

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-144  
Revised April 3, 2017

**For temporary pits, below-grade tanks, and multi-well fluid management pits**, submit to the appropriate NMOC District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOC District Office.

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  
BGT1 Closure ☒ Closure of a pit, below-grade tank, or proposed alternative method  
Report ☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

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

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

1.  
Operator: Simcoe, LLC OGRID #: 329736  
Address: 1199 Main Ave., Suite 101, Durango, CO 81301  
Facility or well name: EPNG Com H LS #009  
API Number: 30-045-21131 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr C Section 32 Township 31N Range 10W County: San Juan  
Center of Proposed Design: Latitude 36.85998748 Longitude -107.9090288 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 Tank ID: A  
Volume: 95 bbl Type of fluid: Produced Water  
Tank Construction material: Steel  
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☒ Other double-walled, double-bottom, sidewalls not visible  
Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)  
☐ Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☐ Alternate. Please specify \_\_\_\_\_

6.

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

- ☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

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

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

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

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No  
☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

☐ Yes ☐ No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

#### **Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

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

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

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

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

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC  
☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC  
☐ Climatological Factors Assessment  
☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Quality Control/Quality Assurance Construction and Installation Plan  
☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC  
☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC  
☐ Nuisance or Hazardous Odors, including H<sub>2</sub>S, 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: Jaclyn Burdine Approval Date: 07/25/2022

Title: Environmental Specialist-A OCD Permit Number: BGT1

19.

**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

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

☒ Closure Completion Date: 3/22/2022

20.

**Closure Method:**

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

21.

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

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

On-site Closure Location: Latitude 36.85998748 Longitude -107.9090288 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): Sabre Beebe Title: Field Environmental Coordinator

Signature: Sabre Beebe Date: 5/3/2022

e-mail address: sabre.beebe@ikavenergy.com Telephone: (970) 852-5172



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

**Well Name: EPNG Com H LS #009**  
**Well API# 30-045-21131**  
**Unit Letter C, Section 32, T31N, R10W**

**BELOW-GRADE TANK CLOSURE PLAN**

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

**General Closure Plan**

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

**Notice was provided and is attached.**

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

**Notice was provided and is attached.**

3. SIMCOE, LLC shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be utilized are:

- a. JFJ Land farm, Permit NM-01-010(B) (Solids and Sludge)
- b. Basin Disposal, Permit NM-01-0005 (Liquids)
- c. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- d. Simcoe, LLC Operated 13 GCU SWD # 1, API 30-045-28601 (Liquids)
- e. Simcoe, LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- f. Simcoe, LLC Operated GCU 306 SWD, API30-045-24286 (Liquids)
- g. Simcoe, LLC Operated GCU 307 SWD, API30-045-24248 (Liquids)
- h. Simcoe, LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- i. Simcoe, LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

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

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

**The BGT was transported for reuse.**

5. Simcoe, LLC shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.

**All equipment associated with the BGT has been removed.**

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

Constituents	Testing Method	Closure Criteria (mg/kg)	5PC-TB@5'(95) Results (mg/kg)
Chloride	US EPA Method 300.0	20,000	ND
TPH	US EPA Method SW-846 418.1	2,500	ND
GRO + DRO	US EPA Method SW-846 8015M	1,000	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
Benzene	US EPA Method SW-846 8021B or 8260B	10	ND

**Notes:** mg/kg- milligram per kilogram; GRO- gasoline range organics; DRO- diesel range organics; TPH- total petroleum hydrocarbons; BTEX- benzene, toluene, ethylbenzene, and total xylenes; ND- analyte not detected. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by whichever concentration level is greatest.

**Soils beneath the BGT were sampled for TPH, BTEX, and chloride per the above requirements. TPH, BTEX, and chloride were all non-detect based on laboratory analytical results.**

7. Simcoe, LLC shall notify the division District III office of its results on form C-141.

**Form C-141 is attached.**

8. If it is found that a release has occurred, then Simcoe, LLC will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.

