

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

Form C-144  
Revised October 11, 2022

## Pit, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Below grade tank registration  
☐ Permit of a pit or proposed alternative method  
☒ Closure of a pit, below-grade tank, or proposed alternative method  
☐ Modification to an existing permit/or registration  
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

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

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

1.  
 Operator: Simcoe LLC OGRID #: 329736  
 Address: 1199 Main Ave., Suite 101, Durango, CO 81301  
 Facility or well name: Barrett LS #001  
 API Number: 30-045-10492 OCD Permit Number: \_\_\_\_\_  
 U/L or Qtr/Qtr K Section 19 Township 31N Range 9W County: San Juan  
 Center of Proposed Design: Latitude 36.881443 Longitude -107.824806 NAD83  
 Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.  
☐ **Pit:** Subsection F, G or J of 19.15.17.11 NMAC  
 Temporary: ☐ Drilling ☐ Workover  
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A ☐ Multi-Well Fluid Management Low Chloride Drilling Fluid ☐ yes ☐ no  
☐ 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.  
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC  
 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 Double wall, double bottom. Liner present beneath BGT and wrapped behind wooden sidewalls.  
 Liner type: Thickness \_\_\_\_\_ mil ☐ HDPE ☐ PVC ☐ Other \_\_\_\_\_

4.  
☐ **Alternative Method:**  
 Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5.  
**Fencing:** Subsection D of 19.15.17.11 NMAC (*Applies to permanent pits, temporary pits, and below-grade tanks*)  
☐ Chain link, six feet in height, two strands of barbed wire at top (*Required if located within 1000 feet of a permanent residence, school, hospital, institution or church*)  
☐ Four foot height, four strands of barbed wire evenly spaced between one and four feet  
☒ Alternate. Please specify 4' Hogwire

6.

**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)

- ☐ Screen ☐ Netting ☐ Other \_\_\_\_\_
- ☐ Monthly inspections (If netting or screening is not physically feasible)

7.

**Signs:** Subsection C of 19.15.17.11 NMAC

- ☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers
- ☐ Signed in compliance with 19.15.16.8 NMAC

8.

**Variances and Exceptions:**

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

***Please check a box if one or more of the following is requested, if not leave blank:***

- ☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.
- ☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.

**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC***Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*****General siting****Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.**

- ☐ NM Office of the State Engineer - iWATERS database search; ☐ USGS; ☐ Data obtained from nearby wells

☐ Yes ☐ No

☐ NA

**Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .**

NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells

☐ Yes ☐ No

☐ NA

Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. **(Does not apply to below grade tanks)**

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine. **(Does not apply to below grade tanks)**

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area. **(Does not apply to below grade tanks)**

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain. **(Does not apply to below grade tanks)**

- FEMA map

☐ Yes ☐ No

**Below Grade Tanks**

Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption;.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

**Temporary Pit using Low Chloride Drilling Fluid** (maximum chloride content 15,000 mg/liter)

Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.)

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application.

NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 100 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Temporary Pit Non-low chloride drilling fluid**

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 300 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

### **Permanent Pit or Multi-Well Fluid Management Pit**

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).

- Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.

- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image

☐ Yes ☐ No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.

- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

Within 500 feet of a wetland.

- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site

☐ Yes ☐ No

10.

#### **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: \_\_\_\_\_

11.

#### **Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC

**Instructions:** Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

- ☐ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ A List of wells with approved application for permit to drill associated with the pit.
- ☐ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC
- ☐ Hydrogeologic Data - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC

☐ Previously Approved Design (attach copy of design) API Number: \_\_\_\_\_ or Permit Number: \_\_\_\_\_

12.

**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

13.

**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 ☐ Multi-well Fluid Management Pit  
☐ 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

14.

**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 C of 19.15.17.13 NMAC  
☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings)  
☐ Soil Backfill and Cover Design Specifications - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC  
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

15.

**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 require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

Ground water is less than 25 feet below the bottom of the buried waste. - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Ground water is between 25-50 feet below the bottom of the buried waste - NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<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 100 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<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 300 horizontal feet of a private, domestic fresh water well or spring used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 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 incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance	



adopted pursuant to NMSA 1978, Section 3-27-3, as amended.

- Written confirmation or verification from the municipality; Written approval obtained from the municipality

☐ Yes ☐ No

Within the area overlying a subsurface mine.

- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division

☐ Yes ☐ No

Within an unstable area.

- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map

☐ Yes ☐ No

Within a 100-year floodplain.

- FEMA map

☐ Yes ☐ No

16.

**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 E of 19.15.17.13 NMAC
- ☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 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 19.15.17.13 NMAC
- ☐ Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- ☐ Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot 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 H of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17.

**Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

e-mail address: \_\_\_\_\_ Telephone: \_\_\_\_\_

18.

