

GCU 263 BGT Release

During removal of the BGT on 11/19/2025 for closure, holes were discovered on the sidewall of the tank with some liquid releasing to the ground. One discrete sample was collected from the wet area along with the 5-point composite base sample required for BGT closure. After the lab data indicated elevated results, Simcoe LLC conducted an excavation and resampled on 12/30/2025 and the sample failed. Simcoe attempted additional an additional excavation but contacted bed rock and was unable to get clean samples from field screening with the PID. After consultation with the NMOCD, Simcoe used a hydro-vac to remove all free soil and washed the sandstone. Two bores into the sandstone were used to collect material from 18-24". The sample from the bores remains elevated, after consultation with NMOCD Simcoe is reporting this as an environmental release.

Due to the release being discovered during removal of the BGT and no evidence of a large liquid release, Simcoe is reporting this as an unknown quantity.





GCU #263
Photographic Log
Simcoe, LLC



Photo 1: GCU #263 well sign.



Photo 2: BGT prior to removal.



GCU #263
Photographic Log
Simcoe, LLC



Photo 3: Location of BGT following removal.



Photo 4: Bottom of BGT following removal.



GCU #263
Photographic Log
Simcoe, LLC



Photo 5: Holes observed on side of BGT following removal.



Photo 6: 5PC-TB @5' (95) collected as five-point composite sample (red circles) and SS01 collected as discrete sample (yellow circle) below base of BGT following removal.

Cottonwood Consulting LLC



GCU #263
Photographic Log
Simcoe, LLC

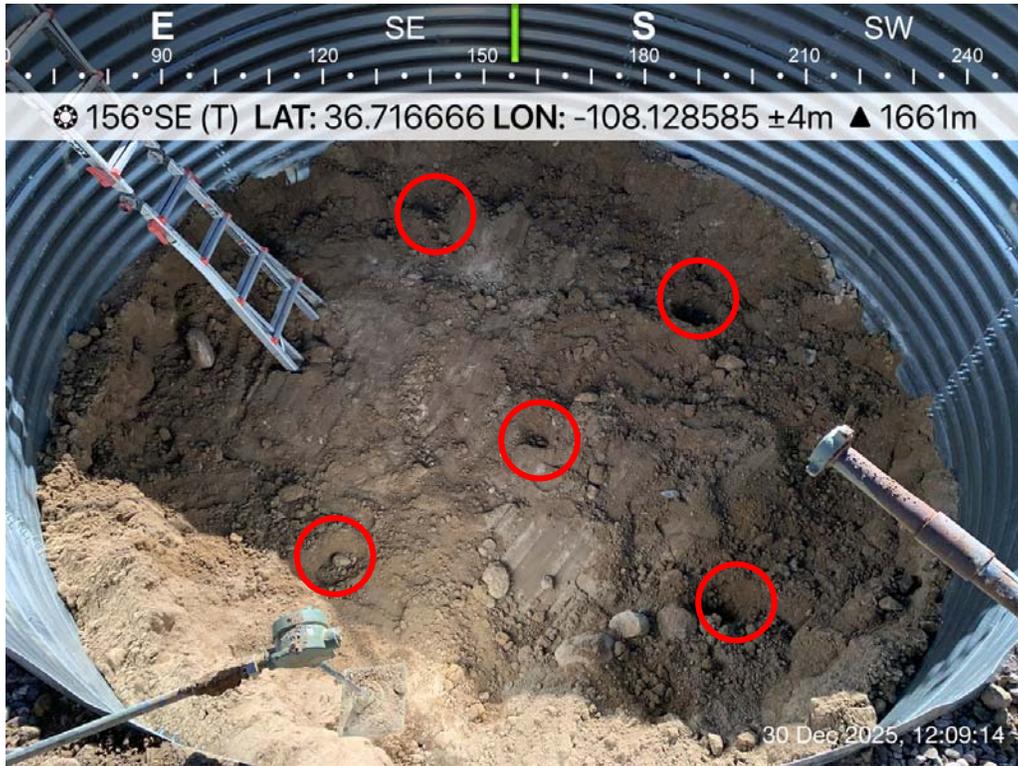


Photo 7: SS02 collected as a five-point composite sample (red circles) from the base of BGT following excavation



Photo 8: SS03 collected as a discrete sample from 18-24” below bedrock surface.



