

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: Jeffers Federal 2-23  
API Number: 30-045-24439 OCD Permit Number: BGT 1  
U/L or Qtr/Qtr K Section 2 Township 23N Range 8W County: San Juan  
Center of Proposed Design: Latitude 36.2536888 Longitude -107.6544647 NAD83 1750' FSL & 1650' 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: 45 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.  
**Variations and Exceptions:**  
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
 Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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

<b><u>General siting</u></b>	
<b><u>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</u></b> - <input type="checkbox"/> NM Office of the State Engineer - iWATERS database search; <input checked="" type="checkbox"/> USGS; <input type="checkbox"/> Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<b><u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u></b> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. <b>(Does not apply to below grade tanks)</b> - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. <b>(Does not apply to below grade tanks)</b> - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b><u>Below Grade Tanks</u></b>	
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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b><u>Temporary Pit using Low Chloride Drilling Fluid</u></b> (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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> 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><u>Temporary Pit Non-low chloride drilling fluid</u></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
<b><u>Permanent Pit or Multi-Well Fluid Management Pit</u></b>	
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	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	<input type="checkbox"/> Yes <input type="checkbox"/> No

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

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

Name (Print): Eileen Yates Title: Regulatory Engineer

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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

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

OCD Representative Signature: Joel Stone Approval Date: 02/26/2026

Title: Senior Environmental Scientist OCD Permit Number: ycon2513350141

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: 2/16/2026

20.  
**Closure Method:**

Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)

If different from approved plan, please explain.

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

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

On-site Closure Location: Latitude 36.2536888 Longitude 107.654464 NAD:  1927  83

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 and Safety Manager

Signature: Eileen Yates Date: February 16, 2026

e-mail address: [Eileen.Yates@duganproduction.com](mailto:Eileen.Yates@duganproduction.com) Telephone: 505-787-9832

# Dugan Production Corp.

## Jeffers Federal 2 23

### BGT Closure Report

API# 30-045-24439

K-02-23N-08W

1750 FSL 1650 FWL

Surface Owner: Federal

Dugan Production Corp. has successfully closed the BGT located at the Jeffers Federal 2 23 well location. The closure procedures executed by Dugan were outlined in the Below Grade Tank Closure Plan, which received approval from the New Mexico Oil Conservation Division (NM OCD) on May 14<sup>th</sup>, 2025 and was found depth to groundwater at this site is more than 100 feet below the base of the BGT.

Tier I Closure Criteria for Soils Impacted by a Release		
Constituent <sup>1</sup>	Method	Limit
Chloride	EPA 300.0 or SM4500 C1 B	20,000 mg/kg
TPH	EPA SW-846 Method 8015M	2,500 mg/kg
GRO-DRO	EPA SW-846 Method 8021B or 8015M	1,000 mg/kg
BTEX <sup>3</sup>	EPA SW-846 Method 8021B or 8260B	50 mg/kg
Benzene	EPA SW-846 Method 8021B or 8260B	10 mg/kg

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

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

<sup>3</sup> - Benzene, Toluene, Ethylbenzene, and Total Xylenes (BTEX).

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

- Dugan notified via email the BLM and the New Mexico Oil Conservation Division (NM OCD) of the closure within 72 hours of the BGT closure.
- The contents and the steel pit were removed on June 13<sup>th</sup>, 2025. The soil samples were collected June 16<sup>th</sup>, 2025, using a five-point composite sample to include any obvious stained, wet soils, or evidence of contamination. Soil samples were collected at a depth of 10' below grade surface. Soil samples were taken to Envirotech in Farmington, NM and analyzed for chlorides, benzene, toluene, ethyl benzene, xylene and total petroleum hydrocarbons.

- The laboratory analytical results for the composite soil samples did not detect any benzene, ethyl benzene, xylene, or chloride. DRO/ORO was detected at a total concentration of 869 mg/kg, respectively, which is less than the NM EMNRD OCD closure criteria of 1,000 mg/kg.
- The below-grade tank vault area was backfilled with uncontaminated soil following the removal of the tank. The reclamation efforts conducted by Dugan included stabilizing the site, contouring the land to align with the natural topography, and re-vegetating the area to ensure seamless integration with the surrounding undisturbed environment. These measures were implemented to promote long-term environmental stability and restore the site to its natural condition.
- Dugan complied with the seeding requirements found in NMAC 19.15.17.13.H.(5).
- This report has been completed to comply with the closure report required by the 19.15.17 NMAC Rule.

