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: _____ OGRID #:_____
Address: _____
Facility or well name: _____
API Number: _____ OCD Permit Number: _____
U/L or Qtr/Qtr _____ Section _____ Township _____ Range _____ County: _____
Center of Proposed Design: Latitude _____ Longitude _____ 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: _____bbl Type of fluid: _____
Tank Construction material: _____
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
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_____

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_2S, 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ 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 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	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ 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
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:** _____

Title: _____ **OCD Permit Number:**_____

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:**_____

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 _____ Longitude _____ 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): _____ Title: _____

Signature:_____ Date: _____

e-mail address:_____ Telephone: _____

Sims Mesa SWD #001 BGT Closure

1. Notice of closure was submitted on 8/13/2025 to the landowner through their notification protocol by email to ECO@nmslo.gov. This was part of an approved remediation plan and notification of sampling.
2. Notification was submitted on 8/11/2025 to the NMOCD in the approved remediation plan and with the notification of sampling C-141. After submitting this as a modification and it being rejected, I talked to Joel Stone, and he approved of this as notification of closure.
3. All liquids and sludges were removed from the BGT and disposed of at the Envirotech Remediation facility. NM-01-0011.
4. The Removed BGT will be cleaned and recycled as scrap material.
5. The BGT will be replaced with a new BGT to be permitted. All existing on-site equipment will be retrofitted to the newly installed BGT.
6. A 5-point composite sample was collected from the base of the excavation after the BGT was removed. Sample results indicate that the soil was not impacted and all constituents passed the standards in Table 1 of the BGT closure plan.
7. No contamination concentrations exceeded the standards set in Table 1.
8. The excavation was not backfilled as the BGT is being replaced with a new BGT.
9. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
10. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
11. The area surrounding the BGT was contoured to the existing well pad and stabilized to reduce erosion and dust.
12. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
13. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
14. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.

15. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
16. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
17. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
18. No reclamation is required currently due to the location continuing to be a process facility. The well pad surrounding the replacement BGT will be contoured to the existing well pad.
19. This closure will include a Form C-144 with all attachments needed to meet the closing criteria.

Cottonwood CONSULTING

Date: 10-16-25 Client: Simcoe

Environmental Specialist(s): Joseph LaFortune Contractor: Kelley

Page: 1 of 1

BGT Closure Field Form

Site Information

Well Name: NEBU Sims Mesa SWD #001 Well API#: 30-039-24236 Lease: Federal / (State) / Fee / Indian

Well Location: Unit: E Sec: 10 T: 30 R: 7 Cty: Rio Arriba St: New Mexico

BGT Information

Prev. Tank ID: _____ 90 bbls (single) / double -wall single / (double -bottom) sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)

Notes: _____

Site Observations Following BGT Removal: evidence of a release (Y) (N) (BGT replaced) / backfilled and graded / other: _____

New Tank ID: _____ _____ bbls single / double -wall single / double -bottom sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)

Notes: _____

NMOCD Closure Standards: TPH _____ mg/kg Chloride _____ mg/kg

Soil Sampling

Sample ID: SS45 Time: 1015 Sample Type: Grab / (Composite) 5 pts PID: 2.8 ppm Lab: ENV

Notes: Collected From soils beneath BGT. Soil silty sand, no stain, no odor, moist

Soil Sampling

Sample ID: SS47 Time: 1345 Sample Type: Grab / (Composite) 5 pts PID: 79.9 ppm Lab: ENV

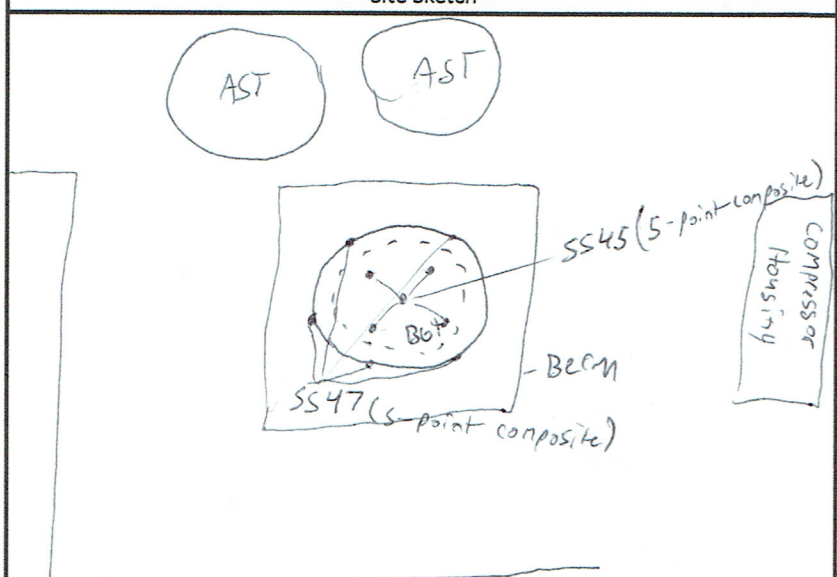
Notes: Collected from sidewalls of BGT location. Soil silty sand, no stain, no odor, moist.

Soil Sampling

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

Notes: _____

Site Sketch



Notes

No staining or evidence of impacts.

BGT replaced following removal.

PID Calibration Date: 10-16-25

Notes: All soil samples collected 10/16/2025. All samples are 5 point composite samples.

Legend

- Soil Sample
- BGT

Cottonwood CONSULTING

Mapping by: K. O'Brien, 10/30/2025
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 10 T30N R7W NMPM

Northeast Blanco Unit
Sims Mesa SWD #001
Project Map
Simcoe LLC

Cottonwood CONSULTING

NEBU Sims Mesa SWD #001
Photographic Log
Simcoe LLC

Photo 1: NEBU Sims Mesa SWD #001 well sign.

Photo 2: BGT prior to removal.

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NEBU Sims Mesa SWD #001
Photographic Log
Simcoe LLC

Photo 3: Former location of BGT following removal.

Photo 4: Five-point composite sample (SS45) collected below base of BGT.

Cottonwood CONSULTING

NEBU Sims Mesa SWD #001
Photographic Log
Simcoe LLC

Photo 5: Five-point composite sample (SS47) collected from sidewalls of BGT location, view west.

Photo 6: Five-point composite sample (SS47) collected from sidewalls of BGT location, view east.

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-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

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

OIL CONS. DIV DIST. 3

AUG 19 2016

15584

Type of action:
- [x] 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: BP AMERICA PRODUCTION COMPANY OGRID #: 778
Address: 200 Energy Court, Farmington, NM 87401
Facility or well name: NEBU SIMS MESA SWD 001
API Number: 3003924236 OCD Permit Number:
U/L or Qtr/Qtr E Section 10.0 Township 30.0N Range 07W County: Rio Arriba County
Center of Proposed Design: Latitude 36.830801 Longitude -107.564725 NAD: [ ] 1927 [x] 1983
Surface Owner: [ ] Federal [x] 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.
[x] **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **TANK ID: B**
Volume: 90.0 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
[x] Visible sidewalls and liner [ ] Visible sidewalls only [ ] Other SINGLE WALLED DOUBLE BOTTOMED
Liner type: Thickness 40 mil [x] 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
[x] Alternate. Please specify 4' Hogwire with single barbed wire

23

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_2S, 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ Yes ☐ No ☐ 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	☐ 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 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	☐ Yes ☐ No
Written confirmation or verification from the municipality; Written approval obtained from the municipality	☐ 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
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): Steve Moskal Title: Field Environmental Coordinator

Signature: [signature] Date: 08\17\2016

e-mail address: steven.moskal@bp.com Telephone: 505-326-9497

18.
OCD Approval: ☒ Permit Application (including closure plan) ☐ Closure Plan (only) ☐ OCD Conditions (see attachment)

OCD Representative Signature: [signature] **Approval Date**: 8/24/2016

Title: Environmental Specialist **OCD Permit Number**:

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**:

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 _____ Longitude _____ 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): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

SITING AND HYDRO-GEOLOGICAL REPORT FOR NEBU SIMS MESA SWD 001

SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is well in excess of 100 feet (ft.). Local topography and proximity to adjacent water features were also considered. Based on a search of the New Mexico State Engineer's Office (attached) and multiple database sources provided as an aerial map (Figure 1), there are no freshwater wells or springs used for public or livestock consumption within 200 horizontal ft. of the below-grade tank (BGT). The nearest water well listed in Figure 1 is POD # SJ03640 (attached). This well is located 1.3 miles south of the well site and had recorded depth to water at 241 ft. A topographic map (Figure 2) demonstrates that the BGT is not within 100 ft. of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake as measured from the ordinary high water mark.

