



P.O. Box 1653
Durango, Colorado 81302
(970) 764-7356
www.cottonwoodconsulting.com

December 15, 2023

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

**RE: Northeast Blanco Unit 400A Site Closure
San Juan County, New Mexico**

To Whom it May Concern,

Cottonwood Consulting LLC (Cottonwood), on behalf of Simcoe LLC (Simcoe), is submitting a closure report for the above ground storage tank (AST) release at the Northeast Blanco Unit #400A well site (API #30-045-33467).

On December 2, 2023, Simcoe discovered a produced water release from a pinhole at a 500-barrel produced water AST at the NEBU #400A during routine inspection operations. Simcoe immediately pulled the water from the tank and stopped the release. The release was caused by corrosion and the AST is no longer in use. A New Mexico Oil Conservation Division (NMOCD) Notice of Release was submitted to the NMOCD and the project was assigned Incident ID nAPP2333849051.

Pursuant to 19.15.29.12.D(1)(a) and 19.15.29.11.A(5)(a)(ii) NMAC, a Notice of Sampling (C-141N) was submitted on December 4, 2023, two business days in advance of the sampling planned for December 7, 2023 at 2:00pm. Cottonwood was on-site to collect closure samples on December 7, 2023 at 2:00pm. Five-point composite samples representative of no more than 200 square feet per composite sample per 19.15.29.12(D)(1)(c) NMAC were collected from the wet area (Figure 1). Samples were submitted to the laboratory for analysis of chloride, BTEX (benzene, toluene, ethylbenzene, and total xylenes), and TPH (total petroleum hydrocarbons).

Chloride, BTEX, and TPH levels were below the NMOCD standard; see Table 1 for a summary of the sample results. Appendix A is a photographic log documenting site conditions during sampling and laboratory results are included in Appendix B.

Should you have any questions regarding this closure report, please do not hesitate to contact me at ksiesser@cottonwoodconsulting.com or 970-764-7356.

Sincerely,

A handwritten signature in black ink that reads "Kyle G. Siesser".

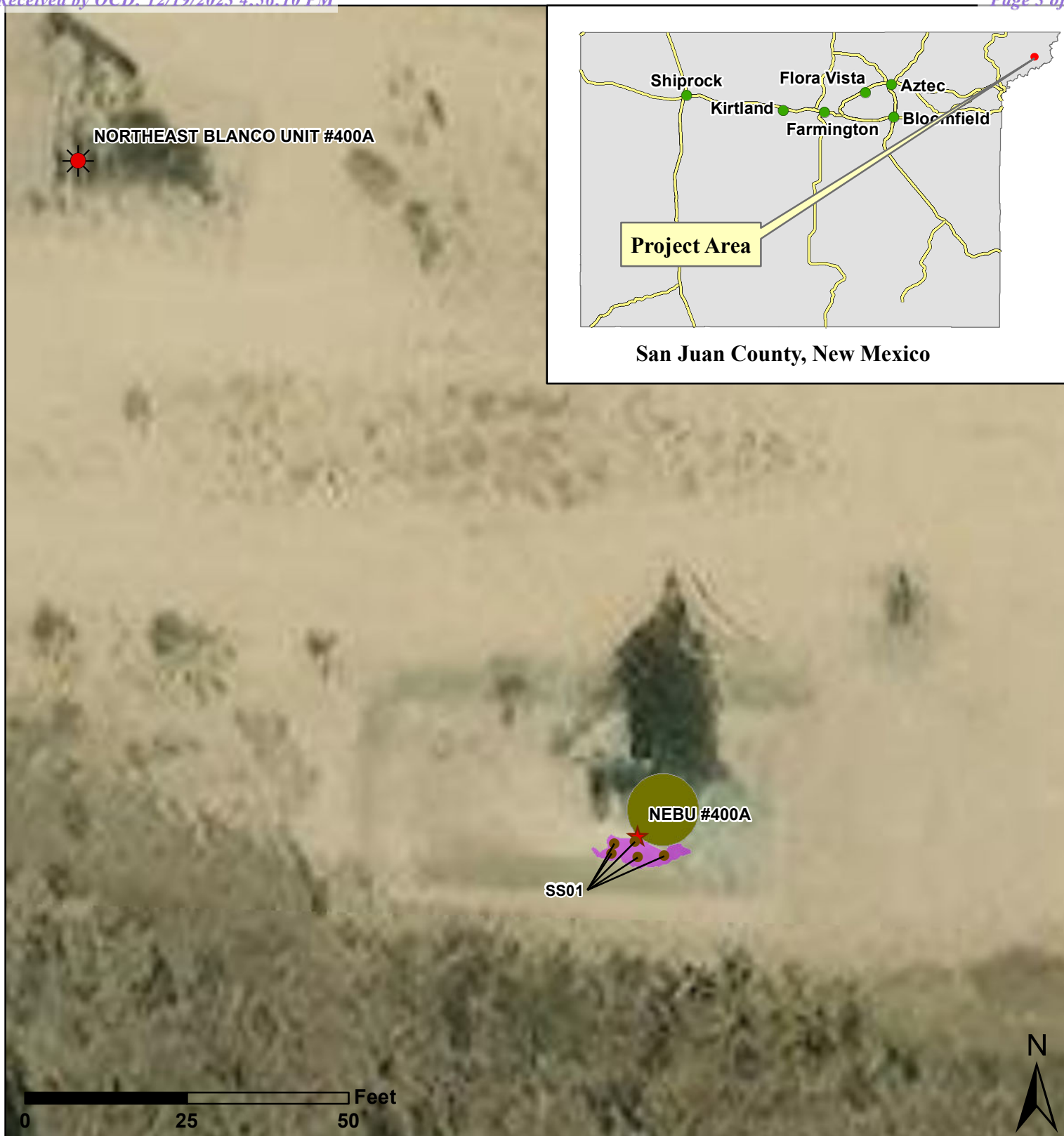
Kyle Siesser, P.G.
Cottonwood Consulting, LLC

