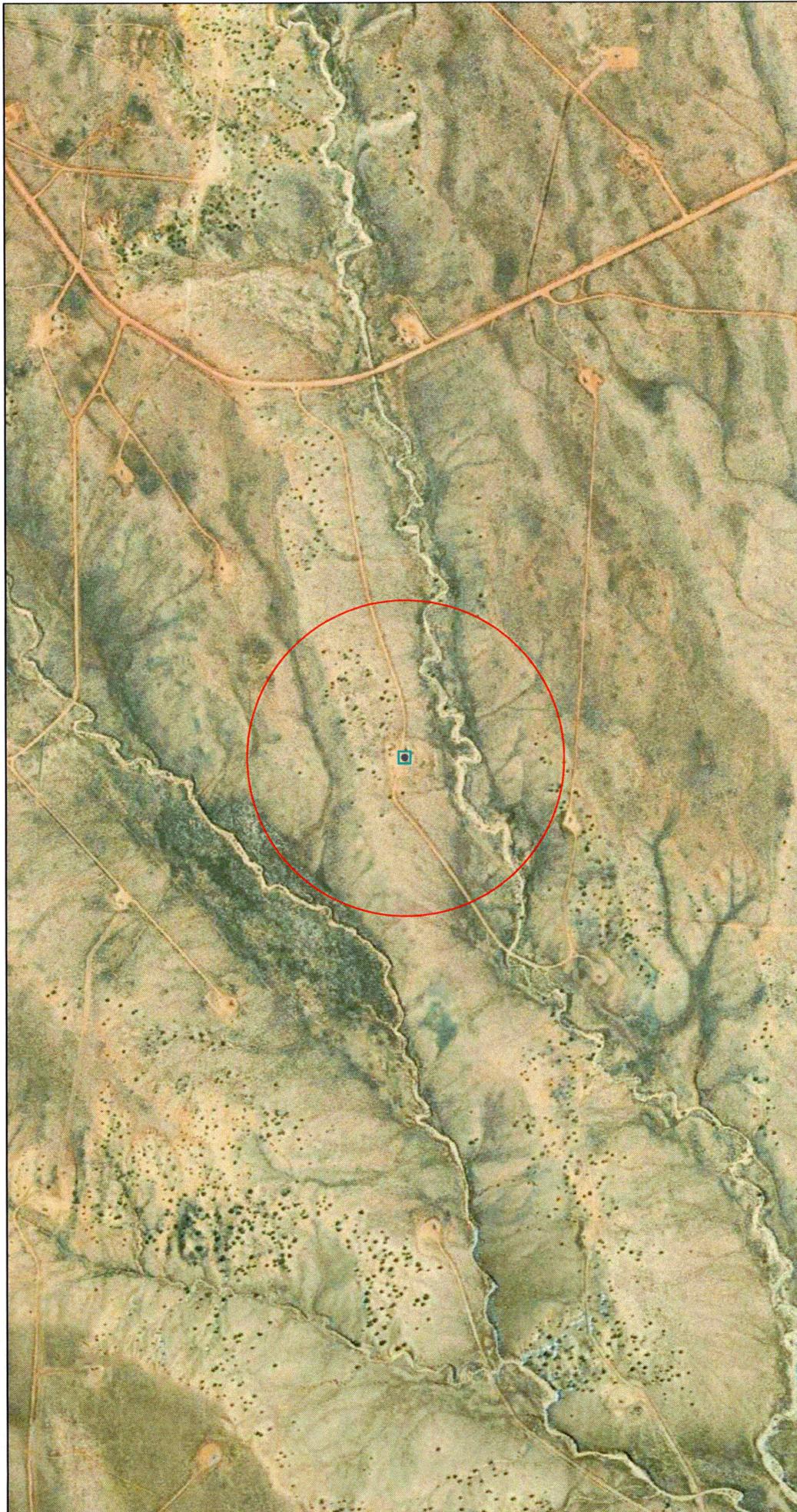
1:72,224

- | | | |
|---------------------------|-----------------------|---------------------|
| Township / Range | Department of Defense | State Land |
| Sections | Department of Energy | State Parks |
| Land Ownership | | |
| Bureau of Land Management | National Park Service | Tribal |
| Bureau of Reclamation | Private Land | State Game and Fish |
| Department of Agriculture | | |



