

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  
 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 contract operated by BP America Production Co. OGRID #: 329736  
Address: 1199 Main Ave., Suite 101, Durango, CO 81301  
Facility or well name: HARDIE LS 011  
APPNumber: 3004521086 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr C Section 25.0 Township 29.0N Range 08W County: San Juan County  
Center of Proposed Design: Latitude 36.70117 Longitude -107.63201 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: 95.0 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 SINGLE WALLED DOUBLE BOTTOMED  
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.<br>- 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).<br>- 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> )<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><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> )<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><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.<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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 H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

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.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells   | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><input type="checkbox"/> NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells  | <input type="checkbox"/> Yes <input type="checkbox"/> No<br><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).<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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.<br>- 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)  
 Report  
**OCD Representative Signature:** Victoria Venegas **Approval Date:** 11/25/2021  
**Title:** Environmental Specialist **OCD Permit Number:** \_\_\_\_\_

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: 08/06/2020

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 36.70117 Longitude -107.63201 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:  Steven Moskal 2020.09.28 14:14:53 -06'00' Date: 9/28/2020  
 e-mail address: Steve.Moskal@bpx.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: \_\_\_\_\_

**SIMCOE LLC**  
*(BP as contractor)*  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

**Hardie LS # 11 – Tank ID: A**  
**API #: 3004521086**  
**Unit Letter C, Section 25, T29N, R08W**

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on SIMCOE LLC (BP as contractor) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP 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. BP 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 BPX's NMOCD approved BGT design attached to the BP Design and Construction Plan. BP 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 BP's NMOCD approved BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP 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. BP 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. BP 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. BP 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. BP 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. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
  - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
  - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
  - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
  - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
  - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
  - k. BP 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. BP 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. BP 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. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP 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) | 5pcs @ 7' Results (mg/Kg) | Grab @ 6' Results (mg/Kg) | 3pcs @ 7' Results (mg/Kg) |
|--------------|-------------------------------------|------------------------------|---------------------------|---------------------------|---------------------------|
| Benzene      | US EPA Method SW-846 8021B or 8260B | 0.2                          | <0.019                    | <0.11                     | <0.018                    |
| Total BTEX   | US EPA Method SW-846 8021B or 8260B | 50                           | <0.077                    | 1.8                       | <0.072                    |
| TPH          | US EPA Method SW-846 418.1          | 100                          | <46                       | 94,075                    | <49                       |
| Chlorides    | US EPA Method 300.0 or 4500B        | 250 or background            | <60                       | <60                       | <60                       |

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. Benzene, BTEX, TPH, & chloride test parameters were below the stated limits. TPH exceeded verification threshold from grab sample, but was achieved with composite sample beneath impacted area. Field and laboratory reports are attached.**

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

**C-141 is attached.**

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

**Sampling results revealed 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 BP 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 revealed evidence of a release had occurred. BGT area has been backfilled with clean, earthen material after remedial activity has been completed.**

10. BP 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. BP 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. BP 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. BP 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, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.  
**BP will notify NMOCD when re-vegetation is successfully completed.**
15. Within 60 days of closure completion, BP 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 C-144 form is included & contains a photo of the current reclamation requirements completed.**
16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.  
**Certification section of C-144 has been completed.**

**From:** Patti Campbell  
**Sent:** Tuesday, July 28, 2020 4:03 PM  
**To:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>  
**Cc:** Steven Moskal, Don Buller, jeffcblagg@aol.com , blagg\_njv@yahoo.com, Erin Dunman, Kyle Siesser <ksiesser@cottonwoodconsulting.com>  
**Subject:** BGT Closure Notification - Hardie LS 011

SENT VIA E-MAIL TO: [CORY.SMITH@STATE.NM.US](mailto:CORY.SMITH@STATE.NM.US)

July 27, 2020

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

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

Hardie LS 011  
API 30-045-21086  
(C) Section 25 – T29N – R08W  
San Juan County, New Mexico

Dear Mr. Cory Smith,

In regards to the captioned subject and requirements of the NMOCDD pit rule, this letter is notification that SIMCOE LLC is planning to close a 95 bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around August 4, 2020.