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

Analyte	Result
<b>Volatile Organics by EPA 8021B</b>	
	mg/kg
Benzene	ND
Ethylbenzene	ND
Toluene	ND
o-Xylene	ND
p,m-Xylene	ND
Total Xylenes	ND
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	
Gasoline Range Organics (C6-C10)	ND
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	
Diesel Range Organics (C10-C28)	426
Oil Range Organics (C28-C36)	443
<b>Anions by EPA 300.0/9056A</b>	
Chloride	ND

\*\* ND – Not Detected

**Reclamation**

Dugan has restored the impacted surface area to the condition that existed prior to the below-grade tank installation. Restoration of the Site includes the replacement of soil to the relative positions and contoured to the topography of the area. The topsoil cover includes a top layer,

which is suitable material to establish vegetation at the Site. The disturbed area was reseeded with a uniformed vegetative cover. Seed mixtures are included in **Appendix C**. Reclamation photos are included in **Appendix D**.

Below is a list of disposal facilities.

Solid waste will be hauled to Envirotech:

Envirotech: Permit #NM01-0011

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

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

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

## Appendix A: Notification

### BGT Closure Notification

**From:** [Eileen Yates](#)  
**To:** "[leighp.barr@state.nm.us](mailto:leighp.barr@state.nm.us)"; [Adeloye, Abiodun A](#)  
**Cc:** [Tyra Fell](#); [Mario Ulibarri](#); [Matthew Wilcox](#); [Neil Haws](#); [James McDaniel](#)  
**Subject:** Notification of BGT Closure Soil Sampling - Jeffers Federal 2 #023  
**Date:** Tuesday, June 10, 2025 1:37:52 PM  
**Attachments:** [image001.png](#)

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Updated to include time:

Good afternoon,

Dugan Production Corp. will be closing the below-grade tank (BGT) located at the Jeffers Federal 2 #023 well site on **Monday, June 16, 2025 at 9:00 am**. As part of the closure process, we will be collecting soil samples in accordance with regulatory requirements.

Please find the site information below for your records:

- **Operator:** Dugan Production Corp.
- **API Number:** 30-045-24439
- **Well Name:** Jeffers Federal 2 #023
- **Status:** Pugged, Site Released
- **Surface Location:** K-02-23N-08W. 1750 FSL. 1650 FWL
- **Lat/Long:** 36.2536888, -107.6544647. NAD83
- **GL Elevation:** 6985
- **Well Type:** Oil
- **Closure Activity:** BGT closure soil sampling
- **Closure Date:** June 16, 2025
- **Point of Contact:**  
Eileen Yates  
Environmental Health and Safety Manager  
[eileen.yates@duganproduction.com](mailto:eileen.yates@duganproduction.com)  
505-787-9832

Let us know if you need any additional information or if site access will be required for oversight.

**Kindest Regards,**

Eileen Yates

Environmental, Health, and Safety Manager  
Dugan Production Corp.  
Phone | 505-787-9832  
Email | [Eileen.Yates@duganproduction.com](mailto:Eileen.Yates@duganproduction.com)

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Appendix B: Lab Results

Figure A: Soil Sample Laboratory Results

Report to:  
James McDaniel



5796 U.S. Hwy 64  
Farmington, NM 87401

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




# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

JAKD Solutions LLC

Project Name: Jeffers Federal 2-23

Work Order: E506135

Job Number: 25022-0001

Received: 6/16/2025

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
6/23/25

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

**Appendix B: Lab Results**

Date Reported: 6/23/25

James McDaniel  
1686 Bloomfield Blvd  
Farmington, NM 87401



Project Name: Jeffers Federal 2-23  
Workorder: E506135  
Date Received: 6/16/2025 3:22:00PM

James McDaniel,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 6/16/2025 3:22:00PM, under the Project Name: Jeffers Federal 2-23.

The analytical test results summarized in this report with the Project Name: Jeffers Federal 2-23 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,

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## Appendix B: Lab Results

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### Appendix B: Lab Results

#### Sample Summary

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 06/23/25 12:05
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
BGT Composite	E506135-01A	Soil	06/16/25	06/16/25	Glass Jar, 4 oz.

