District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

Form C-144
July 21, 2008

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

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

Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
BGT A
☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

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

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

1.
Operator: SIMCOE LLC OGRID #: 329736
Address: 1199 Main Ave., Suite 101, Durango, CO 81301
Facility or well name: GALLEGOS CANYON UNIT #356
APPNumber: 30-045-26365 OCD Permit Number:
U/L or Qtr/Qtr G Section 19 Township 29N Range 12W County: San Juan County
Center of Proposed Design: Latitude 36.715189° Longitude -108.136077° NAD: ☐1927 ☒ 1983
Surface Owner: ☐ Federal ☐ State ☒ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ 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.
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** A
Volume: 95 bbl Type of fluid: Produced 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 DOUBLE WALLED DOUBLE BOTTOMED
Liner type: Thickness 0 mil ☐ HDPE ☐ PVC ☐ Other _____

5.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

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_____

7.

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)

8.

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

9.

Administrative Approvals 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:

☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. **Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.**

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☒ No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to temporary, emergency, or cavitation pits and below-grade tanks)* - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☒ No ☐ NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to permanent pits)* - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No ☐ NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☒ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☒ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☒ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☐ No

11.
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: _____

12.
Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (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: _____

☐ Previously Approved Operating and Maintenance Plan API Number: _____ (*Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)*

13.
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_2S, 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

14.
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 ☐ Closed-loop System ☐ 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

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

16.
Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only: (19.15.17.13.D NMAC)
Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please provide the information below) ☐ No

Required for impacted areas which will not be used for future service and operations:
☐ Soil Backfill and Cover Design Specifications - - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain. - FEMA map	☐ Yes ☐ No

18.
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
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: _____

20.
OCD Approval: ☐ Permit Application (including closure plan) ☒ Closure ~~Plan~~ (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: CRWhitehead **Approval Date:** June 8, 2021

Title: Environmental Specialist **OCD Permit Number:** BGT A

21.
Closure Report (required within 60 days of closure completion): Subsection K of 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:** 4/20/2021

22.
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.

23.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:
Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

Required for impacted areas which will not be used for future service and operations:
☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.
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)
☐ 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 36.715189° Longitude -108.136077° NAD: ☐ 1927 ☒ 1983

25.
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): Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: 4/27/2021

e-mail address: smoskal@ikavenergy.com Telephone: (505) 330-9179

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): _____ Title: _____

Signature:_____ Date: _____

e-mail address:_____ Telephone: _____

Steven Moskal

From: Patricia Campbell
Sent: Friday, April 9, 2021 2:37 PM
To: OCD.Enviro@state.nm.us
Cc: CORY.SMITH@STATE.NM.US; Steven Moskal; Don Buller; Jonathan Divine; Julie Best
Subject: RE: SIMCOE LLC - Gallegos Canyon Unit 356 Below Grade Tank (BGT) Closure

Please see the correction below, a 95bbl tank will be removed.

Patti Campbell
Regulatory Analyst

IKAV
IKAV Energy Inc.
SIMCOE LLC

Office: (970) 462-7948
Mobile Phone: (970) 749-8560
Email: pcampbell@ikavenergy.com
www.simcoe-energy.com
www.ikav.com

1199 Main Ave., Suite 101
Durango, Colorado 81301

From: Patricia Campbell
Sent: Friday, April 9, 2021 2:31 PM
To: OCD.Enviro@state.nm.us
Cc: CORY.SMITH@STATE.NM.US; Steven Moskal <steven.moskal@ikavenergy.com>; Don Buller <don.buller@ikavenergy.com>; Jonathan Divine <jonathan.divine@ikavenergy.com>; Julie Best <julie.best@ikavenergy.com>
Subject: SIMCOE LLC - Gallegos Canyon Unit 356 Below Grade Tank (BGT) Closure

SENT VIA E-MAIL

April 9, 2021

New Mexico Oil Conservation Division
1000 Rio Brazos Road
Aztec, New Mexico 87410

RE: Notice of Proposed Below-Grade Tank (BGT) Closure

Gallegos Canyon Unit 356
API 30-045-26365
(G) Section 19 – T29N – R12W
San Juan County, New Mexico

To Whom It May Concern:

With regards to the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is notification that SIMCOE LLC is planning to close a 95 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around April 16, 2021 at 8:00 AM.

Should you have any questions, please feel free to contact SIMCOE LLC.

Sincerely,

Patti Campbell
Regulatory Analyst

IKAV Energy Inc.
SIMCOE LLC

Office: (970) 462-7948
Mobile Phone: (970) 749-8560
Email: pcampbell@ikavenergy.com
www.simcoe-energy.com
www.ikav.com

1199 Main Ave., Suite 101
Durango, Colorado 81301

SIMCOE LLC

SIMCOE LLC
1199 Main Ave., Suite 101
Durango, CO 81303
Phone: (970) 462-7948

April 12, 2021

Walter H Bump etal
Bernardo Polanco
PO Box 2667
Farmington, NM 87499

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank
Well Name: Gallegos Canyon Unit 356
API# - 3004526365

To Whom It May Concern,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. SIMCOE LLC (SIMCOE) is required to notify the surface owner of SIMCOE's plans to close/remove a below grade tank. SIMCOE wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. SIMCOE plans to commence this work on or about April 16, 2021 at 8:30 a.m. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, SIMCOE will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required, please contact Steve Moskal for a specific time (505) 330-9179.