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

Sincerely,

[Patti Campbell](#) | Regulatory Analyst  
BP America Production Company | BPX Energy Inc.  
(970) 712-5997  
[patti.campbell@bpx.com](mailto:patti.campbell@bpx.com)



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**RE: BGT Closure Notification - Hardie LS 011**

**From:** Patti Campbell  
**To:** Smith, Cory, EMNRD  
**Cc:** Steven Moskal, Don Buller, jeffcblagg@aol.com, Nelson Velez, Erin Dunman, Kyle Siesser  
**Sent:** Tuesday, July 28, 2020 at 4:05 PM

Corrected API Number.

[Patti Campbell](#) | Regulatory Analyst  
BP America Production Company | BPX Energy Inc.  
(970) 712-5997  
[patti.campbell@bpx.com](mailto:patti.campbell@bpx.com)



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BP America Production Company  
1199 Main Ave., Suite 101

July 28, 2020

Bureau of Land Management  
Abiodun Adeloje  
6251 College, Suite A  
Farmington, NM 87402

**VIA EMAIL**

Re: Notification of plans to close/remove a below grade tank  
Well Name: Hardie LS 011  
API# - 3004521086

Dear Mr. Adeloje,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. SIMCOE LLC (BP as contract operator) is required to notify the surface owner of SIMCOE LLC's plans to close/remove a below grade tank. SIMCOE LLC wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. SIMCOE LLC, BP as contractor, plans to commence this work on or about August 4, 2020. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, SIMCOE LLC 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  
BPX – San Juan  
Regulatory Analyst

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 <b>SIMCOE LLC</b> (BP as contractor)                      | OGRID <b>329736</b>                     | <b>Final Report</b> |
| Contact Name <b>Steve Moskal</b>  | Contact Telephone <b>(505) 330-9179</b> |                     |
| Contact email <b>Steven.Moskal@bpx.com</b>                                  | Incident # (assigned by OCD)            |                     |
| Contact mailing address <b>1199 Main Ave., Suite 101, Durango, CO 81301</b> |   |                     |

### Location of Release Source

Latitude 36.70117 Longitude -107.63201  
*(NAD 83 in decimal degrees to 5 decimal places)*

|                                |  |
|--------------------------------|--|
| Site Name <b>Hardie LS 011</b> | Site Type <b>Natural Gas Well</b>      |
| Date Release Discovered        | API# (if applicable) <b>3004521086</b> |

| Unit Letter | Section   | Township   | Range      | County          |
|-------------|-----------|------------|------------|-----------------|
| <b>C</b>    | <b>25</b> | <b>29N</b> | <b>08W</b> | <b>San Juan</b> |

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 checked="" type="checkbox"/> Crude Oil | Volume Released (bbls) <b>Unknown</b>  | Volume Recovered (bbls) <b>None</b>                      |
| <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 for 5 point composite sample collected beneath BGT.**

**Evidence of a release observed and most likely resulted from overflow event of BGT. Minor staining area at northern quadrant of BGT was sampled and removed via excavation.**

**All remedial documentation is attached.**

State of New Mexico  
 Oil Conservation Division

|                |  |
|----------------|--|
| Incident ID    |  |
| District RP    |  |
| Facility ID    |  |
| Application ID |  |

|  |  |
|--|--|
| Was this a major release as defined by 19.15.29.7(A) NMAC?<br><br><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)?<br><br><b>Not required.</b> |  |

### Initial Response

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

|  |
|--|
| <input type="checkbox"/> The source of the release has been stopped.<br><input type="checkbox"/> The impacted area has been secured to protect human health and the environment.<br><input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.<br><input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.   |
| If all the actions described above have <u>not</u> been undertaken, explain why:<br><br><br>   |
| Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.  |
| I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. |
| Printed Name: <u>Steve Moskal</u> Title: <u>Environmental Coordinator</u><br>Signature: _____ Date: _____<br>email: <u>Steve.Moskal@bpx.com</u> Telephone: <u>(505) 330-9179</u>   |
| <b><u>OCD Only</u></b><br>Received by: _____ Date: _____   |

