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

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

Form C-144
July 21, 2008

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

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

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

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

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

1.
Operator: _____ OGRID #: _____
Address: _____
Facility or well name: _____
APPNumber: _____ OCD Permit Number: _____
U/L or Qtr/Qtr _____ Section _____ Township _____ Range _____ County: _____
Center of Proposed Design: Latitude _____ Longitude _____ NAD: ☐1927 ☐ 1983
Surface Owner: ☐ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
☐ String-Reinforced
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____ Volume: _____bbl Dimensions: L_____ x W_____ x D_____

3.
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** _____
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 _____

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

6.

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

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

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

☐ Alternate. Please specify_____

7.

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

☐ Screen ☐ Netting ☐ Other_____

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

8.

Signs: Subsection C of 19.15.17.11 NMAC

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

☐ Signed in compliance with 19.15.16.8 NMAC

9.

Administrative Approvals and Exceptions:

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

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

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

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

10.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

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

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

11.
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

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

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____

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

13.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including H_2S, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☐ Below-grade Tank ☐ Closed-loop System ☐ Alternative

Proposed Closure Method:
- ☐ Waste Excavation and Removal
- ☐ Waste Removal (Closed-loop systems only)
- ☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
  - ☐ In-place Burial ☐ On-site Trench Burial
- ☐ Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

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

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

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

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

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

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

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

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

18.
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) ***Instructions: Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.***
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☐ Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
☐ Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
☐ Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
☐ Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
Operator Application Certification:

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

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

OCD Representative Signature: CRWhitehead **Approval Date:** October 22, 2021

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

21.
Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC

Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.

☐ **Closure Completion Date:** _____

22.
Closure Method:

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

23.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:

Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?

☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

Required for impacted areas which will not be used for future service and operations:

☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.
Closure Report Attachment Checklist: ***Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.***

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

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

25.
Operator Closure Certification:

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

Name (Print): _____ Title: _____

Signature: Julie Best Date: _____

e-mail address: _____ Telephone: _____

Cole GC B001 - Tank ID: B
API #: 3004508205
Unit Letter O, Section 15,
T29N, R9W

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. Notice is attached.
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. Notice is attached.
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)

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

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. The tank was transported for reuse or recycling. No liner present.
5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production. Equipment associated with the tank was removed.
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)	SS01 Results (Composite Sample)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.025 mg/kg
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.225 mg/kg
TPH	US EPA Method SW-846 418.1	100	<61.4 mg/kg
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<60 mg/kg

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.

Soil beneath tank sampled for TPH, BTEX, and chloride. All results were non-detect. Laboratory analytical report is attached. See attached Form C-141 for further details.

7. BP shall notify the division District III office of its results on form C-141. Form C-141 is attached.
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate. No evidence of a release. See attached C-141.
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. No evidence of a release. Tank was above ground and not buried below grade. Area re-graded following tank removal.
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. Area re-graded following tank removal. Reclamation will be completed within allowable timeframe and will meet standards of NMAC 19.15.17.13.
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

Area re-graded following tank removal. Reclamation will be completed within allowable timeframe and will meet standards of NMAC 19.15.17.13.

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. Area re-graded following tank removal. Reclamation will be completed within allowable timeframe and will meet standards of NMAC 19.15.17.13.
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. NMOCD will be notified when re-vegetaion is successfully completed.
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

Closure report on Form C-144 is included and contains a photo of the current reclamation requirements completed.

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. Certification section of Form C-144 has been completed.

Kyle Siesser

From: Gina Doerner <gina.doerner@ikavenergy.com>
Sent: Monday, September 27, 2021 7:30 AM
To: Joyner, Ryan N
Cc: Julie Best; Don Buller
Subject: SIMCOE LLC - Cole GC B1 BGT Closure BLM Notification
Attachments: BLM Notice BGT Closure - Cole GC B1.doc

Good morning Ryan,

Attached is the notification for the Cole GC B1 Below Ground Tank (BGT) removal.

