

GCU 269 BGT Closure Report

SIMCOE LLC
1199 Main Avenue, Suite 101
Durango, CO 81301

To whom it may concern,

SIMCOE LLC is proposing to close the Below Grade Tank (BGT) at the Gallegos Canyon Unit (GCU)269. The BGT was removed on 11/13/2025 with sampling and backfilling occurring the same day. Below is the list of required protocol steps for the closure of the BGT according to the approved plan. Additionally, SIMCOE is requesting a variance and modification on the water depth to determine sampling under the current Part 17 rule.

Closure Checklist:

1. Notification to the surface landowner was completed and letter is attached.
2. Notification to the NMOCD was completed with email confirmation attached.
3. Liquids were hauled from the BGT and disposed of in approved the facility at GCU 307 SWD, API 30-045-24248
4. The BGT was removed and will be recycled as scrap.
5. On site equipment will remain in use on an above surface tank (AST) in the same location.
6. A 5-point composite sample was collected from below the BGT after removal and analyzed for BTEX, Benzene, TPH and chlorides. Sample data is attached to the closure plan.
7. A C-141 form is attached.
8. SIMCOE determined no release had occurred.
9. Backfill has occurred, SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.
10. SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.
11. SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.
12. SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.
13. SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.

14. SIMCOE will not reclaim at this time as the location is being used for an AST on a still active producing well.

Variance/Modification to Plan:

SIMCOE is requesting a variance for sampling requirements of the original BGT closure plan. The original plan used now outdated requirements of NMAC 19.15.17. SIMCOE is proposing to use the current NMAC 19.15.17.13 Table 1 rules for sampling requirement dependent on groundwater depth. NM OSE POD's in the area show a groundwater depth of greater than 50' and this data is attached to the closure plan. SIMCOE is requesting the soil sample to be analyzed against the ground water depth of 51-100 feet Table 1 of NMAC 19.15.17.13.

Regards,

Jerrid Brann
Environmental Coordinator
SIMCOE LLC
1199 Main Avenue, Suite 101 Durango, CO 81301
(405)-658-3331

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

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: _____ OGRID #: _____

Address: _____

Facility or well name: _____

API Number: _____ OCD Permit Number: _____

U/L or Qtr/Qtr _____ Section _____ Township _____ Range _____ County: _____

Center of Proposed Design: Latitude _____ Longitude _____ 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: _____ bbl Type of fluid: _____

Tank Construction material: _____

☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off

☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____

Liner type: 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☐ NAWithin 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 ☐ NoWithin 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 ☐ NoWithin 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 ☐ NoWithin 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 H₂S, Prevention Plan
☐ Emergency Response Plan
☐ Oil Field Waste Stream Characterization
☐ Monitoring and Inspection Plan
☐ Erosion Control Plan
☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

Proposed Closure: 19.15.17.13 NMAC

Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Multi-well Fluid Management Pit
☐ Alternative
- Proposed Closure Method: ☐ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

14.

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

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

15.

Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC

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

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

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:** _____

Title: _____ **OCD Permit Number:** _____

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:** _____

20.

Closure Method:

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

21.

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

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

On-site Closure Location: Latitude _____ Longitude _____ NAD: ☐ 1927 ☐ 1983

22.

Operator Closure Certification:

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

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 approved 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)

BP BGT Closure Plan 04-01-2010

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-vegetate 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

BP BGT Closure Plan 04-01-2010

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.



November 5, 2025

B Square Ranch LLC
3901 Bloomfield Hwy
Farmington, NM 87401

RE: Gallegos Canyon Unit 269 Below Ground Tank (BGT) removal
API # 30-045-22233
Portion of land in NESWSE, Section 18, T28N, R12W
Farmington, NM

Dear Sir;

SIMCOE LLC, as the operator of the Gallegos Canyon Unit #269 gas well located on your property in Farmington, NM, is required by the Bureau of Land Management (BLM) to give you notice that they will be removing a below ground tank from the well location on or about November 13, 2025. The planned activity will take place on the existing well pad and there should be no disturbance to the ground off of the well pad.