**OCD Approval:** ☐ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: Joel Stone Approval Date: 09/17/2025

Title: Senior Environmental Scientist OCD Permit Number: YCON0715913626

19.

**Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC

*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. 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: 8/11/2025

20.

**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.

21.

**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 for private land only)
- ☐ 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 36.881443 Longitude -107.824806 NAD: ☐ 1927 ☒ 1983

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): Kyle Siesser Title: Consultant

Signature: Kyle D. Siesser Date: 9/4/2025

e-mail address: ksiesser@cottonwoodconsulting.com Telephone: 970-764-7356

**SIMCOE, LLC**  
**SAN JUAN BASIN, NORTHWEST NEW MEXICO**

**Well Name: Barrett LS #001**  
**Well API# 30-045-10492**  
**Unit Letter K, Section 19, T31N, R9W**

**BELOW-GRADE TANK CLOSURE PLAN**

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on this SIMCOE, LLC well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, SIMCOE, LLC 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, LLC 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, LLC NMOCD approved BGT design attached to the SIMCOE, LLC Design and Construction Plan. SIMCOE, LLC 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, LLC NMOCD approved BGT Design attached to the SIMCOE, LLC Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. SIMCOE, LLC 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, LLC 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 was provided and is attached.**

2. SIMCOE, LLC 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 is attached.**

3. SIMCOE, LLC 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 utilized are:

- a. JFJ Land farm, Permit NM-01-010(B) (Solids and Sludge)
- b. Basin Disposal, Permit NM-01-0005 (Liquids)
- c. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
- d. Simcoe, LLC Operated 13 GCU SWD # 1, API 30-045-28601 (Liquids)
- e. Simcoe, LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
- f. Simcoe, LLC Operated GCU 306 SWD, API30-045-24286 (Liquids)
- g. Simcoe, LLC Operated GCU 307 SWD, API30-045-24248 (Liquids)
- h. Simcoe, LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
- i. Simcoe, LLC 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, LLC 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 recycled.**

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

**The BGT was removed and area regraded.**

6. Simcoe, LLC shall sample the soils beneath the BGT to determine whether a release has occurred. Simcoe, LLC 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	Closure Criteria (mg/kg)	5PC-TB@6'(21) Results (mg/kg)
Chloride	US EPA Method 300.0	250	ND
TPH	US EPA Method SW-846 418.1	100	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND

**Notes:** mg/kg- milligram per kilogram; GRO- gasoline range organics; DRO- diesel range organics; TPH- total petroleum hydrocarbons; BTEX- benzene, toluene, ethylbenzene, and total xylenes; ND- analyte not detected. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by whichever concentration level is greatest.

**Following removal of the BGT, minor soil impacts were observed in a limited area above the liner within the lined containment. A grab sample of the impacted material indicated DRO and ORO concentrations of 41,100 mg/kg and 29,100 mg/kg respectively. The impacted material was removed and hauled to Envirotech Landfarm for disposal. The wooden sidewalls within the containment were also removed and it was confirmed that the liner had wrapped behind the wooden sidewalls. The liner was removed and disposed of. No impacts were observed behind the liner on the sidewalls or beneath the liner at the base. A 5-point composite sample was collected beneath the former BGT and liner and TPH, BTEX, and chloride were non-detect based on laboratory analytical results.**

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

**Form C-141 is attached.**

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

**Impacts observed were limited in extent and contained to the area within the lined secondary containment. Estimated volume of released fluids was 4.4 barrels based on 2 cubic yards of impacted material. Calculations included on C-141 attached.**

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then Simcoe, LLC 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 within the active process area.

**The BGT was removed and the area regarded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

10. Simcoe, LLC 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, LLC 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. 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 BGT was removed and the area regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

12. Simcoe, LLC shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be conducted 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-affected 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.

**The BGT was removed and the area regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

13. Simcoe, LLC 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.

**The BGT was removed and the area regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, Simcoe, LLC shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

**The BGT was removed and the area regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

15. Within 60 days of closure completion, Simcoe, LLC 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, disposal facility name, and permit number

**Closure report on Form C-144 is included and contains a photo of the location.**

16. Simcoe, LLC 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 Form C-144 has been completed.**



**From:** Jerrid Brann <[jerrid.brann@ikavenergy.com](mailto:jerrid.brann@ikavenergy.com)>  
**Sent:** Monday, August 4, 2025 8:09 AM  
**To:** Stone, Joel, EMNRD <[joel.stone@emnrd.nm.gov](mailto:joel.stone@emnrd.nm.gov)>  
**Cc:** Ryan O'Nan <[ryan.onan@ikavenergy.com](mailto:ryan.onan@ikavenergy.com)>; Christy Kost <[Christy.Kost@Ikavenergy.com](mailto:Christy.Kost@Ikavenergy.com)>; John Ritter <[john.ritter@ikavenergy.com](mailto:john.ritter@ikavenergy.com)>  
**Subject:** Simcoe LLC, Barret LS #001, Below Grade Tank (BGT) Closure