U.S. Bureau of Land Management - New Mexico State Office, Sources: Esri, USGS, NOAA, Sources: Esri, Garmin, USGS, NPS

OSE POD Locations Map



6/1/2022, 11:23:52 AM

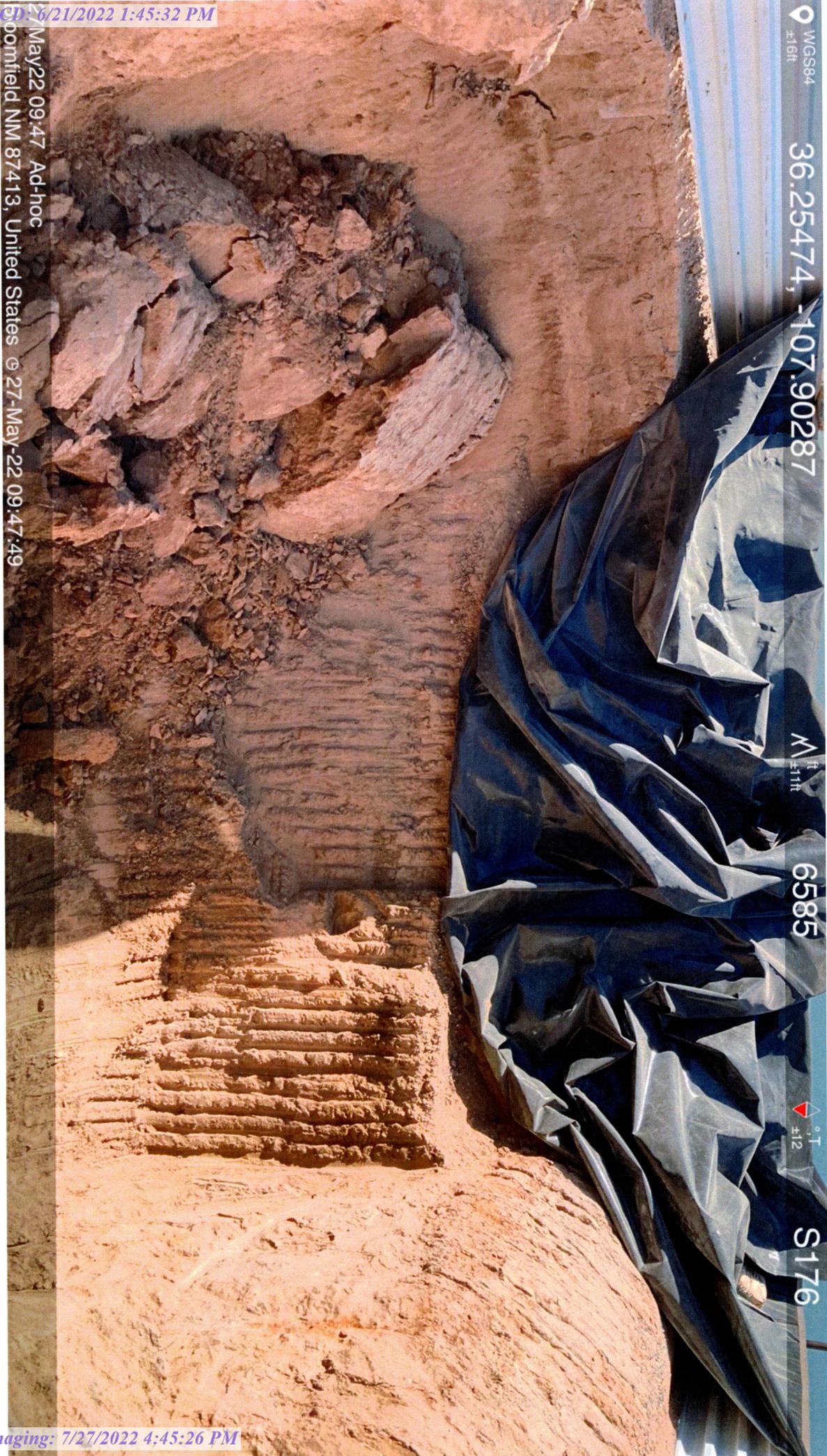
- OSE District Boundary
- Site Boundaries

