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 October 11, 2022

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

BGT1

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: Simcoe Energy LLC OGRID #: 329736

Address: 1199 Main Avenue, Durango, CO 81301

Facility or well name: Atlantic B LS 002

API Number: 30-045-09966 OCD Permit Number:

U/L or Qtr/Qtr A Section 4 Township 30N Range 10W County: San Juan

Center of Proposed Design: Latitude 36.84499 Longitude -107.882492 NAD83

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: 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 Single Walled/Double Bottomed

Liner type: Thickness _____mil ☐ HDPE ☐ PVC ☐ Other_____

4.

☐ **Alternative Method:**

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

5.

Fencing: Subsection D of 19.15.17.11 NMAC *(Applies to permanent pits, temporary pits, and below-grade tanks)*

☐ Chain link, six feet in height, two strands of barbed wire at top *(Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)*

☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet

☐ Alternate. Please specify_____

6.

Netting: Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☐ Signed in compliance with 19.15.16.8 NMAC

8.

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

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

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

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

General siting	
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank. - ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit . NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ 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. **(Does not apply to below grade tanks)** - Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)** - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	☐ Yes ☐ No
Within an unstable area. **(Does not apply to below grade tanks)** - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	☐ Yes ☐ No
Within a 100-year floodplain. **(Does not apply to below grade tanks)** - FEMA map	☐ Yes ☐ No
Below Grade Tanks	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit using Low Chloride Drilling Fluid (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ 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	☐ Yes ☐ No

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
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	☐ 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 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	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ 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	☐ Yes ☐ 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	☐ 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

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_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

13.
Proposed Closure: 19.15.17.13 NMAC
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

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

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

14.
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***

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

15.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	☐ Yes ☐ No ☐ NA
Within 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ Yes ☐ No
Within 300 feet of a wetland. US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	

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

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

- ☐ Siting Criteria 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): _____ Title: _____

Signature:_____ Date: _____

e-mail address:_____ Telephone: _____

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

OCD Representative Signature: Joel Stone **Approval Date:** 06/06/2025

Title: Environmental Scientist & Specialist-A **OCD Permit Number:** BGT1

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:** 4/17/2025

20.
Closure Method:

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

☐ If different from approved plan, please explain.

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

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

On-site Closure Location: Latitude 36.84499 Longitude -107.882492 NAD: 1927 ☐ 1983 ☒

22.

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

Name (Print): Jerrid Brann Title: Environmental Coordinator

Signature: Jerrid Brann Date: 5/30/2025

e-mail address: jerrid.brann@ikavenergy.com Telephone: 970-394-0250

BP AMERICA PRODUCTION COMPANY
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP 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. BP 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 BP NMOCD approved BGT design attached to the BP Design and Construction Plan. BP 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 BP NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP 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. BP 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.
2. BP 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.
3. BP 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. BP 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. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
    f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
    g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
    h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
    i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
    j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
    k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

4. BP 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.
5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP 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)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2
Total BTEX	US EPA Method SW-846 8021B or 8260B	50
TPH	US EPA Method SW-846 418.1	100
Chlorides	US EPA Method 300.0 or 4500B	250 or background

Notes: mg/Kg = milligram per kilogram, 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.

7. BP shall notify the division District III office of its results on form C-141.
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegitate the location. The location will be reclaimed if it is not with in the active process area.
10. BP 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. BP 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.
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

12. BP 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.
13. BP 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.
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
15. Within 60 days of closure completion, BP 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.Disposal Facility Name and Permit Number
16. BP 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.

Closure Plan

1. Notification of removal is attached in this document
2. Notification of removal is attached in this document.
3. All free liquids were removed from the tank prior to removal and disposed of in a approved location. The Pritchard SWD #1(API 30-045-28351). There was no sludge present.
4. The BGT was transported for reuse.
5. equipment related to the BGT was removed and other equipment related to the production of the well remained in service.
6. Soils beneath the BGT were sampled for TPH, BTEX and chloride per the above requirements. Sampling results indicate that all concentrations were below the relevant closure criteria standards.
7. C-141 attached.
8. Sampling results indicate no release has occurred.
9. Sampling results indicate no release has occurred and the excavation was backfilled and re-contoured to the existing well pad.
10. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
11. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
12. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
13. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
14. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
15. Closure report will be the C-144 form, Photo documentation will be included as an attachment in this report.
16. Certification will be in the Form C-144.

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: Jerrid Brann	Contact Telephone 970-394-0250
Contact email: jerrid.brann@ikavenergy.com	Incident # N/A
Contact mailing address: 1199 Main Ste., Suite 101, Durango, CO 81301	

Location of Release Source

Latitude 36.84499 Longitude -107.882492
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Atlantic B LS 002	Site Type: Active Well
Date Release Discovered: N/A	API# 30-045-09966

Unit Letter	Section	Township	Range	County
A	4	30N	10W	San Juan

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

Nature and Volume of Release

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

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls) Approx.	Volume Recovered (bbls) Approx.
	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: Sampling results indicate no release, BGT was removed.		