LOCAL GEOLOGY AND HYDROLOGY

The well site is located on a mesa top approximately 0.6 miles southwest and 0.67 miles north-northeast of Navajo Reservoir. The mesa is composed of the Nacimiento Formation. Broad shaley hills are interspersed with sandstone outcrops and systems of canyons and surface drainages leading into the reservoir. The BGT ground elevation (6,313 ft.) is greater than 225 ft. when the reservoir is at its maximum capacity (estimated at 6,085 ft.).

REGIONAL GEOLOGY AND HYDROLOGY

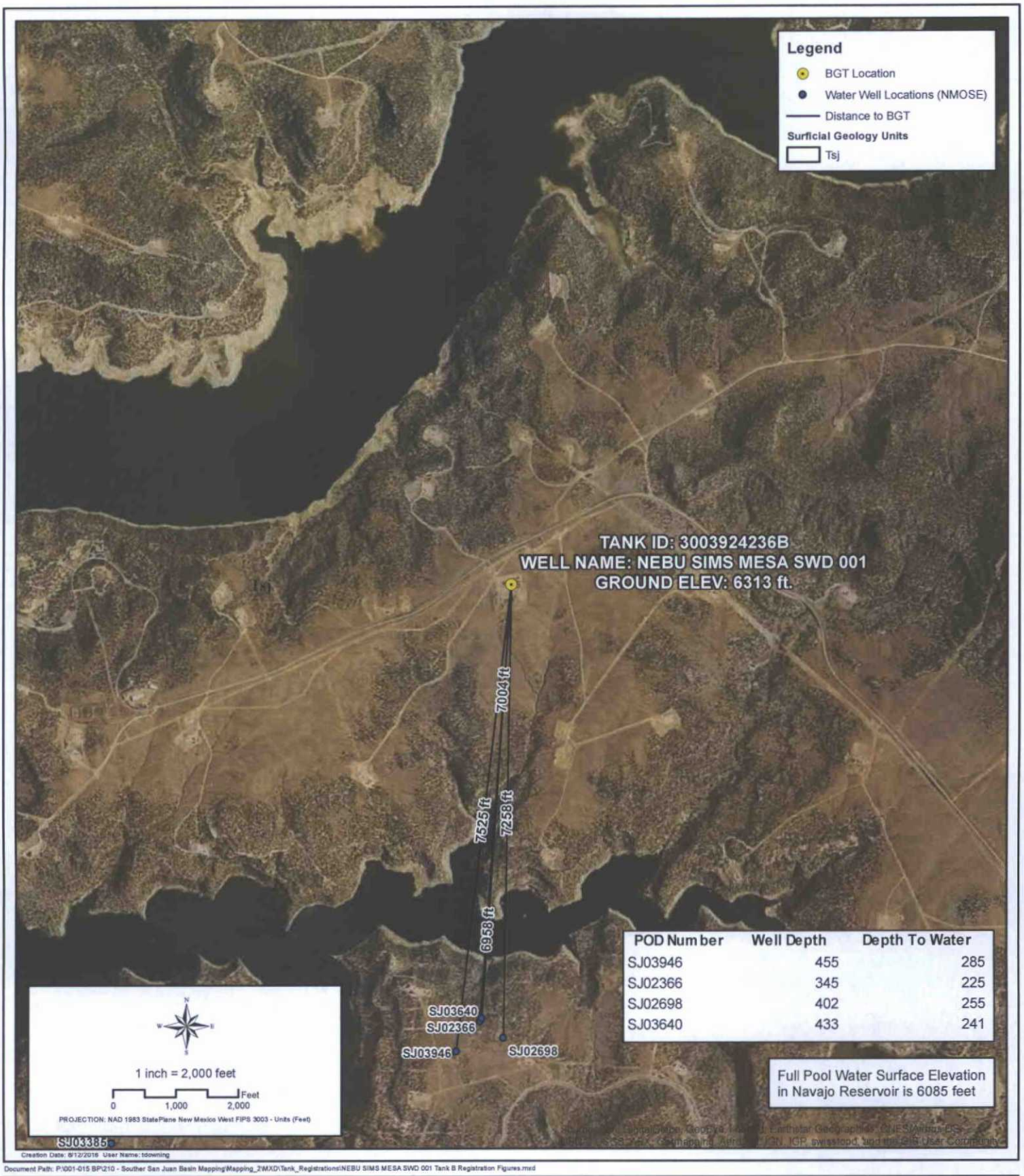
The San Juan Basin is situated in the Navajo section of the Colorado Plateau and is characterized by broad open valleys, mesas, buttes and hogbacks. Away from major valleys and canyons topographic relief is generally low. Native vegetation is sparse and shrubby. Drainage is mainly by the San Juan River, the only permanent stream in the Navajo Section of the Colorado Plateau. The San Juan River is a tributary of the Colorado River. Major tributaries include the Animas, Chaco and La Plata Rivers. Flow of the San Juan River across the basin is regulated by the Navajo Dam, located about 30 miles northeast of Farmington, New Mexico. The climate is arid to semiarid with an average annual precipitation of 8 to 10 inches. Soils within the basin consist of weathered parent rock derived from predominantly physical means mostly from eolian depositional system with fluvial having a lesser impact.

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The Nacimiento Formation of Paleocene age occurs at the surface in a broad belt at the western and southern edges of the central San Juan Basin and dips beneath the San Jose Formation in the center. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft^2/d (Stone et al, 1983). Groundwater within these aquifers flows toward the San Juan River.