August 4, 2025

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

RE: Notice of proposed Below Grade Tank Closure

Well Name: Barrett LS #001  
API# 30-045-10492  
K – 19 – 31N – 9W  
San Juan County, NM

To whom it may concern,

Simcoe LLC is planning to close a Below Grade Tank under the requirements of NMOCD rule 19.15.17.13. This work is proposed to start on or around 9:00 am on August 8th, 2025.

Please let me know if there are any questions,

Thanks,

Jerrid Brann



Jerrid Brann  
Environmental Coordinator  
[jerrid.brann@ikavenergy.com](mailto:jerrid.brann@ikavenergy.com)  
970-394-0250

**Confidentiality Notice:** This email and any attachments are confidential and intended solely for the named recipient(s). If you are not the intended recipient, please notify the sender immediately, and delete this email and any

Well Name: BARRETT LS COM	Well Location: T31N / R9W / SEC 19 / NESW / 36.881241 / -107.824066	County or Parish/State: SAN JUAN / NM
Well Number: 1	Type of Well: CONVENTIONAL GAS WELL	Allottee or Tribe Name:
Lease Number: NMSF078336B	Unit or CA Name: BARRETT COM	Unit or CA Number: NMNM73170
US Well Number: 3004510492	Operator: SIMCOE LLC	

Notice of Intent

Sundry ID: 2866685

Type of Submission: Notice of Intent	Type of Action: Pit Construction or Closure
Date Sundry Submitted: 08/04/2025	Time Sundry Submitted: 11:29
Date proposed operation will begin: 08/08/2025	

Procedure Description: Simcoe LLC is planning to close a Below Grade Tank under the requirements of NMOCD rule 19.15.17.13. This work is proposed to start on or around 9:00 am on August 8th, 2025.

Surface Disturbance

Is any additional surface disturbance proposed?: No

Well Name: BARRETT LS COM	Well Location: T31N / R9W / SEC 19 / NESW / 36.881241 / -107.824066	County or Parish/State: SAN JUAN / NM
Well Number: 1	Type of Well: CONVENTIONAL GAS WELL	Allottee or Tribe Name:
Lease Number: NMSF078336B	Unit or CA Name: BARRETT COM	Unit or CA Number: NMNM73170
US Well Number: 3004510492	Operator: SIMCOE LLC	

Operator

I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a

Operator Electronic Signature: CHRISTY KOST

Signed on: AUG 04, 2025 11:29 AM

Name: SIMCOE LLC

Title: Permitting Agent

Street Address: 1199 MAIN AVE STE 101

City: DURANGO

State: CO

Phone: (719) 251-7733

Email address: CHRISTY.KOST@IKAVENERGY.COM

Field

Representative Name:

Street Address:

City:

State:

Zip:

Phone:

Email address:

Form 3160-5 (June 2019)	UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT	FORM APPROVED OMB No. 1004-0137 Expires: October 31, 2021
<b>SUNDRY NOTICES AND REPORTS ON WELLS</b> <i>Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.</i>		5. Lease Serial No.
		6. If Indian, Allottee or Tribe Name

<b>SUBMIT IN TRIPLICATE - Other instructions on page 2</b>		7. If Unit of CA/Agreement, Name and/or No.
1. Type of Well <input type="checkbox"/> Oil Well <input type="checkbox"/> Gas Well <input type="checkbox"/> Other		8. Well Name and No.
2. Name of Operator		9. API Well No.
3a. Address	3b. Phone No. (include area code)	10. Field and Pool or Exploratory Area
4. Location of Well (Footage, Sec., T.,R.,M., or Survey Description)		11. Country or Parish, State

12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA				
TYPE OF SUBMISSION	TYPE OF ACTION			
<input type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off
	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Hydraulic Fracturing	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input type="checkbox"/> Other
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon	
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal	

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recompleate horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be perfonned or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has detennined that the site is ready for final inspection.)

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed)		
	Title	
Signature	Date	

<b>THE SPACE FOR FEDERAL OR STATE OFFICE USE</b>		
Approved by	Title	Date
Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.	Office	

Title 18 U.S.C Section 1001 and Title 43 U.S.C Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction.