GCU #263
Photographic Log
Simcoe, LLC

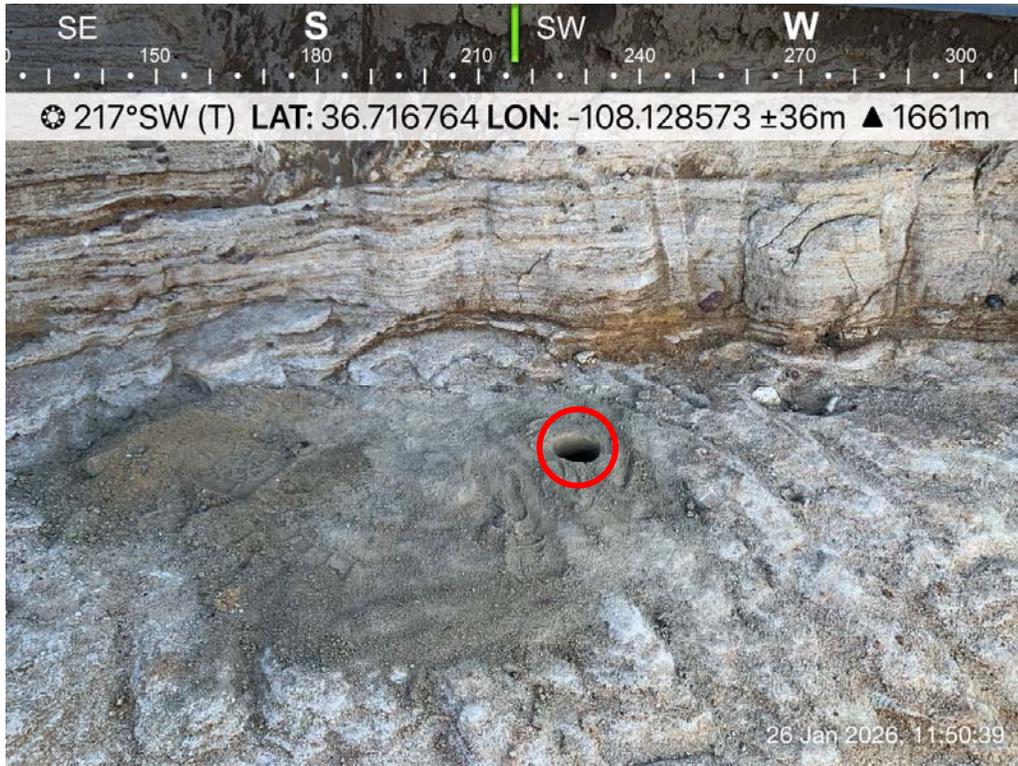
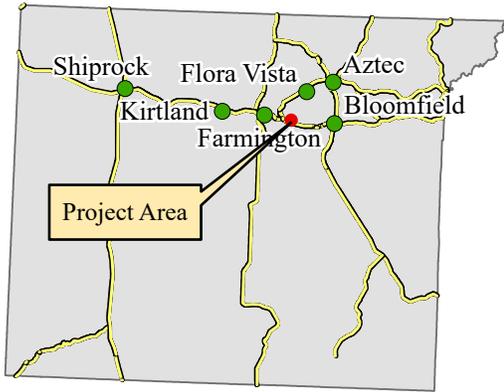


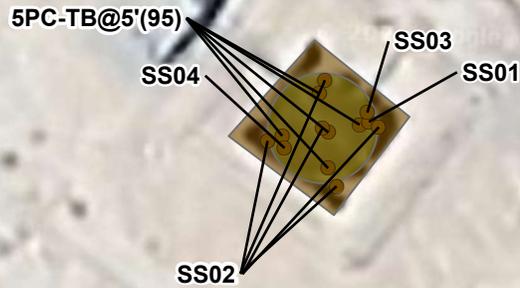
Photo 9: SS04 collected as a discrete sample from 18-24” below bedrock surface.



Photo 10: Overall base of BGT excavation with bedrock exposed.



San Juan County, New Mexico



Notes: 5PC-TB@5'(95) and SS01 collected 11/19/2025. 5PC-TB@5'(95) is a 5-point composite sample. SS01 is a discrete sample. SS02 is a 5-point composite sample collected 12/30/2025. SS03 and SS04 are discrete samples collected 1/26/2026.

Legend

- Soil Sample
- BGT
- Excavation (12/30/2025)



Mapping by: K. O'Brien, 1/27/2026
 Coordinate System:
 NAD 1983 UTM Zone 13 N

Location: Sec 20 T29N R12W NMPM

**GCU #263
 Project Map
 Simcoe LLC**

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: GCU # 263

Work Order: E601244

Job Number: 20035-C-0001

Received: 1/26/2026

Revision: 2

Report Reviewed By:

Walter Hinchman
Laboratory Director
1/28/26

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: 1/28/26

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: GCU # 263
Workorder: E601244
Date Received: 1/26/2026 12:28:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 1/26/2026 12:28:00PM, under the Project Name: GCU # 263.

The analytical test results summarized in this report with the Project Name: GCU # 263 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,

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Table of Contents

Title Page	1
Cover Page	2
Table of Contents	3
Sample Summary	4
Sample Data	5
SS03	5
SS04	6
QC Summary Data	7
QC - Volatile Organics by EPA 8021B	7
QC - Nonhalogenated Organics by EPA 8015D - GRO	8
QC - Nonhalogenated Organics by EPA 8015D - DRO/ORO	9
QC - Anions by EPA 300.0/9056A	10
Definitions and Notes	11
Chain of Custody etc.	12

Sample Summary

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 01/28/26 14:50
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS03	E601244-01A	Soil	01/26/26	01/26/26	Glass Jar, 4 oz.
SS04	E601244-02A	Soil	01/26/26	01/26/26	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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SS03

E601244-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: BA		Batch: 2605034	
Benzene	ND	0.0250	1	01/26/26	01/26/26	
Ethylbenzene	0.0267	0.0250	1	01/26/26	01/26/26	
Toluene	ND	0.0250	1	01/26/26	01/26/26	
o-Xylene	0.0279	0.0250	1	01/26/26	01/26/26	
p,m-Xylene	0.0557	0.0500	1	01/26/26	01/26/26	
Total Xylenes	0.0836	0.0250	1	01/26/26	01/26/26	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		128 %	70-130	01/26/26	01/26/26	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: BA		Batch: 2605034	
Gasoline Range Organics (C6-C10)	ND	20.0	1	01/26/26	01/26/26	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		94.6 %	70-130	01/26/26	01/26/26	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM		Batch: 2605040	
Diesel Range Organics (C10-C28)	355	25.0	1	01/27/26	01/27/26	
Oil Range Organics (C28-C36)	66.7	50.0	1	01/27/26	01/27/26	
<i>Surrogate: n-Nonane</i>		91.6 %	61-141	01/27/26	01/27/26	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: TP		Batch: 2605023	
Chloride	942	20.0	1	01/26/26	01/26/26	