Please do not hesitate to contact me if you have any questions or require any additional information.

Thank you,

Gina Doerner

Gina Doerner

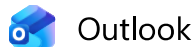
Surface Land Negotiator Supervisor

Direct: 970- 247-2178

Email: gina.doerner@machnr.com



1199 Main Avenue, Suite 101 • Durango, CO 81301



RE: [EXTERNAL] Notice of Below Grade Tank Closure Gallegos Canyon Unit 269

From Stone, Joel, EMNRD <Joel.Stone@emnrd.nm.gov>

Date Fri 11/7/2025 3:00 PM

To Jerrid Brann <jerrid.brann@machnr.com>

Hi Jerrid,

Notification received.

Thank you,

Joel B. Stone • Senior Environmental Scientist
Energy, Minerals and Natural Resources Department
Oil Conservation Division
1220 S. St. Francis Drive, Santa Fe, NM 87505
(505) 709-5149 | joel.stone@emnrd.nm.gov

From: Jerrid Brann <jerrid.brann@machnr.com>

Sent: Friday, November 7, 2025 2:36 PM

To: Stone, Joel, EMNRD <Joel.Stone@emnrd.nm.gov>

Subject: [EXTERNAL] Notice of Below Grade Tank Closure Gallegos Canyon Unit 269

CAUTION: This email originated outside of our organization. Exercise caution prior to clicking on links or opening attachments.

November 7, 2025

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

RE: Notice of proposed Below Grade Tank Closure

Well Name: Gallegos Canyon Unit 269
API# 30-045-22233
Unit O – Sec 18 – T28N – 12W
San Juan County, NM

Mr. Stone,

Simcoe LLC is planning to close a Below Grade Tank under the requirements of NMOCD rule 19.15.17.13. This work is proposed to start on or around 9:00 am on November 13th, 2025.

Please let me know if there are any questions,

Thanks,

Jerrid Brann

Jerrid Brann

Environmental Coordinator

jerrid.brann@machnr.com



NOTICE: This email has come from an **external source**. Do not click on links or open attachments unless you were expecting this email.

Date: 11/13/25Client: IKAVEnvironmental Specialist(s): SLContractor: MelleyPage: 1 of 1

BGT Closure Field Form

Site Information

Well Name: Gallegos Canyon Unit #264 Well API#: 30-045-22233 Lease: Federal / State / Fee / Indian
 Well Location: Unit: D Sec: 18 T: 28N R: 12W Cty: San Juan St: NEW Mexico

BGT Information

Prev. Tank ID: Unreadable 95 bbls single / double-wall single / double-bottom sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)

Notes: Placard on BGT was Unreadable

Site Observations Following BGT Removal:

evidence of a release (Y) (N) BGT replaced, backfilled and graded. Other: Replaced with AST

New Tank ID: 56731 300 bbls single / double-wall single / double-bottom sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)

Notes: BGT is being replaced by AST, area below bgt will be backfilled and graded

NMOCD Closure Standards: TPH _____ mg/kg Chloride _____ mg/kg

Soil Sampling

Sample ID: SPC-TR@5" (95) Time: 1135 Sample Type: Grab/Composite - 5 pts PID: 19.4 ppm Lab: ENV

Notes: Soil brown silty sand w road base, rust staining, SI Plu odor, Moist-Vet.

Soil Sampling

Sample ID: _____ Time: _____ Sample Type: Grab / Composite - _____ pts PID: _____ ppm Lab: _____

