

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

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

Form C-144  
Revised April 3, 2017  
**For temporary pits, below-grade tanks, and multi-well fluid management pits**, submit to the appropriate NMOCD District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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

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

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

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

1.

Operator: Dugan Production Corp. OGRID #: 006515  
 Address: PO Box 420, Farmington, NM 87499-0420  
 Facility or well name: Anabel C # 001  
 API Number: 30-045-25452 OCD Permit Number: BGT 1  
 U/L or Qtr/Qtr M Section 34 Township 25N Range 08W County: San Juan  
 Center of Proposed Design: Latitude 36.3519974 Longitude -107.6759872 NAD83 660' FSL & 790' FWL  
 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: 60 bbl Type of fluid: Water  
 Tank Construction material: Steel  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other \_\_\_\_\_  
 Liner type: Unlined  HDPE  PVC  Other \_\_\_\_\_

4.

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

5.

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

6.

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

7.

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

8.

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

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

 Yes  No NA Yes  No NA**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.**

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

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

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

 Yes  No**Within the area overlying a subsurface mine. (Does not apply to below grade tanks)**

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

 Yes  No**Within an unstable area. (Does not apply to below grade tanks)**

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

 Yes  No**Within a 100-year floodplain. (Does not apply to below grade tanks)**

- FEMA map

 Yes  No**Below Grade Tanks**

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

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

 Yes  No

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

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

 Yes  No**Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)**

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

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

 Yes  No

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

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

 Yes  NoWithin 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.  
NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site Yes  No

Within 100 feet of a wetland.	- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Temporary Pit Non-low chloride drilling fluid</b>		
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	<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 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	<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

### **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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input 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 type="checkbox"/> No

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

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

- Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

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

- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- A List of wells with approved application for permit to drill associated with the pit.
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Multi-well Fluid Management Pit  
 Alternative

Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method

14.

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

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

15.

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

Ground water is less than 25 feet below the bottom of the buried waste.

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

Yes  No  
 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

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 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

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 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

Yes  No

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

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

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 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.

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

OCDA Representative Signature: Joel Stone

Approval Date: 01/16/2026

Title: Senior Environmental Scientist

OCDA Permit Number: ycon2432549855

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: 12/05/2025

20.

**Closure Method:**

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

21.

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

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

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_

NAD:  1927  1983

22.

**Operator Closure Certification:**

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

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

Signature: Eileen Yates Date: January 15, 2026

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

# Dugan Production Corp.

## Anabel C # 001

### BGT Closure Report

API# 30-045-25452

M-34-25N-08W

660 FSL 790 FWL

Surface Owner: Federal

As Directed by Subsection F through H of the NMAC 19.15.17.13 the following removal and remedial processes were conducted:

Dugan Production Corp. has closed the BGT located at the Anabel C # 001 well location. Dugan commenced closure activities on 12/5/2024 by removing the steel pit and sampling soils below the BGT, including wet or stained soils. Soil samples were collected at a depth of 10' below grade surface. Soil samples were taken to a local lab and analyzed for chlorides, benzene, toluene, ethyl benzene, xylene and total petroleum hydrocarbons.

Prior to commencing these activities notice was provided to the landowner as well as the OCD of our intent to close the pit. Proof of the notice has been included in **Appendix A**.

A copy of the lab results has been included with this report. A copy of the report is included in **Appendix B**. A tabulation of the results is found here:

Squaw Valley #001	BTEX (mg/kg)	TPH (mg/kg)	Chlorides (mg/kg)
Bottom Sample	0	0	0
North Sample	0	0	0
South Sample	0	0	0
East Sample	0	0	0
West Sample	0	0	0
Slough Sample	0	0	0

Based on the information collected from the NMSOE iWaters and USGS databases and Site elevation, the depth to ground water is greater than 100 feet to the base of the BGT. This means that the standard of closure for chlorides is 20,000 mg/mg. As such, these results meet the standard for closure under NMAC 19.15.29 and 19.15.17.

When making the depth to groundwater determination, Dugan consulted the USGS database and NMSOE iWater found in the BGT closure plan on file with the NMOCD. The data found there indicates groundwater is greater than 200 feet from surface.

In addition, Dugan collected data from the USGS and found a well with a depth to water 291 feet below grade surface. The data is found in **Appendix C**.