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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SS04

E601244-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg		Analyst: BA		Batch: 2605034
Benzene	ND	0.0250	1	01/26/26	01/26/26	
Ethylbenzene	ND	0.0250	1	01/26/26	01/26/26	
Toluene	ND	0.0250	1	01/26/26	01/26/26	
o-Xylene	ND	0.0250	1	01/26/26	01/26/26	
p,m-Xylene	0.0874	0.0500	1	01/26/26	01/26/26	
Total Xylenes	0.0874	0.0250	1	01/26/26	01/26/26	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		127 %	70-130	01/26/26	01/26/26	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: BA		Batch: 2605034
Gasoline Range Organics (C6-C10)	ND	20.0	1	01/26/26	01/26/26	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		94.4 %	70-130	01/26/26	01/26/26	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: HM		Batch: 2605040
Diesel Range Organics (C10-C28)	310	25.0	1	01/27/26	01/27/26	
Oil Range Organics (C28-C36)	58.7	50.0	1	01/27/26	01/27/26	
<i>Surrogate: n-Nonane</i>		90.3 %	61-141	01/27/26	01/27/26	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: TP		Batch: 2605023
Chloride	964	20.0	1	01/26/26	01/26/26	



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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Volatile Organics by EPA 8021B

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 (2605034-BLK1)

Prepared: 01/26/26 Analyzed: 01/26/26

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	10.0		8.00		125	70-130			

LCS (2605034-BS1)

Prepared: 01/26/26 Analyzed: 01/26/26

Benzene	4.93	0.0250	5.00		98.5	70-130			
Ethylbenzene	4.81	0.0250	5.00		96.2	70-130			
Toluene	4.88	0.0250	5.00		97.7	70-130			
o-Xylene	4.91	0.0250	5.00		98.2	70-130			
p,m-Xylene	9.82	0.0500	10.0		98.2	70-130			
Total Xylenes	14.7	0.0250	15.0		98.2	70-130			
Surrogate: 4-Bromochlorobenzene-PID	9.76		8.00		122	70-130			

Matrix Spike (2605034-MS1)

Source: E601242-02

Prepared: 01/26/26 Analyzed: 01/26/26

Benzene	5.07	0.0250	5.00	ND	101	70-130			
Ethylbenzene	4.93	0.0250	5.00	0.0284	98.1	70-130			
Toluene	5.04	0.0250	5.00	0.0369	100	70-130			
o-Xylene	5.05	0.0250	5.00	0.0342	100	70-130			
p,m-Xylene	10.1	0.0500	10.0	0.0625	100	70-130			
Total Xylenes	15.1	0.0250	15.0	0.0967	100	70-130			
Surrogate: 4-Bromochlorobenzene-PID	9.78		8.00		122	70-130			

Matrix Spike Dup (2605034-MSD1)

Source: E601242-02

Prepared: 01/26/26 Analyzed: 01/26/26

Benzene	5.47	0.0250	5.00	ND	109	70-130	7.65	27	
Ethylbenzene	5.35	0.0250	5.00	0.0284	106	70-130	8.11	26	
Toluene	5.45	0.0250	5.00	0.0369	108	70-130	7.83	20	
o-Xylene	5.48	0.0250	5.00	0.0342	109	70-130	8.15	25	
p,m-Xylene	10.9	0.0500	10.0	0.0625	108	70-130	7.89	23	
Total Xylenes	16.4	0.0250	15.0	0.0967	109	70-130	7.98	26	
Surrogate: 4-Bromochlorobenzene-PID	9.84		8.00		123	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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Nonhalogenated Organics by EPA 8015D - GRO

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 (2605034-BLK1)

Prepared: 01/26/26 Analyzed: 01/26/26

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.62		8.00		95.2	70-130			

LCS (2605034-BS2)

Prepared: 01/26/26 Analyzed: 01/26/26

Gasoline Range Organics (C6-C10)	57.0	20.0	50.0		114	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.82		8.00		97.8	70-130			

Matrix Spike (2605034-MS2)

Source: E601242-02

Prepared: 01/26/26 Analyzed: 01/27/26

Gasoline Range Organics (C6-C10)	54.2	20.0	50.0	ND	108	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.78		8.00		97.2	70-130			

Matrix Spike Dup (2605034-MSD2)

Source: E601242-02

Prepared: 01/26/26 Analyzed: 01/27/26

Gasoline Range Organics (C6-C10)	58.9	20.0	50.0	ND	118	70-130	8.36	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.73		8.00		96.6	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: HM

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 (2605040-BLK1)

Prepared: 01/27/26 Analyzed: 01/27/26

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: <i>n</i> -Nonane	43.4		50.0		86.8	61-141			

LCS (2605040-BS1)

Prepared: 01/27/26 Analyzed: 01/27/26

Diesel Range Organics (C10-C28)	249	25.0	250		99.4	66-144			
Surrogate: <i>n</i> -Nonane	44.4		50.0		88.8	61-141			