|   |   |  |         |  |          |   |  |  |  |  |
|---|---|--|---------|--|----------|---|--|--|--|--|
| CLIENT: <b>SIMCOE</b>   | <b>BLAGG ENGINEERING, INC.</b><br><b>P.O. BOX 87, BLOOMFIELD, NM 87413</b><br><b>(505) 632-1199</b>     | APP #: <b>3004521086</b><br>TANK ID (if applicable): <b>A</b>  |         |  |          |   |  |  |  |  |
| <b>FIELD REPORT:</b> (circle one): <input checked="" type="checkbox"/> <b>BGT CONFIRMATION</b> / <input type="checkbox"/> RELEASE INVESTIGATION / <input type="checkbox"/> OTHER:   |   | PAGE #: <b>1</b> of <b>1</b>   |         |  |          |   |  |  |  |  |
| <b>SITE INFORMATION:</b> SITE NAME: <b>HARDIE LS # 11</b><br>QUAD/UNIT: <b>C</b> SEC: <b>25</b> TWP: <b>29N</b> RING: <b>8W</b> PM: <b>NM</b> CNTY: <b>SJ</b> ST: <b>NM</b><br>1/4 -1/4 FOOTAGE: <b>970'N / 1,500'W</b> <b>NE/NW</b> LEASE TYPE: <input checked="" type="checkbox"/> <b>FEDERAL</b> / STATE / FEE / INDIAN<br>LEASE #: <b>SF078416A</b> PROD. FORMATION: <b>PC</b> CONTRACTOR: <b>KELLEY O.F.S. BPX - D. BULLER</b>   |   | DATE STARTED: <b>08/04/20</b><br>DATE FINISHED: _____<br>ENVIRONMENTAL SPECIALIST(S): <b>JCB</b>   |         |  |          |   |  |  |  |  |
| <b>REFERENCE POINT:</b> WELL HEAD (W.H.) GPS COORD.: <b>36.70121 X 107.63190</b> GL ELEV.: <b>6,379'</b><br>1) <b>95 BGT (SW/DB)</b> GPS COORD.: <b>36.70117 X 107.63201</b> DISTANCE/BEARING FROM W.H.: <b>29', S51W</b><br>2) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____<br>3) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____<br>4) _____ GPS COORD.: _____ DISTANCE/BEARING FROM W.H.: _____   |   |  |         |  |          |   |  |  |  |  |
| <b>SAMPLING DATA:</b> CHAIN OF CUSTODY RECORD(S) # OR LAB USED: <b>HALL</b>   |   | OVM READING (ppm)  |         |  |          |   |  |  |  |  |
| 1) SAMPLE ID: <b>95 BGT 5-pt @ 7'</b> SAMPLE DATE: <b>08/04/20</b> SAMPLE TIME: <b>1101</b> LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b><br>2) SAMPLE ID: <b>GRAB @ 6'</b> SAMPLE DATE: <b>08/04/20</b> SAMPLE TIME: <b>1103</b> LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b><br>3) SAMPLE ID: <b>3-pt @ 7'</b> SAMPLE DATE: <b>08/04/20</b> SAMPLE TIME: <b>1120</b> LAB ANALYSIS: <b>8015B/8021B/300.0 (CI)</b><br>4) SAMPLE ID: _____ SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____<br>5) SAMPLE ID: _____ SAMPLE DATE: _____ SAMPLE TIME: _____ LAB ANALYSIS: _____   |   | <b>29.7</b><br><b>143</b><br><b>2.3</b>  |         |  |          |   |  |  |  |  |
| <b>SOIL DESCRIPTION:</b> SOIL TYPE: SAND <input checked="" type="checkbox"/> <b>SILTY SAND</b> / <input checked="" type="checkbox"/> <b>SILT</b> / SILTY CLAY / CLAY / GRAVEL / OTHER _____<br>SOIL COLOR: <b>DARK YELLOWISH BROWN</b> PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC<br>COHESION (ALL OTHERS): <input checked="" type="checkbox"/> <b>NON COHESIVE</b> / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD<br>CONSISTENCY (NON COHESIVE SOILS): <input checked="" type="checkbox"/> <b>LOOSE</b> / <input checked="" type="checkbox"/> <b>FIRM</b> / DENSE / VERY DENSE HC ODOR DETECTED: <input checked="" type="checkbox"/> <b>YES</b> / NO EXPLANATION - <b>DISCOLORED SOILS ONLY</b><br>MOISTURE: DRY / <input checked="" type="checkbox"/> <b>SLIGHTLY MOIST</b> / MOIST / WET / SATURATED / SUPER SATURATED<br>SAMPLE TYPE: <input checked="" type="checkbox"/> <b>GRAB</b> / <input type="checkbox"/> <b>COMPOSITE</b> # OF PTS. <b>5</b> ANY AREAS DISPLAYING WETNESS: YES <input type="checkbox"/> <b>NO</b> EXPLANATION - _____<br>DISCOLORATION/STAINING OBSERVED: <input checked="" type="checkbox"/> <b>YES</b> / NO EXPLANATION - <b>BLACK TO DARK GRAY @ NORTH QUADRANT AREA.</b> |   |  |         |  |          |   |  |  |  |  |
