

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 NMOCD District Office.  
**For permanent pits** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD 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  
☐ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

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

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

1.  
Operator: \_\_\_\_\_ OGRID #: \_\_\_\_\_  
Address: \_\_\_\_\_  
Facility or well name: \_\_\_\_\_  
API Number: \_\_\_\_\_ OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr \_\_\_\_\_ Section \_\_\_\_\_ Township \_\_\_\_\_ Range \_\_\_\_\_ County: \_\_\_\_\_  
Center of Proposed Design: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD83  
Surface Owner: ☐ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ Lined ☐ Unlined Liner type: Thickness \_\_\_\_\_ mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_  
☐ String-Reinforced  
Liner Seams: ☐ Welded ☐ Factory ☐ Other \_\_\_\_\_ Volume: \_\_\_\_\_ bbl Dimensions: L \_\_\_\_\_ x W \_\_\_\_\_ x D \_\_\_\_\_

3.  
☐ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC 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 \_\_\_\_\_

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:** \_\_\_\_\_ **Approval Date:** \_\_\_\_\_

**Title:** \_\_\_\_\_ **OCD Permit Number:** \_\_\_\_\_

19.

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

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

☐ **Closure Completion Date:** \_\_\_\_\_

20.

**Closure Method:**

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

21.

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

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

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

22.

**Operator Closure Certification:**

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

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: Kyle D. Sierson Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

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

**Well Name: Atlantic A LS 009**  
**Well API# 30-045-10262**  
**Unit N, Section 27, 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 an NMOCD 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, API 30-045-24286 (Liquids)
- g. Simcoe, LLC Operated GCU 307 SWD, API 30-045-24248 (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 will be reused.**

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

**The BGT was removed and area regraded.**

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 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	29.6
TPH	US EPA Method SW-846 418.1	2,500	ND
GRO+DRO	EPA SW-846 Method 8021B or 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; BG - background. 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 and BTEX were non-detect based on laboratory analytical results. Chloride was detected at 29.6 (mg/kg) which is below the closure criteria of 20,000 (mg/kg).**

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 that 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 within the active process area.

**No evidence of a release. The BGT was removed and area 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.

**The BGT was removed and area 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.

**The BGT was removed and area 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.

**The BGT was removed and area 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.

**The BGT was removed and area 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.**



<b>Well Name:</b> ATLANTIC A LS	<b>Well Location:</b> T31N / R10W / SEC 27 / SESW / 36.865265 / -107.87291	<b>County or Parish/State:</b> SAN JUAN / NM
<b>Well Number:</b> 9	<b>Type of Well:</b> CONVENTIONAL GAS WELL	<b>Allottee or Tribe Name:</b>
<b>Lease Number:</b> NMNM0606	<b>Unit or CA Name:</b>	<b>Unit or CA Number:</b>
<b>US Well Number:</b> 3004510262	<b>Well Status:</b> Producing Gas Well	<b>Operator:</b> SIMCOE LLC

### Notice of Intent

**Sundry ID:** 2749155

**Type of Submission:** Notice of Intent

**Type of Action:** Other

**Date Sundry Submitted:** 09/01/2023

**Time Sundry Submitted:** 09:20

**Date proposed operation will begin:** 09/01/2023

**Procedure Description:** Regarding the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is a notification that SIMCOE LLC plans 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 April 5, 2023, at 9:00 AM. Should you have any questions, please feel free to contact SIMCOE LLC.

### Surface Disturbance

**Is any additional surface disturbance proposed?:** No

Well Location: T31N / R10W / SEC 27 /  
SESW / 36.865265 / -107.87291County or Parish/State: SAN  
JUAN / NM

Well Number: 9

Type of Well: CONVENTIONAL GAS  
WELL

Allottee or Tribe Name:

Lease Number: NMNM0606

Unit or CA Name:

Unit or CA Number:

US Well Number: 3004510262

Well Status: Producing Gas Well

Operator: SIMCOE LLC

**Operator**

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

Operator Electronic Signature: CHRISTY KOST

Signed on: SEP 01, 2023 09:19 AM

Name: SIMCOE LLC

Title: Permitting Agent

Street Address: 1199 MAIN AVE STE 101

City: DURANGO

State: CO

Phone: (719) 251-7733

Email address: CHRISTY.KOST@IKAVENERGY.COM

**Field**

Representative Name:

Street Address:

City:

State:

Zip:

Phone:

Email address:

