

## SITING AND HYDRO-GEOLOGICAL REPORT FOR NEBU SIMS MESA SWD 001

### SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is well in excess of 100 feet (ft.). Local topography and proximity to adjacent water features were also considered. Based on a search of the New Mexico State Engineer's Office (attached) and multiple database sources provided as an aerial map (Figure 1), there are no freshwater wells or springs used for public or livestock consumption within 200 horizontal ft. of the below-grade tank (BGT). The nearest water well listed in Figure 1 is POD # SJ03640 (attached). This well is located 1.3 miles south of the well site and had recorded depth to water at 241 ft. A topographic map (Figure 2) demonstrates that the BGT is not within 100 ft. of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake as measured from the ordinary high water mark.

### LOCAL GEOLOGY AND HYDROLOGY

The well site is located on a mesa top approximately 0.6 miles southwest and 0.67 miles north-northeast of Navajo Reservoir. The mesa is composed of the Nacimiento Formation. Broad shaley hills are interspersed with sandstone outcrops and systems of canyons and surface drainages leading into the reservoir. The BGT ground elevation (6,313 ft.) is greater than 225 ft. when the reservoir is at its maximum capacity (estimated at 6,085 ft.).

### REGIONAL GEOLOGY AND HYDROLOGY

The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

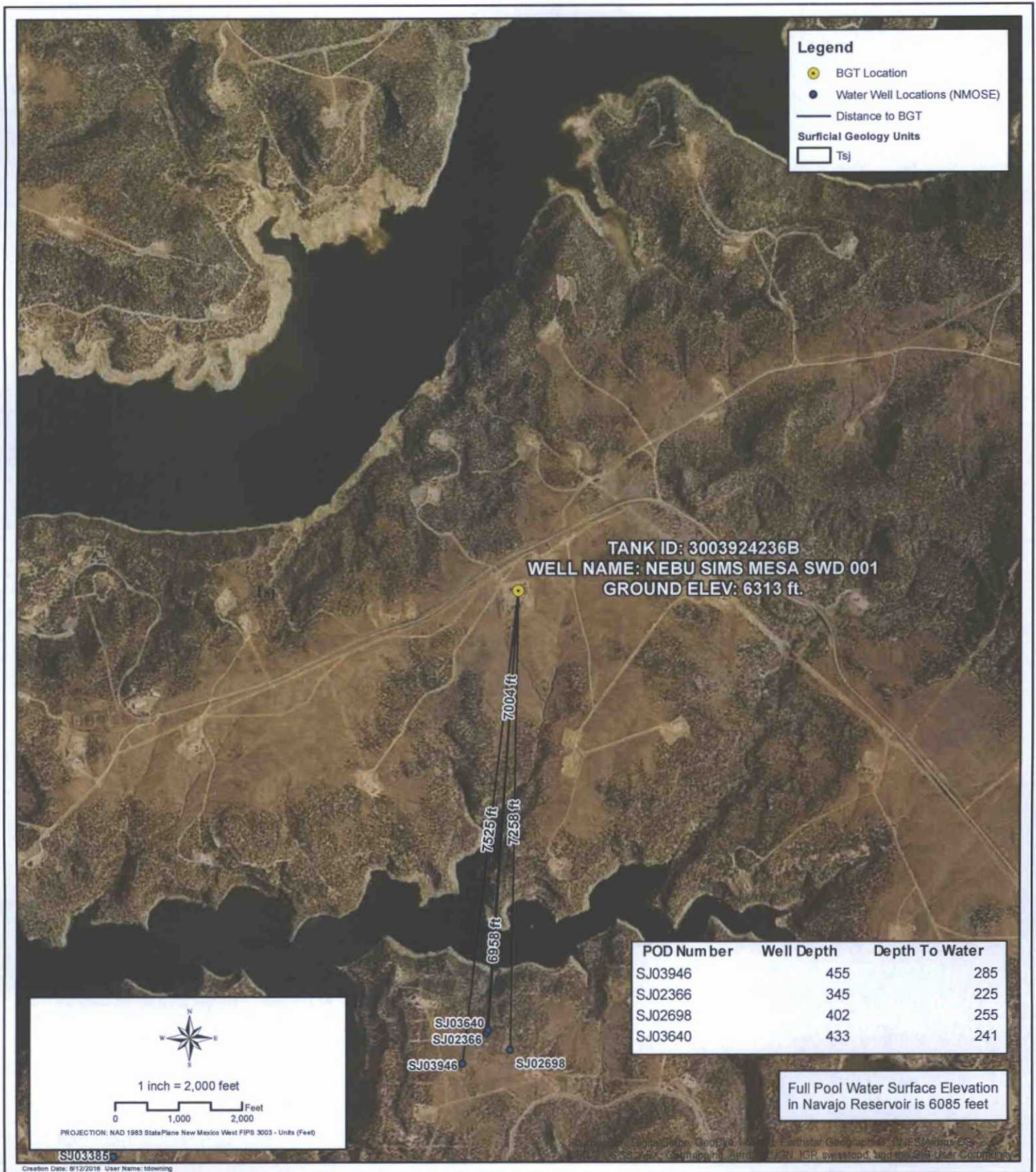
Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft<sup>2</sup>/d (Stone et al, 1983). Groundwater within these aquifers flows toward the San Juan River.