Attachments: Figure 1 – Project Map
Table 1 – Soil Sampling Results
Appendix A – Photographic Log
Appendix B – Laboratory Results

Cottonwood Consulting LLC








FIGURE 1



Notes: SS01 collected 12/7/2023 as a 5-point composite sample.

Legend

-  Oil & Gas Well
-  Point of Release
-  Soil Sample
-  Wet Area (12/7/2023)
-  AST

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Section 7 T31N R6W NMPM

Project Map
Northeast Blanco Unit #400A
Simcoe LLC



TABLE 1



Table 1
Soil Sampling Results
NEBU #400A
Simcoe LLC

Parameter	SS01	Units
	12/7/2023 Wet Area	
Depth	0-1	feet bgs
PID	98.3	ppm
Chloride	<20.0	mg/kg
TPH (GRO)	<20.0	mg/kg
TPH (DRO)	<25.0	mg/kg
TPH (EXT DRO)	<50.0	mg/kg
Total TPH	<95.0	mg/kg
Benzene	<0.0250	mg/kg
Toluene	0.241	mg/kg
Ethylbenzene	<0.0250	mg/kg
Total Xylenes	<0.0250	mg/kg

Notes:

PID - Photoionization Detector

TPH - Total Petroleum Hydrocarbons

GRO - Gasoline Range Organics

DRO - Diesel Range Organics

EXT - Extended

ppm - parts per million

bgs - below ground surface

mg/kg - milligrams per kilogram



APPENDIX A



NEBU #400A
Photographic Log
Simcoe LLC



Photo 1: NEBU #400A well sign, 12/7/2023.

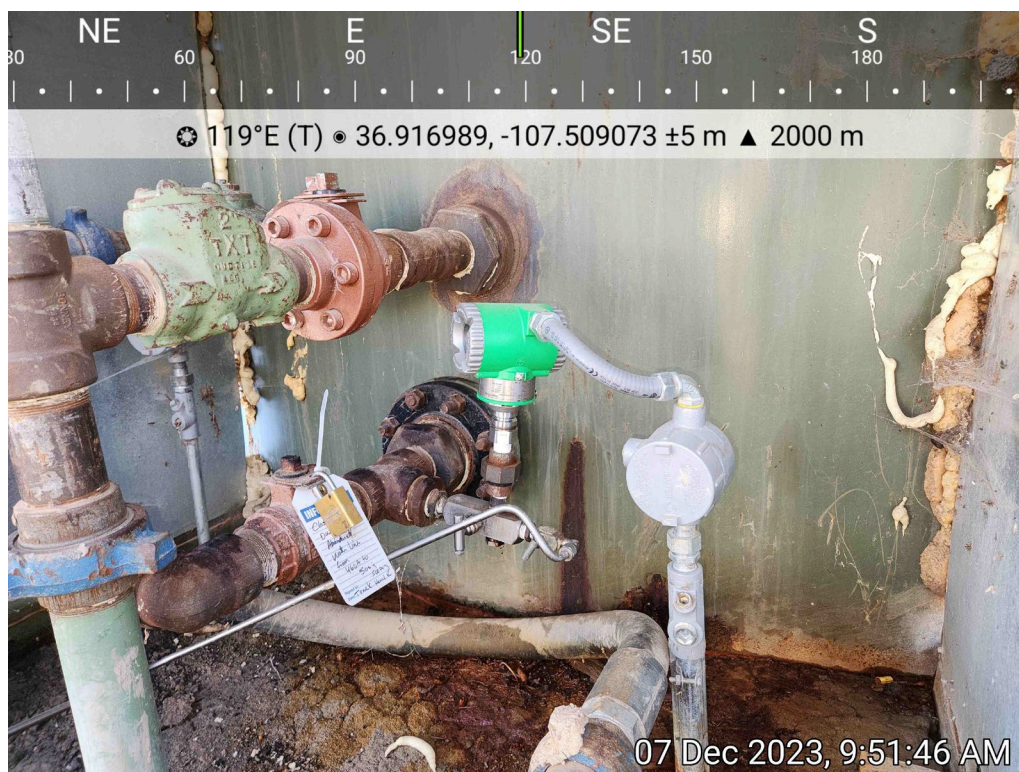


Photo 2: NEBU #400A point of release 12/7/2023.



