Form C-144 Revised October 11, 2022

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

Pit Below-Grade Tank or

rit, below-Grade rank, 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.				
Operator: Simcoe LLC Address: 1199 Main Avenue, Durango, CO 81301				
Address: 1199 Main Avenue, Durango, CO 81301				
Facility or well name: NEBU 15				
API Number: 30-039-0791300 OCD Permit Number:				
API Number: 30-039-0791300 OCD Permit Number:				
Center of Proposed Design: Latitude 36.8388222 Longitude -107.5454421 NAD83				
Surface Owner: ☐ Federal ☑ State ☐ Private ☐ Tribal Trust or Indian Allotment				
Temporary: Drilling Workover Permanent Emergency Cavitation P&A Multi-Well Fluid Management Low Chloride Drilling Fluid yes no Lined Unlined Liner type: Thicknessmil LLDPE HDPE PVC Other String-Reinforced Liner Seams: Welded Factory Other Volume:bbl Dimensions: Lx Wx D				
3. Below-grade tank: Subsection I of 19.15.17.11 NMAC Volume: 25				
Tank Construction material: Fiberglass				
✓ 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: Thicknessmil 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				

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 accept	otable source			
material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.				
Conoral citing				
General siting				
Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.	☐ Yes ☐ No			
- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	∐ 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			
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)	Yes No			
- Written confirmation or verification from the municipality; Written approval obtained from the municipality				
Within the area overlying a subsurface mine. (Does not apply to below grade tanks)	Yes No			
- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division				
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	☐ Yes ☐ No			
Society; Topographic map				
Within a 100-year floodplain. (Does not apply to below grade tanks)	☐ Yes ☐ No			
- FEMA map				
Below Grade Tanks				
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured	☐ Yes ☐ No			
from the ordinary high-water mark).	l les l No			
- Topographic map; Visual inspection (certification) of the proposed site				
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;	☐ Yes ☐ No			
- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site				
<u>Temporary Pit using Low Chloride Drilling Fluid</u> (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,	☐ Yes ☐ No			
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				
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.	Yes No			
- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image				
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.	☐ Yes ☐ No			
NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site				

Form C-144
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 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
Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 Naturations: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the docattached. 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 Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC Design Plan - based upon the appropriate requirements of 19.15.17.12 NMAC Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19. and 19.15.17.13 NMAC Previously Approved Design (attach copy of design) API Number: or Permit Number:	NMAC 15.17.9 NMAC
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 docattached. 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 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:	

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 attached.	documents are			
 ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC ☐ Climatological Factors Assessment ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC 				
 ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC ☐ Quality Control/Quality Assurance Construction and Installation Plan 				
 □ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC □ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC □ Nuisance or Hazardous Odors, including H₂S, Prevention Plan □ Emergency Response Plan 				
☐ Oil Field Waste Stream Characterization ☐ Monitoring and Inspection Plan				
Erosion Control Plan Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC				
13.				
<u>Proposed Closure</u> : 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 F☐ Alternative Proposed Closure Method: ☑ Waste Excavation and Removal	luid Management Pit			
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				
Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be 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				
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 sour provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. I 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	☐ Yes ☐ No ☐ 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 \[\textsqrt{Yes} \sqrt{N} \] \[\textsqrt{NA} \]				
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells Yes No NA				
Within 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				
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				
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	☐ Yes ☐ No			
Written confirmation or verification from the municipality; Written approval obtained from the municipality 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			
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	
Within a 100-year floodplain.	☐ Yes ☐ No
- FEMA map	☐ Yes ☐ No
On-Site Closure Plan Checklist: (19.15.17.13 NMAC) Instructions: Each of the following items must be attached to the closure plan 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 19.15.17.13 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.13 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 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	11 NMAC 15.17.11 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 believed.	ef.
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:	
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 is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not 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-lo□ If different from approved plan, please explain.	oop systems only)
21.	

22.	
Operator Closure Certification:	
I hereby certify that the information and attachments submitted with this closure repor	t 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	
Name (Print): Jerrid Brann	Title: Environmental Coordinator
Signature: Jerrid Brann	Date: 6-13-2025
e-mail address: jerrid.brann@ikavenergy.com	Telephone: 970-394-0250

Devon Energy Production Company, L.P. San Juan Basin Below Grade Tank Closure Plan

In accordance with Rule 19.15.17.12 NMAC the following information describes the closure requirements of a below grade tank on Devon Energy Production Company, L.P. locations. This is Devon Energy's standard procedure for all below grade tanks (BGT). A separate plan will be submitted for any BGT which does not conform to this plan.