### REFERENCES

Circular 154-Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p





## GROUNDWATER AND WATER WELL PROXIMITY

**WELL NAME: NEBU SIMS MESA SWD 001**

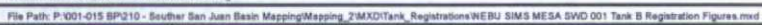
**API NUMBER: 3003924236 TANK ID: 3003924236B**

**SECTION 10, TOWNSHIP 30.0N, RANGE 07W, P.M. NM23**

**FIGURE**

**1**









## New Mexico Office of the State Engineer Wells with Well Log Information

No wells found.

Basin/County Search:

**Basin:** San Juan

UTMNAD83 Radius Search (in meters):

**Easting (X):** 271274.53

**Northing (Y):** 4079172.64

**Radius:** 60.96

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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WELLS WITH WELL LOG INFORMATION



## New Mexico Office of the State Engineer Wells Without Well Log Information

No wells found.

Basin/County Search:

**Basin:** San Juan

UTMNAD83 Radius Search (in meters):

**Easting (X):** 271274.53

**Northing (Y):** 4079172.64

**Radius:** 60.96

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WELLS WITHOUT WELL LOG INFORMATION



## New Mexico Office of the State Engineer Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

**Basin:** San Juan

UTMNAD83 Radius Search (in meters):

**Easting (X):** 271274.53

**Northing (Y):** 4079172.64

**Radius:** 60.96

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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POINT OF DIVERSION WITH METER ATTACHED



*New Mexico Office of the State Engineer*  
**Active & Inactive Points of Diversion**  
 (with Well Drill Dates & Depths)

| (R=POD has been replaced and no longer serves this file, (quarters are 1=NW 2=NE 3=SW 4=SE)<br>(C=the file is closed) (quarters are smallest to largest) (NAD83 UTM in meters) |           |     |           |        |            |      |       |         |   |   |   |    |     | (in feet) |     |        |          |            |             |            |             |
|--|-----------|-----|-----------|--------|------------|------|-------|---------|---|---|---|----|-----|-----------|-----|--------|----------|------------|-------------|------------|-------------|
| (acre ft per annum)  |           |     |           |        |            |      |       |         |   |   |   |    |     |           |     |        |          |            |             |            |             |
| WR File Nbr  | Sub basin | Use | Diversion | County | POD Number | Code | Grant | Source  | q | q | q | 4  | Sec | Tws       | Rng | X      | Y        | Start Date | Finish Date | Depth Well | Depth Water |
| SJ 03640   |           | DOM |           | 3 RA   | SJ 03640   |      |       | Shallow | 1 | 1 | 3 | 15 | 30N | 07W       |     | 271072 | 4077061* | 03/25/2006 | 04/12/2006  | 433        | 241         |

Record Count: 1

**POD Search:**

POD Number: SJ 03640

Sorted by: File Number

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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### ACTIVE & INACTIVE POINTS OF DIVERSION






# New Mexico Office of the State Engineer

## Water Right Summary



**WR File Number:** SJ 03640      **Subbasin:** -      **Cross Reference:** -  
**Primary Purpose:** DOM 72-12-1 DOMESTIC ONE HOUSEHOLD  
**Primary Status:** PMT PERMIT  
**Total Acres:**      **Subfile:** -  
**Total Diversion:** 3      **Cause/Case:** -  
**Owner:** D-D CONSULTING SERVICES, INC.