NEBU #400A
Photographic Log
Simcoe LLC

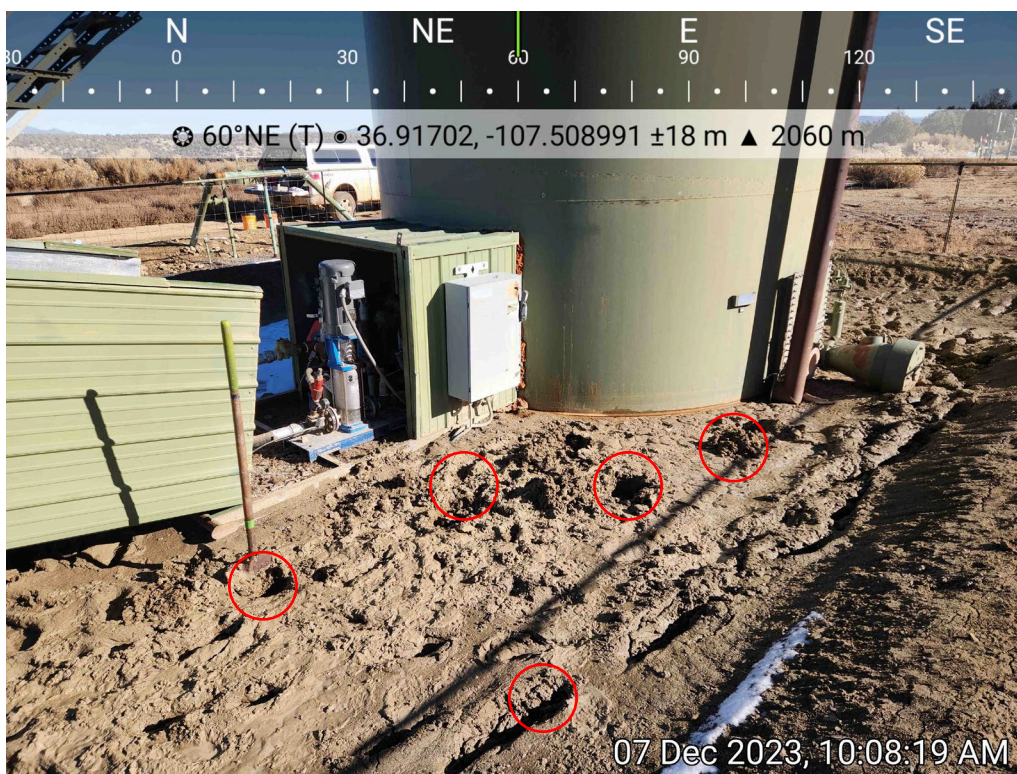
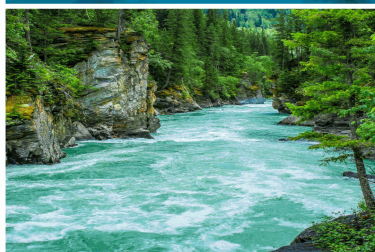


Photo 3: SS01 is a five-point composite sample collected from the wet area, 12/7/2023.



APPENDIX B

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: NEBU 400A

Work Order: E312045

Job Number: 20035-C-0001

Received: 12/7/2023

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
12/14/23

5796 U.S. Hwy 64
Farmington, NM 87401

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



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

Date Reported: 12/14/23

Kyle Siesser
PO Box 1653
Durango, CO 81302



Project Name: NEBU 400A
Workorder: E312045
Date Received: 12/7/2023 2:20:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/7/2023 2:20:00PM, under the Project Name: NEBU 400A.

The analytical test results summarized in this report with the Project Name: NEBU 400A apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

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

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

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

Respectfully,

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

Raina Schwanz
Laboratory Administrator
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Sample Summary

Cottonwood Consulting	Project Name:	NEBU 400A	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/14/23 15:50

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01	E312045-01A	Soil	12/07/23	12/07/23	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: NEBU 400A Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 12/14/2023 3:50:20PM
-----------------------------------------------------------	------------------------------------------------------------------------------------------	-----------------------------------

SS01

E312045-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: RKS		Batch: 2349098	
Benzene	ND	0.0250	1	12/08/23	12/12/23	
Ethylbenzene	ND	0.0250	1	12/08/23	12/12/23	
Toluene	0.241	0.0250	1	12/08/23	12/12/23	
o-Xylene	ND	0.0250	1	12/08/23	12/12/23	
p,m-Xylene	ND	0.0500	1	12/08/23	12/12/23	
Total Xylenes	ND	0.0250	1	12/08/23	12/12/23	
Surrogate: 4-Bromochlorobenzene-PID	95.0 %	70-130		12/08/23	12/12/23	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: RKS		Batch: 2349098	
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/08/23	12/12/23	
Surrogate: 1-Chloro-4-fluorobenzene-FID	89.0 %	70-130		12/08/23	12/12/23	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KM		Batch: 2350003	
Diesel Range Organics (C10-C28)	ND	25.0	1	12/11/23	12/11/23	
Oil Range Organics (C28-C36)	ND	50.0	1	12/11/23	12/11/23	
Surrogate: n-Nonane	93.2 %	50-200		12/11/23	12/11/23	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: BA		Batch: 2350008	
Chloride	ND	20.0	1	12/11/23	12/12/23	



QC Summary Data

Cottonwood Consulting	Project Name:	NEBU 400A	Reported: 12/14/2023 3:50:20PM
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	

Volatile Organics by EPA 8021B

Analyst: RKS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2349098-BLK1) Prepared: 12/08/23 Analyzed: 12/12/23

