

District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

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

For temporary pits, closed-loop systems, and below-grade tanks, submit to the appropriate NMOCD District Office.
For permanent pits and exceptions submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

- Type of action: Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
 Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
 BGT A Modification to an existing permit
 Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

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

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

1.
 Operator: SIMCOE LLC OGRID #: 329736
 Address: 1199 Main Ave., Suite 101, Durango, CO 81301
 Facility or well name: FLORANCE #125
 APPNumber: 30-045-24831 OCD Permit Number: _____
 U/L or Qtr/Qtr E Section 01 Township 29N Range 09W County: San Juan County
 Center of Proposed Design: Latitude 36.755444° Longitude -107.737401° NAD: 1927 1983
 Surface Owner: Federal State Private Tribal Trust or Indian Allotment

2.
 Pit: Subsection F or G of 19.15.17.11 NMAC
 Temporary: Drilling Workover
 Permanent Emergency Cavitation P&A
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 String-Reinforced
 Liner Seams: Welded Factory Other _____ Volume: _____ bbl Dimensions: L _____ x W _____ x D _____

3.
 Closed-loop System: Subsection H of 19.15.17.11 NMAC
 Type of Operation: P&A Drilling a new well Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
 Drying Pad Above Ground Steel Tanks Haul-off Bins Other _____
 Lined Unlined Liner type: Thickness _____ mil LLDPE HDPE PVC Other _____
 Liner Seams: Welded Factory Other _____

4.
 Below-grade tank: Subsection I of 19.15.17.11 NMAC **Tank ID:** A
 Volume: 21 bbl Type of fluid: Produced Water
 Tank Construction material: Steel
 Secondary containment with leak detection Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
 Visible sidewalls and liner Visible sidewalls only Other SINLGE WALLED DOUBLE BOTTOMED SIDEWALLS VISIBLE
 Liner type: Thickness _____ mil HDPE PVC Other _____

5.
 Alternative Method:
 Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.
Fencing: Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)
 Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)
 Four foot height, four strands of barbed wire evenly spaced between one and four feet
 Alternate. Please specify _____

7.
Netting: Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)
 Screen Netting Other _____
 Monthly inspections (If netting or screening is not physically feasible)

8.
Signs: Subsection C of 19.15.17.11 NMAC
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
 Signed in compliance with 19.15.16.8 NMAC

9.
Administrative Approvals and Exceptions:
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.
Please check a box if one or more of the following is requested, if not leave blank:
 Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.
Siting Criteria (regarding permitting): 19.15.17.10 NMAC
Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance. Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.

Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (<i>Applies to temporary, emergency, or cavitation pits and below-grade tanks</i>) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. (<i>Applies to permanent pits</i>) - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

11.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

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

12.

Closed-loop Systems Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- Siting Criteria Compliance Demonstrations (only for on-site closure) - based upon the appropriate requirements of 19.15.17.10 NMAC
- Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- Previously Approved Design (attach copy of design) API Number: _____
- Previously Approved Operating and Maintenance Plan API Number: _____ (Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)

13.

Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H₂S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.

Proposed Closure: 19.15.17.13 NMAC**Instructions:** Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

- Type: Drilling Workover Emergency Cavitation P&A Permanent Pit Below-grade Tank Closed-loop System
 Alternative
- Proposed Closure Method: Waste Excavation and Removal
 Waste Removal (Closed-loop systems only)
 On-site Closure Method (Only for temporary pits and closed-loop systems)
 In-place Burial On-site Trench Burial
 Alternative Closure Method (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.

Waste Excavation and Removal Closure Plan Checklist: (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)
- Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16. **Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)
Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.

Disposal Facility Name: _____ Disposal Facility Permit Number: _____
 Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
 Yes (If yes, please provide the information below) No

Required for impacted areas which will not be used for future service and operations:

Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
 Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
 Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17. **Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 50 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 50 and 100 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is more than 100 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

18. **On-Site Closure Plan Checklist:** (19.15.17.13 NMAC) **Instructions:** Each of the following items must be attached to the closure plan. Please indicate, by a check mark in the box, that the documents are attached.

Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
 Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
 Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of 19.15.17.11 NMAC
 Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
 Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
 Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
 Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F of 19.15.17.13 NMAC
 Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
 Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
 Re-vegetation Plan - based upon the appropriate requirements of Subsection I of 19.15.17.13 NMAC
 Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
Operator Application Certification:
 I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.
 Name (Print): _____ Title: _____
 Signature: _____ Date: _____
 e-mail address: _____ Telephone: _____

20.
OCD Approval: Permit Application (including closure plan) Closure Plan (only) OCD Conditions (see attachment)
 OCD Representative Signature: CR Whitehead Approval Date: July 13, 2021
 Title: Environmental Specialist OCD Permit Number: BGT A

21.
Closure Report (required within 60 days of closure completion): Subsection K of 19.15.17.13 NMAC
Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.
 Closure Completion Date: 3/31/2021

22.
Closure Method:
 Waste Excavation and Removal On-Site Closure Method Alternative Closure Method Waste Removal (Closed-loop systems only)
 If different from approved plan, please explain.

23.
Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:
Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.
 Disposal Facility Name: _____ Disposal Facility Permit Number: _____
 Disposal Facility Name: _____ Disposal Facility Permit Number: _____
 Were the closed-loop system operations and associated activities performed on or in areas that will not be used for future service and operations?
 Yes (If yes, please demonstrate compliance to the items below) No
Required for impacted areas which will not be used for future service and operations:
 Site Reclamation (Photo Documentation)
 Soil Backfilling and Cover Installation
 Re-vegetation Application Rates and Seeding Technique

24.
Closure Report Attachment Checklist: *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*
 Proof of Closure Notice (surface owner and division)
 Proof of Deed Notice (required for on-site closure)
 Plot Plan (for on-site closures and temporary pits)
 Confirmation Sampling Analytical Results (if applicable)
 Waste Material Sampling Analytical Results (required for on-site closure)
 Disposal Facility Name and Permit Number
 Soil Backfilling and Cover Installation
 Re-vegetation Application Rates and Seeding Technique
 Site Reclamation (Photo Documentation)
 On-site Closure Location: Latitude 36.755444° Longitude -107.737401° NAD: 1927 1983

25.
Operator Closure Certification:
 I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.
 Name (Print): Steve Moskal Title: Environmental Coordinator
 Signature: _____ Date: 4/2/2021
 e-mail address: smoskal@ikavenergy.com Telephone: (505) 330-9179

22.

Operator Closure Certification:

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

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

Steven Moskal

From: Patricia Campbell
Sent: Wednesday, March 3, 2021 1:40 PM
To: OCD.Enviro@state.nm.us
Cc: CORY.SMITH@STATE.NM.US; Steven Moskal; Don Buller; Sabre Beebe
Subject: SIMCOE LLC - Florance 125 Below Grade Tank (BGT) Closure

Follow Up Flag: Flag for follow up
Flag Status: Flagged

SENT VIA E-MAIL

March 3, 2021

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

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

Florance 125
API 30-045-24831
(E) Section 01 – T29N – R09W
San Juan County, New Mexico

To Whom It May Concern:

With regards to the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is notification that SIMCOE LLC is planning to close a 21 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around March 8, 2021 at 8:30 AM.

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

Sincerely,

Patti Campbell
Regulatory Analyst



Office: (970) 462-7948
Mobile Phone: (970) 749-8560
Email: pcampbell@ikavenergy.com

www.simcoe-energy.com
www.ikav.com

1199 Main Ave., Suite 101
Durango, Colorado 81301

Confidentiality notice:

This e-mail communication (and any attachment/s) is confidential and is intended only for the individual(s) or entity named above and to others who have been specifically authorized to receive it. Any information in this email and attachments may be legally privileged, may be subject to professional confidentiality, other privilege, or may otherwise be protected by work product immunity or other legal rules. If you are not the intended recipient, any disclosure, copying, reading, distribution, or any action taken or omitted in reliance on it, is prohibited and may be unlawful. Any opinions or advice contained in this email are subject to confidentiality and any terms and conditions may be protected. Please notify the sender that you have received this e-mail in error by calling the phone number above or by e-mail, and then delete the e-mail (including any attachment/s). Thank you.