(Instructions on page 2)

## GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

## SPECIFIC INSTRUCTIONS

*Item 4* - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

*Item 13*: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

## NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c) and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

**BURDEN HOURS STATEMENT:** Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240



## **Additional Information**

### **Location of Well**

0. SHL: NESW / 1650 FSL / 790 FWL / TWSP: 31N / RANGE: 9W / SECTION: 19 / LAT: 36.881241 / LONG: -107.824066 ( TVD: 0 feet, MD: 0 feet )

BHL: NESW / 1650 FSL / 790 FWL / TWSP: 31N / SECTION: / LAT: 36.881241 / LONG: 107.824066 ( TVD: 0 feet, MD: 0 feet )

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

State of New Mexico  
Energy Minerals and Natural  
Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party SIMCOE, LLC	OGRID 329736
Contact Name Jerriid Brann	Contact Telephone (970) 852-5172
Contact email jerrid.brann@ikavenergy.com	Incident # (assigned by OCD)
Contact mailing address 1199 Main Ave., Suite 101 Durango, CO 81301	

### Location of Release Source

Latitude 36.881443 Longitude -107.824806  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Barrett LS #001	Site Type Natural Gas Well
Date Release Discovered NA	API# (if applicable) 30-045-10492

Unit Letter	Section	Township	Range	County
K	19	31N	9W	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 checked="" type="checkbox"/> Produced Water	Volume Released (bbls) 4.4	Volume Recovered (bbls) 4.4 (via excavation)
	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 During a BGT closure, approximately 2 cubic yards of impacted soils were observed above the liner within the lined containment area following BGT removal. A grab sample of the impacted material indicated DRO and ORO concentrations above NMOCD standards. The impacted material was removed and hauled to Envirotech Landfarm for disposal. The wooden sidewalls within the containment were also removed and it was confirmed that the liner had wrapped behind the wooden sidewalls. The liner was removed and disposed of. No impacts were observed behind the liner on the sidewalls or beneath the liner at the base. A 5-point composite sample was collected beneath the former BGT and liner and TPH, BTEX, and chloride were non-detect. Calculations 2 cubic yards = 54 cubic feet. 54 cubic feet x 3.4 gallons/cubic foot (liquid capacity of sand factor) = 183.6 gallons. 183.6 gallons/42 = 4.4 barrels.

Incident ID	
District RP	
Facility ID	
Application ID	

<p>Was this a major release as defined by 19.15.29.7(A) NMAC?</p> <p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>If YES, for what reason(s) does the responsible party consider this a major release?</p>
<p>If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?</p> <p>NA</p>	

## Initial Response

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

<p><input type="checkbox"/> The source of the release has been stopped.</p> <p><input type="checkbox"/> The impacted area has been secured to protect human health and the environment.</p> <p><input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.</p> <p><input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.</p>	
<p>If all the actions described above have <u>not</u> been undertaken, explain why:</p> <p style="font-size: 1.2em;">All impacted soils were removed and disposed of at Envirotech Landfarm.</p>	
<p>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.</p>	
<p>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.</p>	
<p>Printed Name: <u>Kyle Siesser</u></p> <p>Signature: <u></u></p> <p>email: <u>ksiesser@cottonwoodconsulting.com</u></p>	<p>Title: <u>Consultant</u></p> <p>Date: <u>9/4/25</u></p> <p>Telephone: <u>(970) 764-7356</u></p>
<p><b><u>OCD Only</u></b></p> <p>Received by: _____ Date: _____</p>	



Date: 8/8/2025

Client: Simcoe

Environmental Specialist(s): Joseph LaFortune

Contractor: Kelley Oil Field Services

Page: 1 of 1

## BGT Closure Field Form

## Site Information

Well Name: Barret LS #001

Well API#: 30-045-10492

Lease: Federal NMSF078336B

Well Location: Unit: K Sec: 19 T: 31N R: 9W Cty: San Juan St: New Mexico

## BGT Information

Prev. Tank ID: 21 bbls double -wall double -bottom sidewalls visible: Yes berm: Yes fenced: Yes liner: Yes

Notes: One initial grab sample was collected above the liner and one 5-point composite sample was collected beneath the liner. Kelley Oil Field

Services removed BGT.

## Site Observations Following BGT Removal:

evidence of a release: Minor impacts BGT backfilled and graded

New Tank ID: \_ N/A N/A bbls single / double -wall single / double -bottom sidewalls visible: N/A berm: N/A fenced: N/A liner: N/A

Notes: Evidence of minor impacts in soils above liner, all impacted soils and liner were removed following removal of BGT. No impacts observed above liner or outside of the lined containment. BGT was removed, area surrounding BGT was backfilled and graded following removal.

## NMOCD Closure Standards:

TPH \_\_\_\_\_ mg/kg

Chloride \_\_\_\_\_ mg/kg

## Soil Sampling

Sample ID: SS01 Time: 0940 Sample Type: Grab PID: 15.6 ppm Lab: Envirotech

Notes: brown sand, HC odor, minor HC staining, moist, collected 4' below ground surface.