Dugan has backfilled the hole with non-contaminated fill material. The topping material was of sufficient quality to allow for adequate regrowth.

The location was seeded with a mix compatible and appropriate for the local vegetative community in the surrounding area. Please see **Appendix D** for the seed mix.

Below is a list of disposal facilities.

Solid waste would have been hauled to either Envirotech or IEI land farm facilities:

Envirotech: Permit #NM01-0011 and IEI: Permit # NM01-0010B

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

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

Please see **Appendix E** for photos of reclamation.

## Appendix A: Notification

### BGT Closure Notification: 1

**From:** Kevin Smaka  
**Sent:** Monday, December 2, 2024 9:59 AM  
**To:** Barr, Leigh, EMNRD; Adeloye, Abiodun A; Jaquez, Laverna A  
**Cc:** Mario Ulibarri; Eileen Medrano; Tyra Feil  
**Subject:** Notice of Sampling

Dugan will be collecting soil samples from the following sites as part of BGT closure activities this coming Thursday, 12/5/2024, starting at 10:00 AM. We will start at the Anabel C #1 and work our way down to the other 2 sites.

#### 30-045-25035 BRIGHT ANGEL #001 [3603]

##### General Well Information

Operator:	[6515] DUGAN PRODUCTION CORP
Status:	Plugged, Site Released
Well Type:	Oil
Work Type:	New
Surface Location:	L-27-24N-08W 1850 FSL 790 FWL
Lat/Long:	36.2831573,-107.6754837 NAD83
GL Elevation:	6762
KB Elevation:	
DF Elevation:	

#### 30-045-25919 MUDDY MUDDA #001 [3777]

##### General Well Information

Operator:	[6515] DUGAN PRODUCTION CORP
Status:	Plugged, Site Released
Well Type:	Oil
Work Type:	New
Surface Location:	D-21-24N-09W 790 FNL 1040 FWL
Lat/Long:	36.3046532,-107.7999954 NAD83
GL Elevation:	6898
KB Elevation:	
DF Elevation:	

#### 30-045-25452 ANABEL C #001 [3574]

##### General Well Information

Operator:	[6515] DUGAN PRODUCTION CORP
Status:	Plugged, Site Released
Well Type:	Oil
Work Type:	New
Surface Location:	M-34-25N-08W 660 FSL 790 FWL
Lat/Long:	36.3519974,-107.6759872 NAD83
GL Elevation:	7310
KB Elevation:	
DF Elevation:	

Please contact me if you have any questions.

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

## Appendix B: Lab Results



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

Dugan Production Corp.

Project Name: BGT Closure

Work Order: E412032

Job Number: 06094-0177

Received: 12/5/2024

Revision: 0

Report Reviewed By:

**Draft**  
Walter Hinchman  
Laboratory Director  
12/6/24

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 NM009179 for data reported.  
Envirotech Inc. holds the Texas TNI certification T104704557 for data reported.

## Appendix B: Lab Results

Date Reported: 12/6/24

Kevin Smaka  
PO Box 420  
Farmington, NM 87499



Project Name: BGT Closure  
Workorder: E412032  
Date Received: 12/5/2024 1:20:00PM

Kevin Smaka,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/5/2024 1:20:00PM, under the Project Name: BGT Closure.

The analytical test results summarized in this report with the Project Name: BGT Closure 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](mailto:whinchman@envirotech-inc.com)

**Raina Schwanz**  
Laboratory Administrator  
Office: 505-632-1881  
[rainaschwanz@envirotech-inc.com](mailto:rainaschwanz@envirotech-inc.com)

Field Offices:

### Southern New Mexico Area

**Lynn Jarboe**  
Laboratory Technical Representative  
Office: 505-421-LABS(5227)  
Cell: 505-320-4759  
[ljarboe@envirotech-inc.com](mailto:ljarboe@envirotech-inc.com)

**Michelle Gonzales**  
Client Representative  
Office: 505-421-LABS(5227)  
Cell: 505-947-8222  
[mgonzales@envirotech-inc.com](mailto:mgonzales@envirotech-inc.com)

Envirotech Web Address: [www.envirotech-inc.com](http://www.envirotech-inc.com)

## Appendix B: Lab Results

### Sample Summary

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/06/24 13:59
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Bright Angel 1	E412032-01A	Soil	12/05/24	12/05/24	Glass Jar, 2 oz.
Muddy Mudda 1	E412032-02A	Soil	12/05/24	12/05/24	Glass Jar, 2 oz.
Anabel C 1	E412032-03A	Soil	12/05/24	12/05/24	Glass Jar, 2 oz.

