

## Hughes LS #001 BGT Closure Report

SIMCOE LLC  
1199 Main Avenue, Suite 101  
Durango, CO 81301

To whom it may concern,

SIMCOE LLC is proposing to close the Below Grade Tank (BGT) at the Hughes LS #001. The BGT was removed on 12/17/2025 with sampling and backfilling occurring the same day. Below is the list of required protocol steps for the closure of the BGT according to the approved plan

### Closure Checklist:

1. Notification to the surface landowner was completed and confirmation is attached.
2. Notification to the NMOCD was completed with email confirmation attached.
3. Liquids and sludge were hauled from the BGT and disposed of in approved the facility at Basin Disposal, Permit # NM-01-0005
4. The BGT will be scrapped.
5. On site equipment associated with the BGT was removed.
6. A 5-point composite sample was collected from below the BGT after removal and analyzed for BTEX, Benzene, TPH and chlorides. Sample data is attached to the closure plan.
7. A C-141 form is attached.
8. SIMCOE determined no release had occurred.
9. Backfill has occurred, SIMCOE will not reclaim at this time as the location is still an active producing well.
10. SIMCOE will not reclaim at this time as the location is still an active producing well.
11. SIMCOE will not reclaim at this time as the location is still an active producing well.
12. SIMCOE will not reclaim at this time as the location is still an active producing well.
13. SIMCOE will not reclaim at this time as the location is still an active producing well.
14. SIMCOE will not reclaim at this time as the location is still an active producing well.

Regards,

Jerrid Brann  
Sr. EH&S Representative  
SIMCOE LLC  
1199 Main Avenue, Suite 101 Durango, CO 81301  
(405)-658-3331

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.  
**Variations 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.*

<b><u>General siting</u></b>	
<b><u>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</u></b> - <input type="checkbox"/> NM Office of the State Engineer - iWATERS database search; <input type="checkbox"/> USGS; <input type="checkbox"/> Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
<b><u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit .</u></b> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within 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. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. <b>(Does not apply to below grade tanks)</b> - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. <b>(Does not apply to below grade tanks)</b> - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b><u>Below Grade Tanks</u></b>	
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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b><u>Temporary Pit using Low Chloride Drilling Fluid</u></b> (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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> No

Within 100 feet of a wetland.  
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  Yes  No

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

Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  
 - Topographic map; Visual inspection (certification) of the proposed site  Yes  No

Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  Yes  No

Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application;  
 - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  Yes  No

Within 300 feet of a wetland.  
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  Yes  No

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

Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark).  
 - Topographic map; Visual inspection (certification) of the proposed site  Yes  No

Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application.  
 - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image  Yes  No

Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application.  
 - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site  Yes  No

Within 500 feet of a wetland.  
 - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site  Yes  No

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

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

**11. Multi-Well Fluid Management Pit Checklist:** Subsection B of 19.15.17.9 NMAC  
*Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.*

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

12.

**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC

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

- Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Climatological Factors Assessment
- Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- Quality Control/Quality Assurance Construction and Installation Plan
- Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- Nuisance or Hazardous Odors, including H<sub>2</sub>S, Prevention Plan
- Emergency Response Plan
- Oil Field Waste Stream Characterization
- Monitoring and Inspection Plan
- Erosion Control Plan
- Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

13.

**Proposed Closure:** 19.15.17.13 NMAC

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

- Type:  Drilling  Workover  Emergency  Cavitation  P&A  Permanent Pit  Below-grade Tank  Multi-well Fluid Management Pit  
 Alternative
- Proposed Closure Method:  Waste Excavation and Removal  
 Waste Removal (Closed-loop systems only)  
 On-site Closure Method (Only for temporary pits and closed-loop systems)  
 In-place Burial  On-site Trench Burial  
 Alternative Closure Method

14.

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

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

15.