REFERENCES

Circular 154-Guidebook to coal geology of northwest New Mexico By E. C. Beaumont, J. W. Shomaker, W. J. Stone, and others, 1976

Stone, et al., 1983, Hydrogeology and Water Resources of the San Juan Basin, New Mexico, Socorro, New Mexico Bureau of Mines and Mineral Resources Hydrologic Report 6, 70 p



POD Number	Well Depth	Depth To Water
SJ03946	455	285
SJ02366	345	225
SJ02698	402	255
SJ03640	433	241

Document Path: P:\001-015 BP\210 - Souther San Juan Basin Mapping\Mapping_2\MXD\Tank_Registrations\NEBU SIMS MESA SWD 001 Tank B Registration Figures.mxd

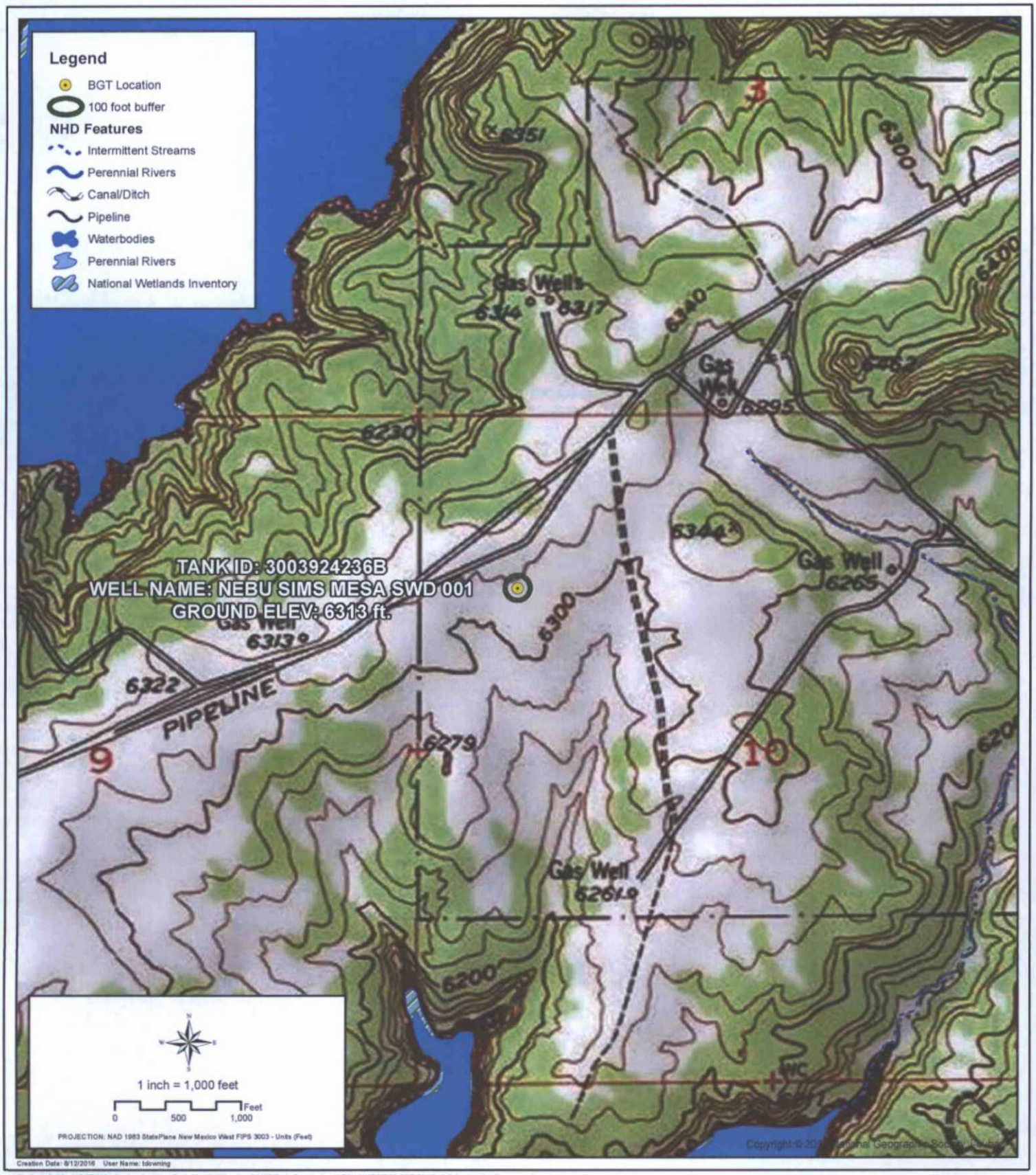
GROUNDWATER AND WATER WELL PROXIMITY

WELL NAME: NEBU SIMS MESA SWD 001

API NUMBER: 3003924236 TANK ID: 3003924236B

SECTION 10, TOWNSHIP 30.0N, RANGE 07W, P.M. NM23

FIGURE 1



bp

PROXIMITY TO WATERCOURSES AND WETLANDS

WELL NAME: NEBU SIMS MESA SWD 001

API NUMBER: 3003924236 TANK ID: 3003924236B

SECTION 10, TOWNSHIP 30.0N, RANGE 07W, P.M. NM23

FIGURE 2

New Mexico Office of the State Engineer
Wells with Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 271274.53 **Northing (Y):** 4079172.64 **Radius:** 60.96

New Mexico Office of the State Engineer
Wells Without Well Log Information

No wells found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 271274.53 **Northing (Y):** 4079172.64 **Radius:** 60.96

New Mexico Office of the State Engineer

Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

Basin: San Juan

UTMNAD83 Radius Search (in meters):

Easting (X): 271274.53 **Northing (Y):** 4079172.64 **Radius:** 60.96

New Mexico Office of the State Engineer

Active & Inactive Points of Diversion

(with Well Drill Dates & Depths)

(acre ft per annum) (R=POD has been replaced and no longer serves this file, C=the file is closed) (quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest) (NAD83 UTM in meters) (in feet)

WR File Nbr	Sub basin	Use	Diversion	County	POD Number	Code Grant	Source	q q q 6416 4	Sec	Tws	Rng	X	Y	Start Date	Finish Date	Depth Well	Depth Water
SJ 03640		DOM	3	RA	SJ 03640		Shallow	1 1 3	15	30N	07W	271072	4077061*	03/25/2006	04/12/2006	433	241

Record Count: 1

POD Search:

POD Number: SJ 03640

Sorted by: File Number

***UTM location was derived from PLSS - see Help**

New Mexico Office of the State Engineer
Water Right Summary

get image list

WR File Number: SJ 03640 **Subbasin:** - **Cross Reference:** -

Primary Purpose: DOM 72-12-1 DOMESTIC ONE HOUSEHOLD

Primary Status: PMT PERMIT

Total Acres: **Subfile:** -

Total Diversion: 3 **Cause/Case:** -

Owner: D-D CONSULTING SERVICES,INC.

Documents on File

	Trn #	Doc	File/Act	Status 1	Status 2	Transaction Desc.	From/ To	Acres	Diversion	Consumptive
get images	333710	72121	2005-06-02	PMT	LOG	SJ 03640	T		3	

Current Points of Diversion

(NAD83 UTM in meters)

POD Number	Source	Q 64	Q 16	Q 4	Sec	Tws	Rng	X	Y	Other Location Desc
SJ 03640	Shallow	1	1	3	15	30N	07W	271072	4077061*	411B DELASSO LOOS ROAD, RA CTY

***An (*) after northing value indicates UTM location was derived from PLSS - see Help**

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK DESIGN AND CONSTRUCTION PLAN

Pursuant to Rule 19.15.17.11 NMAC, BP America Production Company (BP) shall construct a below-grade tank (BGT) or modify an existing permitted BGT according to the following plan. Any deviations from this plan will be addressed on the New Mexico Oil Conservation Division's (NMOCD) form C-144 at the time of submittal.