Thank you,

Gina

Gina Doerner
Regulatory Analyst

IKAV Energy Inc.
SIMCOE LLC

1199 Main Ave., Ste 101
Durango, CO 81301
Direct: 970- 852-0082
Mobile: 970- 247-2178
Gina.Doerner@ikavenergy.com

SIMCOE LLC

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

September 27, 2021

Bureau of Land Management
Ryan Joyner
6251 College, Suite A
Farmington, NM 87402

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank
Well Name: Cole GC B1
API# 30-045-08205
(O) Section 15-T29N-R09W
San Juan County, New Mexico

To Whom It May Concern,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. SIMCOE LLC (SIMCOE) is required to notify the surface owner of SIMCOE's plans to close/remove a below grade tank. SIMCOE wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. SIMCOE plans to commence this work on or about September 30, 2021 at 10:00 a.m. Barring any unforeseen issues, the work should be completed within 10 working days.

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

If witnessing of the tank removal is required, please contact Julie Best for a specific time (970) 822-8924.

Sincerely,

Gina

Gina Doerner
Regulatory Analyst
IKAV Energy Inc.
SIMCOE LLC

Kyle Siesser

From: Gina Doerner <gina.doerner@ikavenergy.com>
Sent: Monday, September 27, 2021 7:29 AM
To: ocd.enviro@state.nm.us
Cc: cory.smith@state.nm.us; Don Buller; Julie Best
Subject: SIMCOE LLC - Cole GC B1 Below Grade Tank (BGT) Closure

SENT VIA E-MAIL

September 27, 2021

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

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

Cole GC B1
API 30-045-08205
(O) Section 15 – T29N – R09W
San Juan County, New Mexico

To Whom It May Concern:

With regards to the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is notification that SIMCOE LLC is planning to close a 21 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around September 30, 2021 at 10:00 AM.

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

Sincerely,

Gina Doerner
Regulatory Analyst

IKAV Energy Inc.
SIMCOE LLC

1199 Main Ave., Ste 101
Durango, CO 81301
Direct: 970- 852-0082
Mobile: 970- 247-2178
Gina.Doerner@ikavenergy.com

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 **Julie Best**	Contact Telephone **(970) 828-4060**
Contact email **julie.best@ikavenergy.com**	Incident # *(assigned by OCD)*
Contact mailing address **1199 Main Ave., Suite 101 Durango, CO 81303**	

Location of Release Source

Latitude **36.720134** Longitude **-107.763260**
(NAD 83 in decimal degrees to 5 decimal places)

Site Name **Cole Gas Com B001**	Site Type **Natural Gas Well**
Date Release Discovered NA	API# *(if applicable)* **3004508205**

Unit Letter	Section	Township	Range	County
O	**15**	**29N**	**09W**	**San Juan**

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

Nature and Volume of Release

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

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

Cause of Release **TPH, BTEX, & chloride all non-detect based on laboratory analytical results. No evidence of a release had occurred.**

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

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

Not required.

Initial Response

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

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

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

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

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

Printed Name: Julie Best Title: HSE and Measurement Manager

Signature: Julie Best Date: 10/19/21

email: julie.best@ikavenergy.com Telephone: (970) 828-4060

OCD Only

Received by: _____ Date: _____

CLIENT: Simcoe LLC

COTTONWOOD CONSULTING LLC
P.O. BOX 1653, DURANGO, COLO. 81303
(970) 764-7356

API #: 3004508205
TANK ID (if applicble): B

FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:

PAGE #: 1 of 1

SITE INFORMATION:

SITE NAME: Cole Gas Com B001

DATE STARTED: 09/30/21
DATE FINISHED: 09/30/21

QUAD/UNIT: O SEC: 15 TWP: 29N RNG: 9W PM: NM CNTY: SJ ST: NM

1/4 -1/4/FOOTAGE: 840 FSL 1630 FEL LEASE TYPE: (FEDERAL) / STATE / FEE / INDIAN

LEASE #: NMSF077091 PROD. FORMATION: Blanco PC CONTACT: CONTRACTOR:

ENVIRONMENTAL SPECIALIST(S): KS

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.720219, -107.763000 GL ELEV.: 5947

1) 21 BBLS Steel tank "B" GPS COORD.: 36.720134, -107.763260 DISTANCE/BEARING FROM ~~P&A~~ wellhead: 82 ft, 200°

2) _____ GPS COORD.: _____ DISTANCE/BEARING FROM P&A: _____

3) _____ GPS COORD.: _____ DISTANCE/BEARING FROM P&A: _____

4) _____ GPS COORD.: _____ DISTANCE/BEARING FROM P&A: _____

SAMPLING DATA:

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL

	SAMPLE ID:	SAMPLE DATE:	SAMPLE TIME:	LAB ANALYSIS:	OVM READING (ppm)
1)	5PC-TB@0-4"(21)	9/30/21	1010	8015M/D, 8021B, 300.0(Cl)	0.1
2)					
3)					
4)					
5)					

SOIL DESCRIPTION:

SOIL TYPE: (SAND) / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER

SOIL COLOR: Brown

COHESION (ALL OTHERS): (NON COHESIVE) / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE

CONSISTENCY (NON COHESIVE SOILS): (LOOSE) / FIRM / DENSE / VERY DENSE

MOISTURE: (DRY) / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED

SAMPLE TYPE: GRAB / (COMPOSITE) - # OF PTS. 5

DISCOLORATION/STAINING OBSERVED: YES / (NO) EXPLANATION -

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

HC ODOR DETECTED: YES / (NO) EXPLANATION -

ANY AREAS DISPLAYING WETNESS: YES / (NO) EXPLANATION -

SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION -

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / NO EXPLANATION:

EQUIPMENT SET OVER RECLAIMED AREA: YES / NO EXPLANATION -

OTHER: Tank is an above ground 21 bbls steel tank. No fence/~~concrete~~ secondary containment observed. Collect 5-pt composite from 0-4" bgs following tank removal.

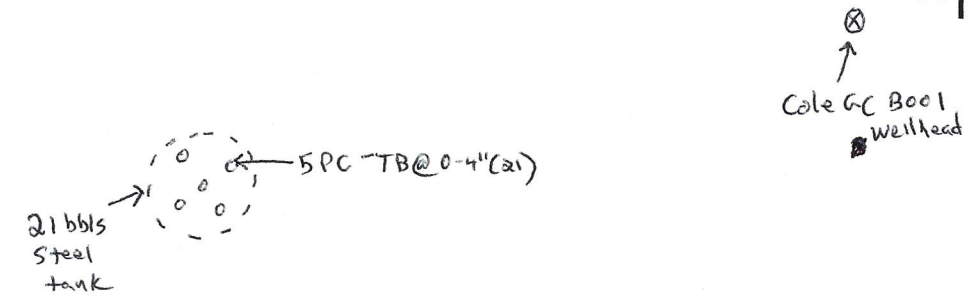
EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): NA

DEPTH TO GROUNDWATER: >100' NEAREST WATER SOURCE: >1,000 ft NEAREST SURFACE WATER: >1,000 ft NMOCD TPH CLOSURE STD: _____ ppm

SITE SKETCH

BGT Located: off / on site

PLOT PLAN circle: attached



OVM CALIB. READ. = 100 ppm RF = 1.00

OVM CALIB. GAS = 100 ppm

TIME: 0945 am/pm DATE: 9/30/21

MISCELL. NOTES

Permit date(s): 6/3/2010

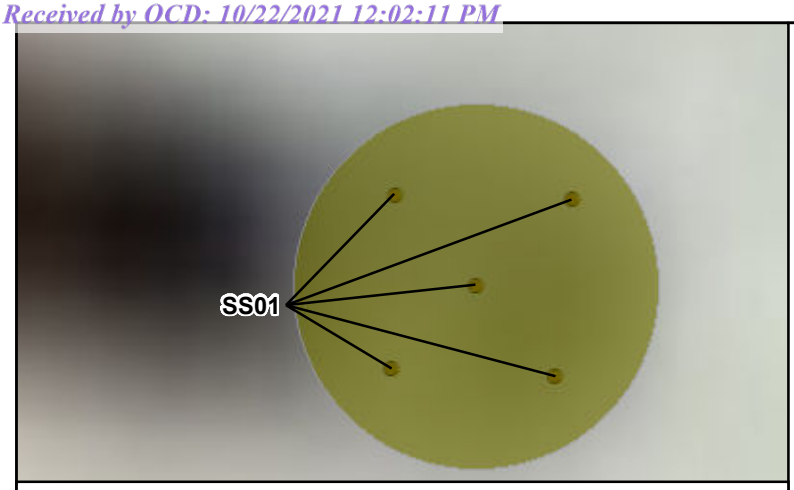
OCD Appr. date(s):

Tank ID	OVM = Organic Vapor Meter ppm = parts per million
B	BGT Sidewalls Visible: (Y) / N
	BGT Sidewalls Visible: Y / N
	BGT Sidewalls Visible: Y / N