**Siting Criteria (regarding on-site closure methods only):** 19.15.17.10 NMAC

**Instructions:** Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

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

adopted pursuant to NMSA 1978, Section 3-27-3, as amended. - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No

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: *Jerrid Brann* \_\_\_\_\_ Date: \_\_\_\_\_

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



Date: 12/17/25

Client: Simcoe

Environmental Specialist(s): DS

Contractor: Kelly O:Field

Page: 1 of 1

BGT Closure Field Form

Site Information

Well Name: Hughes LS 001

Well API#: 3004507950

Lease:  Federal  State / Fee / Indian

Well Location: Unit: N Sec: 19 T: 29N

R: 8W

City:

St:

BGT Information

Prev. Tank ID: A 95 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: 95 bbls  single  double-wall single  double-bottom sidewalls visible  (Y) (N) berm  (Y) (N) fenced  (Y) (N) liner  (Y) (N)

Notes: No evidence of release following removal of BGT

NMOCD Closure Standards:

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

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

Soil Sampling

Sample ID: SPC-TB07' (95) Time: 1350 Sample Type: Grab Composite - 5 pts PID: 0.2 ppm Lab: Envirotech

Notes: Soil tan, sandy clay, no odor, no stain, Fine, damp

Soil Sampling

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

Notes:

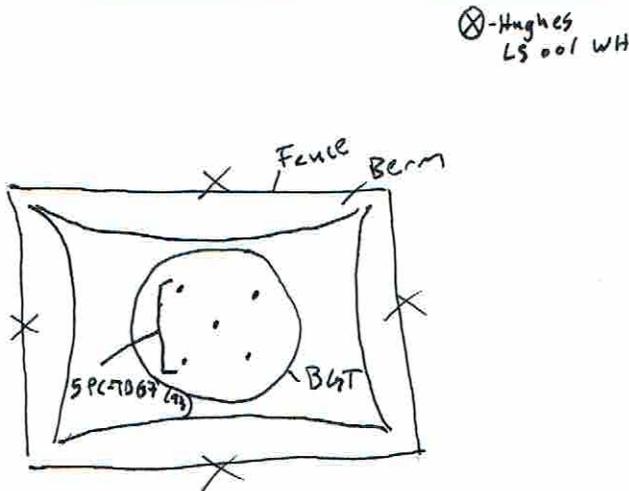
Soil Sampling

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

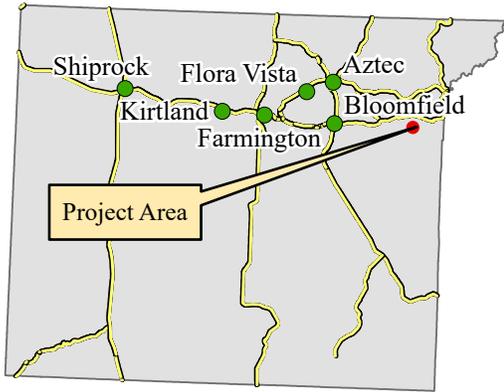
Notes:

Site Sketch

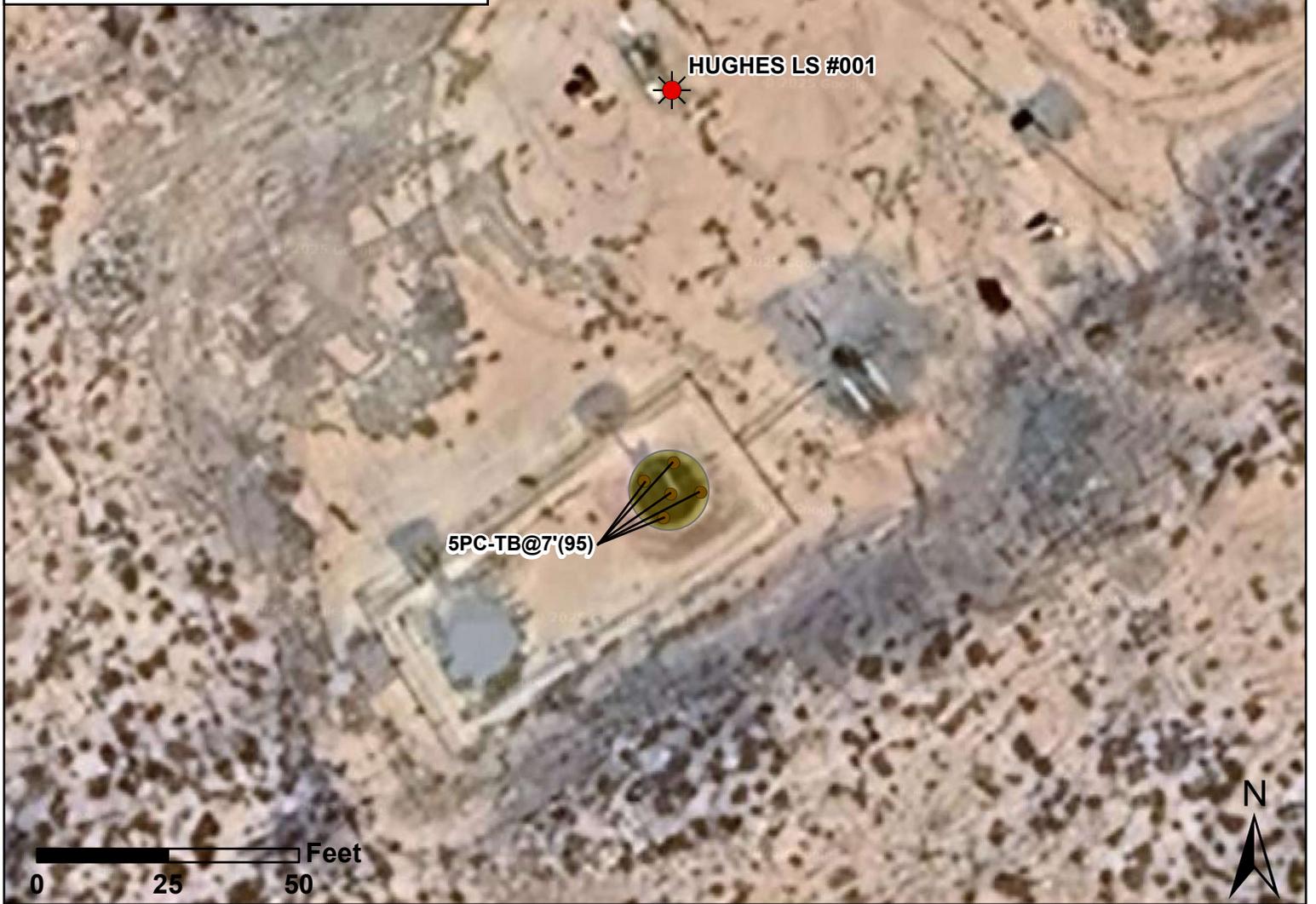
Notes



N PID Calibration Date: 12/17/25



San Juan County, New Mexico



Notes: All soil samples collected 12/17/2025. 5PC-TB@7'(95) is a 5-point composite sample.

**Legend**

-  Oil & Gas Well
-  Soil Sample
-  BGT



Mapping by: K. O'Brien, 12/29/2025  
 Coordinate System:  
 NAD 1983 UTM Zone 13 N

Location: Sec 19 T29N R8W NMPM

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



Hughes LS #001  
Photographic Log  
Simcoe, LLC



Photo 1: Hughes LS #001 well sign.



Photo 2: BGT prior to removal.