Notes: _____

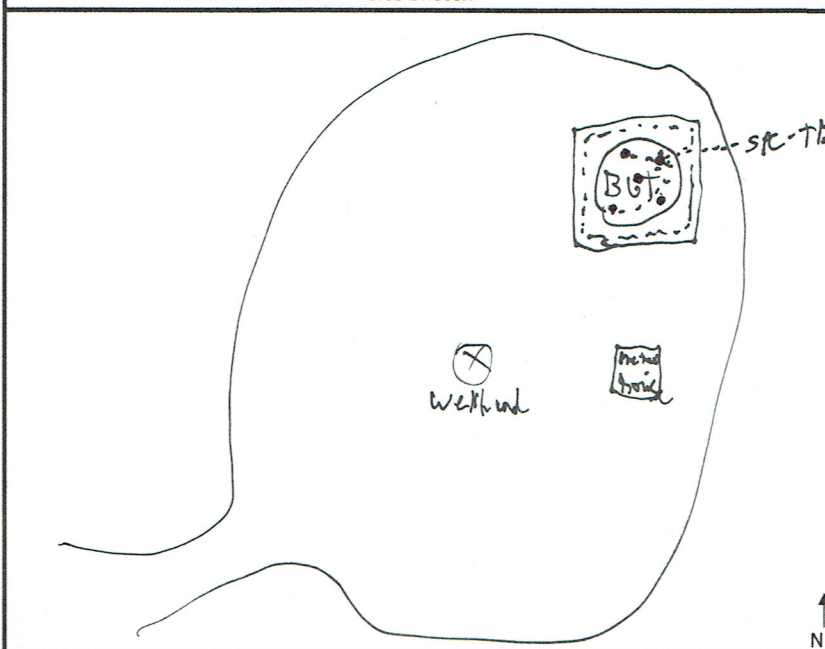
Soil Sampling

Sample ID: _____ Time: _____ Sample Type: Grab / Composite - _____ pts PID: _____ ppm Lab: _____