| <b>SITE OBSERVATIONS:</b> LOST INTEGRITY OF EQUIPMENT: YES <input type="checkbox"/> <b>NO</b> EXPLANATION - _____<br>APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: <input checked="" type="checkbox"/> <b>YES</b> / NO EXPLANATION: <b>APPEARED TO BE FROM BGT OVERFLOW</b><br>EQUIPMENT SET OVER RECLAIMED AREA: YES <input type="checkbox"/> <b>NO</b> EXPLANATION - _____<br>OTHER: <b>NMOC D &amp; / OR BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING. MINOR QUANTITY OF IMPACTED SOILS EXCAVATED AFTER INITIAL BGT BASE SAMPLE COLLECTED. IMPACT INTERVAL APPROXIMATELY 1 FT. IN OVERALL THICKNESS. Compliance #: cJK2013456222</b><br>EXCAVATION DIMENSION ESTIMATION: <b>12</b> ft. X <b>2</b> ft. X <b>1</b> ft. EXCAVATION ESTIMATION (Cubic Yards): <b>1-3 ±</b><br>DEPTH TO GROUNDWATER: <b>&gt;100'</b> NEAREST WATER SOURCE: <b>&gt;1,000'</b> NEAREST SURFACE WATER: <b>300' &lt; X &lt; 1,000'</b> NMOC D TPH CLOSURE STD: <b>2,500</b> ppm  |   |  |         |  |          |   |  |  |  |  |
| <b>SITE SKETCH</b>  |   | BGT Located : off <input checked="" type="checkbox"/> <b>on</b> site      PLOT PLAN circle: <b>attached</b><br>OVM CALIB. READ. = <b>100.1</b> ppm      RF=1.00<br>OVM CALIB. GAS = <b>100</b> ppm<br>TIME: <b>9:20</b> am/pm      DATE: <b>08/04/20</b>   |         |  |          |   |  |  |  |  |
|   |   | <b>MISCELL. NOTES</b><br>PO: <b>4301191982</b><br>AFE #:<br>SIO #:<br>GL #:<br>Permit date(s): <b>06/14/10</b><br>OCD Appr. date(s): <b>03/10/17</b><br><table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:5%;">Tank ID</td> <td>OVM = Organic Vapor Meter<br/>ppm = parts per million</td> </tr> <tr> <td><b>A</b></td> <td>BGT Sidewalls Visible: <input checked="" type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b></td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b></td> </tr> <tr> <td></td> <td>BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b></td> </tr> </table> Magnetic declination: <b>10° E</b> | Tank ID | OVM = Organic Vapor Meter<br>ppm = parts per million | <b>A</b> | BGT Sidewalls Visible: <input checked="" type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b> |  | BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b> |  | BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b> |
| Tank ID   | OVM = Organic Vapor Meter<br>ppm = parts per million  |  |         |  |          |   |  |  |  |  |
| <b>A</b>  | BGT Sidewalls Visible: <input checked="" type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b> |  |         |  |          |   |  |  |  |  |
|   | BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b>            |  |         |  |          |   |  |  |  |  |
|   | BGT Sidewalls Visible: <input type="checkbox"/> <b>Y</b> / <input type="checkbox"/> <b>N</b>            |  |         |  |          |   |  |  |  |  |
| NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGT = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.  |   |  |         |  |          |   |  |  |  |  |
| NOTES: <b>GOOGLE EARTH IMAGERY DATE: 10/5/2016</b> ONSITE: <b>08/04/20</b>  |   |  |         |  |          |   |  |  |  |  |