SIMCOE LLC
1199 Main Ave., Suite 101
Durango, CO 81303
Phone: (970) 462-7948

March 3, 2021

Bureau of Land Management
Ryan Joyner
6251 College, Suite A
Farmington, NM 87402

VIA EMAIL

Re: Notification of plans to close/remove a below grade tank
Well Name: Florance 125
API# - 3004524831

Dear Ryan,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. SIMCOE LLC (SIMCOE) is required to notify the surface owner of SIMCOE's plans to close/remove a below grade tank. SIMCOE wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. SIMCOE plans to commence this work on or about March 8, 2021 at 8:30 a.m. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, SIMCOE will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required, please contact Steve Moskal for a specific time (505) 330-9179.

Sincerely,

Patti Campbell

Patti Campbell
IKAV Energy Inc.
SIMCOE LLC
Regulatory Analyst

SIMCOE LLC
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

Florance 125- Tank ID: A

API #: 3004524831

Unit Letter E, Section 1, T29N, R09W

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

General Closure Plan

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

Notice is attached.

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

Notice was provided and documented in the attached email.

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

- a. SIMCOE Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
- b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
- c. Basin Disposal, Permit NM-01-0005 (Liquids)
- d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- e. SIMCOE Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
- f. SIMCOE Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
- g. SIMCOE Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- h. SIMCOE Operated GCU 306 SWD, API 30-045-24286 (Liquids)
- i. SIMCOE Operated GCU 307 SWD, API 30-045-24248 (Liquids)
- j. SIMCOE Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- k. SIMCOE Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

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

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

The BGT was transported for recycling.

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

All equipment associated with the BGT has been removed.

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

Constituents	Testing Method	Release Verification (mg/Kg)	Composite Results
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.024
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.094
TPH	US EPA Method SW-846 418.1	100	<44
Chlorides	US EPA Method 300.0 or 4500B	250 or background	110

Notes: mg/Kg = milligram per kilogram, pcs = point composite sample, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.

Soils beneath the BGT were sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are attached.

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

Form C-141 is attached.

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

Sampling results reveal no evidence of a release had occurred.

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then SIMCOE shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area.

Sampling results reveal no evidence of a release had occurred. BGT area has been backfilled with clean, earthen material.

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

BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.
12. SIMCOE shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.
13. SIMCOE shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
SIMCOE will notify NMOCD when re-vegetation is successfully completed.
15. Within 60 days of closure completion, SIMCOE shall submit a closure report on NMOCD's form C-144, and will include the following;
 - a. proof of closure notification (surface owner and NMOCD)
 - b. sampling analytical reports; information required by 19.15.17 NMAC;
 - c. disposal facility name and permit number
 - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
 - e. site reclamation, photo documentation.**Closure report on Form C-144 form is included & contains a photo of the current reclamation requirements completed.**
16. SIMCOE shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.
17. **Certification section of Form C-144 has been completed.**

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

State of New Mexico
Energy Minerals and Natural
Resources Department

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party SIMCOE LLC	OGRID 329736
Contact Name Steve Moskal	Contact Telephone (505) 330-9179
Contact email smoskal@ikavenergy.com	Incident # <i>(assigned by OCD)</i>
Contact mailing address 1199 Main Ave., Suite 101, Durango, CO 81301	

Location of Release Source

Latitude 36.755444° Longitude -107.737401°
(NAD 83 in decimal degrees to 5 decimal places)

Site Name FLORANCE #125	Site Type Natural Gas Well
Date Release Discovered	API# <i>(if applicable)</i> 3004524831

Unit Letter	Section	Township	Range	County
E	01	29N	09W	San Juan

Surface Owner: State Federal Tribal Private (Name: _____)

Nature and Volume of Release

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

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
<input type="checkbox"/> Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release **TPH, BTEX, & chloride all below below-grade tank (BGT) permit closure standards. No evidence of a release had occurred.**

State of New Mexico
Oil Conservation Division

Page 2

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release?
---	--

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

Not required.

Initial Response

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

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.
--

If all the actions described above have not been undertaken, explain why:

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

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.