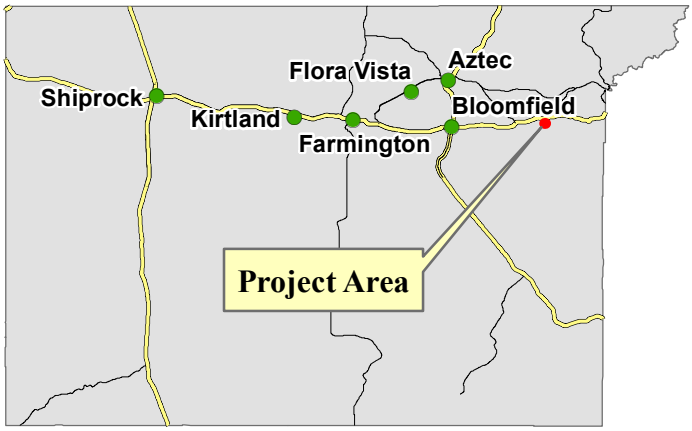
Magnetic declination:

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

NOTES: _____ ONSITE: 9/30/21



Sample Location



San Juan County, New Mexico

Notes: Sample collected 9/30/2021. SS01 is a five-point composite sample.

Legend

- Soil Sample Location
- Approximate Tank Location
- Oil & Gas Wells

Cottonwood CONSULTING

Mapping by: E. Millar, 10/18/2021
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 15 T29N R9W NMPM

Cole Gas Com B #001
Project Map
Simcoe, LLC

Analytical Report
Lab Order **2110003**
Date Reported: **10/15/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE
Client Sample ID: 5 PC-TB@0-4"(21)
Project: Cole GC B001
Collection Date: 9/30/2021 10:10:00 AM
Lab ID: 2110003-001 **Matrix:** SOIL **Received Date:** 10/1/2021 7:21:00 AM

Analyses	Result	PQL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **SB**
Diesel Range Organics (DRO)	ND	9.4		mg/Kg	1	10/5/2021 4:09:55 PM
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	10/5/2021 4:09:55 PM
Surr: DNOP	97.1	70-130		%Rec	1	10/5/2021 4:09:55 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **mb**
Gasoline Range Organics (GRO)	ND	5.0		mg/Kg	1	10/6/2021 4:38:00 AM
Surr: BFB	104	70-130		%Rec	1	10/6/2021 4:38:00 AM
EPA METHOD 8021B: VOLATILES						Analyst: **mb**
Benzene	ND	0.025		mg/Kg	1	10/6/2021 4:38:00 AM
Toluene	ND	0.050		mg/Kg	1	10/6/2021 4:38:00 AM
Ethylbenzene	ND	0.050		mg/Kg	1	10/6/2021 4:38:00 AM
Xylenes, Total	ND	0.10		mg/Kg	1	10/6/2021 4:38:00 AM
Surr: 4-Bromofluorobenzene	94.1	70-130		%Rec	1	10/6/2021 4:38:00 AM
EPA METHOD 300.0: ANIONS						Analyst: **JMT**
Chloride	ND	60		mg/Kg	20	10/12/2021 3:44:01 PM

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

Qualifiers:

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

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

October 15, 2021

Julie Best

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

RE: Cole GC B001 OrderNo.: 2110003

Dear Julie Best:

Hall Environmental Analysis Laboratory received 1 sample(s) on 10/1/2021 for the analyses presented in the following report.

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

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

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

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2110003**

15-Oct-21

Client: SIMCOE

Project: Cole GC B001

Sample ID: **MB-63203**	SampType: **mblk**	TestCode: **EPA Method 300.0: Anions**
Client ID: **PBS**	Batch ID: **63203**	RunNo: **81980**
Prep Date: **10/11/2021**	Analysis Date: **10/12/2021**	SeqNo: **2903835** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: **LCS-63203**	SampType: **lcs**	TestCode: **EPA Method 300.0: Anions**
Client ID: **LCSS**	Batch ID: **63203**	RunNo: **81980**
Prep Date: **10/11/2021**	Analysis Date: **10/12/2021**	SeqNo: **2903836** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	94.3	90	110			

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2110003**

15-Oct-21

Client: SIMCOE

Project: Cole GC B001

Sample ID: **MB-63018**	SampType: **MBLK**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **PBS**	Batch ID: **63018**	RunNo: **81800**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2896369** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	12		10.00		118	70	130			