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)? Notice	

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: Jerrid Brann Title: Environmental Coordinator

Signature: Jerrid Brann Date: 5/30/2025

email: jerrid.brann@ikavenergy.com Telephone: 970-394-0250

OCD Only

Received by: _____ Date: _____

From: Kennedy, Joseph, EMNRD
To: Jerrid Brann
Subject: RE: [EXTERNAL] BGT closure
Date: Thursday, April 17, 2025 9:53:02 AM

Good morning,
It looks like you are referring to a below-grade tank(BGT), not a pit. The permit for this BGT was issued under the older Part 17 rule so you will need to go by the limits defined in that permit. However, the OCD understands that the current 19.15.17 NMAC rule has less stringent limits. If you do the five point sampling and the results exceed the limits of the older rule but fall below the limits of the current rule (based on this depth to groundwater on Table I of 19.15.17.13 NMAC), the operator can request a modification to their existing permit/registration utilizing the C-144 Form. The modification request should state that the operator wants their BGT permit/registration to be based on the current 19.15.17 NMAC rule. The operator also needs to include an update to the closure plan's confirmation sampling limits. Please note: Table I of 19.15.17.13 NMAC specifies that TPH be analyzed using EPA SW-846 Method 418.1. Many lab reports submitted to OCD show the analysis for TPH using method 8015 M/D for DRO+MRO+GRO. If the operator would like to request approval to use these methods and add together DRO, MRO and GRO for TPH result, please include this in your modification request. **For simplicity, the operator can combine this modification request in conjunction with the final closure report.**

The operator must submit the final closure report, utilizing the C-144 Form, to the OCD within 60-days of closure completion. In this C-144 application, the operator also needs to ask for the modification request and check the Type of action "Modification to an existing permit/or registration" in conjunction with the "Closure of a pit, below-grade tank, or proposed alternative method." All applicable sections for the closure report need to be filled out and section 16 needs to be checked for "Confirmational Sampling Plan." The operator needs to include the updated closure plan's confirmation sampling limits.

Of course, if five point sampling results in contamination above the limits of Table I, you will need to report to our incidents group using the online C-141 form-Release Notification and Corrective Action. Please file electronically through OCD Permitting, using the Fee Application tab for releases and they will instruct as to the remediation effort.

Thank you,

Joe Kennedy • Environmental Specialist Advanced
EMNRD - Oil Conservation Division

1220 S. St. Francis Drive | Santa Fe, NM 87505
505.549.5583 | joseph.kennedy@emnrd.nm.gov

From: Jerrid Brann <jerrid.brann@ikavenergy.com>
Sent: Thursday, April 17, 2025 8:57 AM
To: Kennedy, Joseph, EMNRD <Joseph.Kennedy@emnrd.nm.gov>
Subject: [EXTERNAL] BGT closure

Good Morning Joe,

I am the environmental coordinator at Simcoe/IKAV, new to the position and had some questions about BGT/Pit closure. We are planning to remove and close a pit at the Atlantic B LS 2 wellsite (API -3004509966), and I had contacted Nelson Velez about it. He gave me your name as a contact for pit closure. I have made the notifications to the surface owner which is the BLM, and we have submitted a sundry to them for closure, they are requesting the sampling that we would do for OCD of a 5 point composite from below the tank. This is where I needed some questions answered.

This pit is on the "registered pit list" I have from BP when Simcoe purchased the asset and I think that means we follow the approved closure plan that was with the original permit, however the sampling criteria is now the current table 1 standards under 19.15.17. Is this correct? And if so, the original groundwater map shows the water depth within half a mile at 70 ', which would put this pit in the second criteria of the table. Is that correct?

Thanks in advance for your help and please feel free to call if that would be easier for you.

IKAV
Jerrid Brann
Environmental Coordinator
jerrid.brann@ikavenergy.com
970-394-0250

From: Wenman, Christopher P
To: Jerrid Brann
Subject: Re: [EXTERNAL] Atlantic B LS 2 BGT removal
Date: Thursday, April 17, 2025 8:13:58 AM

For BLM that is all the notice we need, thank you.

--

Chris Wenman
Supervisory Natural Resource Specialist
Farmington Field Office
Bureau of Land Management
6251 College Blvd. Suite A
Farmington, NM 87402
Office: (505) 564-7727
Cell: (505) 635-0722

From: Jerrid Brann <jerrid.brann@ikavenergy.com>
Sent: Thursday, April 17, 2025 8:08 AM
To: Wenman, Christopher P <cwenman@blm.gov>
Subject: RE: [EXTERNAL] Atlantic B LS 2 BGT removal

Thank you,

Does this email and the sundry cover my notifications? Under NMOCD I am required to notify 72 hours before and no more than one week prior via certified mail, however Nelson Velez seemed to think email or sundry would be sufficient.

Thanks again!