### Documents on File

| Trn #   | Doc    | File/Act | Status     |         | Transaction Desc. | From/<br>To | Acres | Diversion | Consumptive |
|---|--------|----------|------------|---------|-------------------|-------------|-------|-----------|-------------|
|   |        |          | 1          | 2       |                   |             |       |           |             |
|  | 333710 | 72121    | 2005-06-02 | PMT LOG | SJ 03640          | T           |       | 3         |             |

### Current Points of Diversion

(NAD83 UTM in meters)

| POD Number      | Source  | Q | Q | Q | 64 | 16 | 4 | Sec | Tws | Rng | X      | Y        | Other Location Desc            |
|-----------------|---------|---|---|---|----|----|---|-----|-----|-----|--------|----------|--------------------------------|
| <u>SJ 03640</u> | Shallow | 1 | 1 | 3 | 15 | 30 | N | 07  | W   |     | 271072 | 4077061* | 411B DELASSO LOOS ROAD, RA CTY |

\*An (\*) after northing value indicates UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

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WR SUMMARY - SJ 03640



**SIMCOE LLC**  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

**BELOW-GRADE TANK DESIGN AND CONSTRUCTION PLAN**

Pursuant to Rule 19.15.17.11 NMAC, SIMCOE LLC (SIMCOE) shall construct a below-grade tank (BGT) or modify an existing permitted BGT according to the following plan. Any deviations from this plan will be addressed on the New Mexico Oil Conservation Division's (NMOCD) form C-144 at the time of submittal.

**Design and Construction Plan**

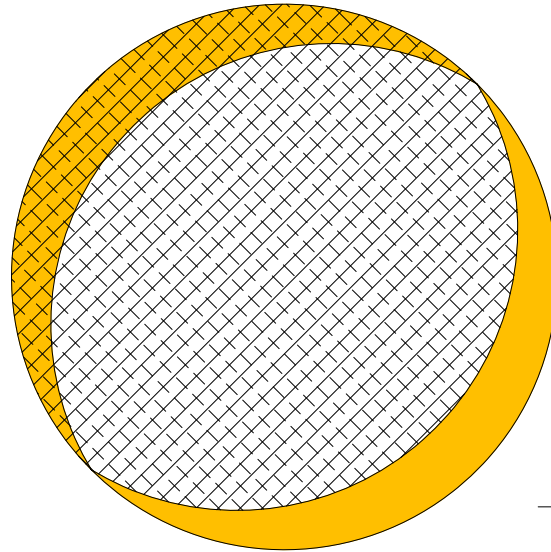
1. SIMCOE will design and construct a BGT which will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment.
2. SIMCOE as the well operator shall install and maintain a well sign that adheres to 19.15.16.8 NMAC. The sign will be posted at the well site to address, at a minimum;
  - a. Well Number
  - b. Property name
  - c. Operators name
  - d. Location by footage, quarter-quarter section, township and range (or unit letter)
  - e. API number
  - f. Emergency contact information
3. SIMCOE will fence or enclose its BGTs in a manner that prevents unauthorized access and shall maintain its fence in good repair.
4. SIMCOE will fence or enclose a BGT located within 1,000 feet of a permanent residence, school, hospital, institution or church with, at a minimum a chain link security fence at least six (6) feet in height with at least two (2) strands of barbed wire at the top. SIMCOE will ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site.
5. SIMCOE is requesting NMOCD's approval for an alternative fence design that provides, at a minimum, equivalent protection to the design specified in Paragraph 3 of Subsection D of 19.15.17.11 NMAC for BGTs beyond the stated distance in paragraph 4 of this document. SIMCOE's proposed design for its BGTs will utilize 48" steel mesh field-fence (hog wire) with a metal or steel top rail. Perimeter T-post will be installed roughly every 10 feet.
6. SIMCOE will construct an expanded metal covering that completely covers the top of the BGT. The covering will be constructed such that it will prevent hazardous conditions to wildlife, including migratory birds
7. SIMCOE shall construct the BGT of materials that are resistant to produced water, any contained liquids, and damage from sunlight. SIMCOE's BGTs will be constructed of fiberglass or carbon steel that meets the requirements of ASTM A36.
8. SIMCOE's BGTs shall have a properly constructed earthen foundation consisting of a level base free of rocks, debris, sharp edges, or irregularities as to prevent punctures, cracks or indentations to the tank bottom as demonstrated on the design drawing.
9. SIMCOE will construct and operate the BGT to prevent surface water run-on by using both earthen berms and leaving a portion of the BGT above the original grade as demonstrated on the design drawing.
10. SIMCOE will construct and operate the BGT to prevent overflow and overfilling of the BGT. Overflow will be prevented by use of either a manual shut off valve or an electronic high fluid level detector that will automatically engage an electronic shut-off valve when a one (1) foot freeboard is reached. The high-level automatic alarm notifies well optimizers when liquid level has reached within a pre-set distance to the top of the BGT. The high-level alarm will trigger the automatic shutdown valve which will close in the well until the liquid level can be lowered.