**BLM Point of Contact**

BLM POC Name: JEFFREY J TAFOYA

BLM POC Title: Assistant Field Manager

BLM POC Phone: 5055647672

BLM POC Email Address: JTAFOYA@BLM.GOV

Disposition: Denied

Disposition Date: 09/05/2023

Signature: s/ Jeff Tafoya

Form 3160-5  
(June 2019)UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENTFORM APPROVED  
OMB No. 1004-0137  
Expires: October 31, 2021**SUNDRY NOTICES AND REPORTS ON WELLS**  
**Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.**

5. Lease Serial No. NMNM0606

6. If Indian, Allottee or Tribe Name

**SUBMIT IN TRIPLICATE - Other instructions on page 2**

1. Type of Well

☐ Oil Well ☒ Gas Well ☐ Other

2. Name of Operator SIMCOE LLC

3a. Address 1199 Main Ave., Suite 101, Durango, CO 81301

3b. Phone No. (include area code)  
(970) 712-5997

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

8. Well Name and No. ATLANTIC A LS/9

9. API Well No. 3004510262

4. Location of Well (Footage, Sec., T., R., M., or Survey Description)  
SEC 27/T31N/R10W/NMP10. Field and Pool or Exploratory Area  
BLANCO/BLANCO MESAVERDE11. Country or Parish, State  
SAN JUAN/NM

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

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

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

Regarding the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is a notification that SIMCOE LLC plans 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 April 5, 2023, at 9:00 AM. Should you have any questions, please feel free to contact SIMCOE LLC.

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed)  
CHRISTY KOST / Ph: (719) 251-7733

Consultant  
Title

Signature

Date

10/3/2023

**THE SPACE FOR FEDERAL OR STATE OFFICE USE**

Approved by

JEFFREY J TAFOYA / Ph: (505) 564-7672 / Denied

Title

Date

10/3/2023

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

Office FARMINGTON

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

(Instructions on page 2)

## Kyle Siesser

---

**From:** Kyle Siesser  
**Sent:** Thursday, August 31, 2023 4:19 PM  
**To:** OCD.Enviro@emnrd.nm.gov; Venegas, Victoria, EMNRD  
**Cc:** Emma Millar  
**Subject:** Simcoe, LLC Atlantic A LS 009 BGT Closure

SENT VIA E-MAIL

August 31, 2023

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

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

Well Name: Atlantic A LS 009  
API# - 30-045-10262  
N-27-31N-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 September 6, 2023, at 10:00 AM.

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

Sincerely,

N \ OH #VHVHU /S 1J 1#  
The logo for Cottonwood Consulting features the company name in a serif font, with 'CONSULTING' in a smaller font below it. To the right of the text is a stylized green leaf graphic.

PO Box 1653  
Durango, CO 81302  
(970) 764-7356  
[www.cottonwoodconsulting.com](http://www.cottonwoodconsulting.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	Contact Telephone
Contact email	Incident # (assigned by OCD)
Contact mailing address 1199 Main Ave., Suite 101 Durango, CO 81301	

### Location of Release Source

Latitude 36.864776 Longitude -107.873508  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Atlantic A LS 009	Site Type Natural Gas Well
Date Release Discovered NA	API# (if applicable) 30-045-10262

Unit Letter	Section	Township	Range	County
N	27	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  
Soils beneath the BGT were sampled for TPH, BTEX, and chloride. TPH and BTEX were non-detect in all samples based on laboratory analytical results. Chloride was detected at 29.6 (mg/kg) which is below the closure criteria of 20,000 (mg/kg).  
No evidence that a release has occurred.



Incident ID	
District RP	
Facility ID	
Application ID	

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

### 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>Kyle Siesser</u>	Title: <u>Consultant</u>
Signature: <u>Kyle D. Siesser</u>	Date: <u>10/3/2023</u>
email: <u>ksiesser@cottonwoodconsulting.com</u>	Telephone: <u>(970) 764-7356</u>
<b><u>OCD Only</u></b> Received by: _____ Date: _____	

Date: 9/6/2023Client: SIMCOEEnvironmental Specialist(s): JLContractor: HeileyPage: 1 of 1

## BGT Closure Field Form

## Site Information

Well Name: Atlantic A LS 009 Well API#: 30-045-10262 Lease: Federal State / Fee / Indian  
 Well Location: Unit: N Sec: 27 T: 31N R: 10W Cty: San Juan St: New Mexico