**Sampling results and field observations reveal no evidence of a release had occurred.**

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then Simcoe, LLC 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.

**No evidence of a release. Area backfilled / regraded.**

10. Simcoe, LLC shall reclaim the BGT location, and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. Simcoe, LLC shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC. 11. The



soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater.

**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

12. Simcoe, LLC shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be conducted by drilling on the contour whenever practical or by other division- approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-affected by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.

**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

13. Simcoe, LLC shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.

**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, Simcoe, LLC shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

15. Within 60 days of closure completion, Simcoe, LLC shall submit a closure report on NMOCD's form C-144, and will include the following:

- a. proof of closure notification (surface owner and NMOCD),
- b. sampling analytical reports: information required by 19.15.17 NMAC,
- c. disposal facility name and permit number,
- d. details on back-filling, capping, covering; and, where applicable, re-vegetation application rates and seeding techniques; and,
- e. site reclamation, photo documentation, disposal facility name, and permit number

**Closure report on Form C-144 is included and contains a photo of the location.**

16. Simcoe, LLC shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

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

## Emma Millar

---

**From:** Sabre Beebe <sabre.beebe@ikavenergy.com>  
**Sent:** March 16, 2022 6:57 AM  
**To:** ocd.enviro@state.nm.us; victoria.venegas@state.nm.us  
**Cc:** Julie Best; Jonathan Divine; Don Buller  
**Subject:** SIMCOE, LLC EPNG Com H LS 009 Below Grade Tank (BGT) Closure

SENT VIA E-MAIL

March 15, 2022

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

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

Well Name: EPNG Com H LS 009  
API#: 30-045-21131  
C-32-31N-10W  
San Juan County, NM

To Whom It May Concern:

With regards to the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is notification that SIMCOE LLC is planning to close a 95 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around March 22, 2022 at 1:30 PM.

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

Sincerely,

Sabre Beebe



**IKAV Energy Inc.**

**Sabre Beebe**

**Field Environmental Coordinator**

**Office: (970) 852-5172**

**Mobile: (970)-769-9523**

**E-Mail: [sabre.beebe@ikavenergy.com](mailto:sabre.beebe@ikavenergy.com)**

Confidentiality notice:

This e-mail communication (and any attachment/s) are confidential and are intended only for the individual(s) or entity named above and to others who have been specifically authorized to receive it. Any information in this email and

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 Sabre Beebe	Contact Telephone (970) 852-5172
Contact email sabre.beebe@ikavenergy.com	Incident # (assigned by OCD)
Contact mailing address 1199 Main Ave., Suite 101 Durango, CO 81301	

### Location of Release Source

Latitude 36.85998748 Longitude -107.9090288  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name EPNG Com H LS #009	Site Type Natural Gas Well
Date Release Discovered NA	API# (if applicable) 30-045-21131

Unit Letter	Section	Township	Range	County
C	32	31N	10W	San Juan

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	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 TPH, BTEX, chloride non-detect based on laboratory analytical results.  
No evidence that a release has occurred.

Incident ID	
District RP	
Facility ID	
Application ID	

<p>Was this a major release as defined by 19.15.29.7(A) NMAC?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If YES, for what reason(s) does the responsible party consider this a major release?</p>
<p>If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?</p> <p>Not required.</p>	