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

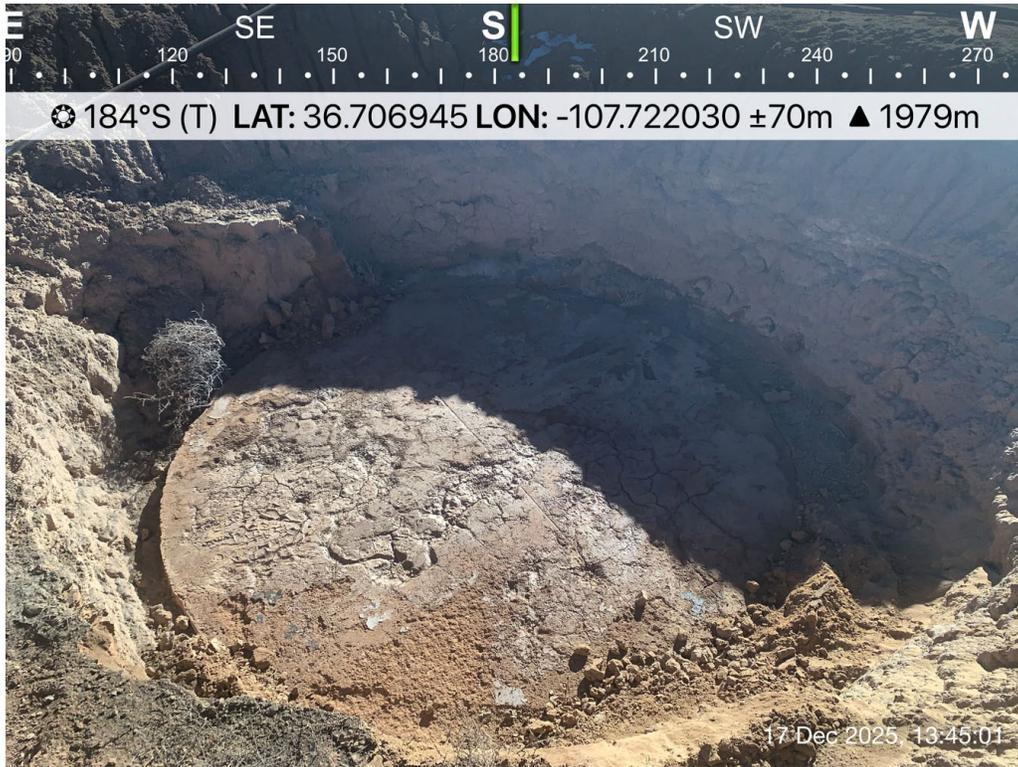


Photo 3: Location of BGT following removal.

