

U.S. Department of the Interior
BUREAU OF LAND MANAGEMENT

11/15/2022

Well Name: NO DOUBT	Well Location: T27N / R13W / SEC 6 / NWNE / 36.609346 / -108.257862	County or Parish/State: SAN JUAN / NM
Well Number: 90	Type of Well: CONVENTIONAL GAS WELL	Allottee or Tribe Name:
Lease Number: NMNM89131	Unit or CA Name:	Unit or CA Number:
US Well Number: 3004530781	Well Status: Abandoned	Operator: NAVAJO NATION OIL & GAS COMPANY

Notice of Intent

Sundry ID: 2702453**Type of Submission:** Notice of Intent**Type of Action:** Reclamation**Date Sundry Submitted:** 11/10/2022**Time Sundry Submitted:** 03:00**Date proposed operation will begin:** 11/10/2022**Procedure Description:** Please find attached the Reclamation Plan for the subject well.

NOI Attachments

Procedure Description

No_Doubt_90_Reclamation_Plan_20221110150023.pdf

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Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: ARLEEN SMITH**Signed on:** NOV 10, 2022 03:00 PM**Name:** NAVAJO NATION OIL & GAS COMPANY**Title:** Regulatory Specialist**Street Address:** 332 RD 3100**City:** AZTEC**State:** NM**Phone:** (505) 327-4892**Email address:** ARLEEN@WALSHENG.NET**Field****Representative Name:****Street Address:****City:****State:****Zip:****Phone:****Email address:****BLM Point of Contact****BLM POC Name:** DAVE J MANKIEWICZ**BLM POC Title:** AFM-Minerals**BLM POC Phone:** 5055647761**BLM POC Email Address:** DMANKIEW@BLM.GOV**Disposition:** Approved**Disposition Date:** 11/15/2022**Signature:** Dave Mankiewicz

RECLAMATION PLAN

for

No Doubt #90
790' FNL & 1850' FEL
Sec. 06, T27N, R13W
San Juan County, New Mexico

Prepared for

Navajo Nation Oil & Gas Company (NNOG)

November 2022



Created by:

Arleen Smith



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Aztec, New Mexico 87410
Phone: (505) 327-4892

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Reclamation Plan (Procedure 8)

Applicant	Navajo Nation Oil & Gas Company
Project Type	Reclamation of a natural oil well site.
Well, Oil and Gas Lease, or Right-of-Way (ROW) Name	No Doubt #90
Legal Location	790' FNL 1850' FEL, Section 6 Township 27 North, Range 13 West in San Juan County, NM
Lease Number(s)	NMNM89131

Introduction

This reclamation plan has been prepared to meet the requirements and guidelines of the Bureau of Land Management (BLM) Farmington Field Office (FFO) Bare Soil Reclamation Procedures (BLM 2013a) and Onshore Oil and Gas Order No. 1.

Walsh Engineering & Production contact person for this Reclamation Plan is:

Arleen Smith
Regulatory Manager
332 Road 3100
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Vegetation Reclamation Procedure

Completion of a Vegetation Reclamation Plan in accordance with Procedure B of the Bureau Land Management Bare Soil Reclamation Procedures is required for surface disturbing actions, grants, or permits authorized by the Bureau Land Management resulting in bare mineral soil across an area greater than or equal to 1 acre, not including a BLM approved working area. Working areas include areas routinely used to operate and maintain facilities or improvements. The FFO makes no distinction between interim and final revegetation processes; revegetation processes and standards are the same for all revegetation activities.

Revision of the Reclamation Plan

Navajo Nation Oil & Gas Co. may submit a request to the BLM/FFO to revise the Reclamation Plan at any time during the life of the project in accordance to page 44 of the Gold Book (USDI-USDA 2007). Navajo Nation Oil & Gas Co. will include justification for the revision request.

Project Description

Navajo Nation Oil & Gas Co. has plug and abandon the No Doubt #90 wellbore and reclaim the well pad. This location is located on lands owned and managed by the Bureau of Land Management. The proposed project is located on lands owned and

managed by the Bureau of Land Management, ~ 12.3 miles South of Farmington, NM. The No Doubt #90 is accessed by travelling from West Main St to Murray Dr for 0.9 miles. Turn right onto NM-371-S for 9.1 miles. Turn right onto Rd 4045 for 1.4 and the well will be located to the right.

Estimated Total Area of Disturbance

The No Doubt #90 well pad was originally 71 ft by 73 ft with a maximum 1 ft cut and a maximum of a 1 ft fill. The well location is located on Navajo Agricultural Product Industry and is managed by the Bureau of Land Management. Total surface disturbance as a result of well pad and pipeline construction that will be reclaimed is approximately 0.47 acres on Bureau of Land Management Lands.

The disturbance site visit occurred on November 9, 2022. The following persons were present at the site visit (Table 1).