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.16		8.00		89.4	70-130			

LCS (2349098-BS1) Prepared: 12/08/23 Analyzed: 12/12/23

Benzene	4.77	0.0250	5.00		95.4	70-130			
Ethylbenzene	5.01	0.0250	5.00		100	70-130			
Toluene	5.09	0.0250	5.00		102	70-130			
o-Xylene	5.16	0.0250	5.00		103	70-130			
p,m-Xylene	10.3	0.0500	10.0		103	70-130			
Total Xylenes	15.5	0.0250	15.0		103	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.26		8.00		90.8	70-130			

Matrix Spike (2349098-MS1) Source: E312044-27 Prepared: 12/08/23 Analyzed: 12/12/23

Benzene	4.69	0.0250	5.00	ND	93.7	54-133			
Ethylbenzene	4.94	0.0250	5.00	ND	98.9	61-133			
Toluene	5.01	0.0250	5.00	ND	100	61-130			
o-Xylene	5.09	0.0250	5.00	ND	102	63-131			
p,m-Xylene	10.2	0.0500	10.0	ND	102	63-131			
Total Xylenes	15.3	0.0250	15.0	ND	102	63-131			
Surrogate: 4-Bromochlorobenzene-PID	7.33		8.00		91.6	70-130			

Matrix Spike Dup (2349098-MSD1) Source: E312044-27 Prepared: 12/08/23 Analyzed: 12/12/23

Benzene	4.36	0.0250	5.00	ND	87.1	54-133	7.30	20	
Ethylbenzene	4.64	0.0250	5.00	ND	92.8	61-133	6.38	20	
Toluene	4.68	0.0250	5.00	ND	93.6	61-130	6.74	20	
o-Xylene	4.77	0.0250	5.00	ND	95.3	63-131	6.63	20	
p,m-Xylene	9.58	0.0500	10.0	ND	95.8	63-131	6.23	20	
Total Xylenes	14.3	0.0250	15.0	ND	95.6	63-131	6.36	20	
Surrogate: 4-Bromochlorobenzene-PID	7.29		8.00		91.1	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	NEBU 400A	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/14/2023 3:50:20PM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: RKS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2349098-BLK1) Prepared: 12/08/23 Analyzed: 12/12/23

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.09		8.00		88.6	70-130			

LCS (2349098-BS2) Prepared: 12/08/23 Analyzed: 12/12/23

Gasoline Range Organics (C6-C10)	41.8	20.0	50.0		83.7	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.24		8.00		90.5	70-130			

Matrix Spike (2349098-MS2) Source: E312044-27 Prepared: 12/08/23 Analyzed: 12/12/23

Gasoline Range Organics (C6-C10)	41.9	20.0	50.0	ND	83.8	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.21		8.00		90.1	70-130			

Matrix Spike Dup (2349098-MSD2) Source: E312044-27 Prepared: 12/08/23 Analyzed: 12/12/23

Gasoline Range Organics (C6-C10)	42.6	20.0	50.0	ND	85.2	70-130	1.69	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.24		8.00		90.5	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	NEBU 400A	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/14/2023 3:50:20PM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KM

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2350003-BLK1) Prepared: 12/11/23 Analyzed: 12/11/23

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	47.0		50.0		94.0	50-200			

LCS (2350003-BS1) Prepared: 12/11/23 Analyzed: 12/11/23

Diesel Range Organics (C10-C28)	238	25.0	250		95.3	38-132			
Surrogate: n-Nonane	47.7		50.0		95.4	50-200			

Matrix Spike (2350003-MS1) Source: E312024-02 Prepared: 12/11/23 Analyzed: 12/11/23

Diesel Range Organics (C10-C28)	252	25.0	250	ND	101	38-132			
Surrogate: n-Nonane	47.6		50.0		95.1	50-200			

Matrix Spike Dup (2350003-MSD1) Source: E312024-02 Prepared: 12/11/23 Analyzed: 12/11/23

Diesel Range Organics (C10-C28)	236	25.0	250	ND	94.5	38-132	6.46	20	
Surrogate: n-Nonane	47.1		50.0		94.3	50-200			



QC Summary Data

Cottonwood Consulting	Project Name:	NEBU 400A	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	12/14/2023 3:50:20PM

Anions by EPA 300.0/9056A

Analyst: BA

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2350008-BLK1)					Prepared: 12/11/23 Analyzed: 12/12/23				
Chloride	ND	20.0							
LCS (2350008-BS1)					Prepared: 12/11/23 Analyzed: 12/12/23				
Chloride	245	20.0	250		98.2	90-110			
Matrix Spike (2350008-MS1)					Source: E312044-22		Prepared: 12/11/23 Analyzed: 12/12/23		
Chloride	251	20.0	250	ND	100	80-120			
Matrix Spike Dup (2350008-MSD1)					Source: E312044-22		Prepared: 12/11/23 Analyzed: 12/12/23		
Chloride	250	20.0	250	ND	100	80-120	0.321	20	

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



Definitions and Notes

Cottonwood Consulting	Project Name:	NEBU 400A	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	12/14/23 15:50

- 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.