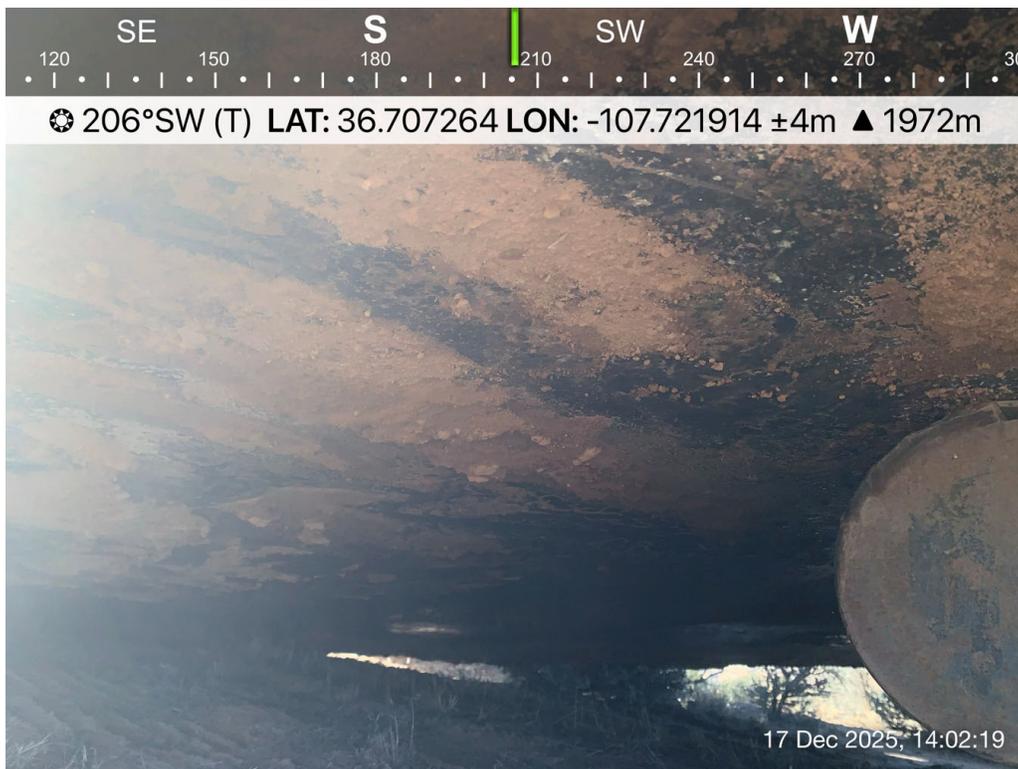


Photo 4: Bottom of BGT following removal.



Hughes LS #001  
Photographic Log  
Simcoe, LLC



Photo 5: 5PC-TB@7'(95) is a 5-point composite sample collected below base of BGT following removal.



Photo 6: New BGT with metal cellar and poly liner installed.

## Jerrid Brann

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**From:** Christy Kost  
**Sent:** Thursday, December 11, 2025 1:33 PM  
**To:** Jerrid Brann  
**Subject:** Fw: Well Name: HUGHES LS, Well Number: 1, Notification of Sundry Received

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**From:** AFMSS <blm-afmss-notifications@blm.gov>  
**Sent:** Thursday, December 11, 2025 1:31 PM  
**To:** Christy Kost <christy.kost@machnr.com>  
**Subject:** Well Name: HUGHES LS, Well Number: 1, Notification of Sundry Received

## The Bureau of Land Management

### Notice Of Intent Receipt

- Operator Name: **SIMCOE LLC**
- Well Name: **HUGHES LS**
- Well Number: **1**
- US Well Number: **300450795000S1**
- Sundry ID: **2886627**

The BLM received your Notice Of Intent, Pit Construction or Closure sundry on 12/11/2025. This is to notify you that we are processing your sundry.

You may contact the field office if you have any questions.

If we need more information we will contact you. Thank you.

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This notification is automatically generated. Please do not reply to this message as this account is not monitored.

**NOTICE:** This email has come from an **external source**. Do not click on links or open attachments unless you were expecting this email.

**Jerrid Brann**

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**From:** Jerrid Brann  
**Sent:** Thursday, December 11, 2025 10:37 AM  
**To:** Stone, Joel, EMNRD  
**Cc:** Christy Kost; Cody Palmer  
**Subject:** Hughes LS #001 BGT Closure Notification

December 11, 2025

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

RE: Notice of proposed Below Grade Tank Closure

Well Name: Hughes LS #001  
API# 30-045-07950  
Unit N – Sec 19 – T29N – 8W  
San Juan County, NM

Mr. Stone,

Simcoe LLC is planning to close a Below Grade Tank under the requirements of NMOCD rule 19.15.17.13. This work is proposed to start on or around 9:00 am on December 17th, 2025.

Please let me know if there are any questions,

Thanks,

**Jerrid Brann**

---

Environmental Coordinator  
[jerrid.brann@machnr.com](mailto:jerrid.brann@machnr.com)



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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

Responsible Party: SIMCOE LLC	OGRID: 329736
Contact Name: Jerrid Brann	Contact Telephone 405-658-3331
Contact email: jerrid.brann@machnr.com	Incident #
Contact mailing address: 1199 Main Ste., Suite 101, Durango, CO 81301	

### Location of Release Source

Latitude 36.70694 Longitude -107.72192  
*(NAD 83 in decimal degrees to 5 decimal places)*

Site Name: Hughes LS #001	Site Type: Active Well
Date Release Discovered:	API# 30-045-07950

Unit Letter	Section	Township	Range	County
N	19	29N	8W	San Juan

Surface Owner:  State  Federal  Tribal  Private (Name: \_\_\_\_\_)

### Nature and Volume of Release

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

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

Cause of Release: No release discovered during BGT removal.