Matrix Spike (2605040-MS1)

Source: E601226-41

Prepared: 01/27/26 Analyzed: 01/27/26

Diesel Range Organics (C10-C28)	266	25.0	250	ND	106	56-156			
Surrogate: <i>n</i> -Nonane	46.3		50.0		92.7	61-141			

Matrix Spike Dup (2605040-MSD1)

Source: E601226-41

Prepared: 01/27/26 Analyzed: 01/27/26

Diesel Range Organics (C10-C28)	260	25.0	250	ND	104	56-156	2.10	20	
Surrogate: <i>n</i> -Nonane	45.4		50.0		90.8	61-141			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU # 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/28/2026 2:50:13PM
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Anions by EPA 300.0/9056A

Analyst: TP

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 (2605023-BLK1)

Prepared: 01/26/26 Analyzed: 01/26/26

Chloride	ND	20.0							
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LCS (2605023-BS1)

Prepared: 01/26/26 Analyzed: 01/26/26

Chloride	257	20.0	250		103	90-110			
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Matrix Spike (2605023-MS1)

Source: E601228-03

Prepared: 01/26/26 Analyzed: 01/26/26

Chloride	584	100	250	282	121	80-120			M2
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Matrix Spike Dup (2605023-MSD1)

Source: E601228-03

Prepared: 01/26/26 Analyzed: 01/26/26

Chloride	571	100	250	282	115	80-120	2.26	20	
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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:	GCU # 263	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	01/28/26 14:50

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

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.



Client Information				Invoice Information				Lab Use Only				TAT				State															
Client: Cottonwood Consulting LLC				Company: Cottonwood Consulting LLC				Lab WO# EL001244				Job Number 20035.C.0001				1D		2D		3D		Std		NM		CO		UT		TX	
Project Name: GCU #263				Address: PO Box 1653												x								x							
Project Manager: Kyle Siesser				City, State, Zip: Durango CO 81302																											
Address: PO Box 1653				Phone: 970-764-7356																											
City, State, Zip: Durango CO 81302				Email: ksiesser@cottonwoodconsulting.com																											
Phone: 970-764-7356				Miscellaneous:																											
Email: ksiesser@cottonwoodconsulting.com																															
Sample Information										Analysis and Method								EPA Program													
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID		Field	Filter	Lab Number	DRO/DRO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	TCEQ 1005 - TX	RCRA 8 Metals	BGDOC - NM	BGDOC - TX	SDWA	CWA	RCRA	Compliance		Y	or	N	PWSID #	Sample Temp	Remarks			
1100	1/26/2026	Soil	1	SS03				1								X										5.9					
1145	1/26/2026	Soil	1	SS04				2								X										4.8					
Additional Instructions: Please CC jharter@cottonwoodconsulting.com emillar@cottonwoodconsulting.com kobrien@cottonwoodconsulting.com jlafortune@cottonwoodconsulting.com dsonger@cottonwoodconsulting.com																															
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.																															
Sampled by: Dylan Songer/ Robert Cochran																															
Relinquished by: (Signature) Robert Cochran				Date 1/26/26		Time 1228		Received by: (Signature) Auth Man				Date 1-26-26		Time 1228		Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days.															
Relinquished by: (Signature)				Date		Time		Received by: (Signature)				Date		Time																	
Relinquished by: (Signature)				Date		Time		Received by: (Signature)				Date		Time																	
Relinquished by: (Signature)				Date		Time		Received by: (Signature)				Date		Time																	
Relinquished by: (Signature)				Date		Time		Received by: (Signature)				Date		Time																	
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other																Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA															
Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																															

Envirotech Analytical Laboratory

Printed: 1/26/2026 12:32:16PM

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:	01/26/26 12:28	Work Order ID:	E601244
Phone:	970-764-7356	Date Logged In:	01/26/26 12:30	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	01/27/26 17:00 (1 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

Carrier: Robert Cochran

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

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? Yes

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

- 13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

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.

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: GCU 263

Work Order: E511263

Job Number: 20035-C-0001

Received: 11/19/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
11/25/25

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: 11/25/25

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: GCU 263
Workorder: E511263
Date Received: 11/19/2025 11:37:00AM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 11/19/2025 11:37:00AM, under the Project Name: GCU 263.

The analytical test results summarized in this report with the Project Name: GCU 263 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
Office: 505-632-1881
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Lynn Jarboe
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Office: 505-421-LABS(5227)
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Table of Contents

Title Page	1
Cover Page	2
Table of Contents	3
Sample Summary	4
Sample Data	5
5PC-TB @ 5' (45)	5
SS01	6
QC Summary Data	7
QC - Volatile Organics by EPA 8021B	7
QC - Nonhalogenated Organics by EPA 8015D - GRO	8
QC - Nonhalogenated Organics by EPA 8015D - DRO/ORO	9
QC - Anions by EPA 300.0/9056A	10
Definitions and Notes	11
Chain of Custody etc.	12

Sample Summary

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/25 15:53
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5PC-TB @ 5' (45)	E511263-01A	Soil	11/19/25	11/19/25	Glass Jar, 4 oz.
SS01	E511263-02A	Soil	11/19/25	11/19/25	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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5PC-TB @ 5' (45)