Sincerely,

Patti Campbell

Patti Campbell
IKAV Energy Inc.
SIMCOE LLC
Regulatory Analyst

Steven Moskal

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Friday, March 26, 2021 10:09 AM
To: Steven Moskal
Cc: Jonathan Divine
Subject: RE: Gallegos Canyon Unit 356 API# 30-045-26356

Steve,

OCD approves the proposed closure method with the following conditions

- Simco will include this approval in the C-144 closure report
- Simco will follow all applicable closure notification/requirements in 19.15.17 NMAC.
- Simco will auger/borehole to 8' deep or to the first signs of obvious impacts which may include staining, smells, PID etc and to collect soil samples.

If you have any additional questions please give me a call.

****Note** Sandstone refusal encountered at 30-40" during hand auger sampling activity**

Cory Smith • Environmental Specialist
Environmental Bureau
EMNRD - Oil Conservation Division
1000 Rio Brazos | Aztec, NM 87410
505.334.6178 x115 | Cory.Smith@state.nm.us
http://www.emnrd.state.nm.us/OCD/

From: Steven Moskal <smoskal@ikavenergy.com>
Sent: Friday, March 26, 2021 9:46 AM
To: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Cc: Jonathan Divine <jonathan.divine@ikavenergy.com>
Subject: [EXT] Gallegos Canyon Unit 356 API# 30-045-26356

Cory,

Jonathan Kelly notified Simcoe of a low profile, above ground pit, located on the area of a permitted BGT. It appears this BGT was not properly closed out, sometime in or around 2016. Simcoe plans to advance 5 hand auger borings in a diagonal fashion in order to collect samples at the base of the former BGT. BP had used this approach in the past in similar situations.

I will notify you of when the work is scheduled, following NMAC 19.15.17 protocol. I just wanted to give you advanced notice.

Please let me know if there are any concerns or objections.

Thank you,

IKAV Energy Inc.
Steve Moskal, ASP

Environmental Coordinator
Phone: 505-330-9179
Email: SMoskal@IKAVENERGY.COM

1199 Main Avenue
Suite 101
Durango, CO 81301, USA

SIMCOE LLC

GALLEGOS CANYON UNIT 356

API #: 30-045-33215

Unit G, Sec. 19, T29N, R12W

BGT Closure via Hand Auger - Lab Results

Table 1

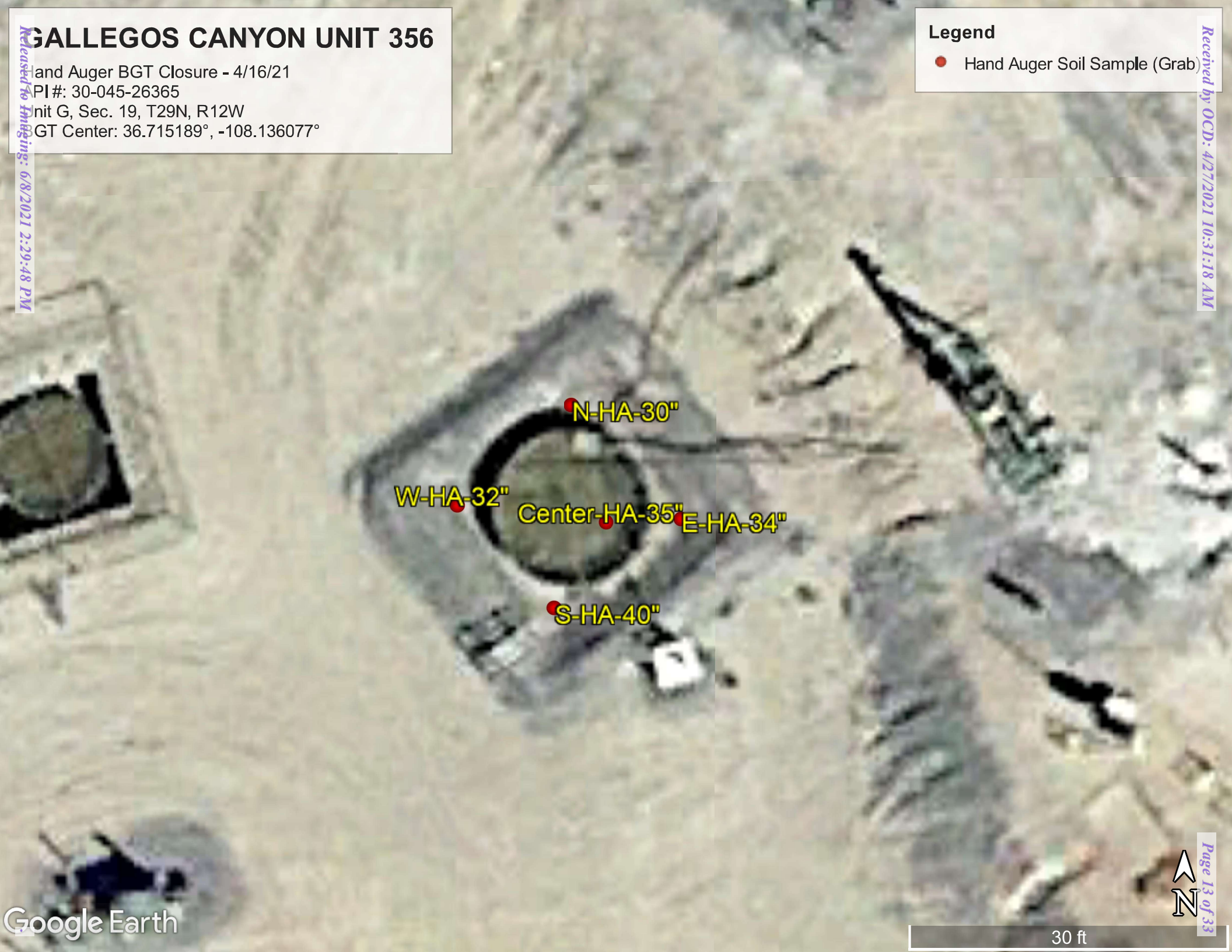
MAP DESIGNATION # & SAMPLE ID	SAMPLE DATE	SAMPLE TIME	GRAB / COMPOSITE	PID	TPH - gasoline (mg/Kg)	TPH - diesel range (mg/Kg)	TPH - cumulative (mg/Kg)	TPH - motor oil range (mg/Kg)	TPH - cumulative (mg/Kg)	Benzene (mg/Kg)	Toluene (mg/Kg)	Ethyl - benzene (mg/Kg)	Total Xylenes (mg/Kg)	BTEX - cumulative (mg/Kg)	Chloride (mg/Kg)
S-HA-40"	04/16/21	8:20	Grab @ 40"D	210.7	<4.8	<9.9	<9.9	<50	<50	<0.024	<0.048	<0.048	<0.096	<0.096	<60
E-HA-34"	04/16/21	8:35	Grab @ 34"D	10.4	<5.0	<9.9	<9.9	<50	<50	<0.025	<0.050	<0.050	<0.099	<0.099	<60
N-HA-30"	04/16/21	8:45	Grab @ 30"D	74.4	<4.8	<9.6	<9.6	<48	<48	<0.024	<0.048	<0.048	<0.097	<0.097	67.0
W-HA-32"	04/16/21	8:55	Grab @ 32"D	44.3	<4.9	<9.7	<9.7	<49	<49	<0.024	<0.049	<0.049	<0.097	<0.097	<60
Center-HA-35"	04/16/21	9:10	Grab @ 35"	21.2	<4.9	<9.9	<9.9	<49	<49	<0.024	<0.049	<0.049	<0.097	<0.097	<60
NMOCD RELEASE CLOSURE STANDARDS -							**100**		**100**	**0.2**				**50**	**250**