Sample ID: **LCS-63018**	SampType: **LCS**	TestCode: **EPA Method 8015M/D: Diesel Range Organics**
Client ID: **LCSS**	Batch ID: **63018**	RunNo: **81800**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2896370** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	47	10	50.00	0	94.8	68.9	135			
Surr: DNOP	5.7		5.000		113	70	130			

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2110003**

15-Oct-21

Client: SIMCOE

Project: Cole GC B001

Sample ID: **mb-63008**	SampType: **MBLK**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **PBS**	Batch ID: **63008**	RunNo: **81809**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2893760** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	1000		1000		103	70	130			

Sample ID: **lcs-63008**	SampType: **LCS**	TestCode: **EPA Method 8015D: Gasoline Range**
Client ID: **LCSS**	Batch ID: **63008**	RunNo: **81809**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2893762** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	31	5.0	25.00	0	123	78.6	131			
Surr: BFB	1200		1000		115	70	130			

Qualifiers:

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

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2110003**

15-Oct-21

Client: SIMCOE

Project: Cole GC B001

Sample ID: **mb-63008**	SampType: **MBLK**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **PBS**	Batch ID: **63008**	RunNo: **81809**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2893812** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.93		1.000		92.7	70	130			

Sample ID: **lcs-63008**	SampType: **LCS**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **LCSS**	Batch ID: **63008**	RunNo: **81809**
Prep Date: **10/4/2021**	Analysis Date: **10/5/2021**	SeqNo: **2893814** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.97	0.025	1.000	0	97.1	80	120			
Toluene	1.0	0.050	1.000	0	100	80	120			
Ethylbenzene	0.98	0.050	1.000	0	97.7	80	120			
Xylenes, Total	3.0	0.10	3.000	0	99.6	80	120			
Surr: 4-Bromofluorobenzene	0.87		1.000		86.6	70	130			

Qualifiers:

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

HALL ENVIRONMENTAL ANALYSIS LABORATORY

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

Sample Log-In Check List

Client Name: SIMCOE Work Order Number: 2110003 RcptNo: 1

Received By: **Tracy Casarrubias** 10/1/2021 7:21:00 AM

Completed By: **Sean Livingston** 10/1/2021 8:21:50 AM Sean Livingston

Reviewed By: JN 10/1/21

Chain of Custody

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

Log In

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

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

Adjusted? _____

Checked by: KPA 10/01/21

Special Handling (if applicable)

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

Person Notified: _____ Date: _____

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

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. **Cooler Information**

Cooler No	Temp °C	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.2	Good				

Chain-of-Custody Record

Client: Simcoe LLC

Mailing Address: 1199 Main St Ste 101
Durango, CO 81301

Phone #: 970 394 0131

email or Fax#: julie.best@ikavenergy.com

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

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

Turn-Around Time:
☒ Standard ☐ Rush

Project Name: Cole GC B 001

Project #:

Project Manager:

Sampler: Kyle Siesser

On Ice: ☒ Yes ☐ No

# of Coolers: 1

Cooler Temp(including CF): 2.3-0.1=2.2 (°C)

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

Analysis Request

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2109211003	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)	BTEX 8021B	TPH 8015B	Chlorides 300.0			
9/30/21	1010	Soil	SPC-TB@0-4"(21)	Two 4oz jars	—	001											X	X	X			

Date: 9/30/21 Time: 1324 Relinquished by: Kyle Siesser
Received by: Via: Date: 9/30/21 Time: 1324

Date: 9/30/21 Time: 1803 Relinquished by: Christian Walker
Received by: Via: COC Date: 10/1/21 Time: 7:21

Remarks:

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

Cottonwood CONSULTING

Cole Gas Com B001
Photographic Log
Simcoe, LLC

Photo 1: Cole Gas Com B 001 well sign, 9/30/21.

Photo 2: 21 bbls steel tank “B” prior to removal, 9/30/21.

Cottonwood CONSULTING

Cole Gas Com B001
Photographic Log
BP America Production Co.

Photo 3: Former location of 21 bbls steel tank "B" following removal, 9/30/21.

Photo 4: Former location of 21 bbls steel tank "B" following removal and re-grading, 9/30/21.

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

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

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 57535
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	10/22/2021