**Appendix B: Lab Results**

**Sample Data**

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 6/23/2025 12:05:32PM
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**BGT Composite  
E506135-01**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>						
	mg/kg	mg/kg		Analyst: SL		Batch: 2525047
Benzene	ND	0.0250	1	06/17/25	06/18/25	
Ethylbenzene	ND	0.0250	1	06/17/25	06/18/25	
Toluene	ND	0.0250	1	06/17/25	06/18/25	
o-Xylene	ND	0.0250	1	06/17/25	06/18/25	
p.m-Xylene	ND	0.0500	1	06/17/25	06/18/25	
Total Xylenes	ND	0.0250	1	06/17/25	06/18/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		86.3 %	70-130	06/17/25	06/18/25	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg		Analyst: SL		Batch: 2525047
Gasoline Range Organics (C6-C10)	ND	20.0	1	06/17/25	06/18/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		92.7 %	70-130	06/17/25	06/18/25	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg		Analyst: NV		Batch: 2525056
Diesel Range Organics (C10-C28)	426	25.0	1	06/17/25	06/18/25	
Oil Range Organics (C28-C36)	443	50.0	1	06/17/25	06/18/25	
<i>Surrogate: n-Nonane</i>						
		93.8 %	61-141	06/17/25	06/18/25	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg		Analyst: DT		Batch: 2525050
Chloride	ND	20.0	1	06/17/25	06/18/25	

**Appendix B: Lab Results**

**QC Summary Data**

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 6/23/2025 12:05:32PM
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**Volatile Organics by EPA 8021B**

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec % %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2525047-BLK1)**

Prepared: 06/17/25 Analyzed: 06/18/25

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	6.82		8.00		83.3	70-130			

**LCS (2525047-BS1)**

Prepared: 06/17/25 Analyzed: 06/18/25

Benzene	4.98	0.0250	5.00		99.7	70-130			
Ethylbenzene	4.87	0.0250	5.00		97.4	70-130			
Toluene	4.95	0.0250	5.00		99.1	70-130			
o-Xylene	4.85	0.0250	5.00		97.0	70-130			
p,m-Xylene	9.84	0.0500	10.0		98.4	70-130			
Total Xylenes	14.7	0.0250	15.0		98.0	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.12		8.00		89.0	70-130			

**Matrix Spike (2525047-MS1)**

Source: E506136-01

Prepared: 06/17/25 Analyzed: 06/18/25

Benzene	5.48	0.0250	5.00	ND	110	70-130			
Ethylbenzene	5.32	0.0250	5.00	ND	106	70-130			
Toluene	5.42	0.0250	5.00	ND	108	70-130			
o-Xylene	5.28	0.0250	5.00	ND	106	70-130			
p,m-Xylene	10.7	0.0500	10.0	ND	107	70-130			
Total Xylenes	16.0	0.0250	15.0	ND	107	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.05		8.00		88.1	70-130			

**Matrix Spike Dup (2525047-MSD1)**

Source: E506136-01

Prepared: 06/17/25 Analyzed: 06/18/25

Benzene	5.30	0.0250	5.00	ND	106	70-130	3.38	27	
Ethylbenzene	5.17	0.0250	5.00	ND	103	70-130	2.90	26	
Toluene	5.25	0.0250	5.00	ND	105	70-130	3.13	20	
o-Xylene	5.14	0.0250	5.00	ND	103	70-130	2.84	25	
p,m-Xylene	10.4	0.0500	10.0	ND	104	70-130	2.82	23	
Total Xylenes	15.6	0.0250	15.0	ND	104	70-130	2.83	26	
Surrogate: 4-Bromochlorobenzene-PID	7.03		8.00		87.9	70-130			

**Appendix B: Lab Results**

**QC Summary Data**

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 6/23/2025 12:05:32PM
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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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<b>Blank (2525047-BLK1)</b>						Prepared: 06/17/25 Analyzed: 06/18/25			
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.69		8.00		96.1	70-130			
<b>LCS (2525047-BS2)</b>						Prepared: 06/17/25 Analyzed: 06/18/25			
Gasoline Range Organics (C6-C10)	39.0	20.0	50.0		78.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.33		8.00		94.1	70-130			
<b>Matrix Spike (2525047-MS2)</b>						Source: E506136-01		Prepared: 06/17/25 Analyzed: 06/18/25	
Gasoline Range Organics (C6-C10)	41.7	20.0	50.0	ND	83.5	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.47		8.00		93.3	70-130			
<b>Matrix Spike Dup (2525047-MSD2)</b>						Source: E506136-01		Prepared: 06/17/25 Analyzed: 06/18/25	
Gasoline Range Organics (C6-C10)	41.6	20.0	50.0	ND	83.2	70-130	0.366	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.54		8.00		94.2	70-130			