Notes:

TPH - Total petroleum hydrocarbons by US EPA Method 8015B.
BTEX - Benzene, toluene, ethylbenzene, total xylenes by US EPA Method 8021B.
ppm - Parts per million.
mg/Kg - Milligram per kilogram (mg/Kg).
(-) - Not analyzed or N/A
NMOCD - New Mexico Oil Conservation Division.

GALLEGOS CANYON UNIT 356

Hand Auger BGT Closure - 4/16/21
API #: 30-045-26365
Unit G, Sec. 19, T29N, R12W
BGT Center: 36.715189°, -108.136077°



SIMCOE LLC

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

GALLEGOS CANYON UNIT 356
API #: 30-045-26365
Unit Letter G, Section 19, T29N, R12W

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on SIMCOE LLC (SIMCOE) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, SIMCOE shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. SIMCOE shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the SIMCOE's NMOCD approved BGT design attached to the SIMCOE Design and Construction Plan. SIMCOE shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the SIMCOE's NMOCD approve BGT Design attached to the SIMCOE Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. SIMCOE shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

General Closure Plan

1. SIMCOE shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
   Notice is attached.

2. SIMCOE shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
   Notice was provided and documented in the attached email.

3. SIMCOE shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
   a. SIMCOE Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
   b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
   c. Basin Disposal, Permit NM-01-0005 (Liquids)
   d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
   e. SIMCOE Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
   f. SIMCOE Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
   g. SIMCOE Operated GCU 259 SWD, API 30-045-20006 (Liquids)
   h. SIMCOE Operated GCU 306 SWD, API 30-045-24286 (Liquids)
   i. SIMCOE Operated GCU 307 SWD, API 30-045-24248 (Liquids)
   j. SIMCOE Operated GCU 328 SWD, API 30-045-24735 (Liquids)
   k. SIMCOE Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

   All liquids and/or sludge within the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.

4. SIMCOE shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
The BGT was transported for recycling.

5. SIMCOE shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
All equipment associated with the BGT has been removed.

6. SIMCOE shall test the soils beneath the BGT to determine whether a release has occurred. SIMCOE shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

Constituents	Testing Method	Release Verification (mg/Kg)	Composite Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.024
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.097
TPH	US EPA Method SW-846 418.1	100	<49
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<60

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

Soils beneath the BGT were sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are attached.

7. SIMCOE shall notify the division District III office of its results on form C-141.
Form C-141 is attached.

8. If it is determined that a release has occurred, then SIMCOE will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
Sampling results reveal no evidence of a significant release had occurred.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then SIMCOE shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area.
Sampling results reveal minor a release had occurred. BGT area has been backfilled with clean, earthen material after remedial activity has been completed.

10. SIMCOE shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. SIMCOE shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.

12. SIMCOE shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.

13. SIMCOE shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
SIMCOE will notify NMOCD when re-vegetation is successfully completed.

15. Within 60 days of closure completion, SIMCOE shall submit a closure report on NMOCD's form C-144, and will include the following;
    a. proof of closure notification (surface owner and NMOCD)
    b. sampling analytical reports; information required by 19.15.17 NMAC;
    c. disposal facility name and permit number
    d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
    e. site reclamation, photo documentation.
Closure report on Form C-144 form is included & contains a photo of the current reclamation requirements completed.