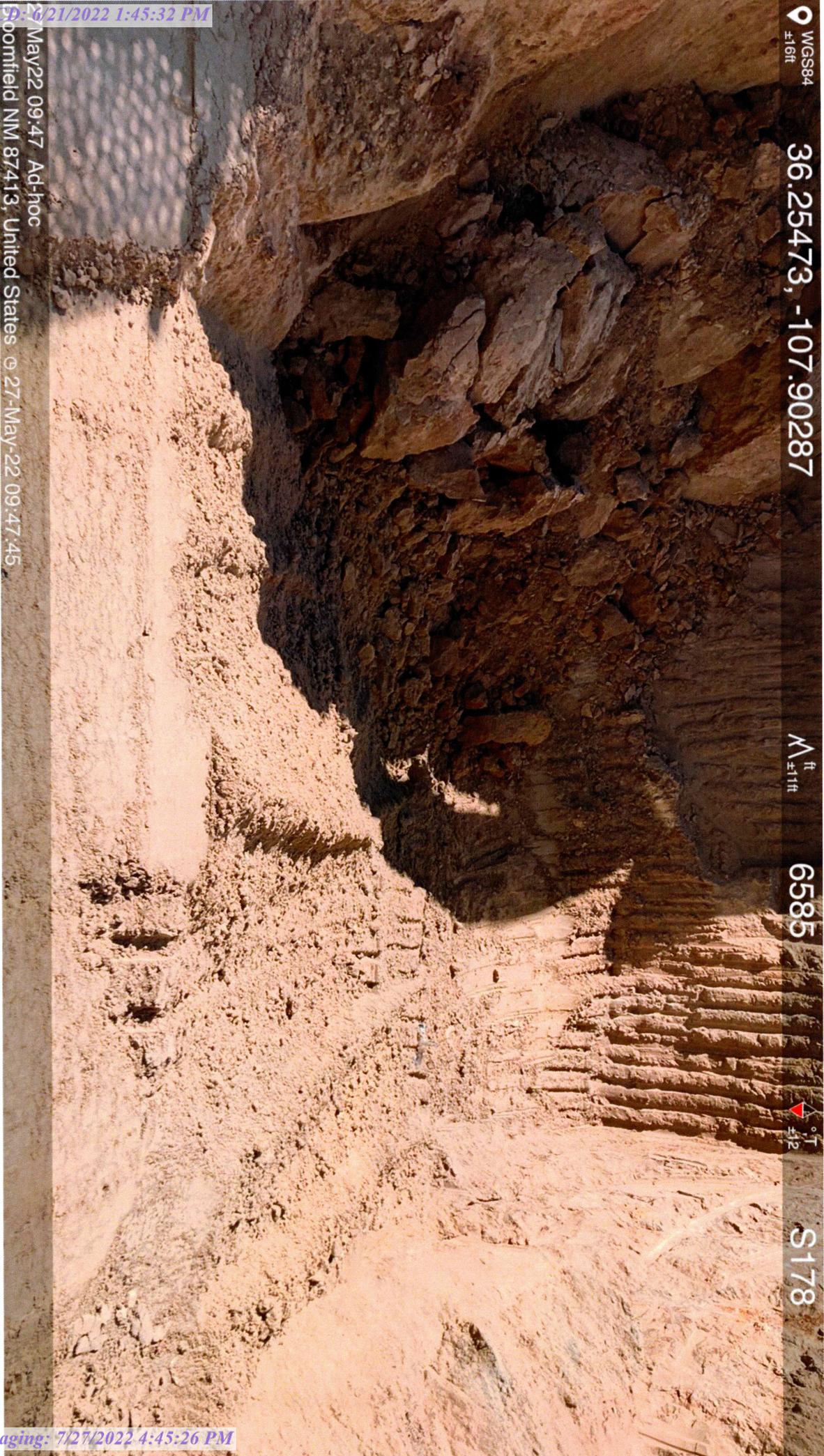
1:9,028



Esri, HERE, Garmin, (c) OpenStreetMap contributors, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community, U.S. Department of Energy Office of Legacy Management