General Plan

- Devon shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the division requires because of imminent danger to fresh water, public health or the environment.
- 2) Devon shall close a permitted BGT within 60 days of cessation of the BGT operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report will be filed on C-144.
- 3) Devon shall remove liquids and sludge from a BGT prior to implementing a closure method and shall dispose of the liquids and sludge in a division-approved facility.
- 4) Devon shall remove the BGT and dispose of it in a division-approved facility or recycle, reuse, or reclaim it in a manner that the appropriate division district office approves.
- 5) If there is any on-site equipment associated with a BGT, then Devon shall remove the equipment, unless the equipment is required for some other purpose.
- A five point composite sample will be taken of the pit from any area that is wet, discolored or showing other evidence of a release and tested for the following as well as notifying the Aztec District office of the results on form C-141. Should it be determined that a release has occurred Devon shall comply with 19.15.3.116 NMAC and 19.15.1.19 NMAC, as appropriate.

Components	Test Method	Limit (mg/Kg)
Benzene	EPA SW-846 8021B or 8260B	0.2
BTEX	EPA SW-846 8021B or 8260B	50
TPH	EPA SW-846 418.1	100
Chlorides	EPA 300.1	250 or Background

- Should contamination be confirmed by field sampling Devon will follow the "Guidelines For Remediation Of Leaks, Spills and Releases" NMOCD August 1993 when remediation contaminants identified.
- 8) If the sampling results demonstrate that there has been no release or that a release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, then Devon shall backfill the excavation with compacted, non-waste containing, earthen material; construct a division prescribed soil cover; re-contour and re-vegetate the site.
- 9) Notice of Closure will be given to the Aztec Division office between 72 hours and one week of closure via email, or verbally. The notification of closure will include the following:
 - Operator's Name
 - Location by Unit Letter, Section, Township, and Range. Well name and API number
- 10) All closure activities will include proper documentation and be available for review upon request and will be submitted to OCD within 60 days of closure of the BGT. Closure report will be filed on C-144 and incorporate the following:

- > Details on Capping and Covering, where applicable
- > Inspection Reports
- > Sampling Results
- 11) Re-contouring of the location will match fit, shape, line, form and texture of the surrounding. Re-shaping will include drainage control to prevent ponding, and prevent erosion. Natural drainages will be unimpeded and water bars and/or silt traps will be placed in areas where needed to prevent erosion on a large scale. Final re-contour shall have a uniform appearance with smooth surface fitting the natural landscape.
- 12) Devon shall seed the disturbed areas the first growing season after the operator closes the pit. Seeding will be accomplished via broadcast or drilling when topography permits. BLM of Forest Service stipulated seed mixes will be used on all Federal Lands. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintain that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs.
- 13) A minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material to establish vegetation at the site, or the background thickness of topsoil, whichever is greater.
- 14) The surface owner shall be notified of Devon's closing of the BGT as per the approved closure plan using certified mail with return receipt requested or via email.

Closure Plan

- 1. N/A
- 2. Simcoe LLC, current operator of BGT closing due to cessation of use and replacement with an AGT, C-144 in this document.
- 3. All free liquids were removed from the tank prior to removal and disposed of in a approved location. The Sims Mesa SWD $#1(API\ 30-039-24236)$. There was no sludge present.
- 4. The BGT will be disposed of in the San Juan County Landfill.
- 5. Equipment related to the BGT was removed and other equipment related to the AGT and production of the well remained in service.
- 6. Soils beneath the BGT were sampled for TPH, BTEX and chloride per the above requirements. Sampling results indicate that all concentrations were below the relevant closure criteria standards. C-141 attached.
- 7. Sampling results indicate no release has occurred.
- 8. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations. The excavation was backfilled with clean dirt and a liner and AGT was installed in its location.
- 9. Notification was made to the field office and is attached.
- 10. Closure documentation is included in this report.
- 11. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
- 12. The BGT was removed, no reclamation will be done at this time as the location is well pad and still needed for production operations.
- 13. The BGT was removed and after backfill a liner and AGT was installed.
- 14. Surface owner notification was made and is attached in this report.