16. SIMCOE shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.
17. **Certification section of Form C-144 has been completed.**

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

State of New Mexico
Energy Minerals and Natural Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party **SIMCOE LLC**	OGRID **329736**
Contact Name **Steve Moskal**	Contact Telephone **(505) 330-9179**
Contact email **smoskal@ikavenergy.com**	Incident # *(assigned by OCD)*
Contact mailing address **1199 Main Ave., Suite 101, Durango, CO 81301**	

Location of Release Source

Latitude **36.715189°** Longitude **-108.136077°**
(NAD 83 in decimal degrees to 5 decimal places)

Site Name **GALLEGOS CANYON UNIT 356**	Site Type **Natural Gas Well**
Date Release Discovered	API# *(if applicable)* **30-045-26365**

Unit Letter	Section	Township	Range	County
G	**19**	**29N**	**12W**	**San Juan**

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

Nature and Volume of Release

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

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

Cause of Release **TPH, BTEX, & chloride all below below-grade tank (BGT) permit closure standards. No evidence a significant release had occurred.**

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ☒ No	If YES, for what reason(s) does the responsible party consider this a major release?

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Not required.

Initial Response

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

- ☐ The source of the release has been stopped.
- ☐ The impacted area has been secured to protect human health and the environment.
- ☐ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ☐ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

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

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: smoskal@ikavenergy.com Telephone: (505) 330-9179

OCD Only

Received by: _____ Date: _____

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

April 22, 2021

Steve Moskal
SIMCOE
1100 Main St.
Durango, CO 81301
TEL: (505) 330-9179
FAX

RE: Gallegos Canyon Unit 356 OrderNo.: 2104810

Dear Steve Moskal:

Hall Environmental Analysis Laboratory received 5 sample(s) on 4/17/2021 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report
Lab Order **2104810**
Date Reported: **4/22/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE **Client Sample ID:** S-HA-40"
Project: Gallegos Canyon Unit 356 **Collection Date:** 4/16/2021 8:20:00 AM
Lab ID: 2104810-001 **Matrix:** SOIL **Received Date:** 4/17/2021 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **mb**
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	4/20/2021 6:47:46 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	4/20/2021 6:47:46 PM
Surr: DNOP	88.6	70-130		%Rec	1	4/20/2021 6:47:46 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **CCM**
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	4/20/2021 10:31:00 PM
Surr: BFB	95.3	70-130		%Rec	1	4/20/2021 10:31:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **CCM**
Benzene	ND	0.024		mg/Kg	1	4/20/2021 10:31:00 PM
Toluene	ND	0.048		mg/Kg	1	4/20/2021 10:31:00 PM
Ethylbenzene	ND	0.048		mg/Kg	1	4/20/2021 10:31:00 PM
Xylenes, Total	ND	0.096		mg/Kg	1	4/20/2021 10:31:00 PM
Surr: 4-Bromofluorobenzene	79.9	70-130		%Rec	1	4/20/2021 10:31:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **VP**
Chloride	ND	60		mg/Kg	20	4/21/2021 11:41:39 AM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

Analytical Report
Lab Order **2104810**
Date Reported: **4/22/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE **Client Sample ID:** E-HA-34"
Project: Gallegos Canyon Unit 356 **Collection Date:** 4/16/2021 8:35:00 AM
Lab ID: 2104810-002 **Matrix:** SOIL **Received Date:** 4/17/2021 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **mb**
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	4/20/2021 6:57:39 PM
Motor Oil Range Organics (MRO)	ND	50		mg/Kg	1	4/20/2021 6:57:39 PM
Surr: DNOP	93.6	70-130		%Rec	1	4/20/2021 6:57:39 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **CCM**
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	4/20/2021 10:51:00 PM
Surr: BFB	95.9	70-130		%Rec	1	4/20/2021 10:51:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **CCM**
Benzene	ND	0.025		mg/Kg	1	4/20/2021 10:51:00 PM
Toluene	ND	0.050		mg/Kg	1	4/20/2021 10:51:00 PM
Ethylbenzene	ND	0.050		mg/Kg	1	4/20/2021 10:51:00 PM
Xylenes, Total	ND	0.099		mg/Kg	1	4/20/2021 10:51:00 PM
Surr: 4-Bromofluorobenzene	79.2	70-130		%Rec	1	4/20/2021 10:51:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **VP**
Chloride	ND	60		mg/Kg	20	4/21/2021 11:54:04 AM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

Analytical Report
Lab Order **2104810**
Date Reported: **4/22/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE **Client Sample ID:** N-HA-30"
Project: Gallegos Canyon Unit 356 **Collection Date:** 4/16/2021 8:45:00 AM
Lab ID: 2104810-003 **Matrix:** SOIL **Received Date:** 4/17/2021 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **mb**
Diesel Range Organics (DRO)	ND	9.6		mg/Kg	1	4/20/2021 7:07:32 PM
Motor Oil Range Organics (MRO)	ND	48		mg/Kg	1	4/20/2021 7:07:32 PM
Surr: DNOP	80.5	70-130		%Rec	1	4/20/2021 7:07:32 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **CCM**
Gasoline Range Organics (GRO)	ND	4.8		mg/Kg	1	4/20/2021 11:10:00 PM
Surr: BFB	96.1	70-130		%Rec	1	4/20/2021 11:10:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **CCM**
Benzene	ND	0.024		mg/Kg	1	4/20/2021 11:10:00 PM
Toluene	ND	0.048		mg/Kg	1	4/20/2021 11:10:00 PM
Ethylbenzene	ND	0.048		mg/Kg	1	4/20/2021 11:10:00 PM
Xylenes, Total	ND	0.097		mg/Kg	1	4/20/2021 11:10:00 PM
Surr: 4-Bromofluorobenzene	79.8	70-130		%Rec	1	4/20/2021 11:10:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **VP**
Chloride	67	60		mg/Kg	20	4/21/2021 12:06:28 PM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