## BGT Information

Prev. Tank ID: 7926 95 bbls single double-wall single double-bottom sidewalls visible (Y)(N) berm (Y)(N) fenced (Y)(N) liner (Y)(N)

Notes: \_\_\_\_\_

## Site Observations Following BGT Removal:

evidence of a release (Y)(N)BGT replaced backfilled and graded other: \_\_\_\_\_

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

Notes: No staining or wet areas observed

## NMOCD Closure Standards:

TPH \_\_\_\_\_ mg/kg

Chloride \_\_\_\_\_ mg/kg

## Soil Sampling

Sample ID: 5PL-TB@5'(95) Time: 1055 Sample Type: Grab / Composite - 5 pts PID: 0.9 ppm Lab: GAL

Notes: Brown Silty Sand, no stain, no odor, moist.

## Soil Sampling

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

Notes: \_\_\_\_\_

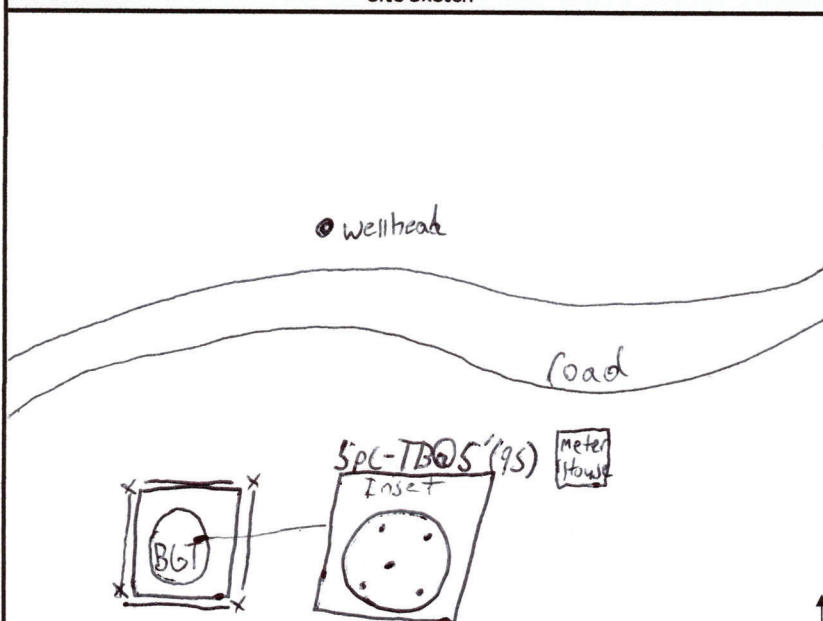
## Soil Sampling

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

Notes: \_\_\_\_\_

## Site Sketch

## Notes



BGT Closure  
Area to backfilled and graded

No evidence of release

N PID Calibration Date: 9-6-2023



San Juan County, New Mexico



Notes: All samples collected 9/6/2023. 5PC-TB@5'(95) is a five-point composite sample.

### Legend

- Soil Sample
- BGT Location
- ★ Oil & Gas Wells

**Cottonwood**  
CONSULTING

Mapping by: K. O'Brien, 10/4/2023  
Coordinate System:  
NAD 1983 UTM Zone 13 N

Location: Sec 27 T31N R10W NMPM

**Atlantic A 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)

14 September 2023

Kyle Siesser  
Cottonwood Consulting  
PO Box 1653  
Durango, CO 81302  
RE: Atlantic A LS 009

Enclosed are the results of analyses for samples received by the laboratory on 09/06/23 12:42. 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 blue ink that reads 'Veronica J. Wells'.

Veronica Wells  
Project 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: T104704514-23-17

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: T104704398-23-16



jeremy.allen@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: Atlantic A LS 009  
Project Manager: Kyle Siesser

**Reported:**  
09/14/23 16:37

## ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
5 PC - TB @ 5' (95)	2309066-01	Solid	09/06/23 10:55	09/06/23 12:42	

Green Analytical Laboratories

A handwritten signature in blue ink that reads 'Veronica J. Wells'.