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

State of New Mexico Energy Minerals and Natural Resources Department

Oil Conservation Division 1220 South St. Francis Dr. Santa Fe, NM 87505 Form C-141 Revised August 24, 2018 Submit to appropriate OCD District office

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party: SIMCOE LLC			OGRID: 329736			
Contact Name: Jerrid Brann			Contact Telephone 970-394-0250			
Contact emai	Contact email: jerrid.brann@ikavenergy.com			Incident #	#	
Contact mailing address: 1199 Main Ste., Suite 101, Durango, CO 81301						
	Location of Release Source					
Latitude 36.8	388222		(NAD 83 in de	ecimal de	Longitude grees to 5 deci	-107.5454421imal places)
Site Name: N	EBU 15				Site Type:	: Active Well
Date Release	Discovered:	: N/A			API# 303	39-0791300
Unit Letter	Section 30	Township 30N	Range 7W	Die	Cou Arriba	inty
Surface Owner	Surface Owner: State Federal Tribal Private (Name: Nature and Volume of Release Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)					
Crude Oil		Volume Release				Volume Recovered (bbls)
Produced	Water	Volume Release	ed (bbls) Approx.			Volume Recovered (bbls) Approx.
		Is the concentrate produced water	tion of dissolved o >10,000 mg/l?	chloride	e in the	☐ Yes ☐ No
Condensa	te	Volume Release	ed (bbls)			Volume Recovered (bbls)
Natural G	as	Volume Release	ed (Mcf)			Volume Recovered (Mcf)
Other (describe) Volume/Weight Released (provide units))	Volume/Weight Recovered (provide units)		
Cause of Rele	ease: No R	elease identified				

Received by OCD: 7/1/2025 8:50:09 AM State of New Mexico
Page 2 Oil Conservation Division

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Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC?	If YES, for what reason(s) does the response	onsible part	y consider this a major release?	
☐ Yes ⊠ No				
If YES, was immediate no Notice	otice given to the OCD? By whom? To w	hom? Whe	en and by what means (phone, email, etc)?	
	Initial R	Response	e	
The responsible	party must undertake the following actions immediate	ely unless they	could create a safety hazard that would result in injury	
The source of the rele	ease has been stopped.			
☐ The impacted area ha	s been secured to protect human health and	d the enviro	onment.	
Released materials ha	ave been contained via the use of berms or	dikes, abso	orbent pads, or other containment devices.	
☐ All free liquids and re	ecoverable materials have been removed an	nd managed	d appropriately.	
If all the actions described	d above have <u>not</u> been undertaken, explain	why:		
has begun, please attach	a narrative of actions to date. If remedial	l efforts hav	n immediately after discovery of a release. If remediation we been successfully completed or if the release occurred ch all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.				
Printed Name: <u>Jerrid</u>			Environmental Coordinator	
Signature:	avenergy.comT	_ Date: _	7/1/2025	
email: <u>jerrid.brann@ik</u>	avenergy.com T	elephone: _	970-394-0250	
OCD Only				
Received by:		Date:		

From: <u>Jerrid Brann</u>

To: <u>Joel.stone@emnrd.nm.gov</u>

Subject: FW: [EXTERNAL] Simcoe LLC, Northeast Blanco Unit 15, Below Grade Tank (BGT) Closure

Date: Friday, May 30, 2025 9:44:00 AM

Good morning, Joel,

I wanted to notify you of a BGT removal/closure that SIMCOE LLC is planning on the NEBU 15 next week(See Below). I talked to Joe Kennedy, and he informed me that you are now handling the BGT's. Please let me know if you have any questions.

Thanks,



Environmental Coordinator jerrid.brann@ikavenergy.com 970-394-0250

From: Kennedy, Joseph, EMNRD < Joseph. Kennedy@emnrd.nm.gov>

Sent: Friday, May 30, 2025 9:38 AM

To: Jerrid Brann < jerrid.brann@ikavenergy.com >

Subject: RE: [EXTERNAL] Simcoe LLC, Northeast Blanco Unit 15, Below Grade Tank (BGT) Closure

Hi Jerrid, Joel Stone is now handling BGTS. Here is his contact info:

Joel Stone (505) 709-5149

<u>Joel.stone@emnrd.nm.gov</u>

Joe Kennedy • Environmental Specialist Advanced EMNRD - Oil Conservation Division 1220 S. St. Francis Drive | Santa Fe, NM 87505 505.549.5583 | joseph.kennedy@emnrd.nm.gov