State of New Mexico  
Oil Conservation Division

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

### Initial Response

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Site Assessment/Characterization

*This information must be provided to the appropriate district office no later than 90 days after the release discovery date.*

What is the shallowest depth to groundwater beneath the area affected by the release?	_____ (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release 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?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did the release impact areas <b>not</b> on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

**Characterization Report Checklist:** *Each of the following items must be included in the report.*

- Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- Field data
- Data table of soil contaminant concentration data
- Depth to water determination
- Determination of water sources and significant watercourses within 1/2-mile of the lateral extents of the release
- Boring or excavation logs
- Photographs including date and GIS information
- Topographic/Aerial maps
- Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico  
Oil Conservation Division

Page 4

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Incident ID	
District RP	
Facility ID	
Application ID	

## Remediation Plan

**Remediation Plan Checklist:** *Each of the following items must be included in the plan.*

- Detailed description of proposed remediation technique
- Scaled sitemap with GPS coordinates showing delineation points
- Estimated volume of material to be remediated
- Closure criteria is to Table 1 specifications subject to 19.15.29.12(C)(4) NMAC
- Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

**Deferral Requests Only:** *Each of the following items must be confirmed as part of any request for deferral of remediation.*

- Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- Extents of contamination must be fully delineated.
- Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

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

email: \_\_\_\_\_ Telephone: \_\_\_\_\_

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

- Approved       Approved with Attached Conditions of Approval       Denied       Deferral Approved

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

State of New Mexico  
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

## Closure

The responsible party must attach information demonstrating they have complied with all applicable closure requirements and any conditions or directives of the OCD. This demonstration should be in the form of a comprehensive report (electronic submittals in .pdf format are preferred) including a scaled site map, sampling diagrams, relevant field notes, photographs of any excavation prior to backfilling, laboratory data including chain of custody documents of final sampling, and a narrative of the remedial activities. Refer to 19.15.29.12 NMAC.

**Closure Report Attachment Checklist:** *Each of the following items must be included in the closure report.*

- A scaled site and sampling diagram as described in 19.15.29.11 NMAC
- Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)
- Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)
- Description of remediation activities

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations. The responsible party acknowledges they must substantially restore, reclaim, and re-vegetate the impacted surface area to the conditions that existed prior to the release or their final land use in accordance with 19.15.29.13 NMAC including notification to the OCD when reclamation and re-vegetation are complete.

Printed Name: Jerrid Brann Title: Sr. EH&S Representative

Signature: \_\_\_\_\_ Date: 2/10/2026

email: jerrid.brann@machnr.com Telephone: 405-658-3331

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

Closure approval by the OCD does not relieve the responsible party of liability should their operations have failed to adequately investigate and remediate contamination that poses a threat to groundwater, surface water, human health, or the environment nor does not relieve the responsible party of compliance with any other federal, state, or local laws and/or regulations.

Closure Approved by: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_ Title: \_\_\_\_\_

**BP AMERICA PRODUCTION COMPANY**  
**SAN JUAN BASIN, NORTHWEST NEW MEXICO**

BELOW-GRADE TANK CLOSURE PLAN

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

**General Closure Plan**

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
  - a. BP Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)
  - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
  - e. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
  - f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
  - g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
  - h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
  - i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
  - j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
  - k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

**BP BGT Closure Plan 04-01-2010**

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

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

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

7. BP shall notify the division District III office of its results on form C-141.
8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area.
10. BP shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. BP shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.
11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. The soil