Analytical Report
Lab Order **2104810**
Date Reported: **4/22/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE **Client Sample ID:** W-HA-32"
Project: Gallegos Canyon Unit 356 **Collection Date:** 4/16/2021 8:55:00 AM
Lab ID: 2104810-004 **Matrix:** SOIL **Received Date:** 4/17/2021 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **mb**
Diesel Range Organics (DRO)	ND	9.7		mg/Kg	1	4/20/2021 7:17:23 PM
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	4/20/2021 7:17:23 PM
Surr: DNOP	81.7	70-130		%Rec	1	4/20/2021 7:17:23 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **CCM**
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	4/20/2021 11:30:00 PM
Surr: BFB	98.4	70-130		%Rec	1	4/20/2021 11:30:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **CCM**
Benzene	ND	0.024		mg/Kg	1	4/20/2021 11:30:00 PM
Toluene	ND	0.049		mg/Kg	1	4/20/2021 11:30:00 PM
Ethylbenzene	ND	0.049		mg/Kg	1	4/20/2021 11:30:00 PM
Xylenes, Total	ND	0.097		mg/Kg	1	4/20/2021 11:30:00 PM
Surr: 4-Bromofluorobenzene	83.4	70-130		%Rec	1	4/20/2021 11:30:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **VP**
Chloride	ND	60		mg/Kg	20	4/21/2021 12:18:52 PM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

Analytical Report
Lab Order **2104810**
Date Reported: **4/22/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE
Client Sample ID: Center-HA-35"
Project: Gallegos Canyon Unit 356
Collection Date: 4/16/2021 9:10:00 AM
Lab ID: 2104810-005 **Matrix:** SOIL
Received Date: 4/17/2021 8:40:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **mb**
Diesel Range Organics (DRO)	ND	9.9		mg/Kg	1	4/20/2021 7:27:12 PM
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	4/20/2021 7:27:12 PM
Surr: DNOP	86.0	70-130		%Rec	1	4/20/2021 7:27:12 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **CCM**
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	4/20/2021 11:50:00 PM
Surr: BFB	96.2	70-130		%Rec	1	4/20/2021 11:50:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **CCM**
Benzene	ND	0.024		mg/Kg	1	4/20/2021 11:50:00 PM
Toluene	ND	0.049		mg/Kg	1	4/20/2021 11:50:00 PM
Ethylbenzene	ND	0.049		mg/Kg	1	4/20/2021 11:50:00 PM
Xylenes, Total	ND	0.097		mg/Kg	1	4/20/2021 11:50:00 PM
Surr: 4-Bromofluorobenzene	82.4	70-130		%Rec	1	4/20/2021 11:50:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **VP**
Chloride	ND	60		mg/Kg	20	4/21/2021 12:31:16 PM

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: **2104810**
22-Apr-21

Client: SIMCOE
Project: Gallegos Canyon Unit 356

Sample ID: **MB-59536**	SampType: **MBLK**	TestCode: **EPA Method 300.0: Anions**							
Client ID: **PBS**	Batch ID: **59536**	RunNo: **76831**							
Prep Date: **4/21/2021**	Analysis Date: **4/21/2021**	SeqNo: **2723936**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: **LCS-59536**	SampType: **LCS**	TestCode: **EPA Method 300.0: Anions**							
Client ID: **LCSS**	Batch ID: **59536**	RunNo: **76831**							
Prep Date: **4/21/2021**	Analysis Date: **4/21/2021**	SeqNo: **2723937**	Units: **mg/Kg**						
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	93.6	90	110			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: **2104810**
22-Apr-21

Client: SIMCOE
Project: Gallegos Canyon Unit 356

Sample ID: **MB-59495**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **59495**	RunNo: **76810**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2722808** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	8.7		10.00		87.4	70	130			

Sample ID: **LCS-59495**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **59495**	RunNo: **76810**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2722809** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	52	10	50.00	0	104	68.9	141			
Surr: DNOP	5.0		5.000		100	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT
Hall Environmental Analysis Laboratory, Inc.

WO#: **2104810**
22-Apr-21

Client: SIMCOE
Project: Gallegos Canyon Unit 356

Sample ID: **LCS-59493**	SampType: **LCS**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **LCSS**	Batch ID: **59493**	RunNo: **76833**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2723303** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	25	5.0	25.00	0	101	78.6	131			
Surr: BFB	1100		1000		107	70	130			

Sample ID: **MB-59493**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **PBS**	Batch ID: **59493**	RunNo: **76833**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2723304** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	1000		1000		101	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.
D	Sample Diluted Due to Matrix
H	Holding times for preparation or analysis exceeded
ND	Not Detected at the Reporting Limit
PQL	Practical Quanitative Limit
S	% Recovery outside of range due to dilution or matrix
B	Analyte detected in the associated Method Blank
E	Value above quantitation range
J	Analyte detected below quantitation limits
P	Sample pH Not In Range
RL	Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2104810**