Design and Construction Plan

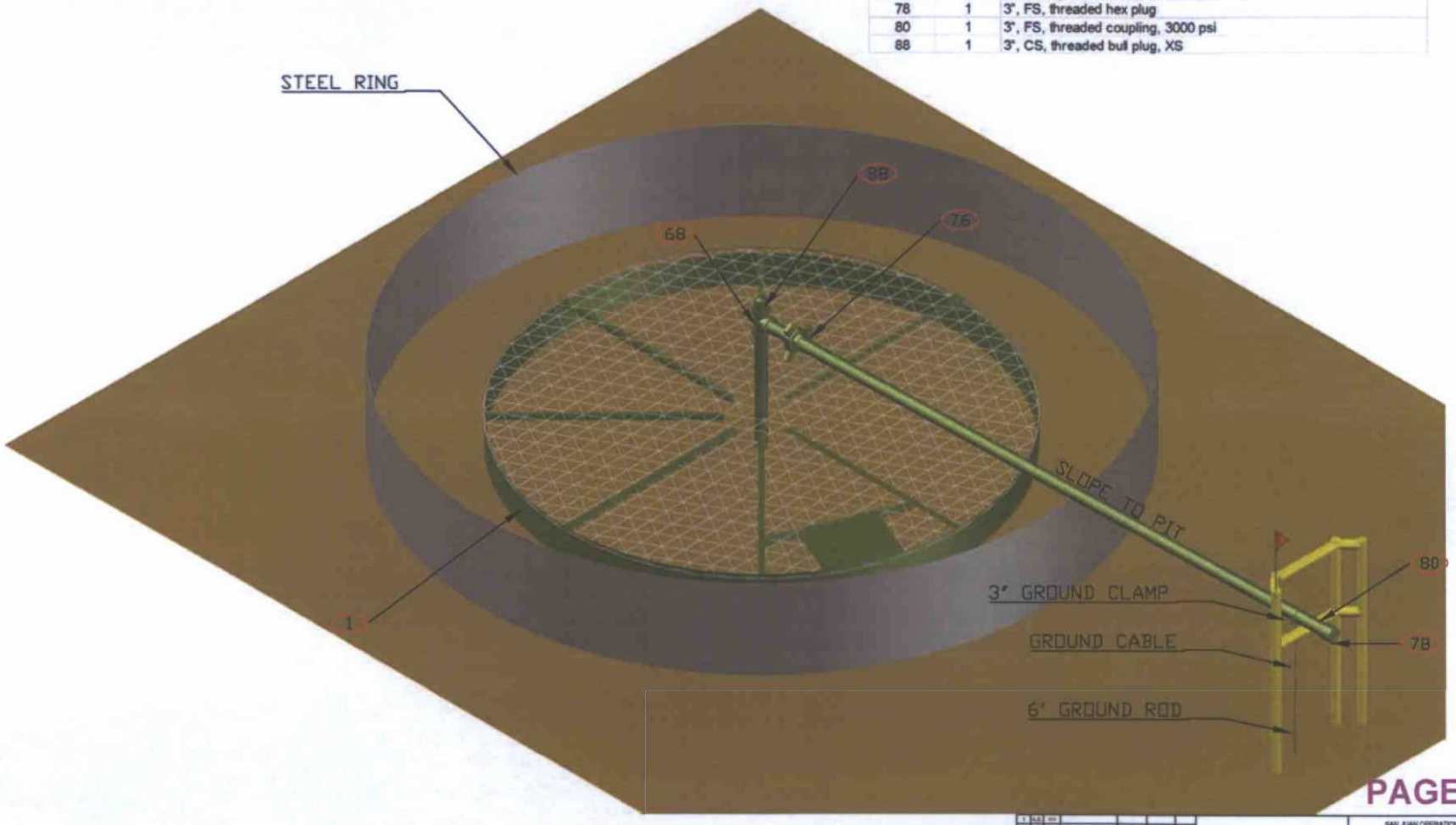
1. BP will design and construct a BGT which will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment.
2. BP is the well operator and shall install and maintain a well sign that is in compliance with 19.15.16.8 NMAC. The sign will be posted at the well site to address, at a minimum;
    a. Well Number
    b. Property name
    c. Operators name
    d. Location by footage, quarter-quarter section, township and range (or unit letter)
    e. API number
    f. Emergency contact information
3. BP will fence or enclose its BGTs in a manner that prevents unauthorized access and shall maintain its fence in good repair.
4. BP will fence or enclose a BGT located within 1,000 feet of a permanent residence, school, hospital, institution or church with, at a minimum a chain link security fence at least six (6) feet in height with at least two (2) strands of barbed wire at the top. BP will ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site.
5. BP is requesting NMOCD's approval for an alternative fence design that provides, at a minimum, equivalent protection to the design specified in Paragraph 3 of Subsection D of 19.15.17.11 NMAC for BGTs beyond the stated distance in paragraph 4 of this document. BP's proposed design for its BGTs will utilize 48" steel mesh field-fence (hogwire) with a metal or steel top rail. Perimeter T-post will be installed roughly every 10 feet.
6. BP will construct an expanded metal covering that completely covers the top of the BGT. The covering will be constructed such that it will prevent hazardous conditions to wildlife, including migratory birds
7. BP shall construct the BGT of materials that are resistant to produced water, any contained liquids, and damage from sunlight. BP's BGTs will be constructed of carbon steel that meets the requirements of ASTM A36.
8. BP's BGTs shall have a properly constructed earthen foundation consisting of a level base free of rocks, debris, sharp edges, or irregularities as to prevent punctures, cracks or indentations to the tank bottom as demonstrated on the design drawing.
9. BP will construct and operate the BGT to prevent surface water run-on by using both earthen berms and leaving a portion of the BGT above the original grade as demonstrated on the design drawing.
10. BP will construct and operate the BGT to prevent overflow and overfilling of the BGT. Overflow will be prevented by use of an electronic high fluid level detector that will automatically engage an electronic shut-off valve when a 1 foot freeboard is reached. The Hi-level automatic alarm notifies well optimizers when liquid level has reached within a pre-set distance to the top of the BGT. The Hi Hi alarm will trigger the Hi-level automatic shutdown valve which will close in the well until the liquid level can be lowered.

11. BP will construct and install a double-walled tank design per Subparagraph (b) of Paragraph (4) of Subsection I of19.15.17.11 NMAC with a two (2) inch diameter leak detection port. The floor supports located in the annular space of the tank bottom will be channeled to allow outward movement of liquid between the walls. Leak detection will be monitored per BP's Operating and Maintenance Plan. The walls of the BGT will be constructed of carbon steel that meets the ASTM A36 standard. BP's BGT design will insure containment of tank contents and protect underlying groundwater. The production equipment line drain is an automated drain that allows water level in production equipment (generally the separator) to be maintained within the equipment's operating parameters. The environmental drain is a manually operated drain that is used to drain liquids off of equipment. The tank drain is a manually operated drain, typically in the closed position that is used to rid the condensate tank of any water accumulation. The vent drain is a manually operated drain off the discharge of production equipment (usually the separator) and is used to blowdown the wellsite. The swab drain line is a manually operated drain originating between the wellhead and separator and is used during well workovers when large amounts of liquid are removed from the well and sent straight to the BGT.
12. BP owned and operated single walled BGTs constructed and installed prior to June 16, 2008 that has the side walls open for visual inspection and that does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, the operator shall promptly drain the BGT and remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
13. BP owned and operated single walled BGTs constructed and installed prior to June 16, 2008 and where any portion of the tank sidewall is below the ground surface and not visible shall equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, or close it, by June 16, 2013. If the existing BGT does not demonstrate integrity, the operator shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
14. BP owned and operated double walled BGTs constructed and installed prior to June 16, 2008 and which does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, the operator shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
15. The general specifications for the design and construction of the BGT have been provided in the attached BP design and construction schematic.

NOTE: INSTALL BARRIER AND PIPE STANDS AS NEEDED.