Veronica Wells, Project 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 8 2309066 GAL FINAL 09 14 23 1637 09/14/23 16:37:10





jeremy.allen@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: Atlantic A LS 009  
Project Manager: Kyle Siesser

Reported:  
09/14/23 16:37

5 PC - TB @ 5' (95)

2309066-01 (Soil)

Sampled Date: 09/06/23 10:55

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
---------	--------	----	-----	-------	----------	----------	--------	-------	---------

**General Chemistry**

% Dry Solids	89.1			%	1	09/08/23 10:07	EPA160.3/1684		AES
--------------	------	--	--	---	---	----------------	---------------	--	-----

**Soluble (DI Water Extraction)**

Chloride	29.6	11.2	0.623	mg/kg dry	10	09/14/23 01:25	EPA300.0		AWG
----------	------	------	-------	-----------	----	----------------	----------	--	-----

Subcontracted -- Cardinal Laboratories 101 East Marland Hobbs, NM 88240

**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	0.005	mg/kg	50	09/08/23 15:25	8021B		MS
Toluene*	<0.050	0.050	0.004	mg/kg	50	09/08/23 15:25	8021B		MS
Ethylbenzene*	<0.050	0.050	0.004	mg/kg	50	09/08/23 15:25	8021B		MS
Total Xylenes*	<0.150	0.150	0.013	mg/kg	50	09/08/23 15:25	8021B		MS
Total BTEX	<0.300	0.300	0.030	mg/kg	50	09/08/23 15:25	8021B		MS

Surrogate: 4-Bromofluorobenzene (PID)	119 %	71.5-134		09/08/23 15:25	8021B		MS
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	6.25	mg/kg	1	09/08/23 18:48	8015B		MS
DRO >C10-C28*	<10.0	10.0	4.26	mg/kg	1	09/08/23 18:48	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	4.26	mg/kg	1	09/08/23 18:48	8015B		MS

Surrogate: 1-Chlorooctane	91.0 %	48.2-134		09/08/23 18:48	8015B		MS
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Surrogate: 1-Chlorooctadecane	113 %	49.1-148		09/08/23 18:48	8015B		MS
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Green Analytical Laboratories

Veronica Wells, Project 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 3 of 8 2309066 GAL FINAL 09 14 23 1637 09/14/23 16:37:10



jeremy.allen@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, Cl  
Project Name / Number: Atlantic A LS 009  
Project Manager: Kyle Siesser

Reported:  
09/14/23 16:37

## Soluble (DI Water Extraction) - Quality Control

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

## Batch B232740 - IC- Ion Chromatograph

## Blank (B232740-BLK1)

Prepared &amp; Analyzed: 09/13/23

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

## LCS (B232740-BS1)

Prepared &amp; Analyzed: 09/13/23

Chloride	250	10.0	mg/kg wet	250	99.8	85-115
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## LCS Dup (B232740-BSD1)

Prepared &amp; Analyzed: 09/13/23

Chloride	254	10.0	mg/kg wet	250	102	85-115	1.73	20
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## 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
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

## Batch 3090804 - Volatiles

## Blank (3090804-BLK1)

Prepared &amp; Analyzed: 09/08/23

Surrogate: 4-Bromofluorobenzene (PID)	0.0578		mg/kg	0.0500		116	71.5-134
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 (3090804-BS1)

Prepared &amp; Analyzed: 09/08/23

Surrogate: 4-Bromofluorobenzene (PID)	0.0499		mg/kg	0.0500		99.9	71.5-134
Benzene	1.81	0.050	mg/kg	2.00		90.6	82.8-130
Ethylbenzene	1.86	0.050	mg/kg	2.00		92.9	85.9-128
m,p-Xylene	3.82	0.100	mg/kg	4.00		95.4	89-129
o-Xylene	1.84	0.050	mg/kg	2.00		91.8	86.1-125
Toluene	1.84	0.050	mg/kg	2.00		92.0	86-128
Total Xylenes	5.65	0.150	mg/kg	6.00		94.2	88.2-128

## LCS Dup (3090804-BSD1)

Prepared &amp; Analyzed: 09/08/23

Surrogate: 4-Bromofluorobenzene (PID)	0.0487		mg/kg	0.0500		97.5	71.5-134		
Benzene	1.92	0.050	mg/kg	2.00		96.0	82.8-130	5.83	15.8
Ethylbenzene	1.97	0.050	mg/kg	2.00		98.3	85.9-128	5.64	16
m,p-Xylene	4.02	0.100	mg/kg	4.00		100	89-129	5.20	16.2

Green Analytical Laboratories

Veronica Wells, Project Manager

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jeremy.allen@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: Atlantic A LS 009  
Project Manager: Kyle Siesser

Reported:  
09/14/23 16:37

### Volatile Organic Compounds by EPA Method 8021 - Quality Control (Continued)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 3090804 - Volatiles (Continued)