### Sample Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/6/2024 1:59:36PM
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#### Anabel C 1

#### E412032-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organic Compounds by EPA 8260B</b>						
Benzene	ND	0.0250	1	12/05/24	12/05/24	
Ethylbenzene	ND	0.0250	1	12/05/24	12/05/24	
Toluene	ND	0.0250	1	12/05/24	12/05/24	
$\alpha$ -Xylene	ND	0.0250	1	12/05/24	12/05/24	
p,m-Xylene	ND	0.0500	1	12/05/24	12/05/24	
Total Xylenes	ND	0.0250	1	12/05/24	12/05/24	
Surrogate: Bromofluorobenzene	112 %	70-130		12/05/24	12/05/24	
Surrogate: 1,2-Dichloroethane-d4	95.2 %	70-130		12/05/24	12/05/24	
Surrogate: Toluene-d8	112 %	70-130		12/05/24	12/05/24	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/05/24	12/05/24	
Surrogate: Bromofluorobenzene	112 %	70-130		12/05/24	12/05/24	
Surrogate: 1,2-Dichloroethane-d4	95.2 %	70-130		12/05/24	12/05/24	
Surrogate: Toluene-d8	112 %	70-130		12/05/24	12/05/24	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
Diesel Range Organics (C10-C28)	ND	25.0	1	12/05/24	12/06/24	
Oil Range Organics (C28-C36)	ND	50.0	1	12/05/24	12/06/24	
Surrogate: n-Nonane	104 %	50-200		12/05/24	12/06/24	
<b>Anions by EPA 300.0/9056A</b>						
Chloride	ND	20.0	1	12/05/24	12/06/24	

## Appendix B: Lab Results

## QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/6/2024 1:59:36PM
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## Volatile Organic Compounds by EPA 8260B

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits	RPD %	RPD Limit %	Notes
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## Blank (2449081-BLK1)

Prepared: 12/05/24 Analyzed: 12/05/24

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: Bromofluorobenzene	0.587	0.500		117	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.461	0.500		92.1	70-130				
Surrogate: Toluene-d8	0.564	0.500		113	70-130				

## LCS (2449081-BS1)

Prepared: 12/05/24 Analyzed: 12/05/24

Benzene	2.46	0.0250	2.50	98.4	70-130				
Ethylbenzene	2.58	0.0250	2.50	103	70-130				
Toluene	2.56	0.0250	2.50	102	70-130				
o-Xylene	2.69	0.0250	2.50	108	70-130				
p,m-Xylene	5.37	0.0500	5.00	107	70-130				
Total Xylenes	8.06	0.0250	7.50	108	70-130				
Surrogate: Bromofluorobenzene	0.590	0.500		118	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.486	0.500		97.2	70-130				
Surrogate: Toluene-d8	0.554	0.500		111	70-130				

## LCS Dup (2449081-BSD1)

Prepared: 12/05/24 Analyzed: 12/05/24

Benzene	2.45	0.0250	2.50	98.0	70-130	0.489	23		
Ethylbenzene	2.59	0.0250	2.50	104	70-130	0.522	27		
Toluene	2.56	0.0250	2.50	102	70-130	0.00	24		
o-Xylene	2.75	0.0250	2.50	110	70-130	2.06	27		
p,m-Xylene	5.48	0.0500	5.00	110	70-130	2.03	27		
Total Xylenes	8.23	0.0250	7.50	110	70-130	2.04	27		
Surrogate: Bromofluorobenzene	0.596	0.500		119	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.469	0.500		93.8	70-130				
Surrogate: Toluene-d8	0.555	0.500		111	70-130				

## QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/6/2024 1:59:36PM
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## Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits	RPD %	RPD Limit %	Notes
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## Blank (2449081-BLK1)

Prepared: 12/05/24 Analyzed: 12/05/24

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: Bromofluorobenzene	0.587	0.500		117	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.461	0.500		92.1	70-130				
Surrogate: Toluene-d8	0.564	0.500		113	70-130				