Jerrid Brann
Environmental Coordinator
jerrid.brann@ikavenergy.com
970-394-0250

From: Wenman, Christopher P <cwenman@blm.gov>
Sent: Thursday, April 17, 2025 8:04 AM

To: Jerrid Brann <jerrid.brann@ikavenergy.com>
Subject: Re: [EXTERNAL] Atlantic B LS 2 BGT removal

Morning Jerrid,

I will get that Sundry processed today.

The 5-point composite is sufficient for BLM, please send it in as a Subsequent Report Sundry for that well.

Thanks,

--
Chris Wenman
Supervisory Natural Resource Specialist
Farmington Field Office
Bureau of Land Management
6251 College Blvd. Suite A
Farmington, NM 87402
Office: (505) 564-7727
Cell: (505) 635-0722

From: Jerrid Brann <jerrid.brann@ikavenergy.com>
Sent: Thursday, April 17, 2025 6:47 AM
To: Wenman, Christopher P <cwenman@blm.gov>
Subject: [EXTERNAL] Atlantic B LS 2 BGT removal

Good morning,

We are removing a BGT on the Atlantic B LS 2 wellsite next Tuesday, an NOI sundry has been sent in, but I had a question about the sampling for removal. For the NMOCD we are required to get a 5-point composite sample from below the tank after removal, is that sufficient for the BLM? Also is there a sampling notification requirement? I assume this would possibly be a COA on the sundry response but haven't seen it yet.

Well Name: ATLANTIC B LS

Well Location: T30N / R10W / SEC 4 / NENE / 36.84522 / -107.88194

County or Parish/State: SAN JUAN / NM

Well Number: 2

Type of Well: CONVENTIONAL GAS WELL

Allottee or Tribe Name:

Lease Number: NMSF080917

Unit or CA Name:

Unit or CA Number:

US Well Number: 3004509966

Operator: SIMCOE LLC

Notice of Intent

Sundry ID: 2847424

Type of Submission: Notice of Intent

Type of Action: Pit Construction or Closure

Date Sundry Submitted: 04/15/2025

Time Sundry Submitted: 01:56

Date proposed operation will begin: 04/22/2025

Procedure Description: SIMCOE requests approval to remove and close the BGT on the Atlantic B LS 2.

Surface Disturbance

Is any additional surface disturbance proposed?: No

NOI Attachments

Procedure Description

SIMCOELLC_SFD_ATLANTIC_B_LS_002_APINo_300450996601_Rev_20250415_PITREMOVAL_20250415135349.pdf

Well Name: ATLANTIC B LS

Well Location: T30N / R10W / SEC 4 / NENE / 36.84522 / -107.88194

County or Parish/State: SAN JUAN / NM

Well Number: 2

Type of Well: CONVENTIONAL GAS WELL

Allottee or Tribe Name:

Lease Number: NMSF080917

Unit or CA Name:

Unit or CA Number:

US Well Number: 3004509966

Operator: SIMCOE LLC

Operator

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

Operator Electronic Signature: CHRISTY KOST

Signed on: APR 15, 2025 01:53 PM

Name: SIMCOE LLC

Title: Permitting Agent

Street Address: 1199 MAIN AVE STE 101

City: DURANGO **State:** CO

Phone: (719) 251-7733

Email address: CHRISTY.KOST@IKAVENERGY.COM

Field

Representative Name:

Street Address:

City: **State:** **Zip:**

Phone:

Email address:

BLM Point of Contact

BLM POC Name: DAVE J MANKIEWICZ

BLM POC Title: AFM-Minerals

BLM POC Phone: 5055647761

BLM POC Email Address: DMANKIEW@BLM.GOV

Disposition: Approved

Disposition Date: 04/17/2025

Signature: Dave J Mankiewicz

Form 3160-5
(June 2019)

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT

FORM APPROVED
OMB No. 1004-0137
Expires: October 31, 2021

SUNDRY NOTICES AND REPORTS ON WELLS

Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.

SUBMIT IN TRIPLICATE *- Other instructions on page 2*

5. Lease Serial No.

6. If Indian, Allottee or Tribe Name

7. If Unit of CA/Agreement, Name and/or No.

1. Type of Well
☐ Oil Well ☐ Gas Well ☐ Other

8. Well Name and No.

2. Name of Operator

9. API Well No.

3a. Address

3b. Phone No. *(include area code)*

10. Field and Pool or Exploratory Area

4. Location of Well *(Footage, Sec., T.,R.,M., or Survey Description)*

11. Country or Parish, State

12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA

TYPE OF SUBMISSION	TYPE OF ACTION			
☐ Notice of Intent	☐ Acidize	☐ Deepen	☐ Production (Start/Resume)	☐ Water Shut-Off
	☐ Alter Casing	☐ Hydraulic Fracturing	☐ Reclamation	☐ Well Integrity
☐ Subsequent Report	☐ Casing Repair	☐ New Construction	☐ Recomplete	☐ Other
	☐ Change Plans	☐ Plug and Abandon	☐ Temporarily Abandon	
☐ Final Abandonment Notice	☐ Convert to Injection	☐ Plug Back	☐ Water Disposal	

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplete horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be perfonned or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has detennined that the site is ready for final inspection.)