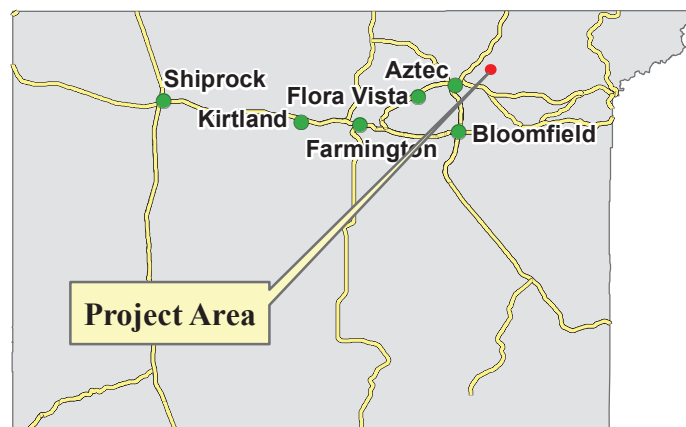
## Initial Response

*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>Sabre Beebe</u>	Title: <u>Field Environmental Coordinator</u>
Signature: <u><i>Sabre Beebe</i></u>	Date: <u>5/3/2022</u>
email: <u>sabre.beebe@ikavenergy.com</u>	Telephone: <u>(970) 852-5172</u>
<b><u>OCD Only</u></b> Received by: _____ Date: _____	

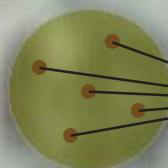
CLIENT: <u>Simcoe</u>	<b>COTTONWOOD CONSULTING LLC</b> <b>P.O. BOX 1653, DURANGO, COLO. 81303</b> <b>(970) 764-7356</b>	API # <u>30-045-21131</u> TANK ID (if applicable): <u>A</u>
<b>FIELD REPORT:</b> (circle one) <u>BGT CONFIRMATION</u> / RELEASE INVESTIGATION / OTHER:		PAGE #: <u>1</u> of <u>1</u>
<b>SITE INFORMATION:</b> SITE NAME: <u>EPNG Wm H LS #009</u> QUAD/UNIT: <u>C SEC: 32 TWP: 31 N RNG: 10W PM: NM CNTY: San Juan ST: NM</u> 1/4-1/4/FOOTAGE: <u>850 FNL 1650 FWL</u> LEASE TYPE: <u>FEDERAL (STATE) FEE / INDIAN</u> LEASE #: <u>B-10400</u> PROD. FORMATION: <u>Blanco</u> CONTACT: <u>Pic Cliffs</u> CONTRACTOR: <u>Kelly oilfield</u>		DATE STARTED: <u>3/22/22</u> DATE FINISHED: <u>3/22/22</u> ENVIRONMENTAL SPECIALIST(S): <u>EM</u>
<b>REFERENCE POINT:</b> WELL HEAD (W.H.) GPS COORD.: <u>36.860057, -107.909086</u> GLELEV: <u>6097</u> 1) <u>95 bbl steel tank</u> GPS COORD.: <u>36.8599875, -107.9090288</u> DISTANCE/BEARING FROM P&A: <u>-</u> 2) GPS COORD.: DISTANCE/BEARING FROM P&A: 3) GPS COORD.: DISTANCE/BEARING FROM P&A: 4) GPS COORD.: DISTANCE/BEARING FROM P&A:		
<b>SAMPLING DATA:</b> CHAIN OF CUSTODY RECORD(S) # OR LAB USED: <u>GAL</u>		OVM READING (ppm)
1) SAMPLE ID: <u>SPC-TB25'(95)</u> SAMPLE DATE: <u>3/22/22</u> SAMPLE TIME: <u>1400</u> LAB ANALYSIS: <u>BTEX, TPH, chloride</u> 2) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: 3) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: 4) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS: 5) SAMPLE ID: SAMPLE DATE: SAMPLE TIME: LAB ANALYSIS:		<u>0.1</u>    
<b>SOIL DESCRIPTION:</b> SOIL TYPE: <u>(SAND) SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER</u> <u>sand w/ minor clay</u> SOIL COLOR: <u>brown</u> PLASTICITY (CLAYS): <u>(NON PLASTIC) SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC</u> COHESION (ALL OTHERS): <u>(NON COHESIVE) SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE</u> CONSISTENCY (NON COHESIVE SOILS): <u>(LOOSE) FIRM / DENSE / VERY DENSE</u> MOISTURE: <u>DRY / (SLIGHTLY MOIST) MOIST / WET / SATURATED / SUPER SATURATED</u> SAMPLE TYPE: <u>GRAB / (COMPOSITE) # OF PTS.</u> <u>5</u> DISCOLORATION/STAINING OBSERVED: YES / <u>(NO)</u> EXPLANATION -		
<b>SITE OBSERVATIONS:</b> LOST INTEGRITY OF EQUIPMENT: YES / <u>(NO)</u> EXPLANATION - APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / <u>(NO)</u> EXPLANATION: EQUIPMENT SET OVER RECLAIMED AREA: YES / <u>(NO)</u> EXPLANATION - <u>BGT removed &amp; area regraded.</u> OTHER:		
EXCAVATION DIMENSION ESTIMATION: <u>20</u> ft. X <u>20</u> ft. X <u>5</u> ft. EXCAVATION ESTIMATION (Cubic Yards): <u>20</u> DEPTH TO GROUNDWATER: <u>&gt;100</u> NEAREST WATER SOURCE: NEAREST SURFACE WATER: NMOCED TPH CLOSURE STD: <u>2,500 ppm</u>		
<b>SITE SKETCH</b> BGT Located: off / <u>(on)</u> site PLOT PLAN circle: <u>attached</u>		
		OVM CALIB. READ. = <u>100</u> ppm RF=1.00 OVM CALIB. GAS = <u>100</u> ppm TIME: <u>0830</u> am/pm DATE: <u>3/22/22</u>
NOTES: BGT = BELOW GRADE TANK; ED = EXCAVATION DEPRESSION; BG = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGL = 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.		<b>MISCELL. NOTES</b>  Permit date(s): OCD Appr. date(s): Tank ID: <u>A</u> OVM = Organic Vapor Meter ppm = parts per million BGT Sidewalls Visible: Y / <u>(N)</u> BGT Sidewalls Visible: Y / N BGT Sidewalls Visible: Y / N Magnetic declination:
NOTES:		ONSITE:





San Juan County, New Mexico

EPNG COM H LS #009




5PC-TB@5'(95)

0 25 50 Feet



Notes: Sample collected 3/22/2022. Sample 5PC-TB@5'(95) is a five-point composite sample.

### Legend

- Soil Sample
- Approximate Former BGT Location
-  Oil & Gas Well

**Cottonwood**  
CONSULTING



Mapping by: E. Millar, 3/29/2022  
Coordinate System:  
NAD 1983 UTM Zone 13 N

Location: Sec 32 T31N R10W NMPM

**EPNG Com H LS #009**  
**Project Map**  
**Simcoe LLC**





75 Suttle Street  
Durango, CO 81303  
970.247.4220 Phone  
970.247.4227 Fax  
[www.greenanalytical.com](http://www.greenanalytical.com)

30 March 2022

Kyle Siesser  
Cottonwood Consulting  
PO Box 1653  
Durango, CO 81302  
RE: BTEX/TPH, CI

Enclosed are the results of analyses for samples received by the laboratory on 03/22/22 16:40. The data to follow was performed, in whole or in part, by Green Analytical Laboratories. Any data that was performed by a subcontract laboratory is included within the GAL report, or with an additional report attached.

If you need any further assistance, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads 'Debbie Zufelt'. The signature is written in a cursive, flowing style.

Debbie Zufelt  
Reports Manager

All accredited analytes contained in this report are denoted by an asterisk (\*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at <http://greenanalytical.com/certifications/>

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water. TNI Certificate Number: T104704514-22-13

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water through the Colorado Department of Public Health and Environment and EPA region 8. TNI Certificate Number: T104704398-21-14



dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

www.GreenAnalytical.com

Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: EPNG COM H LS #009  
Project Manager: Kyle Siesser

**Reported:**  
03/30/22 10:40

## ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
5PC-TB@5'(95)	2203207-01	Solid	03/22/22 14:00	03/22/22 16:40	

Green Analytical Laboratories

A handwritten signature in black ink that reads 'Debbie Zufelt'.