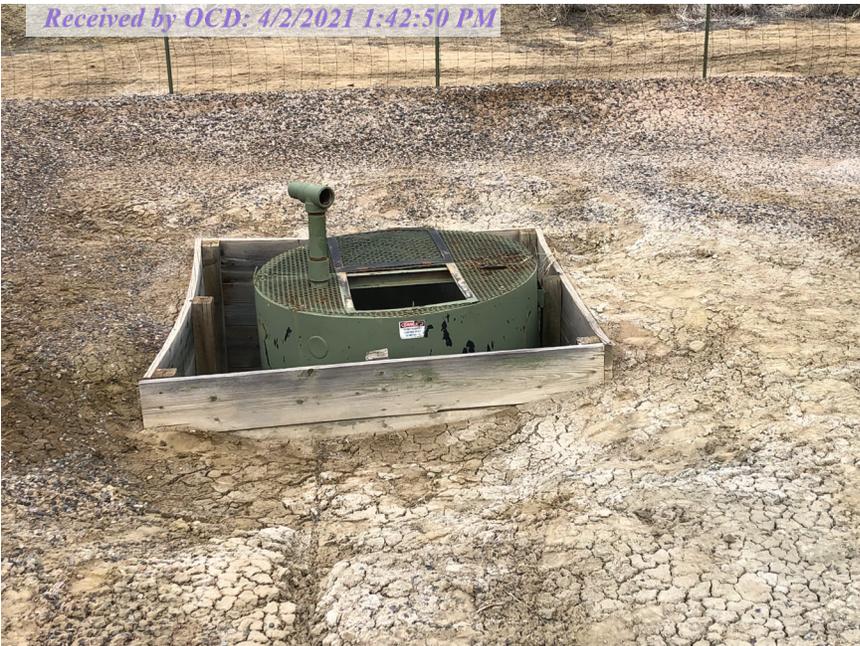
Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: smoskal@ikavenergy.com Telephone: (505) 330-9179

OCD Only

Received by: _____ Date: _____



21 bbl tank prior to removal.

Composite sampling locations of tank base



Area of 21 bbl tank backfilled



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

March 25, 2021

Steve Moskal
SIMCOE
1100 Main St.
Durango, CO 81301
TEL: (505) 330-9179
FAX:

RE: Florance 125 21 BBL

OrderNo.: 2103421

Dear Steve Moskal:

Hall Environmental Analysis Laboratory received 2 sample(s) on 3/9/2021 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Freeman", is written over a light blue horizontal line.

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

Analytical Report

Lab Order **2103421**

Date Reported: **3/25/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE

Client Sample ID: TB-Grab-E-@8'

Project: Florance 125 21 BBL

Collection Date: 3/8/2021 8:48:00 AM

Lab ID: 2103421-001

Matrix: SOIL

Received Date: 3/9/2021 7:51:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: VP
Chloride	110	60		mg/Kg	20	3/19/2021 3:18:04 PM	58846
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: mb
Diesel Range Organics (DRO)	ND	8.9		mg/Kg	1	3/11/2021 12:42:31 PM	58633
Motor Oil Range Organics (MRO)	ND	44		mg/Kg	1	3/11/2021 12:42:31 PM	58633
Surr: DNOP	115	70-130		%Rec	1	3/11/2021 12:42:31 PM	58633
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	3/10/2021 4:53:45 PM	58615
Surr: BFB	110	75.3-105	S	%Rec	1	3/10/2021 4:53:45 PM	58615
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.024		mg/Kg	1	3/10/2021 4:53:45 PM	58615
Toluene	ND	0.047		mg/Kg	1	3/10/2021 4:53:45 PM	58615
Ethylbenzene	ND	0.047		mg/Kg	1	3/10/2021 4:53:45 PM	58615
Xylenes, Total	ND	0.094		mg/Kg	1	3/10/2021 4:53:45 PM	58615
Surr: 4-Bromofluorobenzene	98.0	80-120		%Rec	1	3/10/2021 4:53:45 PM	58615

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	PQL Practical Quantitative Limit	RL Reporting Limit
	S % Recovery outside of range due to dilution or matrix	

Analytical Report

Lab Order **2103421**

Date Reported: **3/25/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE

Client Sample ID: 5PC-TB@8'