BILL OF MATERIALS

ITEM#	QTY	DESCRIPTION
1	1	PIT (90 BBL)
68	1	3", FS, threaded Tee, 3000 psi
76	1	3", FS, figure 400 hammer union, 4000 psi
78	1	3", FS, threaded hex plug
80	1	3", FS, threaded coupling, 3000 psi
88	1	3", CS, threaded bull plug, XS



PAGE 2

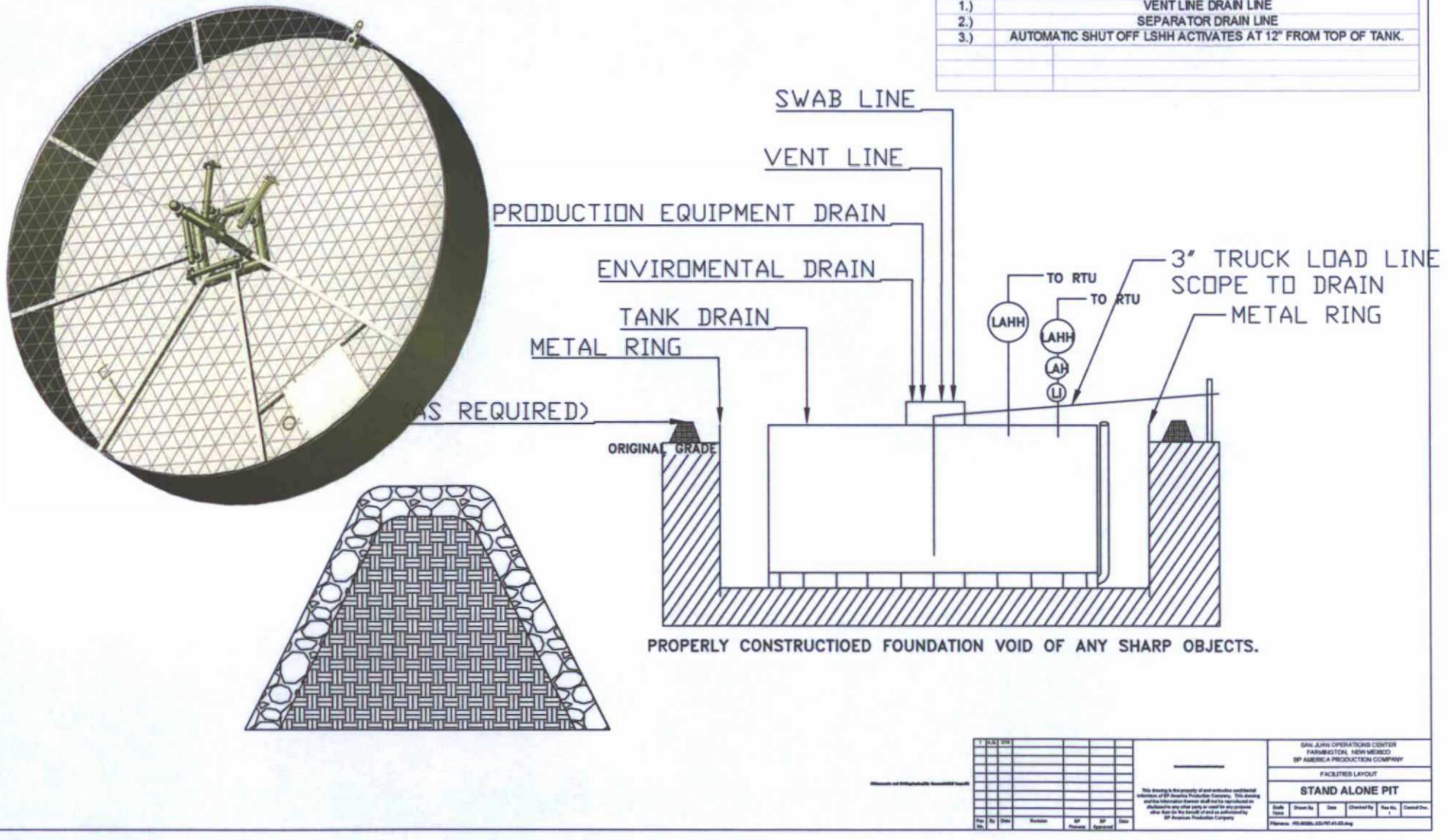
SAN JUAN OPERATIONS CENTER
FARMINGTON, NEW MEXICO
BP AMERICA PRODUCTION COMPANY

FACILITIES LAYOUT

STAND ALONE PIT
NEW STYLE

SINGLE WALLED BGT

	MANUAL OPERATION
1.)	PRODUCTION TANK DRAIN LINE
2.)	SWAB LINE
3.)	ENVIROMENTAL DRAIN
	AUTOMATED OPERATION
1.)	VENT LINE DRAIN LINE
2.)	SEPARATOR DRAIN LINE
3.)	AUTOMATIC SHUT OFF LSHH ACTIVATES AT 12" FROM TOP OF TANK.



SAN JUAN OPERATIONS CENTER
FARMINGTON, NEW MEXICO
BP AMERICA PRODUCTION COMPANY

FACILITIES LAYOUT

STAND ALONE PIT

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK OPERATING AND MAINTENANCE PLAN

Pursuant to Rule 19.15.17.12 NMAC, BP America Production Company (BP) shall maintain and operate a below-grade tank (BGT) by following the plan shown below. Deviations from this plan will be addressed with a submittal to the New Mexico Oil Conservation Division (NMOCD) using form C-144 at the time of the BGT registration or modification to an existing BGT registration.

Operating and Maintenance Plan

1. BP's BGTs will be operated to contain liquids and solids. BP will maintain the integrity of the BGT and secondary containment system as to prevent impacts to fresh water and to protect public health and the environment. BP will use automated high fluid level alarms and automated shut-off valves to insure that liquids are contained within the vessel and that the vessel does not overflow. These alarms and shut-off valves will be consistent with those demonstrated in the design plan.
2. BP will not knowingly discharge to or store any hazardous waste in a BGT.
3. If a BGT develops a leak below the liquid surface, BP shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office pursuant to 19.15.29 NMAC and repair the damage or replace the BGT as applicable.
4. BP will adhere to Subsection D of 19.15.17.12 NMAC. The requirements are as follows;
   a. BP shall not allow a below-grade tank to overflow or allow surface water run-on to enter the BGT.
   b. BP shall remove any measurable layer of oil from the fluid surface of a BGT.
   c. BP shall inspect the BGT for leakage and damage at least monthly and will document the integrity of each tank at least annually and maintain a written record of the integrity for five years.
   d. BP shall maintain adequate freeboard to prevent overtopping of the below-grade tank.
   e. If BP discovers that the BGT tank does not demonstrate integrity or that the BGT develops any of the conditions identified in Paragraph (5) of Subsection A of 19.15.17.12 NMAC, BP shall repair the damage or close the existing BGT pursuant to the closure requirements of 19.15.17.13 NMAC.
   f. If any of BP's BGTs are equipped or retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, then BP shall visually inspect the area beneath the BGT during the retrofit and document any areas that are wet, discolored or showing other evidence of a release on form C-141. BP will attempt to measure and report to the division the concentration of contaminants in the wet or discolored soil with respect to the standards set forth in Table I of 19.15.17.13 NMAC. If there is no wet or discolored soil or if the concentration of contaminants in the wet or discolored soil is less than the standard set forth in Table I of 19.15.17.13 NMAC, then BP shall proceed with the closure requirements of 19.15.17.13 NMAC prior to initiating the retrofit or replacement.