22-Apr-21

Client: SIMCOE

Project: Gallegos Canyon Unit 356

Sample ID: **LCS-59493**	SampType: **LCS**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **LCSS**	Batch ID: **59493**	RunNo: **76833**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2723323** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.83	0.025	1.000	0	82.6	80	120			
Toluene	0.83	0.050	1.000	0	83.0	80	120			
Ethylbenzene	0.85	0.050	1.000	0	85.2	80	120			
Xylenes, Total	2.5	0.10	3.000	0	83.7	80	120			
Surr: 4-Bromofluorobenzene	0.84		1.000		83.9	70	130			

Sample ID: **MB-59493**	SampType: **MBLK**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **PBS**	Batch ID: **59493**	RunNo: **76833**
Prep Date: **4/19/2021**	Analysis Date: **4/20/2021**	SeqNo: **2723324** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.83		1.000		83.2	70	130			

Qualifiers:

*	Value exceeds Maximum Contaminant Level.	B	Analyte detected in the associated Method Blank
D	Sample Diluted Due to Matrix	E	Value above quantitation range
H	Holding times for preparation or analysis exceeded	J	Analyte detected below quantitation limits
ND	Not Detected at the Reporting Limit	P	Sample pH Not In Range
PQL	Practical Quanitative Limit	RL	Reporting Limit
S	% Recovery outside of range due to dilution or matrix		

HALL ENVIRONMENTAL ANALYSIS LABORATORY

Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

Sample Log-In Check List

Client Name: **SIMCOE** Work Order Number: **2104810** RcptNo: **1**

Received By: **Cheyenne Cason** **4/17/2021 8:40:00 AM**

Completed By: **Cheyenne Cason** **4/17/2021 9:31:08 AM**

Reviewed By: 04/17/2021

Chain of Custody

1. Is Chain of Custody complete?	Yes ☑	No ☐	Not Present ☐
2. How was the sample delivered?	Courier		

Log In

3. Was an attempt made to cool the samples?	Yes ☑	No ☐	NA ☐
4. Were all samples received at a temperature of >0° C to 6.0°C	Yes ☑	No ☐	NA ☐
5. Sample(s) in proper container(s)?	Yes ☑	No ☐	
6. Sufficient sample volume for indicated test(s)?	Yes ☑	No ☐	
7. Are samples (except VOA and ONG) properly preserved?	Yes ☑	No ☐	
8. Was preservative added to bottles?	Yes ☐	No ☑	NA ☐
9. Received at least 1 vial with headspace <1/4" for AQ VOA?	Yes ☐	No ☐	NA ☑
10. Were any sample containers received broken?	Yes ☐	No ☑	
11. Does paperwork match bottle labels? (Note discrepancies on chain of custody)	Yes ☑	No ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
13. Is it clear what analyses were requested?	Yes ☑	No ☐	
14. Were all holding times able to be met? (If no, notify customer for authorization.)	Yes ☑	No ☐	

# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)

Adjusted? _____

Checked by 4/17/21

Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	3.6	Good	Yes			

Chain-of-Custody Record

Client: SIMCOE LLC

Mailing Address: 1199 Main St Ste 101 Durango CO 81301

Phone #: 505-330-9179

email or Fax#: steven.moskal@IKAVEnergy.com

QA/QC Package:
☐ Standard ☐ Level 4 (Full Validation)

Accreditation: ☐ Az Compliance
☐ NELAC ☐ Other
☐ EDD (Type)

Turn-Around Time:
~~Standard~~ X Rush 5 day Turn

Project Name: Gallegos Canyon Unit 356

Project #: BGT Compliance

Project Manager: Steve Moskal

Sampler: LI LI

On Ice: ☒ Yes ☐ No

# of Coolers: 1

Cooler Temp(including CF): 3.6 +0=3.6 (°C)

HALL ENVIRONMENTAL ANALYSIS LABORATORY
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2104610	BTEX / ~~MTBE~~ / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)
4/16/21	8:20	soil	S-HA-40"	4oz x 1	Ice	001	X	X					X			
	8:35		E-HA-34"			002	X	X					X			
	8:45		N-HA-30"			003	X	X					X			
	8:55		W-HA-32"			004	X	X					X			
	9:10		Center-HA-35"			005	X	X					X			

Date:	Time:	Relinquished by:	Received by:	Via:	Date	Time
4/16/21	11:30		Chris Walt		4/16/21	1130
4/16/21	1743			courier	4/17/21	0840

Remarks:

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

Photo Log
Gallegos Canyon Unit 356 – Hand Auger BGT Closure
April 16th, 2021

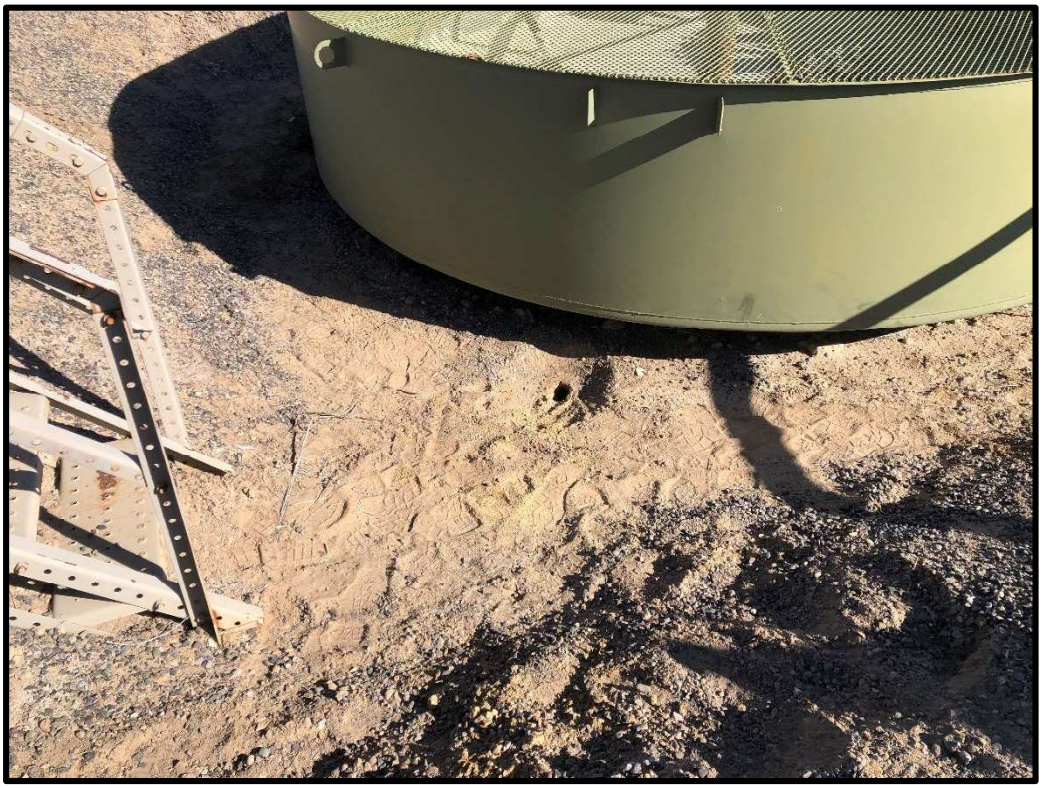


Photo 1: Above - Collection point of S-HA-40", advanced at ~ 25° via hand auger from beneath the above-ground tank.

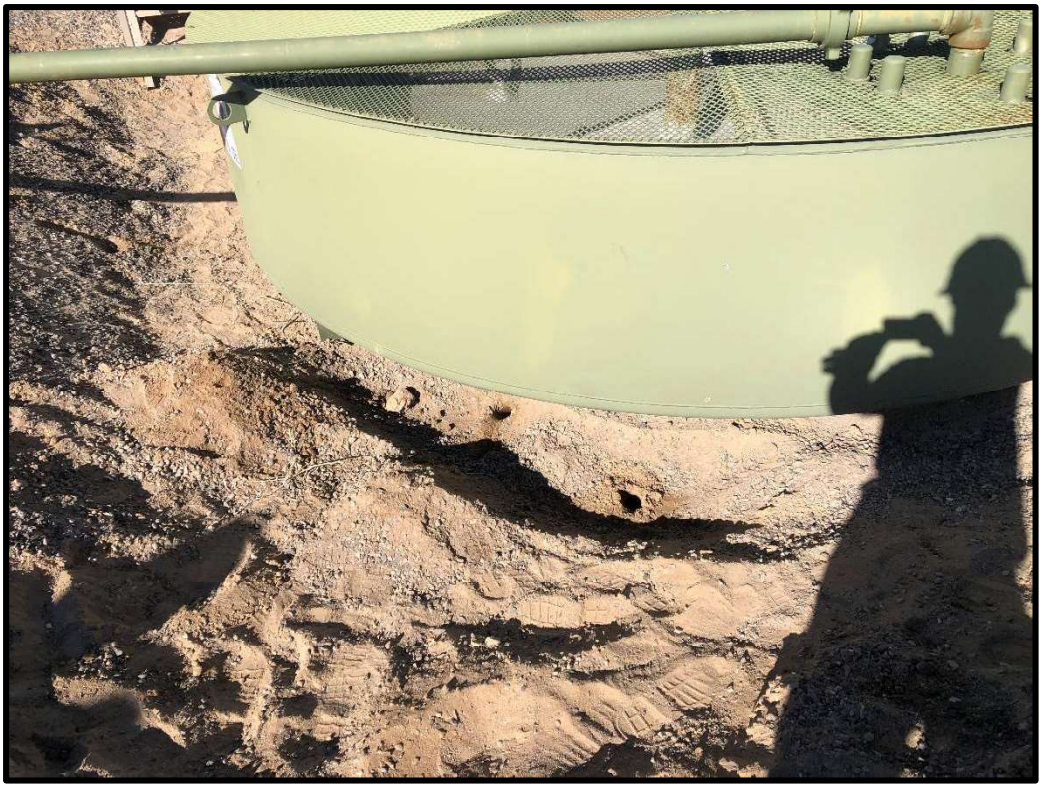


Photo 2: Above - Collection point of E-HA-34" (left) advanced at ~ 25° and Center-HA-35" (right) advanced at ~45° via hand auger from beneath the above-ground tank.