14. I hereby certify that the foregoing is true and correct. Name *(Printed/Typed)*

Title

Signature

Date

THE SPACE FOR FEDERAL OR STATE OFICE USE

Approved by

Title

Date

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office

Title 18 U.S.C Section 1001 and Title 43 U.S.C Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

SPECIFIC INSTRUCTIONS

Item 4 - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

Item 13: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.
AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.
PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c)and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.
ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.
EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:
The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.
Response to this request is mandatory.
The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

BURDEN HOURS STATEMENT: Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect ofthis form to U.S. Department ofthe Interior, Bureau ofLand Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

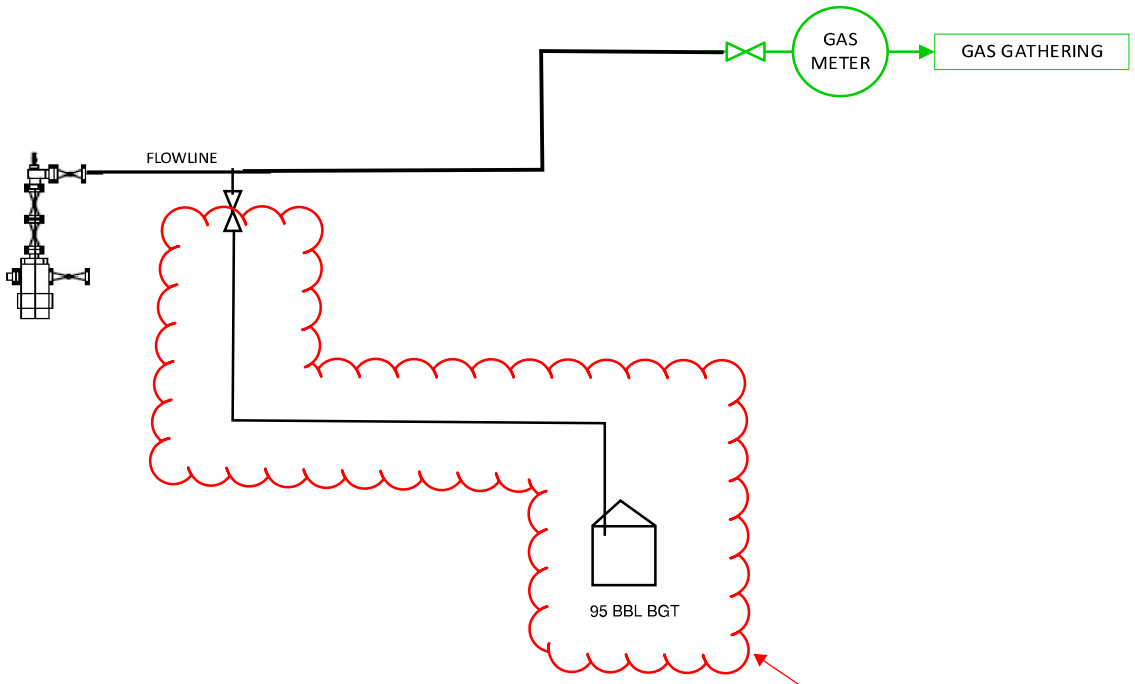
Additional Information

Location of Well

0. SHL: NENE / 990 FNL / 990 FEL / TWSP: 30N / RANGE: 10W / SECTION: 4 / LAT: 36.84522 / LONG: -107.88194 (TVD: 0 feet, MD: 0 feet)

BHL: NENE / 990 FNL / 990 FEL / TWSP: 30N / SECTION: / LAT: 36.84522 / LONG: 107.88194 (TVD: 0 feet, MD: 0 feet)

BHL: NENE / 990 FNL / 990 FEL / TWSP: 30N / SECTION: / LAT: 36.84522 / LONG: 107.88194 (TVD: 0 feet, MD: 0 feet)



CONSOLIDATED EST. FUEL USEAGE		
DEVICE	FUEL USAGE	
PUMP JACK	0.000	MSCFD
SEPARATOR	0.000	MSCFD
COMPRESSOR	0.000	MSCFD
WATER TANK	0.000	MSCFD
OTHER	0.000	MSCFD
TOTAL	**0.000**	**MSCFD**

REMOVE THIS BGT (PIT) TANK
REMEDIATE AND CLOSE PER NMOCD & NMED REGULATIONS.