## LCS (2449081-BS2)

Prepared: 12/05/24 Analyzed: 12/05/24

Gasoline Range Organics (C6-C10)	52.9	20.0	50.0	106	70-130				
Surrogate: Bromofluorobenzene	0.594	0.500		119	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.472	0.500		94.3	70-130				
Surrogate: Toluene-d8	0.567	0.500		113	70-130				

## LCS Dup (2449081-BSD2)

Prepared: 12/05/24 Analyzed: 12/05/24

Gasoline Range Organics (C6-C10)	53.2	20.0	50.0	106	70-130	0.641	20		
Surrogate: Bromofluorobenzene	0.582	0.500		116	70-130				
Surrogate: 1,2-Dichloroethane-d4	0.480	0.500		95.9	70-130				
Surrogate: Toluene-d8	0.572	0.500		114	70-130				

## Appendix B: Lab Results

### QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/6/2024 1:59:36PM
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#### Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits	RPD	RPD Limit %	Notes
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#### Blank (2449088-BLK1)

Prepared: 12/05/24 Analyzed: 12/06/24

Diesel Range Organics (C10-C28)	ND	25.0
Oil Range Organics (C28-C36)	ND	50.0

Surrogate: n-Nonane	52.1	50.0
		104

50-200

#### LCS (2449088-BS1)

Prepared: 12/05/24 Analyzed: 12/06/24

Diesel Range Organics (C10-C28)	250	25.0	250	100	38-132
Surrogate: n-Nonane	54.3		50.0	109	50-200

#### LCS Dup (2449088-BSD1)

Prepared: 12/05/24 Analyzed: 12/06/24

Diesel Range Organics (C10-C28)	257	25.0	250	103	38-132	2.64	20
Surrogate: n-Nonane	55.3		50.0	111	50-200		

### QC Summary Data

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/6/2024 1:59:36PM
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#### Anions by EPA 300.0/9056A

Analyst: DT

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits	RPD	RPD Limit %	Notes
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#### Blank (2449082-BLK1)

Prepared: 12/05/24 Analyzed: 12/06/24

Chloride	ND	20.0
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#### LCS (2449082-BS1)

Prepared: 12/05/24 Analyzed: 12/06/24

Chloride	254	20.0	250	102	90-110
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#### LCS Dup (2449082-BSD1)

Prepared: 12/05/24 Analyzed: 12/06/24

Chloride	254	20.0	250	102	90-110	0.163	20
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### Definitions and Notes

Dugan Production Corp. PO Box 420 Farmington NM, 87499	Project Name: BGT Closure Project Number: 06094-0177 Project Manager: Kevin Smaka	Reported: 12/06/24 13:59
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ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

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

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

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

## Appendix B: Lab Results

Chain of Custody												Page <u>1</u> of <u>1</u>					
Client Information				Invoice Information				Lab Use Only			TAT		State				
Client: <u>PCG BG Closures</u>	Project Name:	Company:	Lab WO# <u>F412032</u>	Address:	Job Number <u>60094-077</u>	City, State, Zip:	1D	2D	3D	Std	NM	CO	UT	TX			
Project Manager: <u>Kevin Snake</u>	Address:	Phone:		Email:		Miscellaneous:					X						
Sample Information												Analysis and Method			EPA Program		
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DIA/DID by 8015	GRD/GID by 8015	BTEX by 8021	VOC by 8460	Chloride 300.0	BEDOC - AMM	TCL 0355 - TR	RCRA 81 Metals	Crust/Filter Pkg	SDWA CWA RCRA	
10:00	12-5	S	1	Bright Angel 1		1				X						Compliance <input checked="" type="checkbox"/> Y or <input type="checkbox"/> N	
10:00	12-5	S	1	Muddy Mudda 1		2				X						PWSID #	
10:00	12-5	S	1	Angela C 1		3				X						Remarks	
Additional Instructions:																	
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.																	
Sampled by: <u>Kevin Snake</u>																	
Relinquished by: (Signature)	Date <u>12-5-20</u>	Time <u>13:20</u>	Received by: (Signature) <u>Randi</u>	Date <u>12/5/20</u>	Time <u>13:20</u>	Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on <u>12/5/20</u> . Lab Use Only <input checked="" type="checkbox"/> Y <input type="checkbox"/> N Received on ice: <input checked="" type="checkbox"/> Y <input type="checkbox"/> N T1 <u>  </u> T2 <u>  </u> T3 <u>  </u> AVG Temp °C <u>4</u>											
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time												
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time												
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time												
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other																	
Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA																	
Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																	




envirotech

## Appendix B: Lab Results

### Envirotech Analytical Laboratory

Printed: 12/5/2024 1:35:15PM

#### 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:	12/05/24 13:20	Work Order ID:	E412032
Phone:	505-486-6207	Date Logged In:	12/05/24 13:30	Logged In By:	Caitlin Mars
Email:	kevin.smaka@duganproduction.com	Due Date:	12/06/24 17:00 (1 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 Carrier: Kevin Smaka
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.