Project: Florance 125 21 BBL

Collection Date: 3/8/2021 8:52:00 AM

Lab ID: 2103421-002

Matrix: SOIL

Received Date: 3/9/2021 7:51:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed	Batch
EPA METHOD 300.0: ANIONS							Analyst: VP
Chloride	ND	60		mg/Kg	20	3/23/2021 12:57:49 PM	58901
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS							Analyst: mb
Diesel Range Organics (DRO)	12	9.4		mg/Kg	1	3/11/2021 1:01:55 PM	58633
Motor Oil Range Organics (MRO)	ND	47		mg/Kg	1	3/11/2021 1:01:55 PM	58633
Surr: DNOP	93.7	70-130		%Rec	1	3/11/2021 1:01:55 PM	58633
EPA METHOD 8015D: GASOLINE RANGE							Analyst: NSB
Gasoline Range Organics (GRO)	ND	4.7		mg/Kg	1	3/10/2021 5:17:25 PM	58615
Surr: BFB	107	75.3-105	S	%Rec	1	3/10/2021 5:17:25 PM	58615
EPA METHOD 8021B: VOLATILES							Analyst: NSB
Benzene	ND	0.023		mg/Kg	1	3/10/2021 5:17:25 PM	58615
Toluene	ND	0.047		mg/Kg	1	3/10/2021 5:17:25 PM	58615
Ethylbenzene	ND	0.047		mg/Kg	1	3/10/2021 5:17:25 PM	58615
Xylenes, Total	ND	0.094		mg/Kg	1	3/10/2021 5:17:25 PM	58615
Surr: 4-Bromofluorobenzene	98.6	80-120		%Rec	1	3/10/2021 5:17:25 PM	58615

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

Qualifiers:	* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
	D Sample Diluted Due to Matrix	E Value above quantitation range
	H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
	ND Not Detected at the Reporting Limit	P Sample pH Not In Range
	PQL Practical Quantitative Limit	RL Reporting Limit
	S % Recovery outside of range due to dilution or matrix	

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 2103421

25-Mar-21

Client: SIMCOE
Project: Florance 125 21 BBL

Sample ID: MB-58846	SampType: MBLK	TestCode: EPA Method 300.0: Anions								
Client ID: PBS	Batch ID: 58846	RunNo: 76062								
Prep Date: 3/19/2021	Analysis Date: 3/19/2021	SeqNo: 2693169	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: LCS-58846	SampType: LCS	TestCode: EPA Method 300.0: Anions								
Client ID: LCSS	Batch ID: 58846	RunNo: 76062								
Prep Date: 3/19/2021	Analysis Date: 3/19/2021	SeqNo: 2693170	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	95.9	90	110			

Sample ID: MB-58901	SampType: MBLK	TestCode: EPA Method 300.0: Anions								
Client ID: PBS	Batch ID: 58901	RunNo: 76140								
Prep Date: 3/23/2021	Analysis Date: 3/23/2021	SeqNo: 2696564	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	ND	1.5								

Sample ID: LCS-58901	SampType: LCS	TestCode: EPA Method 300.0: Anions								
Client ID: LCSS	Batch ID: 58901	RunNo: 76140								
Prep Date: 3/23/2021	Analysis Date: 3/23/2021	SeqNo: 2696565	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	95.9	90	110			

Qualifiers:

* Value exceeds Maximum Contaminant Level.	B Analyte detected in the associated Method Blank
D Sample Diluted Due to Matrix	E Value above quantitation range
H Holding times for preparation or analysis exceeded	J Analyte detected below quantitation limits
ND Not Detected at the Reporting Limit	P Sample pH Not In Range
PQL Practical Quantitative Limit	RL Reporting Limit
S % Recovery outside of range due to dilution or matrix	

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2103421

25-Mar-21

Client: SIMCOE
Project: Florance 125 21 BBL

Sample ID: MB-58633	SampType: MBLK	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: PBS	Batch ID: 58633	RunNo: 75879								
Prep Date: 3/10/2021	Analysis Date: 3/11/2021	SeqNo: 2684700	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	ND	10								
Motor Oil Range Organics (MRO)	ND	50								
Surr: DNOP	10		10.00		104	70	130			