11. SIMCOE will construct and install a double-walled tank design per Subparagraph (b) of Paragraph (4) of Subsection I of 19.15.17.11 NMAC with a two (2) inch diameter leak detection port. The floor supports located in the annular space of the tank bottom will be channeled to allow outward movement of liquid between the walls. Leak detection will be monitored per SIMCOE's Operating and Maintenance Plan. The walls of the BGT will be constructed of fiberglass or carbon steel that meets the ASTM A36 standard. SIMCOE's BGT design will ensure containment of tank contents and protect underlying groundwater. The production equipment line drain is manual or automated drain that allows water level in production equipment (generally the separator) to be maintained within the equipment's operating parameters. The environmental drain is a manually operated drain that is used to drain liquids off of equipment. The tank drain is a manually operated drain, typically in the closed position that is used to rid the condensate tank of any water accumulation. The vent drain is a manually operated drain off the discharge of production equipment (usually the separator) and is used to blowdown the wellsite. The swab drain line is a manually operated drain originating between the wellhead and separator and is used during well workovers when large amounts of liquid are removed from the well and sent straight to the BGT.
12. SIMCOE owned and operated single walled BGTs constructed and installed prior to June 16, 2008 that has the side walls open for visual inspection and that does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT and remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
13. SIMCOE owned and operated single walled BGTs constructed and installed prior to June 16, 2008 and where any portion of the tank sidewall is below the ground surface and not visible shall equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, or close it, by June 16, 2013. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
14. SIMCOE owned and operated double walled BGTs constructed and installed prior to June 16, 2008 and which does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
15. The general specifications for the design and construction of the BGT have been provided in the attached SIMCOE design and construction schematic.