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

Sent: Friday, May 30, 2025 8:33 AM

To: cod.eviro@state.nm.us; Kennedy, Joseph, EMNRD Loseph.Kennedy@emnrd.nm.gov>

Cc: Ryan O'Nan <<u>ryan.onan@ikavenergy.com</u>>

Subject: [EXTERNAL] Simcoe LLC, Northeast Blanco Unit 15, Below Grade Tank (BGT) Closure

You don't often get email from jerrid.brann@ikavenergy.com. Learn why this is important

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May 30, 2025

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

RE: Notice of proposed Below Grade Tank Closure

Well Name: Northeast Blanco Unit 15 API# 30-039-0791300 L – 30 – 30N – 7W Rio Arriba County, NM

To whom it may concern,

Simcoe LLC is planning to close a Below Grade Tank and replace with an Above Grade Tank (AGT)in the same location under the requirements of NMOCD rule 19.15.17.13. This work is proposed to start on or around 9:00 am on June 3rd, 2025.

Please let me know if there are any questions,

Thanks,

Jerrid Brann



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Report to:
Jerrid Brann







5796 U.S. Hwy 64 Farmington, NM 87401

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





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Practical Solutions for a Better Tomorrow

Analytical Report

IKAV Energy Inc.

Project Name: NEBU 15 BGT

Work Order: E506013

Job Number: 20095-0001

Received: 6/3/2025

Revision: 1

Report Reviewed By:

Walter Hinchman Laboratory Director 6/10/25

Envirotech Inc. certifies the test results meet all requirements of TNI unless noted otherwise.

Statement of Data Authenticity: Envirotech Inc, attests the data reported has not been altered in any way.

Partial or incomplete reproduction of this report is prohibited, unless approved by Envirotech Inc.

Envirotech Inc, holds the Utah TNI certification NM00979 for data reported.

Envirotech Inc, holds the Texas TNI certification T104704557 for data reported.

Date Reported: 6/10/25

Jerrid Brann

1199 Main Ave. Suite 242 Durango, CO 81301

Project Name: NEBU 15 BGT

Workorder: E506013

Date Received: 6/3/2025 1:26:00PM

Jerrid Brann,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 6/3/2025 1:26:00PM, under the Project Name: NEBU 15 BGT.

The analytical test results summarized in this report with the Project Name: NEBU 15 BGT apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

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

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

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

Respectfully,

Walter Hinchman

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Cell: 775-287-1762

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Table of Contents

Title Page	1
Cover Page	2
Table of Contents	3
Sample Summary	4
Sample Data	5
SS01	5
QC Summary Data	6
QC - Volatile Organics by EPA 8021B	6
QC - Nonhalogenated Organics by EPA 8015D - GRO	7
QC - Nonhalogenated Organics by EPA 8015D - DRO/ORO	8
QC - Anions by EPA 300.0/9056A	9
Definitions and Notes	10
Chain of Custody etc.	11

Sample Summary

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ſ	IKAV Energy Inc.	Project Name:	NEBU 15 BGT	Reported:
ı	1199 Main Ave. Suite 242	Project Number:	20095-0001	Reported:
l	Durango CO, 81301	Project Manager:	Jerrid Brann	06/10/25 11:25

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01	E506013-01A	Soil	06/03/25	06/03/25	Glass Jar, 4 oz.



Sample Data

IKAV Energy Inc.	Project Name:	NEBU 15 BGT	
1199 Main Ave. Suite 242	Project Number:	20095-0001	Reported:
Durango CO, 81301	Project Manager:	Jerrid Brann	6/10/2025 11:25:02AM

SS01

E506013-01

		E300013-01				
Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analy	st: SL		Batch: 2523093
Benzene	ND	0.0250	1	06/04/25	06/05/25	
Ethylbenzene	ND	0.0250	1	06/04/25	06/05/25	
Toluene	ND	0.0250	1	06/04/25	06/05/25	
o-Xylene	ND	0.0250	1	06/04/25	06/05/25	
p,m-Xylene	ND	0.0500	1	06/04/25	06/05/25	
Total Xylenes	ND	0.0250	1	06/04/25	06/05/25	
Surrogate: 4-Bromochlorobenzene-PID		88.9 %	70-130	06/04/25	06/05/25	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analy	st: SL		Batch: 2523093
Gasoline Range Organics (C6-C10)	ND	20.0	1	06/04/25	06/05/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID		96.1 %	70-130	06/04/25	06/05/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analy	st: NV		Batch: 2523095
Diesel Range Organics (C10-C28)	71.8	25.0	1	06/04/25	06/05/25	
Oil Range Organics (C28-C36)	ND	50.0	1	06/04/25	06/05/25	
Surrogate: n-Nonane		122 %	61-141	06/04/25	06/05/25	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analy	st: DT		Batch: 2523089
Chloride	ND	20.0	1	06/03/25	06/04/25	