**Appendix B: Lab Results**

**QC Summary Data**

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 6/23/2025 12:05:32PM
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**Nonhalogenated Organics by EPA 8015D - DRO/ORO**

Analyst: NV

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

**Blank (2525056-BLK1)**

Prepared: 06/17/25 Analyzed: 06/18/25

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	47.3		50.0		94.6	61-141			

**LCS (2525056-BS1)**

Prepared: 06/17/25 Analyzed: 06/18/25

Diesel Range Organics (C10-C28)	253	25.0	250		101	66-144			
Surrogate: n-Nonane	46.7		50.0		93.3	61-141			

**Matrix Spike (2525056-MS1)**

Source: E506134-01

Prepared: 06/17/25 Analyzed: 06/18/25

Diesel Range Organics (C10-C28)	255	25.0	250	ND	102	56-156			
Surrogate: n-Nonane	47.3		50.0		94.6	61-141			

**Matrix Spike Dup (2525056-MSD1)**

Source: E506134-01

Prepared: 06/17/25 Analyzed: 06/18/25

Diesel Range Organics (C10-C28)	256	25.0	250	ND	102	56-156	0.404	20	
Surrogate: n-Nonane	47.0		50.0		94.0	61-141			

**Appendix B: Lab Results**

**QC Summary Data**

JAKD Solutions LLC 1686 Bloomfield Blvd Farmington NM, 87401	Project Name: Jeffers Federal 2-23 Project Number: 25022-0001 Project Manager: James McDaniel	Reported: 6/23/2025 12:05:32PM
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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
<b>Blank (2525050-BLK1)</b>									
Prepared: 06/17/25 Analyzed: 06/17/25									
Chloride	ND	20.0							
<b>LCS (2525050-BS1)</b>									
Prepared: 06/17/25 Analyzed: 06/17/25									
Chloride	249	20.0	250		99.4	90-110			
<b>Matrix Spike (2525050-MS1)</b>									
Source: E506130-03 Prepared: 06/17/25 Analyzed: 06/17/25									
Chloride	634	100	250	284	140	80-120			M2
<b>Matrix Spike Dup (2525050-MSD1)</b>									
Source: E506130-03 Prepared: 06/17/25 Analyzed: 06/17/25									
Chloride	585	100	250	284	120	80-120	8.09	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.

**Appendix B: Lab Results**

**Definitions and Notes**

JAKD Solutions LLC	Project Name:	Jeffers Federal 2-23	
1686 Bloomfield Blvd	Project Number:	25022-0001	<b>Reported:</b>
Farmington NM, 87401	Project Manager:	James McDaniel	06/23/25 12:05

M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.

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

<b>Client Information</b> Client: <u>AKD Solution</u> Project Name: <u>Walters Federal 2-23</u> Project Manager: <u>J McDaniel</u> Address: <u>1666 McDaniel Blvd</u> City, State, Zip: <u>Farmington, NM 87401</u> Phone: <u>505-860-1666</u> Email: <u>james@akdsolutions.com</u>				<b>Invoice Information</b> Company: <u>AKD</u> Address: City, State, Zip: Phone: Email: Miscellaneous:				<b>Lab Use Only</b> Lab WO# <u>E50613525022-m01</u> Job Number 1D 2D 3D Std <input checked="" type="checkbox"/>				<b>TAT</b> 1D 2D 3D Std			<b>State</b> NM LD UT TX			
<b>Analysis and Method</b>											<b>EPA Program</b> SDWA CWA RCRA Compliance Y or N PWSID #							
<b>Sample Information</b>											<b>Sample Temp</b> 45			<b>Remarks</b>				
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field #	Lab Number	DRO/RO by #013	PH/PO by #015	BTX by #021	VOC by #280	Chloride 300 D	TCO2 3005 - TX	PCOX & Metals	PH/OC - RM	PH/OC - TX			
840	6/16/25	Soil	1-4oz	BGT Composite		1								X				
<b>Additional Instructions:</b> I, (field sampler), attest to the validity and accuracy 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>JAMES MCDANIEL</u>																		
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time		Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days. <b>Lab Use Only</b> Received on ice: <input checked="" type="checkbox"/> N						
<u>[Signature]</u>		6/16/25		3:22		<u>Caitie Mae</u>		6-16-25		15:22								
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, SA - 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 CDC. The liability of the laboratory is limited to the amount paid for on the report.																		