Managed Form NOP-5878 Revision 1

San Juan Lease Inspection

Custodian: Field Environmental Coordinator

Date: **Run:** ***Location:*** ***Name of Inspector:***

Yes	Action	N/A	
			Required Signs
			Does location have Well Sign and emergency phone number?
			Do compressor engines have Hearing Protection signs?
			Hydrogen Sulfide Signs (where applicable)
			Chemical containers and tanks have proper Hazcom label or BP Multi-Product Hazcom numbers?
Yes	Action	N/A	**Location- General**
			Housekeeping satisfactory?
			Tripping or falling hazards are absent? **If NO, identify and report to FSC.**
			Rig anchors/Deadmen adequately marked and visible if they present a hazard to drivers?
			Driving hazards such as risers are marked or flagged?
			Painting meets safety standards?
			Cattleguards/gates properly maintained?
			Tarps in good repair?
			Seeps, drips, or leaks are absent?
			Is weed control adequate?
			Stains on ground are absent? **If NO, remediate immediately, identify and report to FEC.**
			Are there any open ended valves that are not plugged?
Yes	Action	N/A	**Vessel/Tank**
			Adequate fencing around below grade tank?
			Are the dike/berm walkover in place, used and stable?
			Are dikes/berms in good condition?
			Is there adequate and safe access to pit for gauging?
			Does the pit have a high level alarm?
			Are stairways and catwalks properly maintained and in good condition?
			Toprail, midrail and toeboard in place?
			Are thief hatches in good condition, seal properly, and in the closed position?
			Is tank vent line equipped with a PV valve? (Enardo)
			Does the tank have a high level alarm?
			Are open ended load lines and pipes capped?
			Is soil around load lines clean of oil stains?
			Is tank area free of any evidence of seeps or leaks (including manway cover)?
			Are there proper seals on sales and drain valves?
			Are all suspected dump lines well supported?
			Are above ground dump lines marked with t-posts and plastic covers?
			Have all fiberglass drip pits been removed?
Yes	Action	N/A	**Treaters/Separators/Compressors/Pump Jacks**
			If there is a block valve upstream of the relief valve, is the block valve secured in the open position?
			Are relief valve discharge and blow downs piped to a safe area and secured against movement?
			Has flame arrestor been inspected within the last 5 years?
			Is flame port closed?
			Do all lines pass through a super muffler or swirl pot to the pit/tank? If not, are all lines secured?
			Is starting gas vented to a safe area, at least 10' vertically?
			No excessive vibration, knocking or unusual noises anywhere on unit or piping?
			Are site glasses in operating condition?
			Are environmental rails piped to a pit in a dedicated line?
			Do all blow downs, relief valve discharges, and risers have rain caps?
			Stuffing box leaks are absent?
			Are the weight guards and belt guard in place?
			Are skids in good condition?
			Are concrete bases / foundations in good condition?
			Are concrete bases free from erosion or settlement problems?
			Is secondary containment in place for day tanks?

Comments:

Signature of Inspector:

My signature assures that this location is SAFE, is in compliance with the LAW, and exhibits high standards of Pride, Ownership and Excellence.

BP AMERICA PRODUCTION COMPANY

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on BP America Production Company (BP) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, BP will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, BP will request preapproval from the Division District III office of any specific changes and will be included on form C-144. BP shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

General Closure Plan

1. BP shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
2. BP shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT 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.
3. Within 60 days of cessation of operations, 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 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)
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 Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
5. Within six months of cessation of operations, BP shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
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 to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table 1 on following page).

Table 1
Closure Criteria for Soils Beneath Below-Grade Tanks

Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
> 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

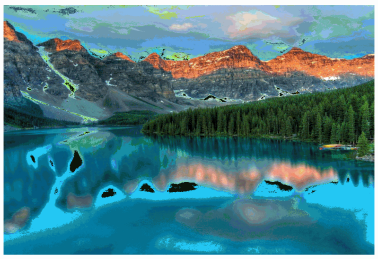
Notes: **mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.**
*** - Or other test methods approved by the division**
**** - Numerical limits or natural background level, whichever is greater**

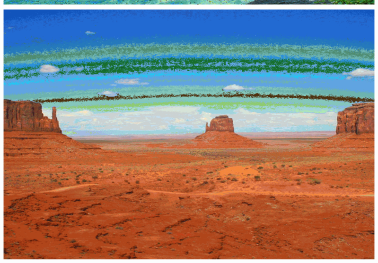
7. If any contaminant concentration exceeds those standards set in Table I, BP will acknowledge NMOCD's position to require additional delineation upon review of the results. BP will not proceed with any further closure activities until approval is first granted by NMOCD.
8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then BP shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
9. 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 Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) of Subsection H of 19.15.17.13 NMAC.
10. BP may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOCD's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. BP will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOCD for its approval.
11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.
12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.

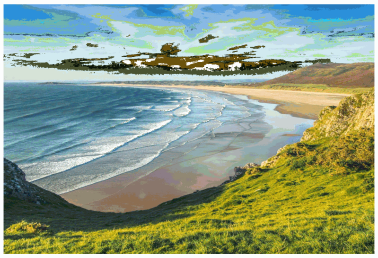
13. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.
17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of BP subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, BP shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
19. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
    a. necessary attachments to document all closure activities
    b. sampling results
    c. information required by 19.15.17 NMAC
    d. details on back-filling, capping and covering, where applicable.
20. 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.

Report to:

Kyle Siesser







5796 U.S. Hwy 64
Farmington, NM 87401

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

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Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name:	Sims Mesa SWD
Work Order:	E510174
Job Number:	20035-C-0001
Received:	10/16/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
10/20/25

Date Reported: 10/20/25

Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: Sims Mesa SWD
Workorder: E510174
Date Received: 10/16/2025 3:25:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 10/16/2025 3:25:00PM, under the Project Name: Sims Mesa SWD.

The analytical test results summarized in this report with the Project Name: Sims Mesa SWD 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 reguarding 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
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Envirotech Web Address: www.envirotech-inc.com

Table of Contents

Sample Summary

Cottonwood Consulting	Project Name:	Sims Mesa SWD	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/25 14:46

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS45	E510174-01A	Soil	10/16/25	10/16/25	Glass Jar, 4 oz.
SS46	E510174-02A	Soil	10/16/25	10/16/25	Glass Jar, 4 oz.
SS47	E510174-03A	Soil	10/16/25	10/16/25	Glass Jar, 4 oz.

Sample Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

SS45

E510174-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Benzene	ND	0.0250	1	10/16/25	10/16/25	
Ethylbenzene	ND	0.0250	1	10/16/25	10/16/25	
Toluene	ND	0.0250	1	10/16/25	10/16/25	
o-Xylene	ND	0.0250	1	10/16/25	10/16/25	
p,m-Xylene	ND	0.0500	1	10/16/25	10/16/25	
Total Xylenes	ND	0.0250	1	10/16/25	10/16/25	
Surrogate: 4-Bromochlorobenzene-PID		*113 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/16/25	10/16/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*99.9 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM			Batch: 2542115
Diesel Range Organics (C10-C28)	ND	25.0	1	10/17/25	10/17/25	
Oil Range Organics (C28-C36)	ND	50.0	1	10/17/25	10/17/25	
Surrogate: n-Nonane		*91.7 %*	*61-141*	*10/17/25*	*10/17/25*	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: DT			Batch: 2542124
Chloride	**55.1**	20.0	1	10/17/25	10/17/25	