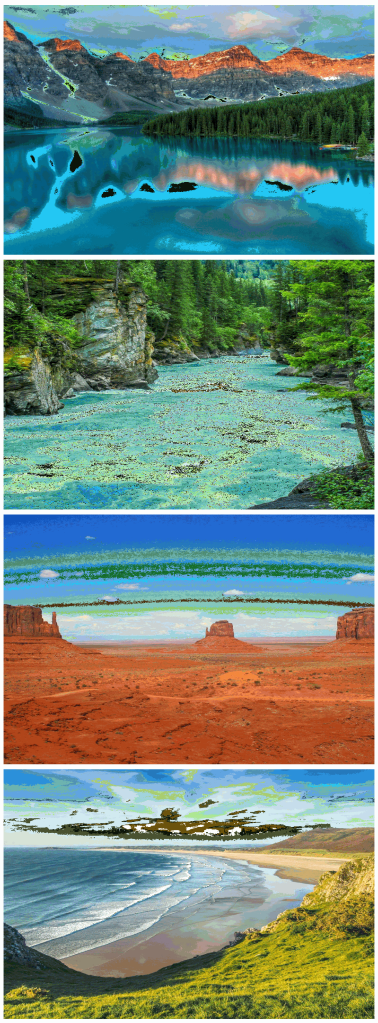
NOTE OTHER SITE EQUIPMENT HAS BEEN REMOVED PREVIOUSLY.

WELL DATA	
API NUMBER:	300450996601
WELL NAME & NUMBER:	ATLANTIC B LS 002
WELL STATUS:	PROD
TWN/RNG/SCTN:	30N / 10W / 4
LAT:	36.84519
LONG:	-107.88247
GAS METER	
GAS METER NUMBER:	70134
PUMP JACK	***NO PUMPJACK***
PUMP JACK RATING:	HP
FUEL CONSUMPTON:	MSCFD
SEPARATOR	***NO SEPARATOR ONSITE***
SEPARATOR STATUS:	
SEPARATOR TYPE:	
BURNER SIZE:	BTUH
BURNER FUEL CONSUMPTION:	0.000 MSCFD
INST. FUEL CONSUMPTION:	0.000 MSCFD
COMPRESSOR	***NO COMPRESSOR ONSITE***
UNIT #:	
ENGINE MODEL:	
OEM HP:	HP
FUEL CONSUMPTON:	0.000 MSCFD
INST. FUEL CONSUMPTION:	0.000 MSCFD
CONDENSATE TANK	***NO CONDENSATE TANK ONSITE***
OIL TANK #1 SIZE:	BBL
OIL TANK #2 SIZE:	BBL
WATER TANK	
WATER PIT #1 SIZE:	95 BBL
WATER PIT #2 SIZE:	BBL
WATER TANK #1 SIZE:	NO WATER TANK ONSITE BBL
WATER TANK #2 SIZE:	BBL
BURNER SIZE:	BTUH
FUEL CONSUMPTON:	0.000 MSCFD

SIMCOE, LLC	
San Juan South Gathering Field, New Mexico	
SITE FACILITY DRAWING	
SITE NAME: ATLANTIC B LS 002-MV	**API: 3004509966**
DATE: 4/15/2025	REV: 1

Report to:

Jerrid Brann



5796 U.S. Hwy 64
Farmington, NM 87401

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

envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

IKAV Energy Inc.

Project Name:	Atlantic B LS 2 BGT
Work Order:	E504218
Job Number:	20095-0001
Received:	4/22/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
4/29/25

Date Reported: 4/29/25

Jerrid Brann
1199 Main Ave. Suite 242
Durango, CO 81301

Project Name: Atlantic B LS 2 BGT
Workorder: E504218
Date Received: 4/22/2025 10:24:00AM

Jerrid Brann,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 4/22/2025 10:24:00AM, under the Project Name: Atlantic B LS 2 BGT.

The analytical test results summarized in this report with the Project Name: Atlantic B LS 2 BGT apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

Please review the Chain-of-Custody (COC) and Sample Receipt Checklist (SRC) for any issues reguarding sample receipt temperature, containers, preservation etc. To best understand your test results, review the entire report summarizing your sample data and the associated quality control batch data.

All reported data in this analytical report were analyzed according to the referenced method(s) and are in compliance with the latest NELAC/TNI standards, unless otherwise noted. Samples or analytical quality control parameters not meeting specific QC criteria are qualified with a data flag. Data flag definitions are located in the Notes and Definitions section of this analytical report.

If you have any questions concerning this report, please feel free to contact Envirotech, Inc.

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Schwanz
Laboratory Administrator
Office: 505-632-1881
rainaschwanz@envirotech-inc.com

Field Offices:

Southern New Mexico Area

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

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

Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	**Reported:**
1199 Main Ave. Suite 242	Project Number:	20095-0001	
Durango CO, 81301	Project Manager:	Jerrid Brann	04/29/25 10:16

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01	E504218-01A	Soil	04/22/25	04/22/25	Glass Jar, 4 oz.