Sample ID: LCS-58633	SampType: LCS	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: LCSS	Batch ID: 58633	RunNo: 75879								
Prep Date: 3/10/2021	Analysis Date: 3/11/2021	SeqNo: 2684702	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	48	10	50.00	0	96.0	68.9	141			
Surr: DNOP	5.3		5.000		107	70	130			

Sample ID: 2103420-001AMS	SampType: MS	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: BatchQC	Batch ID: 58633	RunNo: 75879								
Prep Date: 3/10/2021	Analysis Date: 3/11/2021	SeqNo: 2684705	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	55	18	46.08	31.11	51.7	15	184			
Surr: DNOP	4.9		4.608		107	70	130			

Sample ID: 2103420-001AMSD	SampType: MSD	TestCode: EPA Method 8015M/D: Diesel Range Organics								
Client ID: BatchQC	Batch ID: 58633	RunNo: 75879								
Prep Date: 3/10/2021	Analysis Date: 3/11/2021	SeqNo: 2684707	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	52	19	47.80	31.11	44.3	15	184	1.93	23.9	
Surr: DNOP	5.0		4.780		105	70	130	0	0	

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: 2103421

25-Mar-21

Client: SIMCOE
Project: Florance 125 21 BBL

Sample ID: mb-58615	SampType: MBLK	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: PBS	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683597	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	ND	5.0								
Surr: BFB	1000		1000		104	75.3	105			

Sample ID: lcs-58615	SampType: LCS	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: LCSS	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683598	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	28	5.0	25.00	0	113	80	120			
Surr: BFB	1200		1000		118	75.3	105			S

Sample ID: 2103420-001ams	SampType: MS	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: BatchQC	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683603	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	32	5.0	24.98	0	129	61.3	114			S
Surr: BFB	1200		999.0		122	75.3	105			S

Sample ID: 2103420-001amsd	SampType: MSD	TestCode: EPA Method 8015D: Gasoline Range								
Client ID: BatchQC	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683604	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	32	4.8	23.97	0	133	61.3	114	0.899	20	S
Surr: BFB	1100		958.8		120	75.3	105	0	0	S

Qualifiers:

- * Value exceeds Maximum Contaminant Level.
- D Sample Diluted Due to Matrix
- H Holding times for preparation or analysis exceeded
- ND Not Detected at the Reporting Limit
- PQL Practical Quantitative Limit
- S % Recovery outside of range due to dilution or matrix
- B Analyte detected in the associated Method Blank
- E Value above quantitation range
- J Analyte detected below quantitation limits
- P Sample pH Not In Range
- RL Reporting Limit

QC SUMMARY REPORT**Hall Environmental Analysis Laboratory, Inc.**

WO#: 2103421

25-Mar-21

Client: SIMCOE
Project: Florance 125 21 BBL

Sample ID: mb-58615	SampType: MBLK	TestCode: EPA Method 8021B: Volatiles								
Client ID: PBS	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683621	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	ND	0.025								
Toluene	ND	0.050								
Ethylbenzene	ND	0.050								
Xylenes, Total	ND	0.10								
Surr: 4-Bromofluorobenzene	0.97		1.000		97.2	80	120			

Sample ID: LCS-58615	SampType: LCS	TestCode: EPA Method 8021B: Volatiles								
Client ID: LCSS	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683622	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.89	0.025	1.000	0	89.5	80	120			
Toluene	0.92	0.050	1.000	0	91.9	80	120			
Ethylbenzene	0.91	0.050	1.000	0	91.2	80	120			
Xylenes, Total	2.7	0.10	3.000	0	90.8	80	120			
Surr: 4-Bromofluorobenzene	1.0		1.000		101	80	120			

Sample ID: 2103420-002ams	SampType: MS	TestCode: EPA Method 8021B: Volatiles								
Client ID: BatchQC	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683625	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.93	0.024	0.9606	0	97.0	76.3	120			
Toluene	0.97	0.048	0.9606	0	101	78.5	120			
Ethylbenzene	0.98	0.048	0.9606	0	102	78.1	124			
Xylenes, Total	2.9	0.096	2.882	0	101	79.3	125			
Surr: 4-Bromofluorobenzene	0.97		0.9606		101	80	120			