Sample Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

SS46

E510174-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Benzene	ND	0.0250	1	10/16/25	10/16/25	
Ethylbenzene	ND	0.0250	1	10/16/25	10/16/25	
Toluene	ND	0.0250	1	10/16/25	10/16/25	
o-Xylene	ND	0.0250	1	10/16/25	10/16/25	
p,m-Xylene	ND	0.0500	1	10/16/25	10/16/25	
Total Xylenes	ND	0.0250	1	10/16/25	10/16/25	
Surrogate: 4-Bromochlorobenzene-PID		*111 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/16/25	10/16/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*98.8 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM			Batch: 2542115
Diesel Range Organics (C10-C28)	ND	25.0	1	10/17/25	10/17/25	
Oil Range Organics (C28-C36)	ND	50.0	1	10/17/25	10/17/25	
Surrogate: n-Nonane		*96.2 %*	*61-141*	*10/17/25*	*10/17/25*	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: DT			Batch: 2542124
Chloride	**24.7**	20.0	1	10/17/25	10/17/25	

Sample Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

SS47

E510174-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Benzene	ND	0.0250	1	10/16/25	10/16/25	
Ethylbenzene	ND	0.0250	1	10/16/25	10/16/25	
Toluene	ND	0.0250	1	10/16/25	10/16/25	
o-Xylene	ND	0.0250	1	10/16/25	10/16/25	
p,m-Xylene	ND	0.0500	1	10/16/25	10/16/25	
Total Xylenes	ND	0.0250	1	10/16/25	10/16/25	
Surrogate: 4-Bromochlorobenzene-PID		*113 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: BA			Batch: 2542096
Gasoline Range Organics (C6-C10)	ND	20.0	1	10/16/25	10/16/25	
Surrogate: 1-Chloro-4-fluorobenzene-FID		*98.5 %*	*70-130*	*10/16/25*	*10/16/25*	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM			Batch: 2542115
Diesel Range Organics (C10-C28)	ND	25.0	1	10/17/25	10/17/25	
Oil Range Organics (C28-C36)	ND	50.0	1	10/17/25	10/17/25	
Surrogate: n-Nonane		*94.2 %*	*61-141*	*10/17/25*	*10/17/25*	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: DT			Batch: 2542124
Chloride	**51.9**	20.0	1	10/17/25	10/17/25	

QC Summary Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

Volatile Organics by EPA 8021B

Analyst: BA

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2542096-BLK1)									Prepared: 10/16/25 Analyzed: 10/17/25
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	*9.51*		*8.00*		*119*	*70-130*			
LCS (2542096-BS1)									Prepared: 10/16/25 Analyzed: 10/17/25
Benzene	4.87	0.0250	5.00		97.3	70-130			
Ethylbenzene	4.80	0.0250	5.00		96.0	70-130			
Toluene	4.85	0.0250	5.00		97.0	70-130			
o-Xylene	4.82	0.0250	5.00		96.4	70-130			
p,m-Xylene	9.74	0.0500	10.0		97.4	70-130			
Total Xylenes	14.6	0.0250	15.0		97.1	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*9.57*		*8.00*		*120*	*70-130*			
Matrix Spike (2542096-MS1)				**Source: E510170-23**					Prepared: 10/16/25 Analyzed: 10/17/25
Benzene	4.64	0.0250	5.00	ND	92.7	70-130			
Ethylbenzene	4.54	0.0250	5.00	ND	90.8	70-130			
Toluene	4.59	0.0250	5.00	ND	91.9	70-130			
o-Xylene	4.54	0.0250	5.00	ND	90.7	70-130			
p,m-Xylene	9.21	0.0500	10.0	ND	92.1	70-130			
Total Xylenes	13.7	0.0250	15.0	ND	91.6	70-130			
Surrogate: 4-Bromochlorobenzene-PID	*10.0*		*8.00*		*125*	*70-130*			
Matrix Spike Dup (2542096-MSD1)				**Source: E510170-23**					Prepared: 10/16/25 Analyzed: 10/17/25
Benzene	5.03	0.0250	5.00	ND	101	70-130	8.09	27	
Ethylbenzene	4.95	0.0250	5.00	ND	98.9	70-130	8.60	26	
Toluene	5.00	0.0250	5.00	ND	99.9	70-130	8.37	20	
o-Xylene	4.95	0.0250	5.00	ND	98.9	70-130	8.67	25	
p,m-Xylene	10.0	0.0500	10.0	ND	100	70-130	8.49	23	
Total Xylenes	15.0	0.0250	15.0	ND	99.8	70-130	8.55	26	
Surrogate: 4-Bromochlorobenzene-PID	*10.1*		*8.00*		*126*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: BA

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2542096-BLK1)									Prepared: 10/16/25 Analyzed: 10/17/25
Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.37*		*8.00*		*105*	*70-130*			
LCS (2542096-BS2)									Prepared: 10/16/25 Analyzed: 10/17/25
Gasoline Range Organics (C6-C10)	52.3	20.0	50.0		105	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.73*		*8.00*		*109*	*70-130*			
Matrix Spike (2542096-MS2)				**Source: E510170-23**					Prepared: 10/16/25 Analyzed: 10/17/25
Gasoline Range Organics (C6-C10)	49.7	20.0	50.0	ND	99.4	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.76*		*8.00*		*109*	*70-130*			
Matrix Spike Dup (2542096-MSD2)				**Source: E510170-23**					Prepared: 10/16/25 Analyzed: 10/17/25
Gasoline Range Organics (C6-C10)	57.6	20.0	50.0	ND	115	70-130	14.6	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	*8.32*		*8.00*		*104*	*70-130*			

QC Summary Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: HM

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2542115-BLK1)									Prepared: 10/17/25 Analyzed: 10/17/25
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	*36.3*		*50.0*		*72.7*	*61-141*			
LCS (2542115-BS1)									Prepared: 10/17/25 Analyzed: 10/20/25
Diesel Range Organics (C10-C28)	220	25.0	250		87.9	66-144			
Surrogate: n-Nonane	*39.8*		*50.0*		*79.7*	*61-141*			
Matrix Spike (2542115-MS1)				**Source: E510172-42**					Prepared: 10/17/25 Analyzed: 10/17/25
Diesel Range Organics (C10-C28)	287	25.0	250	43.2	97.6	56-156			
Surrogate: n-Nonane	*47.3*		*50.0*		*94.6*	*61-141*			
Matrix Spike Dup (2542115-MSD1)				**Source: E510172-42**					Prepared: 10/17/25 Analyzed: 10/17/25
Diesel Range Organics (C10-C28)	288	25.0	250	43.2	98.1	56-156	0.432	20	
Surrogate: n-Nonane	*47.1*		*50.0*		*94.2*	*61-141*			

QC Summary Data

Cottonwood Consulting	Project Name:	Sims Mesa SWD	**Reported:**
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/2025 2:46:38PM

Anions by EPA 300.0/9056A

Analyst: DT

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	
Blank (2542124-BLK1)									Prepared: 10/17/25 Analyzed: 10/17/25
Chloride	ND	20.0							
LCS (2542124-BS1)									Prepared: 10/17/25 Analyzed: 10/17/25
Chloride	254	20.0	250		101	90-110			
Matrix Spike (2542124-MS1)				**Source: E510176-02**					Prepared: 10/17/25 Analyzed: 10/17/25
Chloride	1010	40.0	250	813	77.7	80-120			M4
Matrix Spike Dup (2542124-MSD1)				**Source: E510176-02**					Prepared: 10/17/25 Analyzed: 10/17/25
Chloride	1080	40.0	250	813	106	80-120	6.77	20	

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

Definitions and Notes

Cottonwood Consulting	Project Name:	Sims Mesa SWD	
PO Box 1653	Project Number:	20035-C-0001	**Reported:**
Durango CO, 81302	Project Manager:	Kyle Siesser	10/20/25 14:46

M4	Matrix spike recovery value is suspect since the analyte concentration in the sample is disproportionate to the spike level. The associated LCS spike recovery was acceptable.
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
RPD	Relative Percent Difference
DNI	Did Not Ignite
DNR	Did not react with the addition of acid or base.