[illegible]

Envirotech Analytical Laboratory

Printed: 12/11/2023 11:46:50AM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

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

Client:	Cottonwood Consulting	Date Received:	12/07/23 14:20	Work Order ID:	E312045
Phone:	970-764-7356	Date Logged In:	12/08/23 12:56	Logged In By:	Alexa Michaels
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/14/23 17:00 (5 day TAT)		

Chain of Custody (COC)

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

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

Carrier: Courier**Comments/Resolution****Sample Turn Around Time (TAT)**

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

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

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

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

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

Date



envirotech Inc.

POD Number	Well Depth (ft bgs)	Water Depth (ft bgs)
03685	460	310

Surficial Geology Legend



San Jose Formation



Notes: Water well data from the New Mexico Office of the State Engineer. Surficial geology data from the 1997 USGS Geologic Map of New Mexico. ESRI Aerial Imagery date 10/29/2022.

Legend

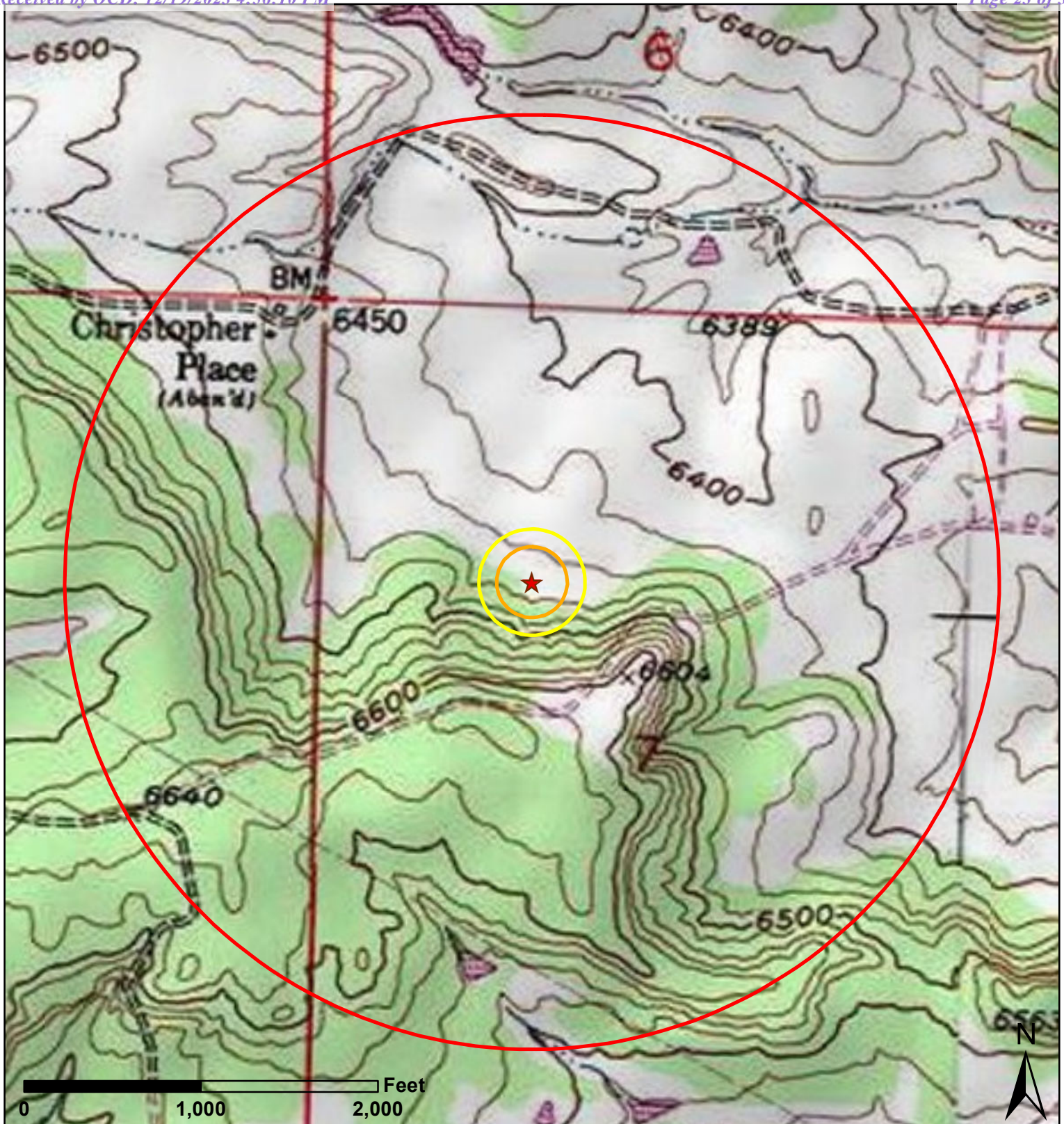
- NEBU #400A
- Water Well
- 1,000ft Buffer

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Section 7 T31N R6W NMPM

Figure 1
Depth to Groundwater Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: Basemap is the USGS topographic map.