#### LCS Dup (3090804-BSD1) (Continued)

Prepared &amp; Analyzed: 09/08/23

o-Xylene	1.93	0.050	mg/kg	2.00		96.7	86.1-125	5.18	16.7	
Toluene	1.95	0.050	mg/kg	2.00		97.5	86-128	5.75	15.9	
Total Xylenes	5.95	0.150	mg/kg	6.00		99.2	88.2-128	5.19	16.3	

### 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 3090739 - General Prep - Organics

#### Blank (3090739-BLK1)

Prepared: 09/07/23 Analyzed: 09/08/23

Surrogate: 1-Chlorooctadecane	59.9		mg/kg	50.0		120	49.1-148			
Surrogate: 1-Chlorooctane	50.2		mg/kg	50.0		100	48.2-134			
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 (3090739-BS1)

Prepared: 09/07/23 Analyzed: 09/08/23

Surrogate: 1-Chlorooctadecane	56.0		mg/kg	50.0		112	49.1-148			
Surrogate: 1-Chlorooctane	50.5		mg/kg	50.0		101	48.2-134			
DRO >C10-C28	233	10.0	mg/kg	200		116	66.5-118			
GRO C6-C10	221	10.0	mg/kg	200		110	66.4-123			
Total TPH C6-C28	453	10.0	mg/kg	400		113	77.6-123			

#### LCS Dup (3090739-BSD1)

Prepared: 09/07/23 Analyzed: 09/08/23

Surrogate: 1-Chlorooctadecane	55.8		mg/kg	50.0		112	49.1-148			
Surrogate: 1-Chlorooctane	50.4		mg/kg	50.0		101	48.2-134			
DRO >C10-C28	218	10.0	mg/kg	200		109	66.5-118	6.64	21	
GRO C6-C10	210	10.0	mg/kg	200		105	66.4-123	5.06	17.7	
Total TPH C6-C28	428	10.0	mg/kg	400		107	77.6-123	5.87	18.5	

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Veronica Wells, Project Manager

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**Reported:**  
09/14/23 16:37

### 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

A handwritten signature in blue ink that reads 'Veronica J. Wells'.

Veronica Wells, Project Manager

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**(970) 247-4220**  
**Fax: (970) 247-4227**

service@greenanalytical.com or dzufelt@greenanalytical.com  
75 Suttle St Durango, CO 81303

## CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

[illegible]





## SAMPLE CONDITION RECEIPT FORM

Client Name: Cottonwood ConsultingWork Order # 2309-066Courier: ☐ Fed Ex ☐ UPS ☐ USPS ☒ Client ☐ KangarooCustody Seals on Box/Cooler Present: ☐ Yes ☒ NoSeals Intact: ☐ Yes ☒ NoThermometer Used: 2 Samples on ice, cooling process has begun: ☒ Yes ☐ NoType of Ice: ☒ Wet ☐ Blue ☐ NoneCooler Temp: Observed Temp: 12.3 °C Correction Factor: 0 °C Final Temp: 12.3 °C

\* Temp should be above freezing to 6°C

Date/Initials of person  
examining contents: 9/6/23  
EELabeled by Initials:  
(If different than above) \_\_\_\_\_

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	3.
Sampler Name and Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	4.
Samples arrived within hold time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8.
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	10.
Dissolved Testing Needed:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	11.
Field Filtered: <input type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Labels match COC: -Includes Date/Time/ID	<input type="checkbox"/> Yes <input type="checkbox"/> No	12.
Matrix: WT (SL) OT		
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	13.
Trip Blank Custody Seals Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	

Client Notification/Resolution:

Person Contacted: \_\_\_\_\_

Date/Time: \_\_\_\_\_

 Comments/Resolution: \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_





Atlantic A LS #009  
Photographic Log  
Simcoe, LLC



Photo 1: Atlantic A LS 009 well sign, 9/6/2023.



Photo 2: BGT prior to removal, 9/6/2023.





Atlantic A LS #009  
Photographic Log  
Simcoe, LLC



Photo 3: Location of BGT following removal, 9/6/2023.



Photo 4: Bottom of BGT following removal, 9/6/2023.



**Atlantic A LS #009**  
**Photographic Log**  
**Simcoe, LLC**



Photo 5: Removed BGT following backfilling and grading, 10/10/2023.



**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 277045

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 277045
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
vvenegas	None	10/27/2023