QC Summary Data

NEBU 15 BGT IKAV Energy Inc. Project Name: Reported: 1199 Main Ave. Suite 242 Project Number: 20095-0001 Durango CO, 81301 Project Manager: Jerrid Brann 6/10/2025 11:25:02AM **Volatile Organics by EPA 8021B** Analyst: SL Reporting Spike Source Rec RPD Analyte Result Limit Level Result Rec Limits RPD Limit mg/kg mg/kg mg/kg mg/kg % % % % Notes Blank (2523093-BLK1) Prepared: 06/04/25 Analyzed: 06/04/25 ND 0.0250 ND Ethylbenzene 0.0250 Toluene ND 0.0250 ND o-Xylene 0.0250 ND p,m-Xylene 0.0500 Total Xylenes ND 0.0250 Surrogate: 4-Bromochlorobenzene-PID 7.24 8.00 90.4 70-130 LCS (2523093-BS1) Prepared: 06/04/25 Analyzed: 06/04/25 5.21 104 70-130 5.00 Benzene 0.0250 Ethylbenzene 5.25 0.0250 5.00 105 70-130 5.28 0.0250 5.00 106 70-130 Toluene 5.24 o-Xylene 0.0250 5.00 105 70-130 10.6 10.0 106 70-130 0.0500 p.m-Xvlene 106 70-130 15.8 15.0 Total Xylenes 0.0250 8.00 92.5 70-130 Surrogate: 4-Bromochlorobenzene-PID 7.40 Matrix Spike (2523093-MS1) Source: E506015-05 Prepared: 06/04/25 Analyzed: 06/05/25 5.21 0.0250 5.00 ND 70-130 Benzene ND 103 70-130 Ethylbenzene 5.14 0.0250 5.00 Toluene 5.18 0.0250 5.00 ND 104 70-130 5.07 ND 101 70-130 5.00 0.0250 o-Xylene p,m-Xylene 10.4 0.0500 10.0 ND 104 70-130 0.0250 15.0 ND 70-130 Total Xylenes 70-130 Surrogate: 4-Bromochlorobenzene-PID 7.16 8.00 Matrix Spike Dup (2523093-MSD1) Source: E506015-05 Prepared: 06/04/25 Analyzed: 06/04/25 4.51 0.0250 5.00 ND 70-130 14.5 27 70-130 12.2 4.54 0.0250 5.00 ND 90.9 26 Ethylbenzene Toluene 4.56 0.0250 5.00 ND 91.2 70-130 12.8 20

5.00

10.0

15.0

8.00

0.0250

0.0500

0.0250

ND

ND

ND

91.6

92.2

92.0

90.8

70-130

70-130

70-130

70-130

10.1

12.0

11.4

25

23

26



o-Xylene

p,m-Xylene

Total Xylenes

Surrogate: 4-Bromochlorobenzene-PID

4.58

9.22

13.8

7.27

QC Summary Data

IKAV Energy Inc.Project Name:NEBU 15 BGTReported:1199 Main Ave. Suite 242Project Number:20095-0001Durango CO, 81301Project Manager:Jerrid Brann6/10/2025 11:25:02AM

	Nonhalogenated Organics by EPA 8015D - GRO								Analyst: SL	
Analyte	Result	Reporting Limit	Spike Level	Source Result	Result Rec	Rec Limits		RPD Limit	N.	
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	Notes	
Blank (2523093-BLK1)							Prepared: 0	6/04/25 Anal	yzed: 06/04/25	
Gasoline Range Organics (C6-C10)	ND	20.0								
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.68		8.00		96.0	70-130				
LCS (2523093-BS2)							Prepared: 0	6/04/25 Anal	yzed: 06/04/25	
Gasoline Range Organics (C6-C10)	44.2	20.0	50.0		88.4	70-130				
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.87		8.00		98.4	70-130				
Matrix Spike (2523093-MS2)				Source:	E506015-	05	Prepared: 0	6/04/25 Anal	yzed: 06/05/25	
Gasoline Range Organics (C6-C10)	41.0	20.0	50.0	ND	82.0	70-130				