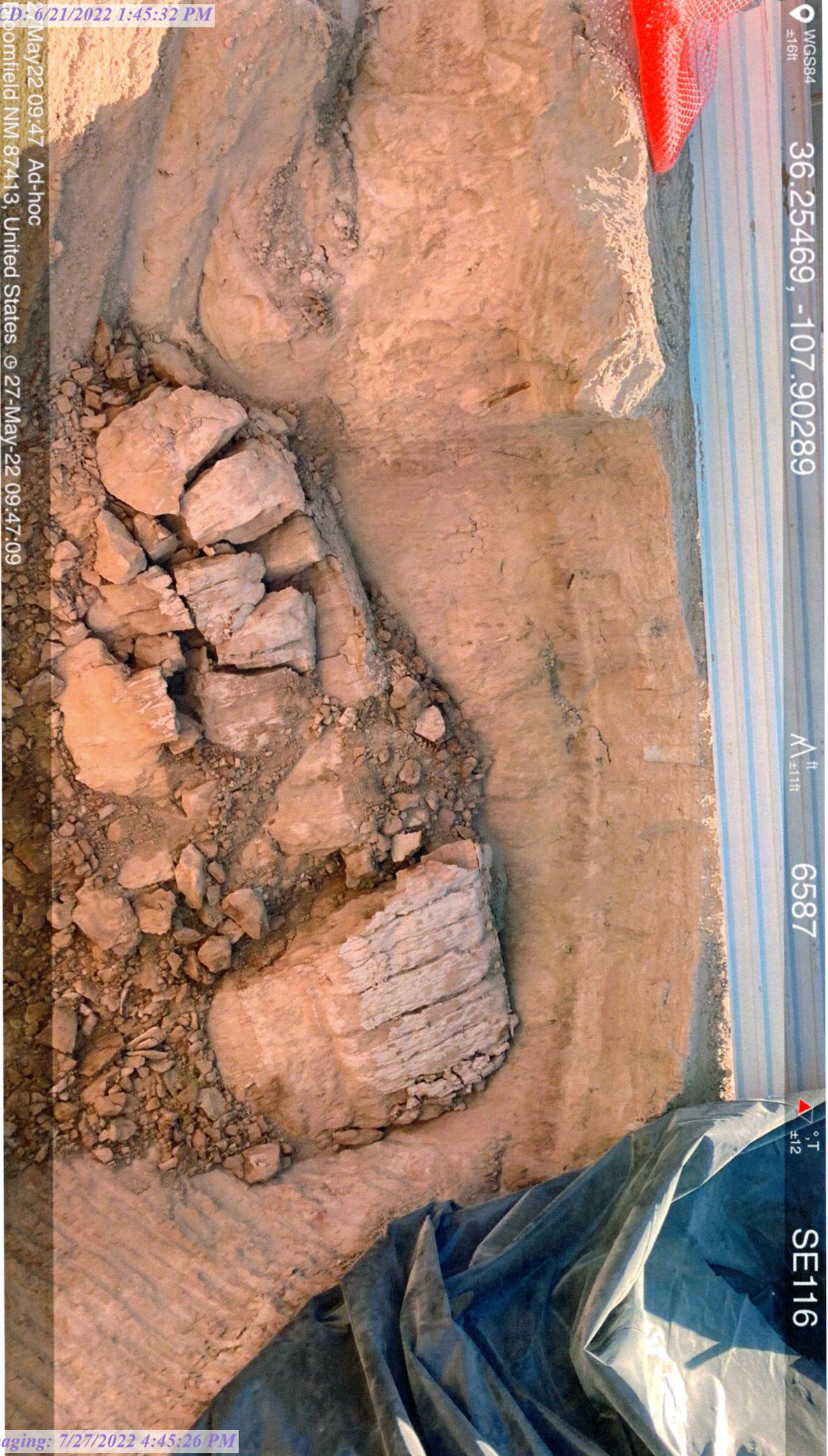
Unofficial Online Map
 These maps are distributed "as is" without warranty of any kind.