Legend

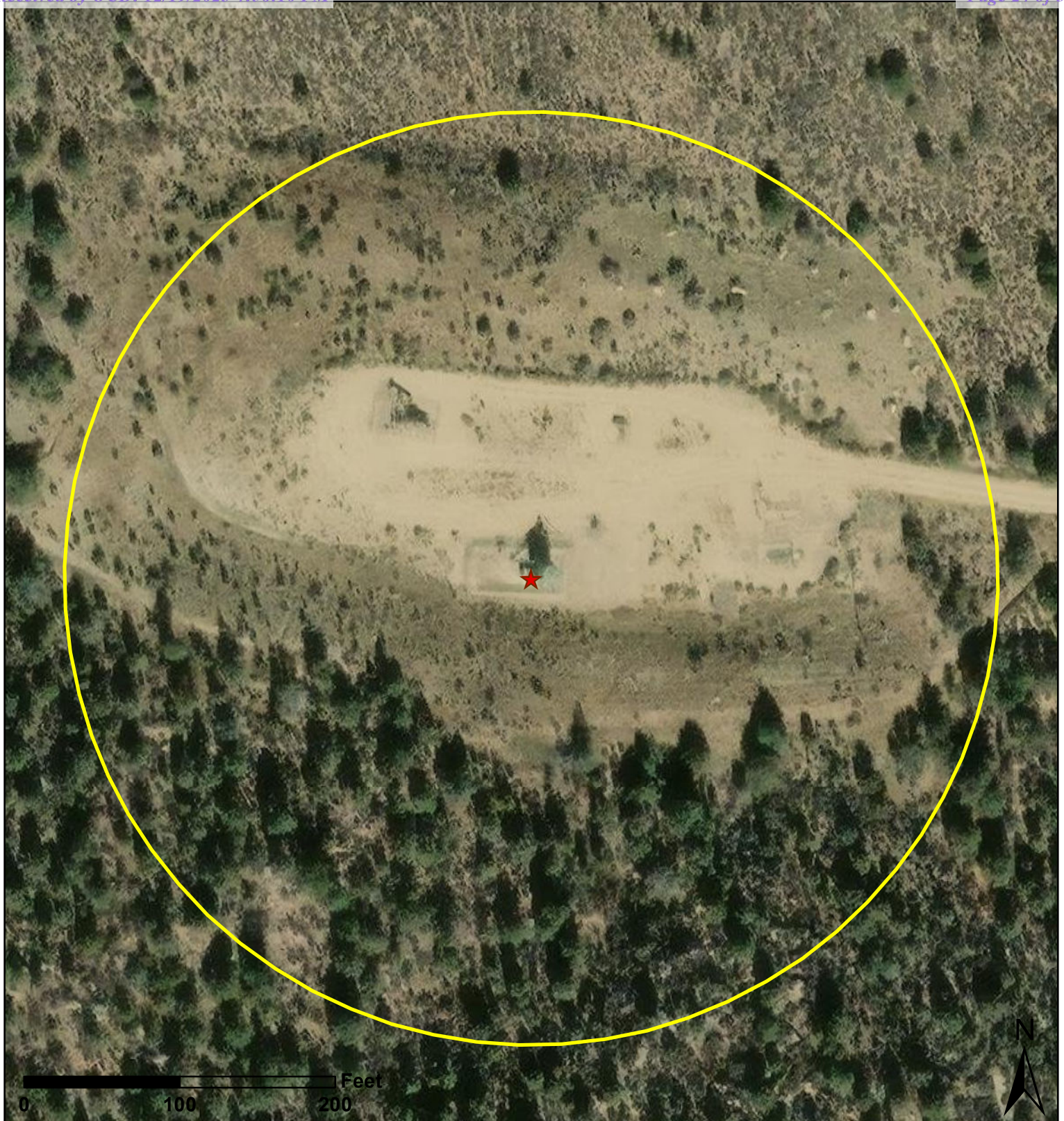
- ★ NEBU #400A
- 1/2 Mile Buffer
- 300ft Buffer
- 200ft Buffer

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N



Location: Section 7 T31N R6W NMPM

Figure 2
Proximity to Watercourses Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: ESRI Aerial Imagery date 10/29/2022.