Sample collected from soil above liner within lined containment.

## Soil Sampling

Sample ID: 5PC-TB@6'(21) Time: 1025 Sample Type: 5-pt composite PID: 0.0 ppm Lab: Envirotech

Notes: brown sand, no odor, no staining, moist, collected ~4.5' below ground surface.

Sample collected below liner following removal of the BGT.

## Soil Sampling

Sample ID: \_\_\_\_\_ Time: \_\_\_\_\_ Sample Type: Grab / Composite - \_\_\_\_\_ pts PID: \_\_\_\_\_ ppm Lab: \_\_\_\_\_

Notes: \_\_\_\_\_

## Site Sketch



## Notes

Following BGT removal, approximately 2 yards of impacted soils were observed above the liner within the lined containment area.

Following removal of the impacted material and liner, no impacts were observed on the sidewalls or beneath the former liner.




PID Calibration Date: 8/8/2025 0905





Notes: All soil samples collected 8/8/2025. 5PC-TB@6'(21) is a 5-point composite sample. SS01 is grab sample.

### Legend

-  Oil & Gas Well
-  Soil Sample
-  BGT Containment

**Cottonwood**  
CONSULTING



Mapping by: K. O'Brien, 8/26/2025

Coordinate System:

NAD 1983 UTM Zone 13 N

Location: Sec 19 T31N R9W NMPM

**Barret LS #001**  
**Project Map**  
**Simcoe LLC**



Report to:  
Kyle Siesser



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

Cottonwood Consulting

Project Name: Barrett LS #001

Work Order: E508106

Job Number: 20035-C-0001

Received: 8/8/2025

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
8/15/25

5796 U.S. Hwy 64  
Farmington, NM 87401

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



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



Date Reported: 8/15/25

Kyle Siesser  
PO Box 1653  
Durango, CO 81302

Project Name: Barrett LS #001  
Workorder: E508106  
Date Received: 8/8/2025 11:50:00AM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 8/8/2025 11:50:00AM, under the Project Name: Barrett LS #001.

The analytical test results summarized in this report with the Project Name: Barrett LS #001 apply to the individual samples collected, identified and submitted bearing the project name on the enclosed chain-of-custody. Subcontracted sample analyses not conducted by Envirotech, Inc., are attached in full as issued by the subcontract laboratory.

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

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

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

Respectfully,

**Walter Hinchman**  
Laboratory Director  
Office: 505-632-1881  
Cell: 775-287-1762  
[whinchman@envirotech-inc.com](mailto:whinchman@envirotech-inc.com)

**Raina Schwanz**  
Laboratory Administrator  
Office: 505-632-1881  
[rainaschwanz@envirotech-inc.com](mailto:rainaschwanz@envirotech-inc.com)

Field Offices:

**Southern New Mexico Area**

**Lynn Jarboe**  
Laboratory Technical Representative  
Office: 505-421-LABS(5227)  
Cell: 505-320-4759  
[ljjarboe@envirotech-inc.com](mailto:ljjarboe@envirotech-inc.com)

**Michelle Gonzales**  
Client Representative  
Office: 505-421-LABS(5227)  
Cell: 505-947-8222  
[mgonzales@envirotech-inc.com](mailto:mgonzales@envirotech-inc.com)

Envirotech Web Address: [www.envirotech-inc.com](http://www.envirotech-inc.com)

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Sample Summary

Cottonwood Consulting	Project Name:	Barrett LS #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	08/15/25 09:04

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01	E508106-01A	Soil	08/08/25	08/08/25	Glass Jar, 4 oz.
5PC-TB@6' (21)	E508106-02A	Soil	08/08/25	08/08/25	Glass Jar, 4 oz.



## Sample Data

Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project Name: Barrett LS #001  
Project Number: 20035-C-0001  
Project Manager: Kyle Siesser

**Reported:**  
8/15/2025 9:04:16AM

**SS01**

**E508106-01**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>	mg/kg	mg/kg	Analyst: BA		Batch: 2533017	
Benzene	ND	0.0250	1	08/11/25	08/13/25	
Ethylbenzene	ND	0.0250	1	08/11/25	08/13/25	
Toluene	ND	0.0250	1	08/11/25	08/13/25	
o-Xylene	ND	0.0250	1	08/11/25	08/13/25	
p,m-Xylene	ND	0.0500	1	08/11/25	08/13/25	
Total Xylenes	ND	0.0250	1	08/11/25	08/13/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	83.9 %	70-130		08/11/25	08/13/25	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>	mg/kg	mg/kg	Analyst: BA		Batch: 2533017	
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/11/25	08/13/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>	86.8 %	70-130		08/11/25	08/13/25	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>	mg/kg	mg/kg	Analyst: KH		Batch: 2533024	
Diesel Range Organics (C10-C28)	41100	500	20	08/11/25	08/12/25	
Oil Range Organics (C28-C36)	29100	1000	20	08/11/25	08/12/25	
<i>Surrogate: n-Nonane</i>	76.0 %	61-141		08/11/25	08/12/25	
<b>Anions by EPA 300.0/9056A</b>	mg/kg	mg/kg	Analyst: IY		Batch: 2533016	
Chloride	ND	20.0	1	08/11/25	08/11/25	