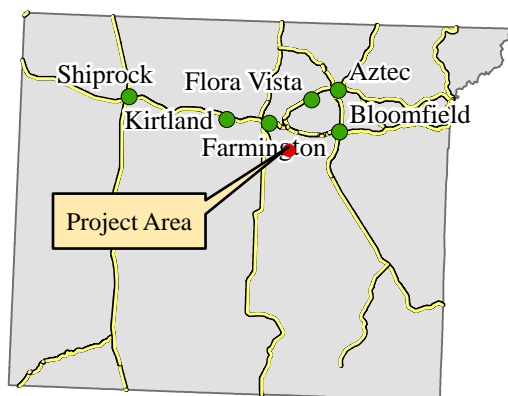
Notes: _____

Site Sketch

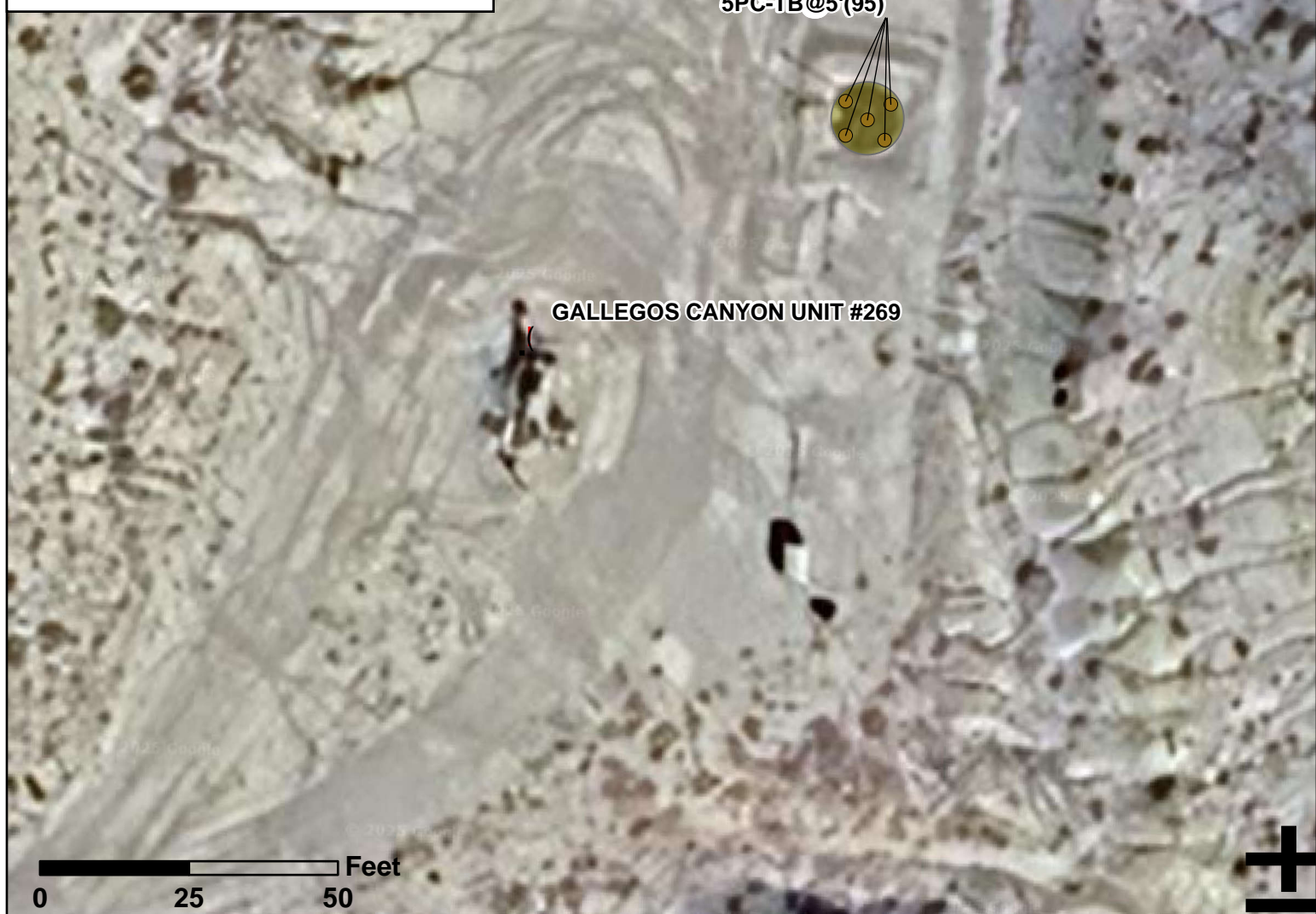
Notes



N PID Calibration Date: 11/13/25






San Juan County, New Mexico



Notes: All soil samples collected 11/13/2025. 5PC-TB@5'(95) is a 5-point composite sample.

Legend

-  Oil & Gas Well
-  Soil Sample
-  BGT

Cottonwood
CONSULTING



Mapping by: K. O'Brien, 11/17/2025

Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 18 T28N R12W NMPM

Gallegos Canyon Unit #269
Project Map
Simcoe LLC



GCU #269
Photographic Log
Simcoe, LLC



Photo 1: GCU #269 well sign



Photo 2: BGT prior to removal.



GCU #269
Photographic Log
Simcoe, LLC



Photo 3: Location of BGT following removal.



Photo 4: Bottom of BGT following removal.



GCU #269
Photographic Log
Simcoe, LLC



Photo 5: 5-point composite sample collected below base of BGT following removal.

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 405-658-3331
Contact email: jerrid.brann@machnr.com	Incident #
Contact mailing address: 1199 Main Ste., Suite 101, Durango, CO 81301	

Location of Release Source

Latitude 36.65726 Longitude -108.14946
(NAD 83 in decimal degrees to 5 decimal places)

Site Name: Gallegos Canyon Unit 269	Site Type: Active Well
Date Release Discovered:	API# 30-045-22233