Table 1 Site Visit Attendees

Name	Affiliation	Contact Info
Rachael Dahozy	NNOG	505-399-8535
Bertha Spencer	BIA	505-863-8336
Lenora Tsosie	BIA	505-863-8336
Roger Herrera	BLM	505-564-7703
Belinda Chee	Navajo Nation	928-206-7119
Steven Prince	Navajo Nation	928-871-7285
Alyssa Pablo	NAPI	505-566-2600
Arleen Smith	Walsh	505-215-6662
Michael Dean	Walsh	505-860-0481

Vegetation Community

Based on observations made during the disturbance site visit, it has been determined that No Doubt #90 doesn't fall into any vegetation community.

Weed Survey

During the site visit, the proposed action area was surveyed for noxious weeds listed on the New Mexico Department of Agriculture's Class A and Class B list. During the survey, no noxious weeds were found.

Soil Evaluation

Unless any stained soil is discovered during the surface reclamation, no soil testing will be necessary.

Reclamation Techniques for Successful Revegetation Site Clearing

After the well is plugged the wellhead will be cut off 3" below ground level. A P&A Marker cut 6' below grade surface with a steel plate will be installed with location coordinates. The access road will be closed at the entrance of location. Remove

gravel and spread around the pump station located south of the well location. All rig anchors have been removed. No seeding is required in crop areas.

Topsoil Replacement

No topsoil was stockpiled during the original construction of the well pad. The remaining location will be re-contoured to match the natural topography. Walsh Engineering & Production (and its contractor) will take care not to mix topsoil with the underlying subsoil horizons. Topsoil and sub-surface soils will be replaced in the proper order, prior to final seedbed preparation.

Water Management/Erosion Control Features

Based on the site visit with the Bureau Land Management representative(s) and the Walsh Engineering & Production representative determined there was no need to develop any other site-specific erosion control or water management features than the planned silt trap. Based on the topography natural run off can occur with no impact as far as erosion is concerned.

Walsh Engineering & Production (or its contractors) will use erosion control blankets, straw bales, or straw wattles as appropriate to limit erosion and sediment transport from any stockpiled soils.

Soil Amendments

Based on information gathered at the onsite inspection, the Walsh Engineering & Production and Bureau Land Management representatives have decided collaboratively that no soil amendments will be used during reclamation of the affected environment.

Mulching

Based on the onsite, mulching should not be necessary but if needed hand seeding with hydro-mulch, excelsior netting, and/or mulch with netting could be utilized on cut and fill slopes. Mulch should be grass or straw spread at 2,000 to 3,000 pounds per acre, or approximately 1 to 2 inches deep. Mulching will consist of crimping certified weed-free straw or certified weed-free native grass hay into the soil. Straw or native grass hay mulch can be applied by hand broadcasting or blowing to a relatively uniform depth of 2 to 3 inches, equivalent to a rate of approximately 2 tons per acre (one 74-pound bale per 800 square feet). When applied properly, approximately 20 to 40 percent of the original ground surface will be visible.

Straw or native grass hay mulch will then be anchored using one of the following methods:

Hand Punching - a spade or shovel is used to punch mulch into the topsoil at 1-foot intervals until all areas have mulch standing perpendicular to the slope and the mulch is embedded at least 4 inches into the soil.

Roller Punching - a roller is used to spread mulch over an area; the roller is equipped with straight studs not less than 6 inches long, from 4 to 6 inches wide, and approximately 1 inch thick.

Crimper Punching - similar to roller punching, a crimper is used over the soil. The crimper has serrated disk blades about 4 to 8 inches apart that force the mulch into the soil. Crimping should be done in two directions with the final pass across the slope.

Mulch applications in extremely clay soils should be evaluated carefully to avoid developing an adobe mixture. In these cases, a soil amendment may be beneficial.

Noxious and Invasive Weed Control

Should noxious or invasive weeds be documented after earthwork and seeding activities, the Bureau Land Management weed coordinator will provide Walsh Engineering & Production with specific requirements and instructions for weed treatments, including the period of treatment, approved herbicides that may be used, required documentation to be submitted to the Bureau Land Management after treatment, and any other site-specific instructions that may be applicable.

Monitoring Requirements

Monitoring will be completed according to the Bureau Land Management Bare Soil Reclamation Procedure B (BLM 2013b) and Monitoring activities will be initiated after the project is completed, during the post-disturbance earthwork and seeding inspection process.

Post-Reclamation Monitoring Initiation

After the well has been plugged and the reclamation work and seeding have been completed, a post-disturbance inspection at the project site will occur. The Bureau Land Management representative (in collaboration with Walsh Engineering & Production) will determine site-specific monitoring locations for photo point monitoring and vegetation line point intercept transects, (if necessary). Bureau Land Management will collect GPS data on the monitoring locations, take the initial monitoring photographs, and complete the initial monitoring report within 60 days of the post-disturbance earthwork and seeding inspection. The initial report will be available from the Bureau Land Management.