E511263-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg		Analyst: SL		Batch: 2547092
Benzene	ND	0.0250	1	11/20/25	11/21/25	
Ethylbenzene	ND	0.0250	1	11/20/25	11/21/25	
Toluene	ND	0.0250	1	11/20/25	11/21/25	
o-Xylene	ND	0.0250	1	11/20/25	11/21/25	
p,m-Xylene	ND	0.0500	1	11/20/25	11/21/25	
Total Xylenes	ND	0.0250	1	11/20/25	11/21/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		106 %	70-130	11/20/25	11/21/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg		Analyst: SL		Batch: 2547092
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/25	11/21/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		84.9 %	70-130	11/20/25	11/21/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg		Analyst: NV		Batch: 2547084
Diesel Range Organics (C10-C28)	30.5	25.0	1	11/20/25	11/21/25	
Oil Range Organics (C28-C36)	ND	50.0	1	11/20/25	11/21/25	
<i>Surrogate: n-Nonane</i>						
		96.4 %	61-141	11/20/25	11/21/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg		Analyst: DT		Batch: 2547091
Chloride	316	20.0	1	11/20/25	11/20/25	



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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SS01

E511263-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg		Analyst: SL		Batch: 2547092
Benzene	ND	0.0250	1	11/20/25	11/21/25	
Ethylbenzene	ND	0.0250	1	11/20/25	11/21/25	
Toluene	ND	0.0250	1	11/20/25	11/21/25	
o-Xylene	ND	0.0250	1	11/20/25	11/21/25	
p,m-Xylene	ND	0.0500	1	11/20/25	11/21/25	
Total Xylenes	ND	0.0250	1	11/20/25	11/21/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		105 %	70-130	11/20/25	11/21/25	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg		Analyst: SL		Batch: 2547092
Gasoline Range Organics (C6-C10)	ND	20.0	1	11/20/25	11/21/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		83.9 %	70-130	11/20/25	11/21/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg		Analyst: NV		Batch: 2547084
Diesel Range Organics (C10-C28)	48.6	25.0	1	11/20/25	11/21/25	
Oil Range Organics (C28-C36)	74.0	50.0	1	11/20/25	11/21/25	
<i>Surrogate: n-Nonane</i>		97.1 %	61-141	11/20/25	11/21/25	
Anions by EPA 300.0/9056A	mg/kg	mg/kg		Analyst: DT		Batch: 2547091
Chloride	156	20.0	1	11/20/25	11/20/25	



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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Volatile Organics by EPA 8021B

Analyst: SL

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 (2547092-BLK1)

Prepared: 11/20/25 Analyzed: 11/20/25

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	8.34		8.00		104	70-130			

LCS (2547092-BS1)

Prepared: 11/20/25 Analyzed: 11/20/25

Benzene	5.73	0.0250	5.00		115	70-130			
Ethylbenzene	5.48	0.0250	5.00		110	70-130			
Toluene	5.63	0.0250	5.00		113	70-130			
o-Xylene	5.54	0.0250	5.00		111	70-130			
p,m-Xylene	11.2	0.0500	10.0		112	70-130			
Total Xylenes	16.7	0.0250	15.0		111	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.43		8.00		105	70-130			

Matrix Spike (2547092-MS1)

Source: E511266-04

Prepared: 11/20/25 Analyzed: 11/21/25

Benzene	5.77	0.0250	5.00	0.0931	113	70-130			
Ethylbenzene	6.02	0.0250	5.00	0.620	108	70-130			
Toluene	6.40	0.0250	5.00	0.823	112	70-130			
o-Xylene	5.90	0.0250	5.00	0.421	110	70-130			
p,m-Xylene	12.2	0.0500	10.0	1.30	109	70-130			
Total Xylenes	18.1	0.0250	15.0	1.72	109	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.58		8.00		107	70-130			

Matrix Spike Dup (2547092-MSD1)

Source: E511266-04

Prepared: 11/20/25 Analyzed: 11/21/25

Benzene	5.79	0.0250	5.00	0.0931	114	70-130	0.420	27	
Ethylbenzene	6.05	0.0250	5.00	0.620	109	70-130	0.390	26	
Toluene	6.42	0.0250	5.00	0.823	112	70-130	0.226	20	
o-Xylene	5.91	0.0250	5.00	0.421	110	70-130	0.0966	25	
p,m-Xylene	12.3	0.0500	10.0	1.30	110	70-130	0.337	23	
Total Xylenes	18.2	0.0250	15.0	1.72	110	70-130	0.259	26	
Surrogate: 4-Bromochlorobenzene-PID	8.61		8.00		108	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

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 (2547092-BLK1)

Prepared: 11/20/25 Analyzed: 11/20/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.79		8.00		84.9	70-130			

LCS (2547092-BS2)

Prepared: 11/20/25 Analyzed: 11/21/25

Gasoline Range Organics (C6-C10)	50.6	20.0	50.0		101	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	6.84		8.00		85.5	70-130			

Matrix Spike (2547092-MS2)

Source: E511266-04

Prepared: 11/20/25 Analyzed: 11/21/25

Gasoline Range Organics (C6-C10)	70.4	20.0	50.0	ND	141	70-130			M6
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.03		8.00		87.8	70-130			

Matrix Spike Dup (2547092-MSD2)

Source: E511266-04

Prepared: 11/20/25 Analyzed: 11/21/25

Gasoline Range Organics (C6-C10)	67.4	20.0	50.0	ND	135	70-130	4.30	20	M6
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.01		8.00		87.6	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: NV