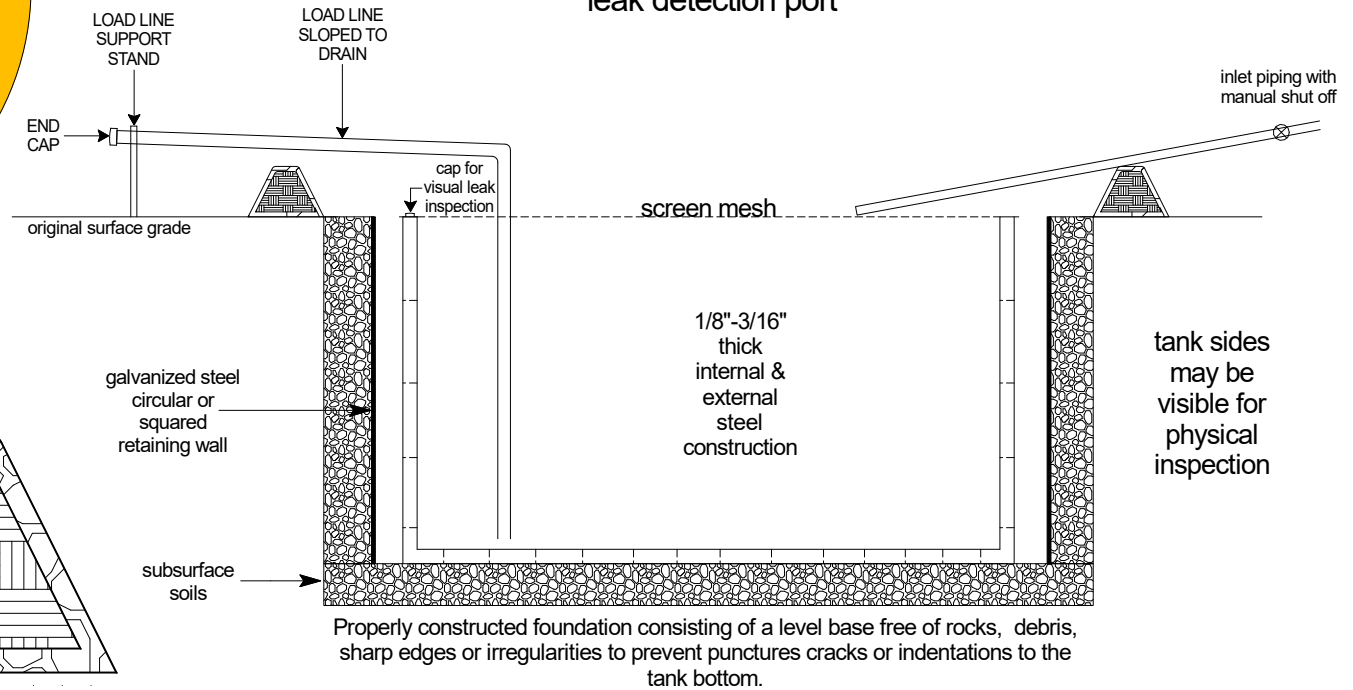


# DOUBLE WALLED BELOW-GRADE TANK (BGT)

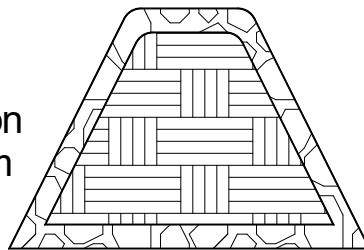
Rule 19.15.17.11 I (4b) NMAC



95 bbl steel tank: double  
wall / double bottom with  
leak detection port



overflow & run-on  
prevention berm



Schematic is for demonstrative purposes only and is not intended for final specification design. Details into requirements should be reference within the Design and Construction (D & C) Plan submitted or any manufacturer's attachment to the D & C Plan.



Date Drawn: 11/11/2020  
Drawn By: NJV  
Filename: Fiberglass BGT Schematic.SKF

**SIMCOE LLC**  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

**BELOW-GRADE TANK OPERATING AND MAINTENANCE PLAN**

Pursuant to Rule 19.15.17.12 NMAC, SIMCOE LLC (SIMCOE) shall maintain and operate a below-grade tank (BGT) by following the plan shown below. Deviations from this plan will be addressed with a submittal to the New Mexico Oil Conservation Division (NMOCD) using form C-144 at the time of the BGT registration or modification to an existing BGT registration.

**Operating and Maintenance Plan**

1. SIMCOE's BGTs will be operated to contain liquids and solids. SIMCOE will maintain the integrity of the BGT and secondary containment system as to prevent impacts to fresh water and to protect public health and the environment. SIMCOE will use automated high fluid level alarms and automated shut-off valves to ensure that liquids are contained within the vessel and that the vessel does not overflow. These alarms and shut-off valves will be consistent with those demonstrated in the design plan.
2. SIMCOE will not knowingly discharge to or store any hazardous waste in a BGT.
3. If a BGT develops a leak below the liquid surface, SIMCOE shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office pursuant to 19.15.29 NMAC and repair the damage or replace the BGT as applicable.
4. SIMCOE will adhere to Subsection D of 19.15.17.12 NMAC. The requirements are as follows;
  - a. SIMCOE shall not allow a below-grade tank to overflow or allow surface water run-on to enter the BGT.
  - b. SIMCOE shall remove any measurable layer of oil from the fluid surface of a BGT.
  - c. SIMCOE shall inspect the BGT for leakage and damage at least monthly and will document the integrity of each tank at least annually and maintain record of the integrity for five years.
  - d. SIMCOE shall maintain adequate freeboard to prevent overtopping of the below-grade tank.
  - e. If SIMCOE discovers that the BGT tank does not demonstrate integrity or that the BGT develops any of the conditions identified in Paragraph (5) of Subsection A of 19.15.17.12 NMAC, SIMCOE shall repair the damage or close the existing BGT pursuant to the closure requirements of 19.15.17.13 NMAC.
  - f. If any of SIMCOE's BGTs are equipped or retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, then SIMCOE shall visually inspect the area beneath the BGT during the retrofit and document any areas that are wet, discolored or showing other evidence of a release on form C-141. SIMCOE will attempt to measure and report to the division the concentration of contaminants in the wet or discolored soil with respect to the standards set forth in Table I of 19.15.17.13 NMAC. If there is no wet or discolored soil or if the concentration of contaminants in the wet or discolored soil is less than the standard set forth in Table I of 19.15.17.13 NMAC, then SIMCOE shall proceed with the closure requirements of 19.15.17.13 NMAC prior to initiating the retrofit or replacement.