Legend

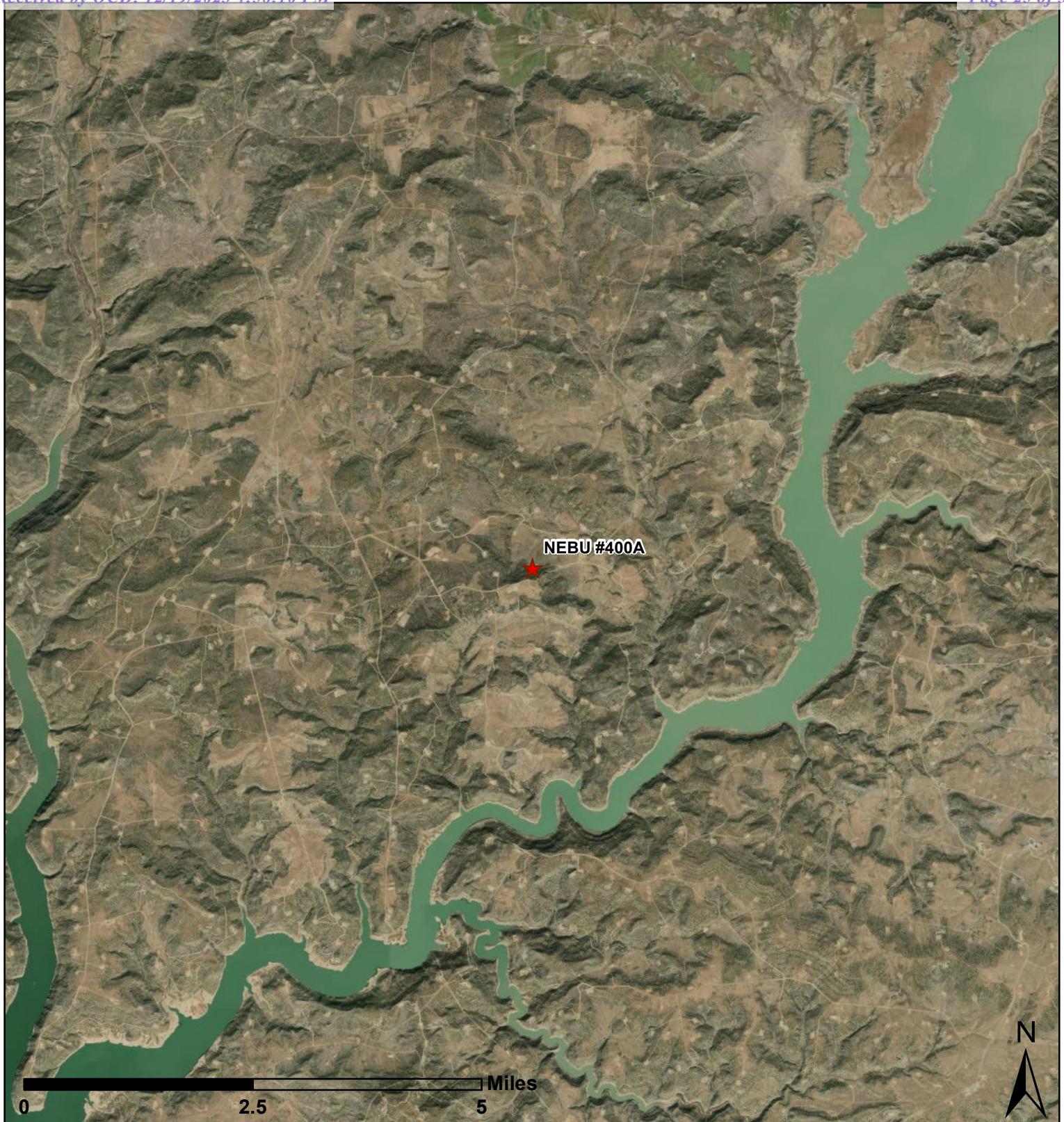
-  NEBU #400A
-  300ft Buffer



Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Section 7 T31N R6W NMPM

Figure 3
Proximity to Permanent
Structures Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: ESRI Aerial Imagery date 10/29/2022.

Legend

★ NEBU #400A

Cottonwood
CONSULTING



Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N




Location: Section 7 T31N R6W NMPM

Figure 4
Proximity to Municipal
Boundaries Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: Wetland data from the National Hydrography Dataset. ESRI Aerial Imagery date 10/29/2022.

Legend

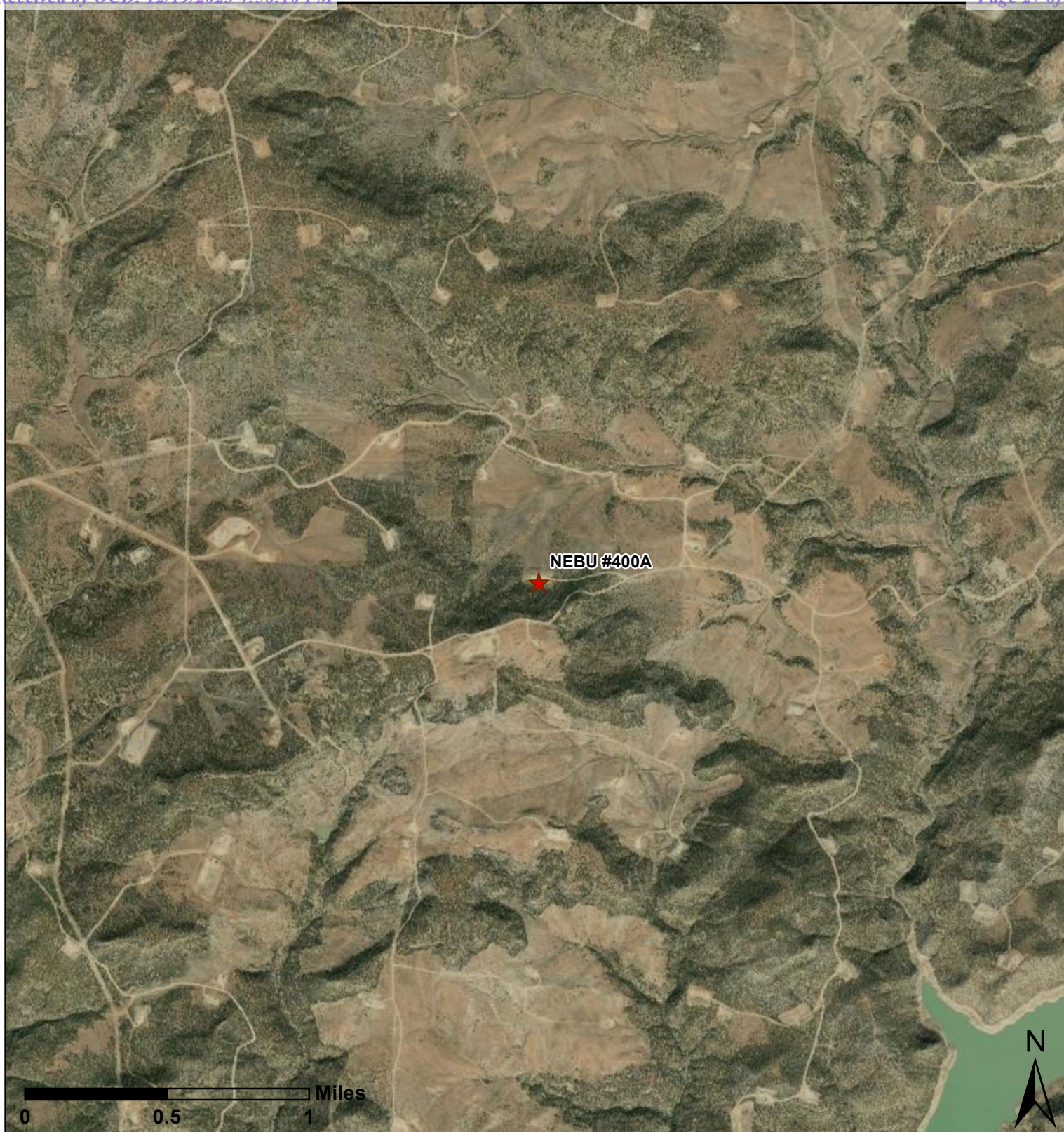
-  NEBU #400A
-  300ft Buffer
-  Wetland