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

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

envirotech
Analytical Laboratory

Chain of Custody

Client Information	Invoice Information	Lab Use Only	TAT				State					
Client: Cottonwood Consulting LLC	Company: Cottonwood Consulting LLC	Lab WO# E510174	Job Number 2035-C-0001	1D	2D	3D	Std	NM	CO	UT	TX	
Project Name: Sims Mesa SWD	Address: PO Box 1653			X				X				
Project Manager: Kyle Siesser	City, State, Zip: Durango CO 81302											
Address: PO Box 1653	Phone: 970-764-7356											
City, State, Zip: Durango CO 81302	Email: ksiesser@cottonwoodconsulting.com											
Phone: 970-764-7356	Miscellaneous:											
Email: ksiesser@cottonwoodconsulting.com												

Sample Information

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Field Filter	Lab Number	DRO/ORO by 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Chloride 300.0	TCEQ 1005 - TX	RCRA 8 Metals	BGDOC - NM	BGDOC - TX	Sample Temp	Remarks
1015	10/16/2025	Soil	1	SS45		1	✓	✓	✓		✓					4.0	
1020	↓	Soil	1	SS46		2	✓	✓	✓		✓					3.6	
1345	✓	Soil	1	SS47		3	✓	✓	✓		✓					3.4	
	JL	~~Soil~~	~~1~~ JL	~~SS48~~ JL													
	JL	~~Soil~~	~~1~~ JL	~~SS49~~ JL													
	JL	~~Soil~~	~~1~~ JL	~~SS50~~ JL													

Additional Instructions: Please CC jharter@cottonwoodconsulting.com emillar@cottonwoodconsulting.com kobrien@cottonwoodconsulting.com jlafortune@cottonwoodconsulting.com dsonger@cottonwoodconsulting.com Rush 1 Day TAT please.

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
	10-16-25	1525		10.16.25	1525

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: (Y) N

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: 10/16/2025 3:28:59PM

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:	10/16/25 15:25	Work Order ID:	E510174
Phone:	970-764-7356	Date Logged In:	10/16/25 15:26	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	10/17/25 17:00 (1 day TAT)		

Chain of Custody (COC)

1. Does the sample ID match the COC?	Yes	
2. Does the number of samples per sampling site location match the COC	Yes	
3. Were samples dropped off by client or carrier?	Yes	Carrier: Joseph LaFortune
4. Was the COC complete, i.e., signatures, dates/times, requested analyses?	Yes	
5. Were all samples received within holding time? Note: Analysis, such as pH which should be conducted in the field, i.e, 15 minute hold time, are not included in this disucssion.	Yes	

Comments/Resolution

Sample Turn Around Time (TAT)

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

Sample Cooler

7. Was a sample cooler received?	Yes
8. If yes, was cooler received in good condition?	Yes
9. Was the sample(s) received intact, i.e., not broken?	Yes
10. Were custody/security seals present?	No
11. If yes, were custody/security seals intact?	NA
12. Was the sample received on ice? Note: Thermal preservation is not required, if samples are received within 15 minutes of sampling	Yes
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.

From: OCDOnline@state.nm.us
To: Kyle Siesser
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 514812
Date: Monday, October 13, 2025 3:37:49 PM

To whom it may concern (c/o Kyle Siesser for SIMCOE LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nBP0804351945.

The sampling event is expected to take place:

When: 10/16/2025 @ 09:30
Where: E-10-30N-07W 1450 FNL 790 FWL (36.8303986,-107.5647507)

Additional Information: 36.8303986, -107.5647507

Additional Instructions: 36.8303986, -107.5647507

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**
- **If confirmation sampling is going to take place over multiple days, individual C-141N applications must be submitted for each sampling date. Date ranges are not currently accepted on the C-141N application.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

From: OCDOnline@state.nm.us
To: Kyle Siesser
Subject: The Oil Conservation Division (OCD) has accepted the application, Application ID: 514817
Date: Monday, October 13, 2025 3:39:40 PM

To whom it may concern (c/o Kyle Siesser for SIMCOE LLC),

The OCD has received the submitted *Notification for (Final) Sampling of a Release* (C-141N), for incident ID (n#) nAPP2503132631.

The sampling event is expected to take place:

When: 10/16/2025 @ 09:30
Where: E-10-30N-07W 1450 FNL 790 FWL (36.8304568,-107.5647217)

Additional Information: 36.8303986, -107.5647507

Additional Instructions: 36.8303986, -107.5647507

An OCD representative may be available onsite at the date and time reported. In the absence or presence of an OCD representative, sampling pursuant to 19.15.29.12.D NMAC is required. Sampling must be performed following an approved sampling plan or pursuant to 19.15.29.12.D.(1).(c) NMAC. Should there be a change in the scheduled date and time of the sampling event, then another notification should be resubmitted through OCD permitting as soon as possible.

- **Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.**
- **If confirmation sampling is going to take place over multiple days, individual C-141N applications must be submitted for each sampling date. Date ranges are not currently accepted on the C-141N application.**

If you have any questions regarding this application, or don't know why you have received this email, please contact us.

New Mexico Energy, Minerals and Natural Resources Department
1220 South St. Francis Drive
Santa Fe, NM 87505

Jerrid Brann

From: David, Deon W. <ddavid@nmslo.gov>
Sent: Friday, August 22, 2025 3:08 PM
To: Jerrid Brann
Cc: Bisbey-Kuehn, Elizabeth A.; Knight, Tami C.; Honea, Tammy; Griffin, Becky R.; Biernoff, Ari; Heltman, Elaine G.
Subject: SIMCOE LLC - NEBU SIMS MESA SWD #001 (30-039-24236). Remediation Plan - Approved.

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

RE: 30-039-24236 (SIMCOE LLC); NEBU SIMS MESA SWD #001; North East Blanco Unit (SIMCOE LLC)
Incident #: 2503132631 & nBP0628430543
Remediation Workplan Received: August 13, 2025
Workplan Status: **Approved**

Details regarding the workplan review are provided in the table below. The lessee and/or their contractor are responsible for ensuring that the project manager and field personnel performing the work follow the approved work plan. Please respond to this email that you understand and agree to the conditions of approval.

General Scope of Work Topics Addressed in Remediation Workplan In Detail	Included/Approved	Not Included/Not Approved	Not Required
NMOCD Record Review	Approved		
Historical Aerial Review with Areas of Concern Identified	Approved		
CPP/Bio Statements	Approved		
Site Characterization/Closure Criteria	Approved		
Site assessment/delineation results	Approved		
Remediation Method Detailed	Approved		
Sampling Protocol	Approved		
Reclamation Workplan/Discussion			Not Required. No work is scheduled to occur

			outside of the authorized pad area.
Schedule of Implementation	Approved. Remediation work is scheduled for October 2025.		

We appreciate the efforts being taken to reclaim State Trust Land.

Environmental Compliance Office
New Mexico State Land Office
eco@nmslo.gov
nmstatelands.org

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

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 522493
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
joel.stone	Closure report approved for existing permitted 90 bbl BGT. BGT was replaced due to loss of tank integrity. BGT was removed from service on 10/16/2025. 5-point composite soil sample analysis indicated all analytes were below closure criteria. Operator will submit C-144 BGT registration and closure plan for the replacement tank. Reclamation and revegetation will be completed at the site upon closure of the replacement BGT.	11/6/2025