## Sample Data

Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project Name: Barrett LS #001  
Project Number: 20035-C-0001  
Project Manager: Kyle Siesser

**Reported:**  
8/15/2025 9:04:16AM

## 5PC-TB@6' (21)

## E508106-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>						
	mg/kg	mg/kg	Analyst: BA		Batch: 2533017	
Benzene	ND	0.0250	1	08/11/25	08/12/25	
Ethylbenzene	ND	0.0250	1	08/11/25	08/12/25	
Toluene	ND	0.0250	1	08/11/25	08/12/25	
o-Xylene	ND	0.0250	1	08/11/25	08/12/25	
p,m-Xylene	ND	0.0500	1	08/11/25	08/12/25	
Total Xylenes	ND	0.0250	1	08/11/25	08/12/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	92.4 %	70-130		08/11/25	08/12/25	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>						
	mg/kg	mg/kg	Analyst: BA		Batch: 2533017	
Gasoline Range Organics (C6-C10)	ND	20.0	1	08/11/25	08/12/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	91.9 %	70-130		08/11/25	08/12/25	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>						
	mg/kg	mg/kg	Analyst: KH		Batch: 2533024	
Diesel Range Organics (C10-C28)	ND	25.0	1	08/11/25	08/12/25	
Oil Range Organics (C28-C36)	ND	50.0	1	08/11/25	08/12/25	
<i>Surrogate: n-Nonane</i>						
	97.3 %	61-141		08/11/25	08/12/25	
<b>Anions by EPA 300.0/9056A</b>						
	mg/kg	mg/kg	Analyst: IY		Batch: 2533016	
Chloride	ND	20.0	1	08/11/25	08/11/25	



## QC Summary Data

Cottonwood Consulting	Project Name:	Barrett LS #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	8/15/2025 9:04:16AM

## Volatile Organics by EPA 8021B

Analyst: BA

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2533017-BLK1)

Prepared: 08/11/25 Analyzed: 08/12/25

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.46		8.00		93.3	70-130			

## LCS (2533017-BS1)

Prepared: 08/11/25 Analyzed: 08/12/25

Benzene	5.77	0.0250	5.00		115	70-130			
Ethylbenzene	5.52	0.0250	5.00		110	70-130			
Toluene	5.68	0.0250	5.00		114	70-130			
o-Xylene	5.39	0.0250	5.00		108	70-130			
p,m-Xylene	11.1	0.0500	10.0		111	70-130			
Total Xylenes	16.4	0.0250	15.0		110	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.36		8.00		92.1	70-130			

## Matrix Spike (2533017-MS1)

Source: E508107-05

Prepared: 08/11/25 Analyzed: 08/12/25

Benzene	5.50	0.0250	5.00	ND	110	70-130			
Ethylbenzene	5.26	0.0250	5.00	ND	105	70-130			
Toluene	5.41	0.0250	5.00	ND	108	70-130			
o-Xylene	5.14	0.0250	5.00	ND	103	70-130			
p,m-Xylene	10.5	0.0500	10.0	ND	105	70-130			
Total Xylenes	15.7	0.0250	15.0	ND	105	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.35		8.00		91.8	70-130			

## Matrix Spike Dup (2533017-MSD1)

Source: E508107-05

Prepared: 08/11/25 Analyzed: 08/12/25

Benzene	6.05	0.0250	5.00	ND	121	70-130	9.44	27	
Ethylbenzene	5.76	0.0250	5.00	ND	115	70-130	9.12	26	
Toluene	5.94	0.0250	5.00	ND	119	70-130	9.23	20	
o-Xylene	5.64	0.0250	5.00	ND	113	70-130	9.24	25	
p,m-Xylene	11.5	0.0500	10.0	ND	115	70-130	8.97	23	
Total Xylenes	17.2	0.0250	15.0	ND	114	70-130	9.06	26	
Surrogate: 4-Bromochlorobenzene-PID	7.31		8.00		91.3	70-130			



## QC Summary Data

Cottonwood Consulting	Project Name:	Barrett LS #001	<b>Reported:</b>
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	8/15/2025 9:04:16AM