Photo Log
Gallegos Canyon Unit 356 – Hand Auger BGT Closure
April 16th, 2021

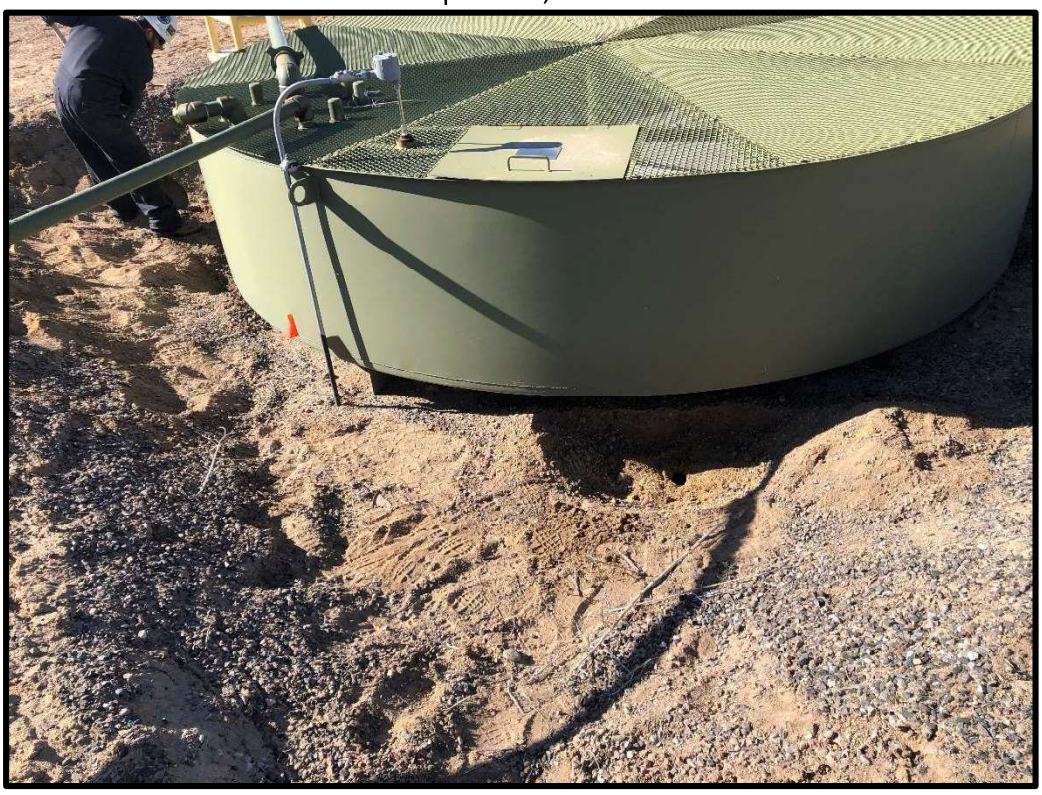


Photo 3: Above - Collection point of N-HA-30", advanced at ~ 25° via hand auger from beneath the above-ground tank.

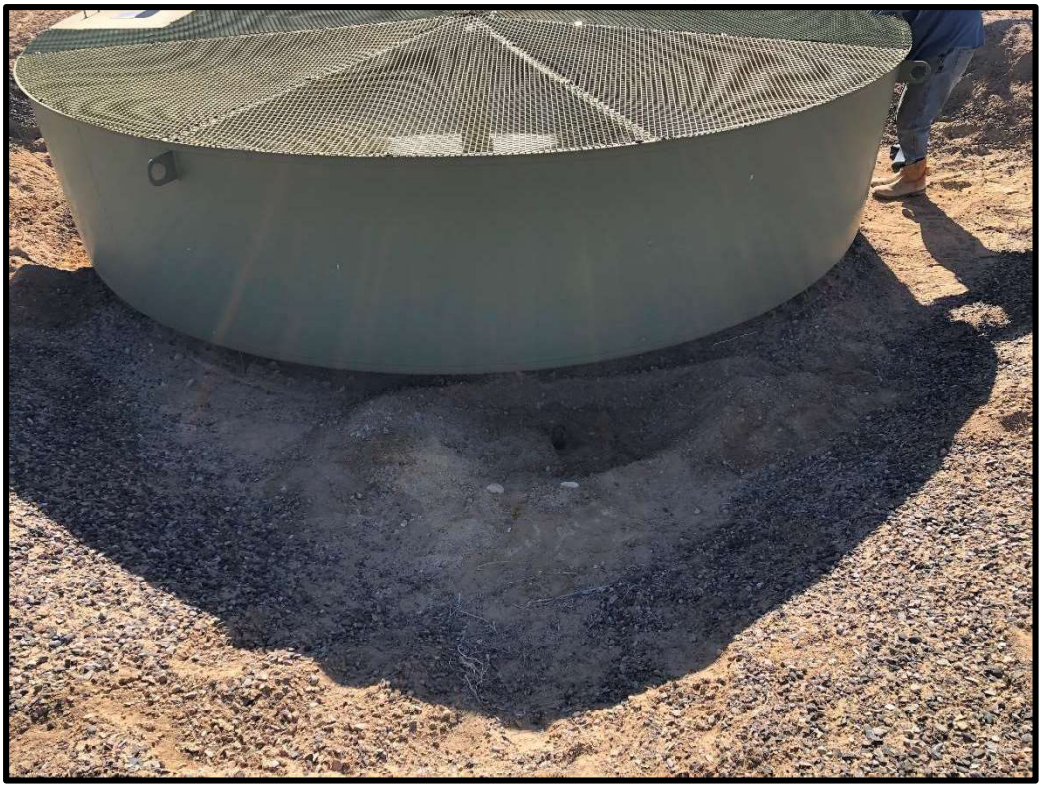


Photo 4: Above - Collection point of W-HA-32", advanced at ~ 25° via hand auger from beneath the above-ground tank.

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 25802

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 25802
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	6/8/2021