Sample Data

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	
1199 Main Ave. Suite 242	Project Number:	20095-0001	**Reported:**
Durango CO, 81301	Project Manager:	Jerrid Brann	4/29/2025 10:16:04AM

SS01

E504218-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: IY			Batch: 2517064
Benzene	ND	0.0250	1	04/23/25	04/23/25	
Ethylbenzene	ND	0.0250	1	04/23/25	04/23/25	
Toluene	ND	0.0250	1	04/23/25	04/23/25	
o-Xylene	ND	0.0250	1	04/23/25	04/23/25	
p,m-Xylene	ND	0.0500	1	04/23/25	04/23/25	
Total Xylenes	ND	0.0250	1	04/23/25	04/23/25	
Surrogate: 4-Bromochlorobenzene-PID		*98.6 %*	*70-130*	*04/23/25*	*04/23/25*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: IY			Batch: 2517064
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/23/25	04/23/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*93.8 %*	*70-130*	*04/23/25*	*04/23/25*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KH			Batch: 2517060
Diesel Range Organics (C10-C28)	ND	25.0	1	04/23/25	04/23/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/23/25	04/23/25	
Surrogate: n-Nonane		*86.7 %*	*61-141*	*04/23/25*	*04/23/25*	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: DT			Batch: 2517070
Chloride	ND	20.0	1	04/23/25	04/23/25	

QC Summary Data

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	**Reported:**
1199 Main Ave. Suite 242	Project Number:	20095-0001	
Durango CO, 81301	Project Manager:	Jerrid Brann	4/29/2025 10:16:04AM

Volatile Organics by EPA 8021B

Analyst: IY

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2517064-BLK1)									Prepared: 04/23/25 Analyzed: 04/23/25
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	*7.96*		*8.00*		*99.4*	*70-130*			
LCS (2517064-BS1)									Prepared: 04/23/25 Analyzed: 04/23/25
Benzene	4.47	0.0250	5.00		89.3	70-130			
Ethylbenzene	4.43	0.0250	5.00		88.5	70-130			
Toluene	4.46	0.0250	5.00		89.2	70-130			
o-Xylene	4.41	0.0250	5.00		88.2	70-130			
p,m-Xylene	8.86	0.0500	10.0		88.6	70-130			
Total Xylenes	13.3	0.0250	15.0		88.5	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*7.78*		*8.00*		*97.2*	*70-130*			
Matrix Spike (2517064-MS1)				**Source: E504221-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Benzene	4.67	0.0250	5.00	ND	93.4	70-130			
Ethylbenzene	4.65	0.0250	5.00	0.0256	92.4	70-130			
Toluene	4.66	0.0250	5.00	ND	93.2	70-130			
o-Xylene	4.57	0.0250	5.00	ND	91.5	70-130			
p,m-Xylene	9.26	0.0500	10.0	0.0598	92.0	70-130			
Total Xylenes	13.8	0.0250	15.0	0.0598	91.8	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*7.77*		*8.00*		*97.1*	*70-130*			
Matrix Spike Dup (2517064-MSD1)				**Source: E504221-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Benzene	4.71	0.0250	5.00	ND	94.2	70-130	0.907	27	
Ethylbenzene	4.70	0.0250	5.00	0.0256	93.4	70-130	1.03	26	
Toluene	4.71	0.0250	5.00	ND	94.2	70-130	1.10	20	
o-Xylene	4.61	0.0250	5.00	ND	92.2	70-130	0.719	25	
p,m-Xylene	9.36	0.0500	10.0	0.0598	93.0	70-130	1.03	23	
Total Xylenes	14.0	0.0250	15.0	0.0598	92.7	70-130	0.924	26	
Surrogate: 4-Bromochlorobenzene-PID	*7.74*		*8.00*		*96.7*	*70-130*			

QC Summary Data

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	**Reported:**
1199 Main Ave. Suite 242	Project Number:	20095-0001	
Durango CO, 81301	Project Manager:	Jerrid Brann	4/29/2025 10:16:04AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: IY

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2517064-BLK1)									Prepared: 04/23/25 Analyzed: 04/23/25
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.74*		*8.00*		*96.8*	*70-130*			
LCS (2517064-BS2)									Prepared: 04/23/25 Analyzed: 04/23/25
Gasoline Range Organics (C6-C10)	44.8	20.0	50.0		89.6	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.84*		*8.00*		*98.1*	*70-130*			
Matrix Spike (2517064-MS2)				**Source: E504221-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Gasoline Range Organics (C6-C10)	60.6	20.0	50.0	ND	121	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.36*		*8.00*		*104*	*70-130*			
Matrix Spike Dup (2517064-MSD2)				**Source: E504221-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Gasoline Range Organics (C6-C10)	63.5	20.0	50.0	ND	127	70-130	4.64	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*7.87*		*8.00*		*98.4*	*70-130*			