Page 11 of 12

Appendix B: Lab Results

Envirotech Analytical Laboratory

Printed: 6/16/2025 3:54:31PM

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: JAKD Solutions LLC	Date Received: 06/16/25 15:22	Work Order ID: E506135
Phone: (505) 860-1666	Date Logged In: 06/16/25 15:52	Logged In By: Caitlin Mars
Email: james@jaksolutions.com	Due Date: 06/23/25 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 Carrier: James McDaniel
- 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.

Comments/Resolution

**Sample Turn Around Time (TAT)**

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

**Sample Cooler**

- 7. Was a sample cooler received? Yes
  - 8. If yes, was cooler received in good condition? Yes
  - 9. Was the sample(s) received intact, i.e., not broken? Yes
  - 10. Were custody/security seals present? No
  - 11. If yes, were custody/security seals intact? NA
  - 12. Was the sample received on ice? Yes
- Note: Thermal preservation is not required, if samples are received within 15 minutes of sampling
- 13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

**Sample Container**

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

**Field Label**

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

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

Date



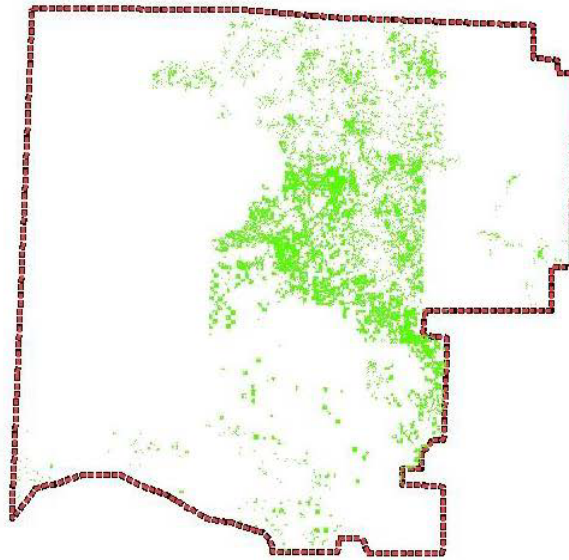
envirotech Inc.

## Appendix C: Seed Mix

### Remediation Seed Mixture

#### SAGEBRUSH COMMUNITY

The sagebrush/grass vegetation community comprises approximately 551,198 acres (approximately 39%) of the Farmington Field Office (FFO) Area (Map 1). This community is comprised primarily of Wyoming big sage with lesser amounts of basin big sage and minor areas of black sage. This plant community occupies vast areas of relatively open rolling hills to the south of Farmington and numerous mesas and canyon bottoms to the east and north. It is found on all aspects from about 5,000 to 7,200 feet but is most common on southerly and western aspects. Soils vary from clayey to fine sandy loam to loamy in texture with loamy sites being more pervasive. In general, the soils underlying this plant community are moderately deep (20 to 54 inches thick) and well drained. Typical soil series in the FFO area where the sagebrush/grass plant community is found include Penistaja, Buckle, Doak, Blancot and Orlie. The precipitation regime varies from 7 to 14 inches.



**Map 1. Sagebrush/Grass plant community on BLM lands within the FFO area.**

The sagebrush/grass vegetation community is a dominant component and is integral to a proper functioning watershed and ecosystem of the FFO area landscape. Maintaining proper hydrologic function of this plant community is essential to the ability of the plants to produce forage for livestock and wildlife, retention of soils on site and the minimization of the degradation of water quality due to the deposition of salts and sediment. Common species that can be expected to occur are Wyoming and basin big sagebrush, western wheatgrass, galleta, blue grama, Indian ricegrass and sand dropseed. Forbs are highly dependent upon precipitation; typical species are biscuit root, woolly plantain, astragalus spp., asters, daisies and borage spp.