**Analytical Report**

Lab Order **2008125**

Date Reported: **8/6/2020**

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

**Client Sample ID:** 95 BGT 5-Pt @ 7'

**Project:** Hardie LS 11

**Collection Date:** 8/4/2020 11:01:00 AM

**Lab ID:** 2008125-001

**Matrix:** SOIL

**Received Date:** 8/5/2020 7:45:00 AM

| Analyses   | Result | RL       | Qual | Units | DF | Date Analyzed        | Batch               |
|--|--------|----------|------|-------|----|----------------------|---------------------|
| <b>EPA METHOD 300.0: ANIONS</b>                  |        |          |      |       |    |                      | Analyst: <b>MRA</b> |
| Chloride   | ND     | 60       |      | mg/Kg | 20 | 8/5/2020 12:46:15 PM | 54179               |
| <b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b> |        |          |      |       |    |                      | Analyst: <b>CLP</b> |
| Diesel Range Organics (DRO)                      | ND     | 9.1      |      | mg/Kg | 1  | 8/5/2020 1:16:18 PM  | 54177               |
| Motor Oil Range Organics (MRO)                   | ND     | 46       |      | mg/Kg | 1  | 8/5/2020 1:16:18 PM  | 54177               |
| Surr: DNOP                                       | 97.1   | 30.4-154 |      | %Rec  | 1  | 8/5/2020 1:16:18 PM  | 54177               |
| <b>EPA METHOD 8015D: GASOLINE RANGE</b>          |        |          |      |       |    |                      | Analyst: <b>NSB</b> |
| Gasoline Range Organics (GRO)                    | ND     | 3.9      |      | mg/Kg | 1  | 8/5/2020 11:35:17 AM | 54156               |
| Surr: BFB  | 106    | 75.3-105 | S    | %Rec  | 1  | 8/5/2020 11:35:17 AM | 54156               |
| <b>EPA METHOD 8021B: VOLATILES</b>               |        |          |      |       |    |                      | Analyst: <b>NSB</b> |
| Benzene  | ND     | 0.019    |      | mg/Kg | 1  | 8/5/2020 11:35:17 AM | 54156               |
| Toluene  | ND     | 0.039    |      | mg/Kg | 1  | 8/5/2020 11:35:17 AM | 54156               |
| Ethylbenzene                                     | ND     | 0.039    |      | mg/Kg | 1  | 8/5/2020 11:35:17 AM | 54156               |
| Xylenes, Total                                   | ND     | 0.077    |      | mg/Kg | 1  | 8/5/2020 11:35:17 AM | 54156               |
| Surr: 4-Bromofluorobenzene                       | 105    | 80-120   |      | %Rec  | 1  | 8/5/2020 11:35:17 AM | 54156               |

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

|                    |     |   |    |   |
|--------------------|-----|---|----|---|
| <b>Qualifiers:</b> | *   | 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 **2008118**

Date Reported: **8/6/2020**

**Hall Environmental Analysis Laboratory, Inc.**

**CLIENT:** Blagg Engineering

**Client Sample ID:** Grab @ 6'

**Project:** Hardie LS 11

**Collection Date:** 8/4/2020 11:03:00 AM

**Lab ID:** 2008118-001

**Matrix:** SOIL

**Received Date:** 8/5/2020 7:45:00 AM

| Analyses   | Result | RL       | Qual | Units | DF  | Date Analyzed        | Batch               |
|--|--------|----------|------|-------|-----|----------------------|---------------------|
| <b>EPA METHOD 300.0: ANIONS</b>                  |        |          |      |       |     |                      | Analyst: <b>MRA</b> |
| Chloride   | ND     | 60       |      | mg/Kg | 20  | 8/5/2020 11:19:46 AM | 54179               |
| <b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b> |        |          |      |       |     |                      | Analyst: <b>CLP</b> |
| Diesel Range Organics (DRO)                      | 44000  | 970      |      | mg/Kg | 100 | 8/5/2020 10:52:31 AM | 54177               |
| Motor Oil Range Organics (MRO)                   | 50000  | 4800     |      | mg/Kg | 100 | 8/5/2020 10:52:31 AM | 54177               |
| Surr: DNOP                                       | 0      | 30.4-154 | S    | %Rec  | 100 | 8/5/2020 10:52:31 AM | 54177               |
| <b>EPA METHOD 8015D: GASOLINE RANGE</b>          |        |          |      |       |     |                      | Analyst: <b>NSB</b> |
| Gasoline Range Organics (GRO)                    | 75     | 21       |      | mg/Kg | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| Surr: BFB  | 191    | 75.3-105 | S    | %Rec  | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| <b>EPA METHOD 8021B: VOLATILES</b>               |        |          |      |       |     |                      | Analyst: <b>NSB</b> |
| Benzene  | ND     | 0.11     |      | mg/Kg | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| Toluene  | ND     | 0.21     |      | mg/Kg | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| Ethylbenzene                                     | ND     | 0.21     |      | mg/Kg | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| Xylenes, Total                                   | 1.8    | 0.42     |      | mg/Kg | 5   | 8/5/2020 9:37:15 AM  | 54156               |
| Surr: 4-Bromofluorobenzene                       | 108    | 80-120   |      | %Rec  | 5   | 8/5/2020 9:37:15 AM  | 54156               |

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

|                    |     |   |    |   |
|--------------------|-----|---|----|---|
| <b>Qualifiers:</b> | *   | 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 2008118

Date Reported: 8/6/2020

Hall Environmental Analysis Laboratory, Inc.