QC Summary Data

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	**Reported:**
1199 Main Ave. Suite 242	Project Number:	20095-0001	
Durango CO, 81301	Project Manager:	Jerrid Brann	4/29/2025 10:16:04AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2517060-BLK1)									Prepared: 04/23/25 Analyzed: 04/23/25
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*40.6*		*50.0*		*81.2*	*61-141*			
LCS (2517060-BS1)									Prepared: 04/23/25 Analyzed: 04/23/25
Diesel Range Organics (C10-C28)	213	25.0	250		85.4	66-144			
Surrogate: n-Nonane	*41.8*		*50.0*		*83.5*	*61-141*			
Matrix Spike (2517060-MS1)				**Source: E504225-01**					Prepared: 04/23/25 Analyzed: 04/23/25
Diesel Range Organics (C10-C28)	234	25.0	250	ND	93.4	56-156			
Surrogate: n-Nonane	*44.4*		*50.0*		*88.8*	*61-141*			
Matrix Spike Dup (2517060-MSD1)				**Source: E504225-01**					Prepared: 04/23/25 Analyzed: 04/23/25
Diesel Range Organics (C10-C28)	232	25.0	250	ND	92.8	56-156	0.634	20	
Surrogate: n-Nonane	*43.9*		*50.0*		*87.9*	*61-141*			

QC Summary Data

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	**Reported:**
1199 Main Ave. Suite 242	Project Number:	20095-0001	
Durango CO, 81301	Project Manager:	Jerrid Brann	4/29/2025 10:16:04AM

Anions by EPA 300.0/9056A

Analyst: DT

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2517070-BLK1)									Prepared: 04/23/25 Analyzed: 04/23/25
Chloride	ND	20.0							
LCS (2517070-BS1)									Prepared: 04/23/25 Analyzed: 04/23/25
Chloride	260	20.0	250		104	90-110			
Matrix Spike (2517070-MS1)				**Source: E504222-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Chloride	261	20.0	250	ND	104	80-120			
Matrix Spike Dup (2517070-MSD1)				**Source: E504222-02**					Prepared: 04/23/25 Analyzed: 04/23/25
Chloride	263	20.0	250	ND	105	80-120	0.694	20	

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

Definitions and Notes

IKAV Energy Inc.	Project Name:	Atlantic B LS 2 BGT	
1199 Main Ave. Suite 242	Project Number:	20095-0001	**Reported:**
Durango CO, 81301	Project Manager:	Jerrid Brann	04/29/25 10:16

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.

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT	State
Client: IKAV Energy	Company: IKAV Energy	Lab WO# E 504218	1D 2D 3D Std	NM CO UT TX
Project Name: Atlantic B LS 2 BGT	Address: 1199 Main Ave Suite 101	Job Number 20095-0001		X
Project Manager: Jerrid Brann	City, State, Zip: Durango, CO 81301		X	
Address:1199 Main Ave Suite 101	Phone: 970-394-0250			
City, State, Zip: Durango, CO 81301	Email: jerrid.brann@ikavenergy.com			
Phone:970-39-0250	Miscellaneous:			
Email:jerrid.brann@ikavenergy.com				

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	BGDOC - NM	TCEQ 1005 - TX	RCRA 8 Metals	Cation/Anion Pkg	ECMC Table 915-1	TPH by SW-846 418.1	Remarks
9:20	4-22-25	Soil	3	SS01		1	X	X	X		X							

Analysis and Method

EPA Program

SDWA	CWA	RCRA

Compliance Y or N

PWSID #

Additional Instructions:

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: JERRID BRANN

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
	4-22-25	10:23	Caitlin Mar	4-22-25	10:24
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

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Lab Use Only

Received on ice: Y (N)

T1 15.8 T2 15.6 T3 15.4

AVG Temp °C 15.6

Sample Matrix: **S** - Soil, **Sd** - Solid, **Sg** - Sludge, **A** - Aqueous, **O** - Other _____

Container Type: **g** - glass, **p** - poly/plastic, **ag** - amber glass, v - VOA

Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

envirotech

Envirotech Analytical Laboratory

Printed: 4/22/2025 12:44:20PM

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:	IKAV Energy Inc.	Date Received:	04/22/25 10:24	Work Order ID:	E504218
Phone:	(970) 828-4060	Date Logged In:	04/22/25 12:39	Logged In By:	Noe Soto
Email:	jerrid.brann@ikavenergy.com	Due Date:	04/29/25 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: Jerrid Brann
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

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?	No
8. If yes, was cooler received in good condition?	NA
9. Was the sample(s) received intact, i.e., not broken?	Yes
10. Were custody/security seals present?	No
11. If yes, were custody/security seals intact?	NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C Note: Thermal preservation is not required, if samples are received w/i 15 minutes of sampling	No
13. If no visible ice, record the temperature. Actual sample temperature: 15.6°C	