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 (2547084-BLK1)

Prepared: 11/20/25 Analyzed: 11/21/25

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: <i>n</i> -Nonane	49.7		50.0		99.3	61-141			

LCS (2547084-BS1)

Prepared: 11/20/25 Analyzed: 11/21/25

Diesel Range Organics (C10-C28)	250	25.0	250		100	66-144			
Surrogate: <i>n</i> -Nonane	46.8		50.0		93.7	61-141			

Matrix Spike (2547084-MS1)

Source: E511262-44

Prepared: 11/20/25 Analyzed: 11/21/25

Diesel Range Organics (C10-C28)	537	25.0	250	265	109	56-156			
Surrogate: <i>n</i> -Nonane	48.5		50.0		97.0	61-141			

Matrix Spike Dup (2547084-MSD1)

Source: E511262-44

Prepared: 11/20/25 Analyzed: 11/21/25

Diesel Range Organics (C10-C28)	529	25.0	250	265	106	56-156	1.50	20	
Surrogate: <i>n</i> -Nonane	48.6		50.0		97.1	61-141			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 11/25/2025 3:53:09PM
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Anions by EPA 300.0/9056A

Analyst: DT

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 (2547091-BLK1)

Prepared: 11/20/25 Analyzed: 11/20/25

Chloride ND 20.0

LCS (2547091-BS1)

Prepared: 11/20/25 Analyzed: 11/20/25

Chloride 253 20.0 250 101 90-110

Matrix Spike (2547091-MS1)

Source: E511264-01

Prepared: 11/20/25 Analyzed: 11/20/25

Chloride 6890 100 250 7010 NR 80-120 M4

Matrix Spike Dup (2547091-MSD1)

Source: E511264-01

Prepared: 11/20/25 Analyzed: 11/20/25

Chloride 6650 100 250 7010 NR 80-120 3.52 20 M4

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:	GCU 263	Reported: 11/25/25 15:53
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	

- M4 Matrix spike recovery value is suspect since the analyte concentration in the sample is disproportionate to the spike level. The associated LCS spike recovery was acceptable.
- M6 Matrix spike recovery has a high bias. The native sample results were below the RL, but appears to have contributed to high MS recoveries.
- 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.



Client Information				Invoice Information				Lab Use Only				TAT				State			
Client: Cottonwood Consulting LLC				Company: Cottonwood Consulting LLC				Lab WO# E511263				Job Number 26035-C-001				1D 2D 3D Std X			
Project Name: GCU 263				Address: PO Box 1653												NM CO UT TX			
Project Manager: Kyle Siesser				City, State, Zip: Durango CO 81302												x			
Address: PO Box 1653				Phone: 970-764-7356															
City, State, Zip: Durango CO 81302				Email: ksiesser@cottonwoodconsulting.com															
Phone: 970-764-7356				Miscellaneous:															
Email: ksiesser@cottonwoodconsulting.com																			
Sample Information												Analysis and Method				EPA Program			
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/DRO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	TEEQ 1005-TX	RCRA 8 Metals	BGDOC - NM	BGDOC - TX	SDWA	CWA	RCRA	
1040	11/19/2025	Soil	1	JL 5PG-TB 5' (95) 5PC-TB 0.5' (95)		1	✓	✓	✓	✓									
1045	11-19-25	Soil	1	SS01		2	✓	✓	✓	✓									
Additional Instructions: Please CC jharter@cottonwoodconsulting.com emillar@cottonwoodconsulting.com kobrien@cottonwoodconsulting.com jlafortune@cottonwoodconsulting.com dsonger@cottonwoodconsulting.com												Compliance Y or N							
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.												PWSID #							
Sampled by: Joseph LaFortune												Sample Temp							
Relinquished by: (Signature)			Date	Time	Received by: (Signature)			Date	Time	Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days.									
Relinquished by: (Signature)			Date	Time	Received by: (Signature)			Date	Time										
Relinquished by: (Signature)			Date	Time	Received by: (Signature)			Date	Time										
Relinquished by: (Signature)			Date	Time	Received by: (Signature)			Date	Time										
Relinquished by: (Signature)			Date	Time	Received by: (Signature)			Date	Time										
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other												Lab Use Only							
Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA												Received on ice: (Y/N)							
Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																			

Envirotech Analytical Laboratory

Printed: 11/19/2025 12:02:31PM

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: 11/19/25 11:37 Work Order ID: E511263
Phone: 970-764-7356 Date Logged In: 11/19/25 11:59 Logged In By: Caitlin Mars
Email: ksiesser@cottonwoodconsulting.com Due Date: 11/26/25 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

Carrier: Kyle Siesser

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

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? Yes

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

- 13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

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

Empty box for Client Instruction

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

Date



envirotech Inc.

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: GCU 263

Work Order: E512231

Job Number: 20035-C-0001

Received: 12/30/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
1/5/26

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: 1/5/26

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: GCU 263
Workorder: E512231
Date Received: 12/30/2025 12:39:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/30/2025 12:39:00PM, under the Project Name: GCU 263.