Unit Letter	Section	Township	Range	County
O	18	28N	12W	San Juan

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

Nature and Volume of Release

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

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

Cause of Release: No release discovered during removal of BGT

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

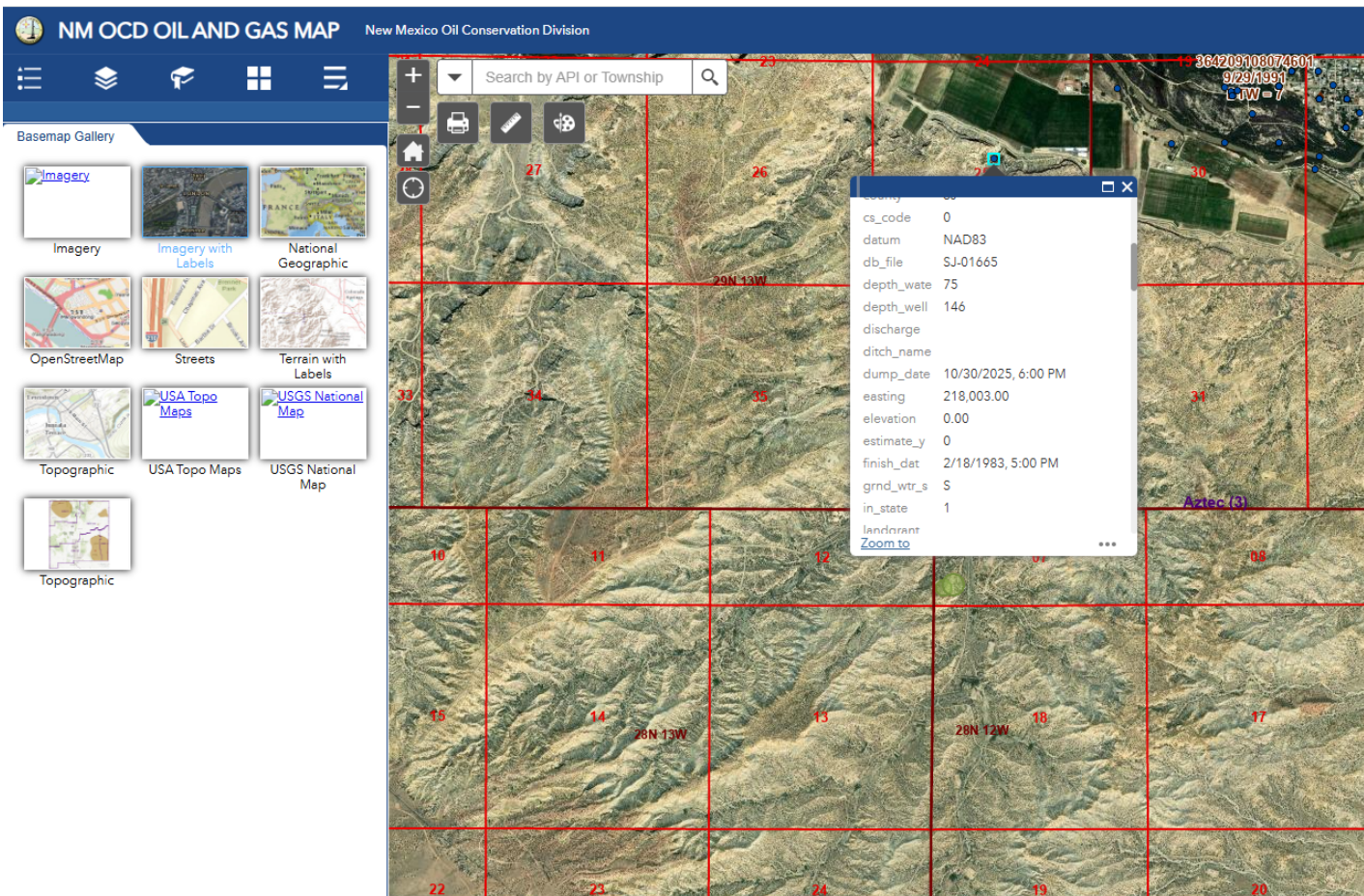
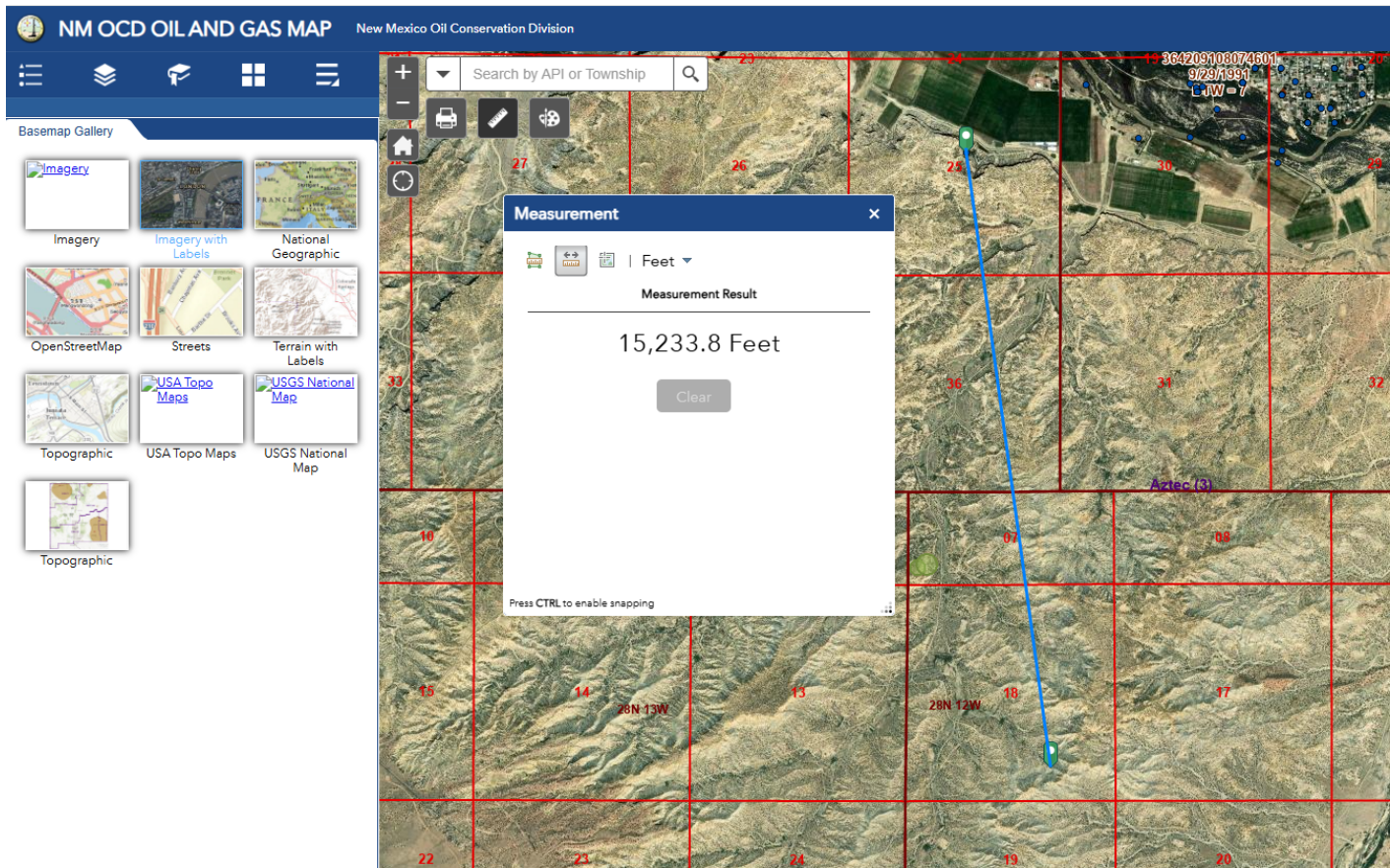
Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, 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