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

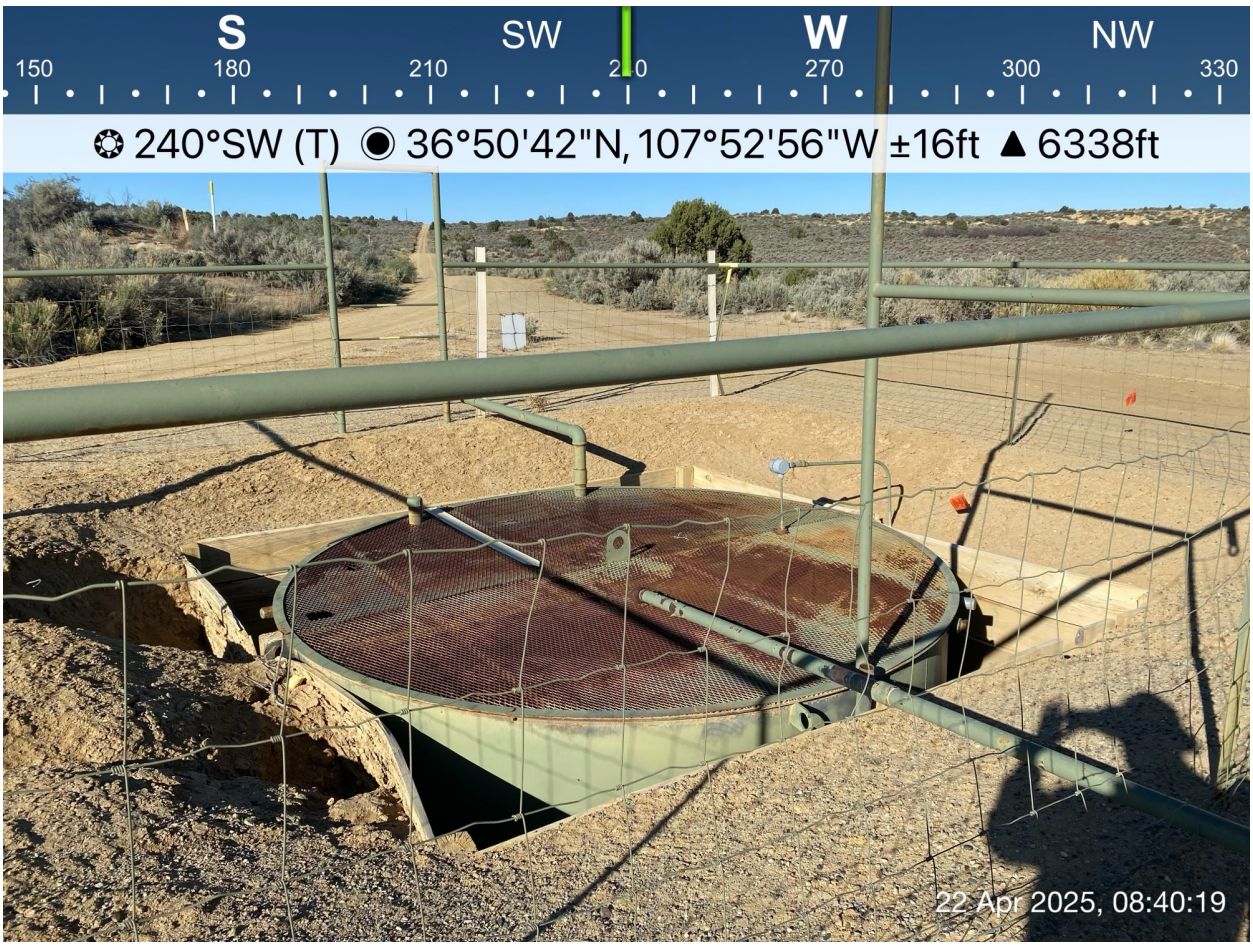
Client Instruction

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

Date

envirotech Inc.

Atlantic B LS 2 - BGT Removal Photos




W NW N NE
240 270 300 330 0 30
324°NW (T) 36°50'41"N, 107°52'56"W ±32ft 6339ft
22 Apr 2025, 08:41:04


SE S SW W
120 150 180 210 240 270
201°S (T) 36°50'42"N, 107°52'56"W ±42ft 6339ft
22 Apr 2025, 09:16:58


N NE E SE
0 30 60 90 120 150
75°E (T) 36°50'41"N, 107°52'57"W ±42ft 6338ft
22 Apr 2025, 09:22:50


N NE E SE
330 0 30 6 90 120 150
61°NE (T) 36°50'41"N, 107°52'57"W ±13ft 6339ft
22 Apr 2025, 09:36:21


SW W NW N
210 240 270 300 330 0 30
301°NW (T) 36°50'41"N, 107°52'56"W ±22ft 6336ft
22 Apr 2025, 11:24:37


S SW W NW
180 210 240 270 300 330
264°W (T) 36°50'41"N, 107°52'56"W ±29ft 6339ft
22 Apr 2025, 11:26:22

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

General Information
Phone: (505) 629-6116

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

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

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 471160
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	Upon the cessation of all production operations in the area associated with this below-grade tank, well API 30-045-09966 (Atlantic B LS 002), the operator shall complete the requirements of 19.15.17.13 NMAC for the area associated with this below-grade tank and notify the OCD when restoration, reclamation, and re-vegetation are complete.	6/6/2025