Debbie Zufelt, Reports Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.

Page 2 of 7 2203207 GAL FINAL 03 30 22 1040 03/30/22 10:40:58



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Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: EPNG COM H LS #009  
Project Manager: Kyle Siesser

Reported:  
03/30/22 10:40

**5PC-TB@5'(95)****2203207-01 (Soil)**

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
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**General Chemistry**

% Dry Solids	94.4			%	1	03/23/22 16:35	EPA160.3/1684		VJW
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**Soluble (DI Water Extraction)**

Chloride	<21.2	21.2	0.645	mg/kg dry	20	03/26/22 03:26	EPA300.0		AES
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**Subcontracted -- Cardinal Laboratories 101 East Marland Hobbs, NM 88240****Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	0.004	mg/kg	50	03/28/22 16:20	8021B		MS\
Toluene*	<0.050	0.050	0.006	mg/kg	50	03/28/22 16:20	8021B		MS\
Ethylbenzene*	<0.050	0.050	0.006	mg/kg	50	03/28/22 16:20	8021B		MS\
Total Xylenes*	<0.150	0.150	0.014	mg/kg	50	03/28/22 16:20	8021B		MS\
Total BTEX	<0.300	0.300	0.030	mg/kg	50	03/28/22 16:20	8021B		MS\

Surrogate: 4-Bromofluorobenzene (PID)	105 %	69.9-140				03/28/22 16:20	8021B		MS\
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	6.25	mg/kg	1	03/28/22 19:31	8015B		MS
DRO >C10-C28*	<10.0	10.0	4.26	mg/kg	1	03/28/22 19:31	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	4.26	mg/kg	1	03/28/22 19:31	8015B		MS

Surrogate: 1-Chlorooctane	81.5 %	66.9-136				03/28/22 19:31	8015B		MS
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Surrogate: 1-Chlorooctadecane	79.0 %	59.5-142				03/28/22 19:31	8015B		MS
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Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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www.GreenAnalytical.com

Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: EPNG COM H LS #009  
Project Manager: Kyle Siesser

**Reported:**  
03/30/22 10:40

## General Chemistry - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

## Batch B220765 - General Prep - Wet Chem

## Duplicate (B220765-DUP1)

Source: 2203190-01 Prepared &amp; Analyzed: 03/23/22

% Dry Solids	93.6		%		93.7			0.0574	20	
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## Soluble (DI Water Extraction) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

## Batch B220767 - IC- Ion Chromatograph

## Blank (B220767-BLK1)

Prepared: 03/24/22 Analyzed: 03/25/22

Chloride	ND	10.0	mg/kg wet							
----------	----	------	-----------	--	--	--	--	--	--	--

## LCS (B220767-BS1)

Prepared: 03/24/22 Analyzed: 03/25/22

Chloride	244	10.0	mg/kg wet	250		97.7	85-115			
----------	-----	------	-----------	-----	--	------	--------	--	--	--

## LCS Dup (B220767-BSD1)

Prepared: 03/24/22 Analyzed: 03/25/22

Chloride	244	10.0	mg/kg wet	250		97.5	85-115	0.135	20	
----------	-----	------	-----------	-----	--	------	--------	-------	----	--

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: EPNG COM H LS #009  
Project Manager: Kyle Siesser

Reported:  
03/30/22 10:40

## Volatile Organic Compounds by EPA Method 8021 - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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## Batch 2032804 - Volatiles

## Blank (2032804-BLK1)

Prepared &amp; Analyzed: 03/28/22

Surrogate: 4-Bromofluorobenzene (PID)	0.0528		mg/kg	0.0500		106	69.9-140			
Benzene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Total Xylenes	ND	0.150	mg/kg							