<input type="checkbox"/> The source of the release has been stopped.	
<input type="checkbox"/> The impacted area has been secured to protect human health and the environment.	
<input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.	
<input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> 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: <u>Jerrid Brann</u>	Title: <u>Environmental Coordinator</u>
Signature: <u>Jerrid Brann</u>	Date: <u>12/11/2025</u>
email: <u>jerrid.brann@machnr.com</u>	Telephone: <u>405-658-3331</u>
<u>OCD Only</u>	
Received by: _____	Date: _____

Distance to nearest water well and depth to water



Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: GCU #269

Work Order: E511176

Job Number: 20035-C-0001

Received: 11/13/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
11/17/25

5796 U.S. Hwy 64
Farmington, NM 87401

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



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

Date Reported: 11/17/25

Kyle Siesser
PO Box 1653
Durango, CO 81302



Project Name: GCU #269
Workorder: E511176
Date Received: 11/13/2025 12:51:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 11/13/2025 12:51:00PM, under the Project Name: GCU #269.

The analytical test results summarized in this report with the Project Name: GCU #269 apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

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

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

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

Respectfully,

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

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

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Cell: 505-320-4759
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Cell: 505-947-8222
mgonzales@envirotech-inc.com

Envirotech Web Address: www.envirotech-inc.com

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Sample Summary

Cottonwood Consulting	Project Name:	GCU #269	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/25 14:10

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5PC-TB@5' (95)	E511176-01A	Soil	11/13/25	11/13/25	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: GCU #269
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
11/17/2025 2:10:24PM

5PC-TB@5' (95)

E511176-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: BA		Batch: 2546130
Benzene	ND	0.0250	1	11/13/25	11/13/25	
Ethylbenzene	ND	0.0250	1	11/13/25	11/13/25	
Toluene	ND	0.0250	1	11/13/25	11/13/25	
o-Xylene	ND	0.0250	1	11/13/25	11/13/25	
p,m-Xylene	ND	0.0500	1	11/13/25	11/13/25	
Total Xylenes	ND	0.0250	1	11/13/25	11/13/25	
Surrogate: 4-Bromochlorobenzene-PID	95.3 %	70-130		11/13/25	11/13/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: BA		Batch: 2546130
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/13/25	11/13/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID	91.0 %	70-130		11/13/25	11/13/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: KH		Batch: 2546138
Diesel Range Organics (C10-C28)	ND	25.0	1	11/14/25	11/14/25	
Oil Range Organics (C28-C36)	ND	50.0		11/14/25	11/14/25	
Surrogate: n-Nonane	102 %	61-141		11/14/25	11/14/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: TP		Batch: 2546145
Chloride	2640	40.0	1	11/14/25	11/14/25	



QC Summary Data

Cottonwood Consulting	Project Name:	GCU #269	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/2025 2:10:24PM

Volatile Organics by EPA 8021B

Analyst: BA

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

Blank (2546130-BLK1)

Prepared: 11/13/25 Analyzed: 11/14/25

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	7.27		8.00		90.9	70-130			

LCS (2546130-BS1)

Prepared: 11/13/25 Analyzed: 11/14/25

Benzene	5.13	0.0250	5.00		103	70-130			
Ethylbenzene	4.79	0.0250	5.00		95.8	70-130			
Toluene	4.98	0.0250	5.00		99.6	70-130			
o-Xylene	4.85	0.0250	5.00		97.1	70-130			
p,m-Xylene	9.76	0.0500	10.0		97.6	70-130			
Total Xylenes	14.6	0.0250	15.0		97.4	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.16		8.00		89.5	70-130			

Matrix Spike (2546130-MS1)

Source: E511173-05

Prepared: 11/13/25 Analyzed: 11/14/25

Benzene	5.60	0.0250	5.00	ND	112	70-130			
Ethylbenzene	5.24	0.0250	5.00	ND	105	70-130			
Toluene	5.44	0.0250	5.00	ND	109	70-130			
o-Xylene	5.32	0.0250	5.00	ND	106	70-130			
p,m-Xylene	10.6	0.0500	10.0	ND	106	70-130			
Total Xylenes	16.0	0.0250	15.0	ND	106	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.14		8.00		89.2	70-130			

Matrix Spike Dup (2546130-MSD1)

Source: E511173-05

Prepared: 11/13/25 Analyzed: 11/14/25

Benzene	5.00	0.0250	5.00	ND	100	70-130	11.3	27	
Ethylbenzene	4.69	0.0250	5.00	ND	93.7	70-130	11.1	26	
Toluene	4.86	0.0250	5.00	ND	97.1	70-130	11.3	20	
o-Xylene	4.76	0.0250	5.00	ND	95.1	70-130	11.3	25	
p,m-Xylene	9.54	0.0500	10.0	ND	95.4	70-130	10.9	23	
Total Xylenes	14.3	0.0250	15.0	ND	95.3	70-130	11.0	26	
Surrogate: 4-Bromochlorobenzene-PID	7.26		8.00		90.8	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	GCU #269	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/2025 2:10:24PM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: BA