Surrogate: 1-Chloro-4-fluorobenzene-FID	7.87		8.00		98.4	70-130			
Matrix Spike (2523093-MS2)				Source	E506015-	05	Prepared: 0	6/04/25 Ana	alyzed: 06/05/25
Gasoline Range Organics (C6-C10)	41.0	20.0	50.0	ND	82.0	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.75		8.00		96.9	70-130			
Matrix Spike Dup (2523093-MSD2)				Source	E506015-	05	Prepared: 0	6/04/25 Ana	alyzed: 06/05/25
Gasoline Range Organics (C6-C10)	47.7	20.0	50.0	ND	95.3	70-130	15.1	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.94		8.00		99.2	70-130			

QC Summary Data

IKAV Energy Inc.	Project Name:	NEBU 15 BGT	Reported:
1199 Main Ave. Suite 242	Project Number:	20095-0001	•
Durango CO, 81301	Project Manager:	Jerrid Brann	6/10/2025 11:25:02AM

Durango CO, 81301		Project Manage	r: Jei	rid Brann				(5/10/2025 11:25:02A
	Nonha	logenated Or	ganics by l	EPA 8015I) - DRO	/ORO			Analyst: NV
Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	Notes
Blank (2523095-BLK1)							Prepared: 0	6/04/25 Ar	nalyzed: 06/05/25
Diesel Range Organics (C10-C28)	ND	25.0							
Dil Range Organics (C28-C36)	ND	50.0							
urrogate: n-Nonane	55.2		50.0		110	61-141			
LCS (2523095-BS1)							Prepared: 0	6/04/25 Ar	nalyzed: 06/05/25
Diesel Range Organics (C10-C28)	286	25.0	250		114	66-144			
urrogate: n-Nonane	56.4		50.0		113	61-141			
Matrix Spike (2523095-MS1)				Source:	E506015-0	09	Prepared: 0	6/04/25 Ar	nalyzed: 06/05/25
Diesel Range Organics (C10-C28)	294	25.0	250	ND	117	56-156			
urrogate: n-Nonane	55.3		50.0		111	61-141			
Matrix Spike Dup (2523095-MSD1)				Source:	E506015-0	09	Prepared: 0	6/04/25 Ar	nalyzed: 06/05/25
Diesel Range Organics (C10-C28)	286	25.0	250	ND	114	56-156	2.64	20	
urrogate: n-Nonane	54.8		50.0		110	61-141			

Matrix Spike Dup (2523089-MSD1)

Chloride

433

20.0

QC Summary Data

IKAV Energy Inc. 1199 Main Ave. Suite 242		Project Name: Project Number:		EBU 15 BGT 0095-0001					Reported:
Durango CO, 81301		Project Manager		errid Brann				6/	10/2025 11:25:02AM
		Anions	by EPA 3	300.0/9056 <i>£</i>	4				Analyst: DT
Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	Notes
Blank (2523089-BLK1)							Prepared: 0	6/03/25 Ana	alyzed: 06/04/25
Chloride	ND	20.0							
LCS (2523089-BS1)							Prepared: 0	6/03/25 Ana	alyzed: 06/04/25
Chloride	261	20.0	250		104	90-110			
Matrix Spike (2523089-MS1)				Source:	E506010-	01	Prepared: 0	6/03/25 Ana	alyzed: 06/04/25
Chloride	333	20.0	250	57.5	110	80-120			

250

Source: E506010-01

150

80-120

26.2

57.5

QC Summary Report Comment:

Calculations are based off of the raw (non-rounded) data. However, for reporting purposes all QC data is rounded to three significant figures. Therefore, hand calculated values may differ slightly.



Prepared: 06/03/25 Analyzed: 06/04/25

M2, R3

20

Definitions and Notes

	IKAV Energy Inc.	Project Name:	NEBU 15 BGT	
l	1199 Main Ave. Suite 242	Project Number:	20095-0001	Reported:
l	Durango CO, 81301	Project Manager:	Jerrid Brann	06/10/25 11:25

M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.

R3 The RPD exceeded the acceptance limit. LCS spike recovery met acceptance criteria.