Post-Reclamation Monitoring Photographs

The minimum photo points necessary to document post-disturbance monitoring (including annual monitoring and long-term monitoring) are described in Table 5. Photographs will be taken with a digital camera without zoom or wide-angle adjustments. GPS coordinates for each photo point will be provided by the Bureau Land Management in the initial monitoring report and subsequently included with each photograph in the annual monitoring report.

Table 5. List of Minimum Required Post-Disturbance Monitoring Photographs

Photo Point	Photographs	Location Description

Annual Monitoring

If needed, Walsh Engineering & Production will begin annual monitoring of the photo points and the vegetation line point intercept transects 2 calendar years after the completion and approval of the final earthwork and seeding. Monitoring may occur any time of the year. A completed monitoring report of the permanent photo points will be submitted by Walsh Engineering & Production to Bureau Land Management by December 31 of the year the site is monitored. Within 60 days after receipt, the Bureau Land Management will acknowledge that the report has been received and evaluated. Vegetation line point intercept transects will be monitored annually until attainment of vegetation reclamation cover standards have been met. Walsh Engineering & Production will keep a record of the monitoring for future submittal to the Bureau Land Management at reclamation attainment.

Attainment of Vegetation Reclamation Standards

When vegetation on a reclaimed site appears to meet the required percent revegetation standard, Walsh Engineering & Production will submit to the Bureau Land Management a written request for concurrence that revegetation standards have been attained. The request will include all annual transect data sheets and a current set of monitoring photographs. The Bureau Land Management will review the request and approve or deny the request within 60 days of receipt. If the request is denied, the Bureau Land Management may initiate a site inspection within 60 days of the denial to analyze the site and determine if remedy actions may be appropriate.

Long-Term Monitoring

If needed, after the required percent revegetation standard has been attained, Walsh Engineering & Production will begin long-term monitoring. Every fifth year after attainment, Walsh Engineering & Production will monitor the site at all established photo points to ensure the site remains productive and stable. A completed monitoring report of the permanent photo points will be submitted to the Bureau Land Management by December 31 of the year the site is monitored. The Bureau Land Management will acknowledge that the report has been received and evaluated within 60 days after receipt.

Final Abandonment

If 1 or more acre of bare soil results from earthwork required in preparation for final abandonment, Walsh Engineering & Production will follow Vegetation Reclamation Plan in accordance with Procedure B of the BLM/FFO Bare Soil Reclamation Procedures (2013a) and any additional or separate requirements from the Bureau Land Management.

Revegetation percent cover standards will be attained, documented, and submitted to the Bureau Land Management by Walsh Engineering & Production or an exception granted before the Bureau Land Management will approve a final abandonment notice (FAN) or relinquishment.

Upon final reclamation, the location will be returned to pre-disturbance conditions as practicable.

Cessation of Monitoring

Monitoring requirements will remain in effect as long as the permit, grant, or authorization remains in effect and until all infrastructure or associated facilities are abandoned by established BLM procedure and a FAN or relinquishment is issued by the Bureau Land Management. Walsh Engineering & Production will document that percent cover standards have been attained when submitting a request for a FAN or relinquishment.

References

43 CFR Part 3160, "Onshore Oil and Gas Order No. 1; Onshore Oil and Gas Operations; Federal and Indian Oil and Gas Leases; approval of Operations," 72 Federal Register 44 (March 2007), pp. 10328- 10338.

BLM. 2013a. Farmington Field Office Bare Soil Reclamation Procedures. Available at: [http://www.blm.gov/nm/st/en/fo/Farmington Field Office/ffo planning/surface use plan of.html](http://www.blm.gov/nm/st/en/fo/Farmington_Field_Office/ffo_planning/surface_use_plan_of.html). Accessed November 2013.

BLM. 2013b. Updated Reclamation Goals. Available at: [http://www.blm.gov/nm/st/en/fo/Farmington Field Office/ffo planning/surface use plan of/updated reclamation.html](http://www.blm.gov/nm/st/en/fo/Farmington_Field_Office/ffo_planning/surface_use_plan_of/updated_reclamation.html). Accessed November 2013.

U.S. Department of the Interior, U.S. Department of Agriculture (USDI, USDA). 2007. Surface Operating Standards and Guidelines for Oil and Gas Exploration and Development. BLM/WO/ST-06/021+307/REV07. Bureau of Land Management, Denver, Colorado

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Energy, Minerals and Natural Resources
Oil Conservation Division
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CONDITIONS

Action 158796

CONDITIONS

Operator: NNOGC EXPLORATION AND PRODUCTION, LLC P.O. Box 4439 Window Rock, AZ 86515	OGRID: 292875
	Action Number: 158796
	Action Type: [C-103] NOI General Sundry (C-103X)

CONDITIONS

Created By	Condition	Condition Date
jagarcia	Accepted for record, John Garcia, Petroleum Engineer	2/6/2023