## Nonhalogenated Organics by EPA 8015D - GRO

Analyst: BA

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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## Blank (2533017-BLK1)

Prepared: 08/11/25 Analyzed: 08/12/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.37		8.00		92.1	70-130			

## LCS (2533017-BS2)

Prepared: 08/11/25 Analyzed: 08/12/25

Gasoline Range Organics (C6-C10)	51.3	20.0	50.0		103	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.46		8.00		93.3	70-130			

## Matrix Spike (2533017-MS2)

Source: E508107-05

Prepared: 08/11/25 Analyzed: 08/12/25

Gasoline Range Organics (C6-C10)	52.8	20.0	50.0	ND	106	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.53		8.00		94.1	70-130			

## Matrix Spike Dup (2533017-MSD2)

Source: E508107-05

Prepared: 08/11/25 Analyzed: 08/12/25

Gasoline Range Organics (C6-C10)	52.2	20.0	50.0	ND	104	70-130	1.21	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.51		8.00		93.9	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	Barrett LS #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	8/15/2025 9:04:16AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2533024-BLK1)					Prepared: 08/11/25 Analyzed: 08/12/25				
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	48.1		50.0		96.2	61-141			

LCS (2533024-BS1)					Prepared: 08/11/25 Analyzed: 08/12/25				
Diesel Range Organics (C10-C28)	253	25.0	250		101	66-144			
Surrogate: n-Nonane	46.5		50.0		93.0	61-141			

Matrix Spike (2533024-MS1)					Source: E508105-09		Prepared: 08/11/25 Analyzed: 08/12/25		
Diesel Range Organics (C10-C28)	269	25.0	250	ND	107	56-156			
Surrogate: n-Nonane	48.9		50.0		97.8	61-141			

Matrix Spike Dup (2533024-MSD1)					Source: E508105-09		Prepared: 08/11/25 Analyzed: 08/12/25		
Diesel Range Organics (C10-C28)	269	25.0	250	ND	108	56-156	0.265	20	
Surrogate: n-Nonane	48.8		50.0		97.6	61-141			



QC Summary Data

Cottonwood Consulting	Project Name:	Barrett LS #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	8/15/2025 9:04:16AM

Anions by EPA 300.0/9056A

Analyst: IY

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2533016-BLK1)					Prepared: 08/11/25 Analyzed: 08/11/25				
Chloride	ND	20.0							
LCS (2533016-BS1)					Prepared: 08/11/25 Analyzed: 08/11/25				
Chloride	252	20.0	250		101	90-110			
Matrix Spike (2533016-MS1)					Source: E508086-05		Prepared: 08/11/25 Analyzed: 08/11/25		
Chloride	816	100	250	659	62.9	80-120			M2
Matrix Spike Dup (2533016-MSD1)					Source: E508086-05		Prepared: 08/11/25 Analyzed: 08/11/25		
Chloride	725	100	250	659	26.5	80-120	11.8	20	M2

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



Definitions and Notes

Cottonwood Consulting	Project Name:	Barrett LS #001	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	08/15/25 09:04

- M2 Matrix spike recovery was outside quality control limits. The associated LCS spike recovery was acceptable.
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- DNI Did Not Ignite
- DNR Did not react with the addition of acid or base.

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

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





## Chain of Custody

Client Information				Invoice Information				Lab Use Only				TAT				State							
Client: Cottonwood Consulting LLC				Company: Cottonwood Consulting LLC				Lab WO#		Job Number		1D	2D	3D	Std	NM	CO	UT	TX				
Project Name: Barrett LS #001				Address: PO Box 1653				E5081010		20035-C-0001					X	x							
Project Manager: Kyle Siesser				City, State, Zip: Durango CO 81302																			
Address: PO Box 1653				Phone: 970-764-7356																			
City, State, Zip: Durango CO 81302				Email: ksiesser@cottonwoodconsulting.com																			
Phone: 970-764-7356				Miscellaneous:																			
Email: ksiesser@cottonwoodconsulting.com																							
Sample Information												Analysis and Method								EPA Program			
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/DRO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	TCEQ 1005 - TX	RCRA 8 Metals	BDOC - NM	BDOC - TX	SDWA	CWA	RCRA					
0940	8/8/2025	Soil	1	S501		1	X	X	X	X													
1025	8/8/2025	Soil	1	SPC-TB@6'(21)		2	X	X	X	X													
Additional Instructions: Please CC jharter@cottonwoodconsulting.com emillar@cottonwoodconsulting.com kobrien@cottonwoodconsulting.com jlafortune@cottonwoodconsulting.com dsonger@cottonwoodconsulting.com. Please make all reports locked.																							
I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabeling the sample location, date or time of collection is considered fraud and may be grounds for legal action.																							
Sampled by: Joseph LaFortune																							
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time		Samples requiring thermal preservation must be received on ice the day they are sampled or received packed on ice at a temp above 0 but less than 6°C on subsequent days. Lab Use Only Received on ice: 											
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time													
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time													
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time													
Relinquished by: (Signature)		Date		Time		Received by: (Signature)		Date		Time													
Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other												Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA											
Note: Samples are discarded 14 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.																							