Appendix C: Seed Mix

**Table 1. Reclamation Goal for Sagebrush/Grass Community**

Functional Group	Percent (%) Foliar Cover	Common Species
Trees/Shrubs/Grasses/Forbs	≥35	Utah Juniper-Pinyon pine; big sagebrush, four-wing saltbush , antelope bitterbrush, alkali sacaton, Western wheatgrass, Indian ricegrass, galleta, sand dropseed, scarlet globemallow, woolly Indianwheat , fleabane, Penstemon spp., buckwheat, threadleaf groundsel
Invasive/undesirables <b>10% allowed toward meeting standard of 35%.</b>	≤10	Plants that have the potential to become a dominant species on a site where its presence is a detriment to revegetation efforts or the native plant community. Examples of invasive species include cheatgrass, Russian thistle, kochia.

**Table 2. Menu based seed mix for use in reclamation for sagebrush/grass community (minimum requirement) \*\***

Common Name	Scientific Names	Variety	Season	Form	PLS lbs/acre*
<b>Plant two of the following:</b>					
Fourwing saltbush	<i>Atriplex canescens</i>	VNS	Cool	Shrub	2.0
Antelope bitterbrush	<i>Purshia tridentata</i>	VNS	Cool	Shrub	2.0
Winterfat	<i>Krascheninnikovia lanata</i>	VNS	Cool	Shrub	2.0
<b>And three of the following:</b>					
Indian ricegrass	<i>Achnatherum hymenoides</i>	Paloma or Rimrock	Cool	Bunch	4.0
Blue grama	<i>Bouteloua gracilis</i>	Alma or Hachita	Warm	Sod-forming	2.0
Galleta	<i>Pleuraphis jamesii</i>	Viva florets	Warm	Bunch/Sod-forming	3.0
Sand dropseed	<i>Sporobolus cryptandrus</i>	VNS	Warm	Bunch	0.5
Western wheatgrass	<i>Pascopyrum smithii</i>	Arriba	Cool	Sod-forming	4.0
<b>And one of the following:</b>					
Bottle brush squirreltail	<i>Elymus elymoides</i>	Tusas or VNS	Cool	Bunch	3.0
Siberian wheatgrass	<i>Agropyron fragile</i>	Vavilov	Cool	Bunch	3.0
<b>And two of the following</b>					
Small burnet	<i>Sanguisorba minor</i>	Delar	Cool	Forb	2.0
Rocky Mtn. bee plant	<i>Cleome serrulata</i>	Local collection or VNS	Cool	Forb	0.25
Blue flax	<i>Linum lewisii</i>	Apar	Cool	Forb	0.25

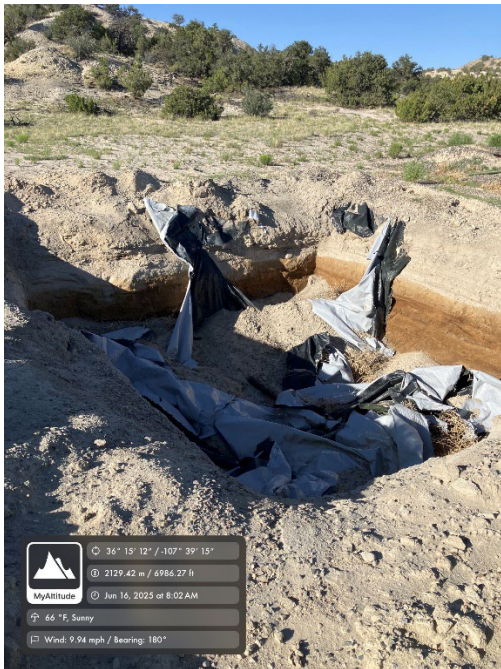
**\*\*Based on 60 pure live seeds (PLS) per square foot, drill seeded. Double this rate (120 PLS per square foot) if broadcast or hydroseeded.\*\*Based on 60 pure live seeds (PLS) per square foot, drill seeded. Double this rate (120 PLS per square foot) if broadcast or hydroseeded.**

### Appendix D: Site Photo

#### Photo 1: BGT before removal



#### Photo 2: BGT after removal



**Appendix D: Site Photo**

**Photo 3 – BGT after remediation**



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

General Information  
Phone: (505) 629-6116

Online Phone Directory  
<https://www.emnrd.nm.gov/oecd/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 554320

**CONDITIONS**

Operator: DUGAN PRODUCTION CORP PO Box 420 Farmington, NM 87499	OGRID: 6515
	Action Number: 554320
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

**CONDITIONS**

Created By	Condition	Condition Date
joel.stone	None	2/26/2026