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

Blank (2546130-BLK1) Prepared: 11/13/25 Analyzed: 11/14/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.13		8.00		89.2	70-130			

LCS (2546130-BS2) Prepared: 11/13/25 Analyzed: 11/14/25

Gasoline Range Organics (C6-C10)	47.6	20.0	50.0		95.2	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.42		8.00		92.8	70-130			

Matrix Spike (2546130-MS2) Source: E511173-05 Prepared: 11/13/25 Analyzed: 11/14/25

Gasoline Range Organics (C6-C10)	55.4	20.0	50.0	ND	111	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.70		8.00		96.3	70-130			

Matrix Spike Dup (2546130-MSD2) Source: E511173-05 Prepared: 11/13/25 Analyzed: 11/14/25

Gasoline Range Organics (C6-C10)	52.9	20.0	50.0	ND	106	70-130	4.74	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.25		8.00		90.6	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	GCU #269	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/2025 2:10:24PM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

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

Blank (2546138-BLK1)					Prepared: 11/14/25 Analyzed: 11/14/25				
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	47.3		50.0		94.6	61-141			

LCS (2546138-BS1)					Prepared: 11/14/25 Analyzed: 11/14/25				
Diesel Range Organics (C10-C28)	242	25.0	250		96.9	66-144			
Surrogate: n-Nonane	48.5		50.0		97.1	61-141			

Matrix Spike (2546138-MS1)					Source: E511178-02		Prepared: 11/14/25 Analyzed: 11/14/25		
Diesel Range Organics (C10-C28)	240	25.0	250	ND	96.0	56-156			
Surrogate: n-Nonane	48.0		50.0		95.9	61-141			

Matrix Spike Dup (2546138-MSD1)					Source: E511178-02		Prepared: 11/14/25 Analyzed: 11/14/25		
Diesel Range Organics (C10-C28)	249	25.0	250	ND	99.7	56-156	3.87	20	
Surrogate: n-Nonane	48.7		50.0		97.4	61-141			



QC Summary Data

Cottonwood Consulting	Project Name:	GCU #269	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/2025 2:10:24PM

Anions by EPA 300.0/9056A

Analyst: TP

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

Blank (2546145-BLK1)					Prepared: 11/14/25 Analyzed: 11/14/25				
Chloride	ND	20.0							
LCS (2546145-BS1)					Prepared: 11/14/25 Analyzed: 11/14/25				
Chloride	250	20.0	250		99.9	90-110			
Matrix Spike (2546145-MS1)					Source: E511178-01		Prepared: 11/14/25 Analyzed: 11/14/25		
Chloride	258	20.0	250	ND	103	80-120			
Matrix Spike Dup (2546145-MSD1)					Source: E511178-01		Prepared: 11/14/25 Analyzed: 11/14/25		
Chloride	259	20.0	250	ND	104	80-120	0.672	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

Cottonwood Consulting	Project Name:	GCU #269	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	11/17/25 14:10

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

[illegible]

Envirotech Analytical Laboratory

Printed: 11/13/2025 3:25:49PM

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:	Cottonwood Consulting	Date Received:	11/13/25 12:51	Work Order ID:	E511176
Phone:	970-764-7356	Date Logged In:	11/13/25 15:18	Logged In By:	Noe Soto
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	11/14/25 17:00 (1 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC? Yes
2. Does the number of samples per sampling site location match the COC? Yes
3. Were samples dropped off by client or carrier? Yes
4. Was the COC complete, i.e., signatures, dates/times, requested analyses? Yes
5. Were all samples received within holding time? Yes

Note: Analysis, such as pH which should be conducted in the field, i.e., 15 minute hold time, are not included in this discussion.

Carrier: Joseph LaFortuneComments/ResolutionSample Turn Around Time (TAT)

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

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? Yes

Note: Thermal preservation is not required, if samples are received within 15 minutes of sampling

13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

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

Date



envirotech Inc.

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 534028

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 534028
	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 well API 30-045-22233 (Gallegos Canyon Unit #269), 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.	12/18/2025