## Envirotech Analytical Laboratory

Printed: 8/8/2025 2:08:12PM

## Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

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

Client:	Cottonwood Consulting	Date Received:	08/08/25 11:50	Work Order ID:	E508106
Phone:	970-764-7356	Date Logged In:	08/08/25 14:06	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	08/15/25 07:00 (5 day TAT)		

Chain of Custody (COC)

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

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

Carrier: Joseph LaFortuneComments/ResolutionSample Turn Around Time (TAT)

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

Sample Cooler

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

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

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

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

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

Date



envirotech Inc.





**Barrett LS #001  
Photographic Log  
Simcoe, LLC**

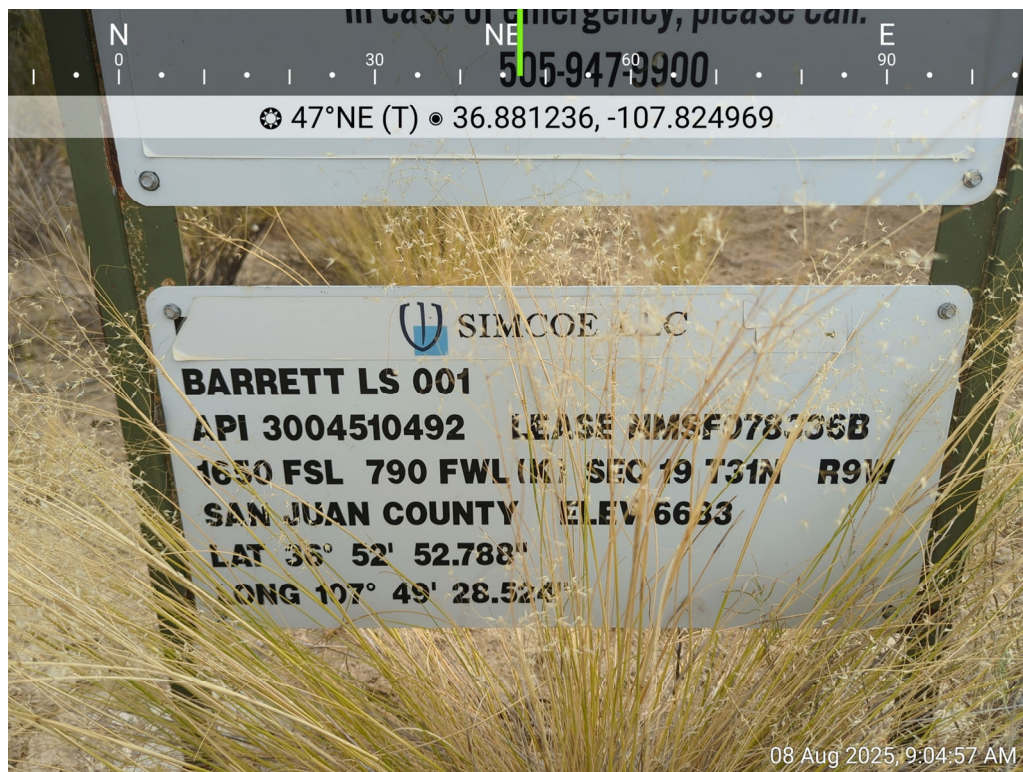


Photo 1: Barrett LS #001 well sign



Photo 2: BGT prior to removal.





**Barrett LS #001  
Photographic Log  
Simcoe, LLC**



Photo 3: Location of BGT following removal.



Photo 4: Bottom of BGT following removal.





**Barrett LS #001  
Photographic Log  
Simcoe, LLC**



Photo 5: SS01 collected from potentially impacted soils above the liner following removal of BGT.



Photo 6: Location of BGT following removal of tank and liner.





**Barrett LS #001  
Photographic Log  
Simcoe, LLC**



Photo 7: Location of former BGT following backfill and re-grading.

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

General Information  
Phone: (505) 629-6116

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

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

CONDITIONS

Action 503014

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 503014
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	Upon the cessation of all production operations in the area associated with well API 30-045-10492 (Barrett LS #001), the operator shall complete the requirements of 19.15.17.13 NMAC for the area associated with this below-grade tank and notify the OCD when restoration, reclamation, and re-vegetation are complete.	9/17/2025