The analytical test results summarized in this report with the Project Name: GCU 263 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
Office: 505-632-1881
rainaschwanz@envirotech-inc.com

Field Offices:

Southern New Mexico Area

Lynn Jarboe
Laboratory Technical Representative
Office: 505-421-LABS(5227)
Cell: 505-320-4759
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Michelle Gonzales
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Table of Contents

Title Page	1
Cover Page	2
Table of Contents	3
Sample Summary	4
Sample Data	5
SS02	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

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 01/05/26 10:37
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS02	E512231-01A	Soil	12/30/25	12/30/25	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/5/2026 10:37:25AM
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SS02

E512231-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: BA		Batch: 2553017	
Benzene	ND	0.0250	1	12/30/25	12/31/25	
Ethylbenzene	ND	0.0250	1	12/30/25	12/31/25	
Toluene	ND	0.0250	1	12/30/25	12/31/25	
o-Xylene	ND	0.0250	1	12/30/25	12/31/25	
p,m-Xylene	ND	0.0500	1	12/30/25	12/31/25	
Total Xylenes	ND	0.0250	1	12/30/25	12/31/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		98.0 %	70-130	12/30/25	12/31/25	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: BA		Batch: 2553017	
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/30/25	12/31/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		89.0 %	70-130	12/30/25	12/31/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM		Batch: 2553022	
Diesel Range Organics (C10-C28)	62.9	25.0	1	12/31/25	12/31/25	
Oil Range Organics (C28-C36)	ND	50.0	1	12/31/25	12/31/25	
<i>Surrogate: n-Nonane</i>		92.9 %	61-141	12/31/25	12/31/25	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: TP		Batch: 2553024	
Chloride	1250	20.0	1	12/30/25	12/30/25	



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/5/2026 10:37:25AM
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Volatile Organics by EPA 8021B

Analyst: SL

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 (2553017-BLK1)

Prepared: 12/29/25 Analyzed: 12/29/25

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	8.10		8.00		101	70-130			

LCS (2553017-BS1)

Prepared: 12/29/25 Analyzed: 12/29/25

Benzene	5.27	0.0250	5.00		105	70-130			
Ethylbenzene	5.07	0.0250	5.00		101	70-130			
Toluene	5.20	0.0250	5.00		104	70-130			
o-Xylene	5.14	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	8.10		8.00		101	70-130			

Matrix Spike (2553017-MS1)

Source: E512225-02

Prepared: 12/29/25 Analyzed: 12/30/25

Benzene	5.85	0.0250	5.00	ND	117	70-130			
Ethylbenzene	5.64	0.0250	5.00	ND	113	70-130			
Toluene	5.78	0.0250	5.00	ND	116	70-130			
o-Xylene	5.69	0.0250	5.00	ND	114	70-130			
p,m-Xylene	11.5	0.0500	10.0	ND	115	70-130			
Total Xylenes	17.2	0.0250	15.0	ND	114	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.12		8.00		102	70-130			

Matrix Spike Dup (2553017-MSD1)

Source: E512225-02

Prepared: 12/29/25 Analyzed: 12/30/25

Benzene	5.65	0.0250	5.00	ND	113	70-130	3.38	27	
Ethylbenzene	5.46	0.0250	5.00	ND	109	70-130	3.33	26	
Toluene	5.58	0.0250	5.00	ND	112	70-130	3.45	20	
o-Xylene	5.52	0.0250	5.00	ND	110	70-130	2.99	25	
p,m-Xylene	11.1	0.0500	10.0	ND	111	70-130	3.32	23	
Total Xylenes	16.6	0.0250	15.0	ND	111	70-130	3.21	26	
Surrogate: 4-Bromochlorobenzene-PID	8.23		8.00		103	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/5/2026 10:37:25AM
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Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

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 (2553017-BLK1)

Prepared: 12/29/25 Analyzed: 12/29/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.40		8.00		92.5	70-130			

LCS (2553017-BS2)

Prepared: 12/29/25 Analyzed: 12/30/25

Gasoline Range Organics (C6-C10)	55.0	20.0	50.0		110	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.46		8.00		93.2	70-130			

Matrix Spike (2553017-MS2)

Source: E512225-02

Prepared: 12/29/25 Analyzed: 12/30/25

Gasoline Range Organics (C6-C10)	58.0	20.0	50.0	ND	116	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.40		8.00		92.5	70-130			

Matrix Spike Dup (2553017-MSD2)

Source: E512225-02

Prepared: 12/29/25 Analyzed: 12/30/25

Gasoline Range Organics (C6-C10)	57.5	20.0	50.0	ND	115	70-130	0.891	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.47		8.00		93.4	70-130			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/5/2026 10:37:25AM
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Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: HM

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 (2553022-BLK1)

Prepared: 12/30/25 Analyzed: 12/30/25

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	44.1		50.0		88.3	61-141			

LCS (2553022-BS1)

Prepared: 12/30/25 Analyzed: 12/30/25

Diesel Range Organics (C10-C28)	239	25.0	250		95.5	66-144			
Surrogate: n-Nonane	43.1		50.0		86.3	61-141			

Matrix Spike (2553022-MS1)

Source: E512228-01

Prepared: 12/30/25 Analyzed: 12/30/25

Diesel Range Organics (C10-C28)	1290	25.0	250	988	122	56-156			
Surrogate: n-Nonane	43.2		50.0		86.4	61-141			

Matrix Spike Dup (2553022-MSD1)

Source: E512228-01

Prepared: 12/30/25 Analyzed: 12/30/25

Diesel Range Organics (C10-C28)	1080	25.0	250	988	35.1	56-156	18.3	20	M4
Surrogate: n-Nonane	43.8		50.0		87.6	61-141			



QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: GCU 263 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 1/5/2026 10:37:25AM
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Anions by EPA 300.0/9056A