SIMCOE LLC (Previously BP America)  
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 this SIMCOE, LLC well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, SIMCOE, LLC 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, LLC 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, LLC NMOCD approved BGT design attached to the SIMCOE, LLC Design and Construction Plan. SIMCOE, LLC 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, LLC NMOCD approved BGT Design attached to the SIMCOE, LLC Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. SIMCOE, LLC 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, LLC 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. SIMCOE, LLC 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. SIMCOE, LLC 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 utilized are:
  - a. JFJ Land farm, Permit NM-01-010(B) (Solids and Sludge)
  - b. Basin Disposal, Permit NM-01-0005 (Liquids)
  - c. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
  - d. Simcoe, LLC Operated 13 GCU SWD # 1, API 30-045-28601 (Liquids)
  - e. Simcoe, LLC Operated GCU 259 SWD, API 30-045-20006(Liquids)
  - f. Simcoe, LLC Operated GCU 306 SWD, API30-045-24286 (Liquids)
  - g. Simcoe, LLC Operated GCU 307 SWD, API30-045-24248 (Liquids)
  - h. Simcoe, LLC Operated GCU 328 SWD, API 30-045-24735(Liquids)
  - i. Simcoe, LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

4. Simcoe, LLC 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. Simcoe, LLC shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
6. Simcoe, LLC shall sample the soils beneath the BGT to determine whether a release has occurred. Simcoe, LLC 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.

| <b>Table 1</b><br><b>Closure Criteria for Soils Beneath Below-Grade Tanks</b>                  |             |                                  |              |
|--|-------------|----------------------------------|--------------|
| Depth below bottom of pit to groundwater less than 10,000 mg/l TDS                             | Constituent | Method*                          | Limit**      |
| ≤50 feet   | Chloride    | EPA 300.0                        | 600 mg/kg    |
|  | TPH         | EPA SW-846 Method 418.1          | 100 mg/kg    |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |
| 51 feet-100 feet   | Chloride    | EPA 300.0                        | 10,000 mg/kg |
|  | TPH         | EPA SW-846 Method 418.1          | 2,500 mg/kg  |
|  | GRO+DRO     | EPA SW-846 Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |
|  > 100 feet | Chloride    | EPA 300.0                        | 20,000 mg/kg |
|  | TPH         | EPA SW-846 Method 418.1          | 2,500 mg/kg  |
|  | GRO+DRO     | EPA SW-846 Method 8015M          | 1,000 mg/kg  |
|  | BTEX        | EPA SW-846 Method 8021B or 8260B | 50 mg/kg     |
|  | Benzene     | EPA SW-846 Method 8021B or 8015M | 10 mg/kg     |

Notes: mg/Kg = milligram per kilogram

BTEX = benzene, toluene, ethylbenzene, and total xylenes

TPH = total petroleum hydrocarbons

TDS = total dissolved solids.

\* - Or other test methods approved by the division

\*\* - Numerical limits or natural background level, whichever is greater



7. Simcoe, LLC shall notify the division District III office of its results on form C-141.
8. If it is found that a release has occurred, then Simcoe, LLC 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-vegetate the location. The location will be reclaimed if it is not within the active process area.
10. Simcoe, LLC 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, LLC 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.
12. Simcoe, LLC shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be conducted 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-affected 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. Simcoe, LLC 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, Simcoe, LLC shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.
15. Within 60 days of closure completion, Simcoe, LLC 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. Simcoe, LLC 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.



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

General Information  
Phone: (505) 629-6116

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

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

CONDITIONS

Action 525226

CONDITIONS

|   |  |
|---|--|
| Operator:<br>SIMCOE LLC<br>1199 Main Ave., Suite 101<br>Durango, CO 81301 | OGRID:<br>329736                                       |
|   | Action Number:<br>525226                               |
|   | Action Type:<br>[C-144] Below Grade Tank Plan (C-144B) |

CONDITIONS

| Created By | Condition   | Condition Date |
|------------|---|----------------|
| joel.stone | The operator shall install, or maintain on site, an oil absorbent boom or other device to contain an unanticipated release. | 11/18/2025     |