## LCS (2032804-BS1)

Prepared &amp; Analyzed: 03/28/22

Surrogate: 4-Bromofluorobenzene (PID)	0.0518		mg/kg	0.0500		104	69.9-140			
Benzene	1.79	0.050	mg/kg	2.00		89.3	83.4-122			
Ethylbenzene	2.11	0.050	mg/kg	2.00		106	84.2-121			
m,p-Xylene	4.44	0.100	mg/kg	4.00		111	89.9-126			
o-Xylene	2.13	0.050	mg/kg	2.00		106	84.3-123			
Toluene	2.00	0.050	mg/kg	2.00		100	84.2-126			
Total Xylenes	6.57	0.150	mg/kg	6.00		109	89.1-124			

## LCS Dup (2032804-BSD1)

Prepared &amp; Analyzed: 03/28/22

Surrogate: 4-Bromofluorobenzene (PID)	0.0511		mg/kg	0.0500		102	69.9-140			
Benzene	1.84	0.050	mg/kg	2.00		91.8	83.4-122	2.77	12.6	
Ethylbenzene	2.16	0.050	mg/kg	2.00		108	84.2-121	2.54	13.9	
m,p-Xylene	4.56	0.100	mg/kg	4.00		114	89.9-126	2.56	13.6	
o-Xylene	2.18	0.050	mg/kg	2.00		109	84.3-123	2.53	14.1	
Toluene	2.07	0.050	mg/kg	2.00		103	84.2-126	3.08	13.3	
Total Xylenes	6.74	0.150	mg/kg	6.00		112	89.1-124	2.55	13.4	

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: EPNG COM H LS #009  
Project Manager: Kyle Siesser

Reported:  
03/30/22 10:40

### Petroleum Hydrocarbons by GC FID - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 2032534 - General Prep - Organics

##### Blank (2032534-BLK1)

Prepared: 03/25/22 Analyzed: 03/28/22

Surrogate: 1-Chlorooctadecane	44.6		mg/kg	50.0		89.2	59.5-142			
Surrogate: 1-Chlorooctane	46.0		mg/kg	50.0		92.0	66.9-136			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							

##### LCS (2032534-BS1)

Prepared: 03/25/22 Analyzed: 03/28/22

Surrogate: 1-Chlorooctadecane	48.5		mg/kg	50.0		97.0	59.5-142			
Surrogate: 1-Chlorooctane	54.7		mg/kg	50.0		109	66.9-136			
DRO >C10-C28	225	10.0	mg/kg	200		113	77-136			
GRO C6-C10	196	10.0	mg/kg	200		97.9	79.1-128			
Total TPH C6-C28	421	10.0	mg/kg	400		105	82.9-127			

##### LCS Dup (2032534-BSD1)

Prepared: 03/25/22 Analyzed: 03/28/22

Surrogate: 1-Chlorooctadecane	46.7		mg/kg	50.0		93.3	59.5-142			
Surrogate: 1-Chlorooctane	53.8		mg/kg	50.0		108	66.9-136			
DRO >C10-C28	235	10.0	mg/kg	200		117	77-136	3.99	17.9	
GRO C6-C10	198	10.0	mg/kg	200		99.2	79.1-128	1.33	21.4	
Total TPH C6-C28	433	10.0	mg/kg	400		108	82.9-127	2.76	17.6	

### Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis *Results reported on as received basis unless designated as dry.
RPD	Relative Percent Difference
LCS	Laboratory Control Sample (Blank Spike)
RL	Report Limit
MDL	Method Detection Limit

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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### CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]





**EPNG Com H LS #009**  
**Photographic Log**  
**Simcoe LLC**



Photo 1: EPNG Com H LS #009 well sign, 3/22/2022.



Photo 2: 95 bbls steel tank prior to removal, 3/22/2022.





EPNG Com H LS #009  
Photographic Log  
Simcoe LLC



Photo 3: Former location of BGT following removal, 3/22/2022.



Photo 4: Former location BGT following removal and re-grading, 3/22/2022.

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

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

CONDITIONS  
  
Action 104489

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 104489
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
jburdine	None	7/25/2022