Analyst: TP

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 (2553024-BLK1)

Prepared: 12/30/25 Analyzed: 12/30/25

Chloride ND 20.0

LCS (2553024-BS1)

Prepared: 12/30/25 Analyzed: 12/30/25

Chloride 260 20.0 250 104 90-110

Matrix Spike (2553024-MS1)

Source: E512230-04

Prepared: 12/30/25 Analyzed: 12/30/25

Chloride 298 20.0 250 30.5 107 80-120

Matrix Spike Dup (2553024-MSD1)

Source: E512230-04

Prepared: 12/30/25 Analyzed: 12/30/25

Chloride 282 20.0 250 30.5 101 80-120 5.26 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:	GCU 263	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	01/05/26 10:37

M4 Matrix spike recovery value is suspect since the analyte concentration in the sample is disproportionate to the spike level. The associated LCS spike recovery was acceptable.

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.



Envirotech Analytical Laboratory

Printed: 12/30/2025 12:42:58PM

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:	12/30/25 12:39	Work Order ID:	E512231
Phone:	970-764-7356	Date Logged In:	12/30/25 12:40	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/31/25 17:00 (1 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

Carrier: Dylan Songer

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

Comments/Resolution

Sample received on ice. Sample temperature was higher then 6 degrees celsius.

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? Yes

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

- 13. See COC for individual sample temps. Samples outside of 0°C-6°C will be recorded in comments.

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.

Soil Sampling Results
GCU #263
Simcoe LLC

Parameter	5PC-TB @ 5' (95)	SS01	SS02	SS03	SS04	Units
	11/19/2025 Below BGT Base	11/19/2025 Below BGT Base	12/30/2025 Excavation Base	1/26/2026 Excavation Base	1/26/2026 Excavation Base	
Depth	5	5	8	10.5-11*	10.5-11*	feet bgs
Field, PID	1.2	1.4	10.4	63.5	150.5	ppm
Chloride	316	156	1,250	942	964	mg/kg
Benzene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Toluene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Ethylbenzene	<0.0250	<0.0250	<0.0250	0.0267	<0.0250	mg/kg
Total Xylenes	<0.0250	<0.0250	<0.0250	0.0836	0.0874	mg/kg
Total BTEX	<0.100	<0.100	<0.100	0.1103	0.0874	mg/kg
TPH (GRO)	<20.0	<20.0	<20.0	<20.0	<20.0	mg/kg
TPH (DRO)	30.5	48.6	62.9	355	310	mg/kg
TPH (EXT DRO)	<50.0	74.0	<50.0	66.7	58.7	mg/kg
Total TPH	30.5	122.6	62.9	421.7	368.7	mg/kg

Notes: 5PC-TB @ 5' (95) & SS02 collected as five-point composite samples. SS01, SS03 & SS04 collected as discrete samples.

" * " - Samples collected 18-24 inches below excavation base and from bedrock.

PID - Photoionization Detector

BTEX - Benzene, Toluene, Ethylbenzene, & Total Xylenes

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

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

General Information
Phone: (505) 629-6116

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

QUESTIONS

Action 550692

QUESTIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:	329736
	Action Number:	550692
	Action Type:	[C-141] Initial C-141 (C-141-v-Initial)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2603625766
Incident Name	NAPP2603625766 GALLEGOS CANYON UNIT 263 @ 30-045-20277
Incident Type	Produced Water Release
Incident Status	Initial C-141 Received
Incident Well	[30-045-20277] GALLEGOS CANYON UNIT #263

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	Gallegos Canyon Unit 263
Date Release Discovered	01/26/2026
Surface Owner	Private

Incident Details	
<i>Please answer all the questions in this group.</i>	
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	
<i>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.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Corrosion Tank (Any) Produced Water Released: 0 BBL (Unknown Released Amount) Recovered: 0 BBL Lost: 0 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)	This release is being reported after a BGT removal. Simcoe worked with Joel Stone on the removal with three sampling events and two excavations, and it is being elevated to a spill on the advice of Shelly Wells.

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

QUESTIONS, Page 2

Action 550692

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 550692
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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	Yes
Reasons why this would be considered a submission for a notification of a major release	From paragraph A. "Major release" determine using: (1) an unauthorized release of a volume, excluding gases, of 25 barrels or more.
<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	Not answered.

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: Jerrid Brann Title: Environmental Coordinator Email: jerrid.brann@machnr.com Date: 02/05/2026
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**State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505**

QUESTIONS, Page 3

Action 550692

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 550692
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

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)	Not answered.
What method was used to determine the depth to ground water	Not answered.
Did this release impact groundwater or surface water	Not answered.
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	Not answered.
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Not answered.
An occupied permanent residence, school, hospital, institution, or church	Not answered.
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Not answered.
Any other fresh water well or spring	Not answered.
Incorporated municipal boundaries or a defined municipal fresh water well field	Not answered.
A wetland	Not answered.
A subsurface mine	Not answered.
An (non-karst) unstable area	Not answered.
Categorize the risk of this well / site being in a karst geology	Not answered.
A 100-year floodplain	Not answered.
Did the release impact areas not on an exploration, development, production, or storage site	Not answered.

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	No
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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State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 550692

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 550692
	Action Type: [C-141] Initial C-141 (C-141-v-Initial)

CONDITIONS

Created By	Condition	Condition Date
nvez	None	2/6/2026