27-May-22 09:47 Ad-hoc
Boonfield NM 87413, United States © 27-May-22 09:47:45

Received by OGD: 6/21/2022 1:45:32 PM



WGS84
±1ft

36.25469, -107.90289

N
±11ft

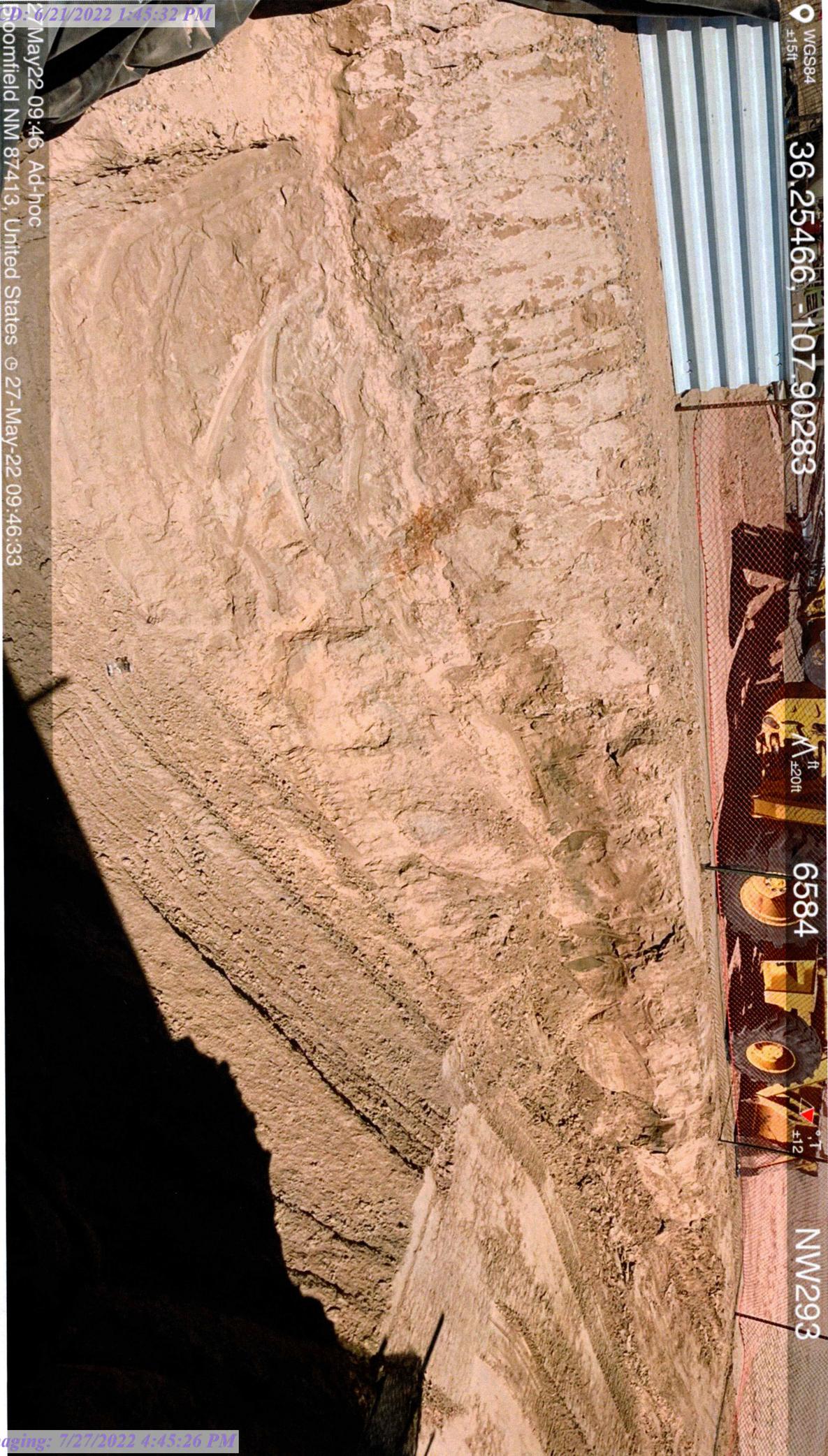
6587

T
±12

SE116

May22 09:47 Ad-hoc
Pomonafield NM 87413, United States © 27-May-22 09:47:09

Released to Imaging: 7/27/2022 4:45:26 PM



WGS84
±15ft

36.25466, -107.90283

11 ft
±20ft

6584

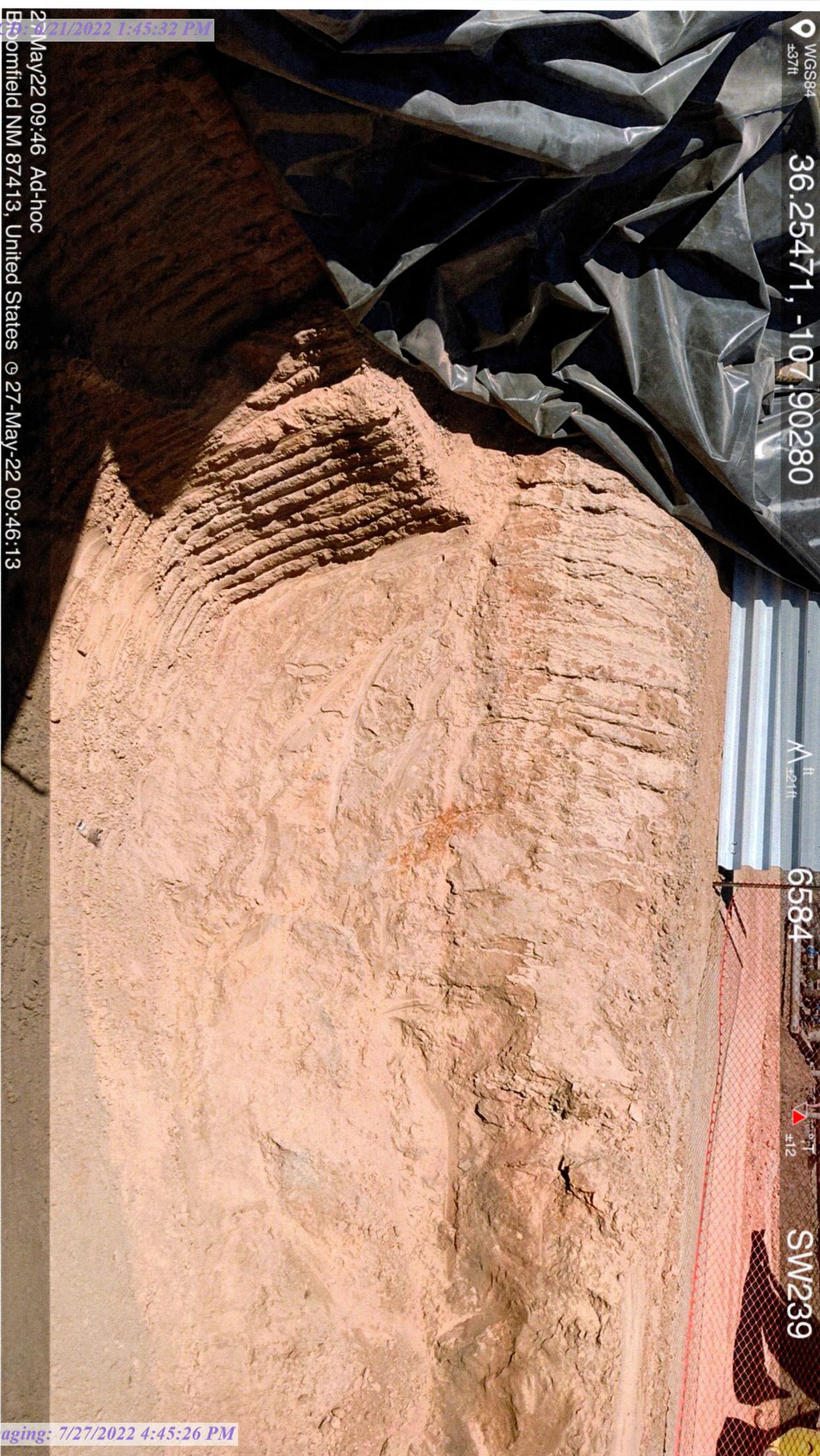
±12

NW293

27-May-22 09:46 Ad-hoc
Boonfield NM 87413, United States © 27-May-22 09:46:33

Received by OC 7/27/2022 1:45:32 PM

27-May-22 09:46 Ad-hoc
Boomfield NIM 87413, United States © 27-May-22 09:46:13



WGS84 36.25471, -107.90280

6584

SW239

Released to Imaging: 7/27/2022 4:45:26 PM

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 119088

CONDITIONS

Operator: DUGAN PRODUCTION CORP PO Box 420 Farmington, NM 87499	OGRID: 6515
	Action Number: 119088
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
jburdine	Conditions of Approval: Release confirmed, remediation required per 19.15.29 NMAC see incident # nAPP2213748461, BGT Closure report approved.	7/27/2022