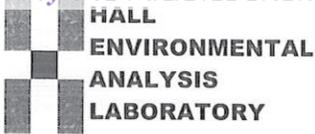
Sample ID: 2103420-002amsd	SampType: MSD	TestCode: EPA Method 8021B: Volatiles								
Client ID: BatchQC	Batch ID: 58615	RunNo: 75824								
Prep Date: 3/9/2021	Analysis Date: 3/10/2021	SeqNo: 2683626	Units: mg/Kg							
Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.90	0.024	0.9625	0	93.8	76.3	120	3.09	20	
Toluene	0.95	0.048	0.9625	0	98.3	78.5	120	2.29	20	
Ethylbenzene	0.97	0.048	0.9625	0	100	78.1	124	1.02	20	
Xylenes, Total	2.9	0.096	2.887	0	99.3	79.3	125	1.88	20	
Surr: 4-Bromofluorobenzene	0.98		0.9625		102	80	120	0	0	

Qualifiers:

* Value exceeds Maximum Contaminant Level.
D Sample Diluted Due to Matrix
H Holding times for preparation or analysis exceeded
ND Not Detected at the Reporting Limit
PQL Practical Quantitative Limit
S % Recovery outside of range due to dilution or matrix

B Analyte detected in the associated Method Blank
E Value above quantitation range
J Analyte detected below quantitation limits
P Sample pH Not In Range
RL Reporting Limit

Page 6 of 6



Hall Environmental Analysis Laboratory
4901 Hawkins NE
Albuquerque, NM 87109
TEL: 505-345-3975 FAX: 505-345-4107
Website: clients.hallenvironmental.com

Sample Log-In Check List

Client Name: SIMCOE

Work Order Number: 2103421

RcptNo: 1

Received By: Cheyenne Cason 3/9/2021 7:51:00 AM

Completed By: Cheyenne Cason 3/9/2021 8:01:50 AM

Reviewed By: SCC 3/9/21

Chain of Custody

- 1. Is Chain of Custody complete? Yes [checked] No [] Not Present []
2. How was the sample delivered? Courier

Log In

- 3. Was an attempt made to cool the samples? Yes [checked] No [] NA []
4. Were all samples received at a temperature of >0° C to 6.0° C? Yes [checked] No [] NA []
5. Sample(s) in proper container(s)? Yes [checked] No []
6. Sufficient sample volume for indicated test(s)? Yes [checked] No []
7. Are samples (except VOA and ONG) properly preserved? Yes [checked] No []
8. Was preservative added to bottles? Yes [] No [checked] NA []
9. Received at least 1 vial with headspace <1/4" for AQ VOA? Yes [] No [] NA [checked]
10. Were any sample containers received broken? Yes [] No [checked]
11. Does paperwork match bottle labels? Yes [checked] No []
12. Are matrices correctly identified on Chain of Custody? Yes [checked] No []
13. Is it clear what analyses were requested? Yes [checked] No []
14. Were all holding times able to be met? Yes [checked] No []

of preserved bottles checked for pH: 3/9/21 (<2 or >12 unless noted) Adjusted? Checked by:

Special Handling (if applicable)

- 15. Was client notified of all discrepancies with this order? Yes [] No [] NA [checked]

Person Notified: Date: By Whom: Via: [] eMail [] Phone [] Fax [] In Person Regarding: Client Instructions:

16. Additional remarks:

17. Cooler Information

Table with 7 columns: Cooler No, Temp °C, Condition, Seal Intact, Seal No, Seal Date, Signed By. Row 1: 1, 1.5, Good, [], [], []

District I
 1625 N. French Dr., Hobbs, NM 88240
 Phone:(575) 393-6161 Fax:(575) 393-0720

District II
 811 S. First St., Artesia, NM 88210
 Phone:(575) 748-1283 Fax:(575) 748-9720

District III
 1000 Rio Brazos Rd., Aztec, NM 87410
 Phone:(505) 334-6178 Fax:(505) 334-6170

District IV
 1220 S. St Francis Dr., Santa Fe, NM 87505
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS
 Action 22690

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 22690
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	7/13/2021