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

DNR Did not react with the addition of acid or base.

Note (1): Methods marked with ** are non-accredited methods.

Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.



Chain	٥f	Custo	٦,
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Address: City, Stat	Manager: Jer 1199 Main A te, Zip: Dura 70-39-0250	ve Suite 1	101			City, State, Zip: Durango, CO 81 Phone: 970-394-0250 Email: jerrid.brann@ikavenerg						Ana	lysis	and	Meti	Meth	Met	Met	Met	Met	Met	Met	Met	Met	Meti	Meth	hod	hod	hod	hod	nod	hod	hod	nod	hod	hod	nod	nod	nod	hod			indicate.	SDWA	PA Progr CWA	RCRA
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envirotech

Envirotech Analytical Laboratory

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

If we receive no response concerning these items within 24 hours of the date of this notice, all the samples will be analyzed as requested.

Client:	IKAV Energy Inc.	Date Received:	06/03/25 13	3:26	Work Order ID:	E506013
Phone:	(970) 828-4060	Date Logged In:	06/03/25 13	3:41	Logged In By:	Caitlin Mars
Email:	jerrid.brann@ikavenergy.com	Due Date:	06/10/25 17	7:00 (5 day TAT)		
Chain of	Custody (COC)					
1. Does th	ne sample ID match the COC?		Yes			
	ne number of samples per sampling site location ma	tch the COC	Yes			
	amples dropped off by client or carrier?		Yes	Carrier: Jerrid Brann		
	e COC complete, i.e., signatures, dates/times, reque	ested analyses?	Yes			
5. Were a	Il samples received within holding time? Note: Analysis, such as pH which should be conducted i.e, 15 minute hold time, are not included in this disucss		Yes		Commen	ts/Resolution
Sample T	Curn Around Time (TAT)					
	COC indicate standard TAT, or Expedited TAT?		Yes			
Sample C	<u>Cooler</u>					
7. Was a s	sample cooler received?		Yes			
8. If yes,	was cooler received in good condition?		Yes			
9. Was the	e sample(s) received intact, i.e., not broken?		Yes			
	custody/security seals present?		No			
	were custody/security seals intact?		NA			
•	e sample received on ice?		Yes			
	Note: Thermal preservation is not required, if samples at 15 minutes of sampling OC for individual sample temps. Samples outside of			. aammanta		
		or 0 C-0 C will be	recorded in	i comments.		
	Container graphy VOC samples present?		Ma			
	queous VOC samples present? OC samples collected in VOA Vials?		No NA			
	head space less than 6-8 mm (pea sized or less)?		NA NA			
	• • • • • • • • • • • • • • • • • • • •		NA NA			
	trip blank (TB) included for VOC analyses?	.9				
	on-VOC samples collected in the correct containers		Yes			
	appropriate volume/weight or number of sample contain	mers conected?	Yes			
Field Lat		amatian				
	field sample labels filled out with the minimum inf ample ID?	ormation.	Yes			
	rate/Time Collected?		Yes			
C	ollectors name?		Yes			
Sample F	<u>reservation</u>					
21. Does	the COC or field labels indicate the samples were p	reserved?	No			
22. Are sa	ample(s) correctly preserved?		NA			
24. Is lab	filtration required and/or requested for dissolved m	etals?	No			
Multipha	se Sample Matrix					
26. Does	the sample have more than one phase, i.e., multipha	ase?	No			
27. If yes	, does the COC specify which phase(s) is to be anal	yzed?	NA			
Subcontr	ract Laboratory					
	amples required to get sent to a subcontract laborate	orv?	No			
	subcontract laboratory specified by the client and	•		Subcontract Lab: NA		
	nstruction					
CHEIL	isti uction					

Photographs



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

General Information Phone: (505) 629-6116

Online Phone Directory https://www.emnrd.nm.gov/ocd/contact-us

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

CONDITIONS

Action 480480

CONDITIONS

Operator:	OGRID:
SIMCOE LLC	329736
1199 Main Ave., Suite 101	Action Number:
Durango, CO 81301	480480
	Action Type:
	[C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	Upon the cessation of all production operations in the area associated with this below-grade tank, well API 30-039-07913 (Northeast Blanco Unit 15), the operator shall complete the requirements of 19.15.17.13 NMAC for the area associated with this below-grade tank and notify the OCD when restoration, reclamation, and re-vegetation are complete.	7/17/2025