#### 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

#### Comments/Resolution

#### Sample Container

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

#### Field Label

20. Were field sample labels filled out with the minimum information:
 

Sample ID?	Yes
Date/Time Collected?	Yes
Collectors name?	No

#### Sample Preservation

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

#### Multiphase Sample Matrix

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

#### Subcontract Laboratory

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

#### Client Instruction

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

Date \_\_\_\_\_



envirotech Inc.

## Appendix C: USGS Water Data

### USGS Water Data

#### USGS 362146107425301 25N.08W.31.2241

San Juan County, New Mexico

Latitude 36°21'46", Longitude 107°42'53" NAD27

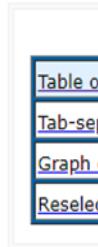
Land-surface elevation 6,690 feet above NGVD29

The depth of the well is 461 feet below land surface.

The depth of the hole is 461 feet below land surface.

This well is completed in the Colorado Plateaus aquifers (N300COPLTS) national aquifer.

This well is completed in the Nacimiento Formation (125NCMN) local aquifer.



Date	Time	Water-level date-time accuracy	Parameter code	Water level, feet below land surface	Water level, feet above specific vertical datum
1957-03		M	62610		6393.50
1957-03		M	62611		6397.09
1957-03		M	72019	296.50	
1986-05-28		D	62610		6399.00
1986-05-28		D	62611		6402.59
1986-05-28		D	72019	291.00	

## Appendix D: Seed Mix

Common Name	Scientific Names	Variety	Season	Form	PLS lbs/acre*
<b>Plant one of the following:</b>					
Mountain mahogany	<i>Cercocarpus montanus</i>	VNS	Warm	Shrub	2.0
Antelope bitterbrush	<i>Purshia tridentata</i>	VNS	Cool	Shrub	2.0
<b>And two of the following:</b>					
Western wheatgrass	<i>Pascopyrum smithii</i>	Arriba	Cool	Sod	2.0
Bottlebrush squirreltail	<i>Elymus elymoides</i>	Tusas or VNS	Cool	Bunch	3.0
Needleandthread	<i>Hesperostipa comata</i>	VNS	Cool	Bunch	3.0
<b>And three of the following:</b>					
Indian ricegrass	<i>Achnatherum hymenoides</i>	Paloma or Rimrock	Warm	Bunch	3.5
Blue grama	<i>Bouteloua gracilis</i>	Alma or Hachita	Warm	Bunch	2.0
Sand dropseed	<i>Sporobolus cryptandrus</i>	VNS	Warm	Bunch	0.5
Prairie Junegrass	<i>Koeleria macrantha</i>	VNS	Cool	Bunch	2.0
Mutongrass	<i>Poa fendleriana</i>	VNS	Cool	Bunch	2.0
<b>And one of the following:</b>					
Scarlet globemallow	<i>Sphaeralcea coccinea</i>	VNS	Warm	Forb	0.25
Utah sweetvetch	<i>Hedysarum boreale</i>	VNS	Warm	Forb	0.25

\*\*Based on 60 pure live seeds (PLS) per square foot, drill seeded. Double this rate (120 PLS per square foot) if broadcast or hydroseeded.

## Appendix E: Site Photo

**Photo 1: Site Photo - Below Grade Tank Prior to Removal**



**Photo 2: Reclamation Site Photo - Below Grade Tank Area**



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

General Information  
Phone: (505) 629-6116

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

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

CONDITIONS

Action 543557

**CONDITIONS**

Operator:  DUGAN PRODUCTION CORP PO Box 420 Farmington, NM 87499	OGRID: 6515
	Action Number: 543557
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

**CONDITIONS**

Created By	Condition	Condition Date
joel.stone	None	1/16/2026