CLIENT: Blagg Engineering

Client Sample ID: 3 Point @ 7'

Project: Hardie LS 11

Collection Date: 8/4/2020 11:20:00 AM

Lab ID: 2008118-002

Matrix: SOIL

Received Date: 8/5/2020 7:45:00 AM

| Analyses   | Result | RL       | Qual | Units | DF | Date Analyzed        | Batch               |
|--|--------|----------|------|-------|----|----------------------|---------------------|
| <b>EPA METHOD 300.0: ANIONS</b>                  |        |          |      |       |    |                      | Analyst: <b>MRA</b> |
| Chloride   | ND     | 60       |      | mg/Kg | 20 | 8/5/2020 11:32:08 AM | 54179               |
| <b>EPA METHOD 8015M/D: DIESEL RANGE ORGANICS</b> |        |          |      |       |    |                      | Analyst: <b>CLP</b> |
| Diesel Range Organics (DRO)                      | ND     | 9.7      |      | mg/Kg | 1  | 8/5/2020 11:40:16 AM | 54177               |
| Motor Oil Range Organics (MRO)                   | ND     | 49       |      | mg/Kg | 1  | 8/5/2020 11:40:16 AM | 54177               |
| Surr: DNOP                                       | 95.4   | 30.4-154 |      | %Rec  | 1  | 8/5/2020 11:40:16 AM | 54177               |
| <b>EPA METHOD 8015D: GASOLINE RANGE</b>          |        |          |      |       |    |                      | Analyst: <b>NSB</b> |
| Gasoline Range Organics (GRO)                    | ND     | 3.6      |      | mg/Kg | 1  | 8/5/2020 10:01:03 AM | 54156               |
| Surr: BFB  | 96.3   | 75.3-105 |      | %Rec  | 1  | 8/5/2020 10:01:03 AM | 54156               |
| <b>EPA METHOD 8021B: VOLATILES</b>               |        |          |      |       |    |                      | Analyst: <b>NSB</b> |
| Benzene  | ND     | 0.018    |      | mg/Kg | 1  | 8/5/2020 10:01:03 AM | 54156               |
| Toluene  | ND     | 0.036    |      | mg/Kg | 1  | 8/5/2020 10:01:03 AM | 54156               |
| Ethylbenzene                                     | ND     | 0.036    |      | mg/Kg | 1  | 8/5/2020 10:01:03 AM | 54156               |
| Xylenes, Total                                   | ND     | 0.072    |      | mg/Kg | 1  | 8/5/2020 10:01:03 AM | 54156               |
| Surr: 4-Bromofluorobenzene                       | 101    | 80-120   |      | %Rec  | 1  | 8/5/2020 10:01:03 AM | 54156               |

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

|                    |     |   |    |   |
|--------------------|-----|---|----|---|
| <b>Qualifiers:</b> | *   | 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 |    |   |

**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**

COMMENTS

Action 10409

**COMMENTS**

|   |  |
|---|--|
| Operator:<br>SIMCOE LLC<br>1199 Main Ave., Suite 101<br>Durango, CO 81301 | OGRID:<br>329736                                 |
|   | Action Number:<br>10409                          |
|   | Action Type:<br>[C-144] PIT Generic Plan (C-144) |

**COMMENTS**

| Created By | Comment   | Comment Date |
|------------|---|--------------|
| vvenegas   | Incident # NRM2027448549 HARDIE LS 011 @ 30-045-21086 | 11/24/2021   |

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**Oil Conservation Division**  
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CONDITIONS  
 Action 10409

**CONDITIONS**

|   |  |
|---|--|
| Operator:<br>SIMCOE LLC<br>1199 Main Ave., Suite 101<br>Durango, CO 81301 | OGRID:<br>329736                                 |
|   | Action Number:<br>10409                          |
|   | Action Type:<br>[C-144] PIT Generic Plan (C-144) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|------------|-----------|----------------|
| vvenegas   | None      | 11/24/2021     |