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Section 7 T31N R6W NMPM

Figure 5
Proximity to Wetlands Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: Mine data from the New Mexico Mining and Minerals Division. ESRI Aerial Imagery date 10/29/2022.

Legend

- ★ NEBU #400A
- Mine

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N




Location: Section 7 T31N R6W NMPM

Figure 6
Proximity to Mines Map
Northeast Blanco Unit #400A
Simcoe LLC



Notes: Floodplain data from the Federal Emergency Management Agency. ESRI Aerial Imagery date 10/29/2022.

Legend

-  NEBU #400A
-  A; Area w/ 1% Chance of Flooding
-  X; Area of Minimal Flood Hazard

Cottonwood
CONSULTING

Mapping by: E. Millar, 12/8/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Section 7 T31N R6W NMPM

Figure 7
Proximity to Floodplains Map
Northeast Blanco Unit #400A
Simcoe LLC

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QUESTIONS

Action 295173

QUESTIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 295173
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2333849051
Incident Name	NAPP2333849051 NORTHEAST BLANCO UNIT #400A @ 0
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received

Location of Release Source	
Please answer all the questions in this group.	
Site Name	NORTHEAST BLANCO UNIT #400A
Date Release Discovered	12/02/2023
Surface Owner	Federal

Incident Details	
Please answer all the questions in this group.	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Production Tank Produced Water Released: 10 BBL Recovered: 0 BBL Lost: 10 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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QUESTIONS, Page 2

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 295173
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	<i>Unavailable.</i>
<i>With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.</i>	

Initial Response

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

The source of the release has been stopped	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	<i>Not answered.</i>

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 12/13/2023
----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------

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QUESTIONS, Page 3

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:	329736
	Action Number:	295173
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Site Characterization**

Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	NM OSE iWaters Database Search
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between 1 and 5 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Greater than 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1000 (ft.) and ½ (mi.)
Any other fresh water well or spring	Greater than 5 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1000 (ft.) and ½ (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

Requesting a remediation plan approval with this submission	Yes
-------------------------------------------------------------	-----

Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.

Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No

Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)

Chloride (EPA 300.0 or SM4500 Cl B)	0
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0.2
Benzene (EPA SW-846 Method 8021B or 8260B)	0

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

On what estimated date will the remediation commence	12/07/2023
On what date will (or did) the final sampling or liner inspection occur	12/07/2023
On what date will (or was) the remediation complete(d)	12/07/2023
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0

These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 4

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:	329736
	Action Number:	295173
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS**Remediation Plan (continued)**

Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:

(Select all answers below that apply.)	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	Following the release, a 5-pt composite sample was collected from the release area, which measured less than 200 ft2 and was limited to the inside of the bermed area on the pad surface. Since the sample passed, no remediation is proposed.

Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.

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.

I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 12/19/2023
----------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.

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QUESTIONS, Page 5

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:	329736
	Action Number:	295173
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:	329736
	Action Number:	295173
	Action Type:	[C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	290906
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	12/07/2023
What was the (estimated) number of samples that were to be gathered	1
What was the sampling surface area in square feet	200

Remediation Closure Request

Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.

Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	Following the release, a 5-pt composite sample was collected from the release area, which measured less than 200 ft2 and was limited to the inside of the bermed area on the pad surface. Since the sample passed, no remediation is proposed. No reclamation is proposed at this time because the release area is on the working pad surface, inside the berm for the AST.

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (in .pdf format) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

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. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 12/19/2023
----------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------

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QUESTIONS, Page 7

Action 295173

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 295173
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 295173

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 295173
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
nvelez	None	3/18/2024