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. proof of closure notification (surface owner and NMOCD)
  - b. sampling analytical reports; information required by 19.15.17 NMAC;
  - c. disposal facility name and permit number
  - d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
  - e. site reclamation, photo documentation. Disposal Facility Name and Permit Number
16. BP shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

Report to:  
Kyle Siesser



# envirotech

*Practical Solutions for a Better Tomorrow*

## Analytical Report

Cottonwood Consulting

Project Name: Hughes LS 001

Work Order: E512177

Job Number: 20035-C-0001

Received: 12/17/2025

Revision: 1

Report Reviewed By:

Walter Hinchman  
Laboratory Director  
12/29/25

5796 U.S. Hwy 64  
Farmington, NM 87401

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



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



Date Reported: 12/29/25

Kyle Siesser  
PO Box 1653  
Durango, CO 81302

Project Name: Hughes LS 001  
Workorder: E512177  
Date Received: 12/17/2025 3:08:00PM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 12/17/2025 3:08:00PM, under the Project Name: Hughes LS 001.

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

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

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

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

Respectfully,

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

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

Field Offices:

**Southern New Mexico Area**

**Lynn Jarboe**  
Laboratory Technical Representative  
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[ljjarboe@envirotech-inc.com](mailto:ljjarboe@envirotech-inc.com)

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

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

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### Sample Summary

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/25 09:54
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Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
5PC-TB@7' (95)	E512177-01A	Soil	12/17/25	12/17/25	Glass Jar, 4 oz.

### Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/2025 9:54:11AM
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**5PC-TB@7' (95)**

**E512177-01**

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
<b>Volatile Organics by EPA 8021B</b>		mg/kg	mg/kg	Analyst: SL		Batch: 2551129
Benzene	ND	0.0250	1	12/19/25	12/20/25	
Ethylbenzene	ND	0.0250	1	12/19/25	12/20/25	
Toluene	ND	0.0250	1	12/19/25	12/20/25	
o-Xylene	ND	0.0250	1	12/19/25	12/20/25	
p,m-Xylene	ND	0.0500	1	12/19/25	12/20/25	
Total Xylenes	ND	0.0250	1	12/19/25	12/20/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		102 %	70-130	12/19/25	12/20/25	
<b>Nonhalogenated Organics by EPA 8015D - GRO</b>		mg/kg	mg/kg	Analyst: SL		Batch: 2551129
Gasoline Range Organics (C6-C10)	ND	20.0	1	12/19/25	12/20/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		90.4 %	70-130	12/19/25	12/20/25	
<b>Nonhalogenated Organics by EPA 8015D - DRO/ORO</b>		mg/kg	mg/kg	Analyst: KH		Batch: 2551135
Diesel Range Organics (C10-C28)	ND	25.0	1	12/19/25	12/20/25	
Oil Range Organics (C28-C36)	ND	50.0	1	12/19/25	12/20/25	
<i>Surrogate: n-Nonane</i>		104 %	61-141	12/19/25	12/20/25	
<b>Anions by EPA 300.0/9056A</b>		mg/kg	mg/kg	Analyst: TP		Batch: 2551147
Chloride	ND	20.0	1	12/19/25	12/20/25	

### QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/2025 9:54:11AM
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#### Volatile Organics by EPA 8021B

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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#### Blank (2551129-BLK1)

Prepared: 12/19/25 Analyzed: 12/22/25

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.85		8.00		98.2	70-130			

#### LCS (2551129-BS1)

Prepared: 12/19/25 Analyzed: 12/19/25

Benzene	4.99	0.0250	5.00		99.8	70-130			
Ethylbenzene	4.79	0.0250	5.00		95.8	70-130			
Toluene	4.92	0.0250	5.00		98.5	70-130			
o-Xylene	4.84	0.0250	5.00		96.7	70-130			
p,m-Xylene	9.78	0.0500	10.0		97.8	70-130			
Total Xylenes	14.6	0.0250	15.0		97.4	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.47		8.00		106	70-130			

#### Matrix Spike (2551129-MS1)

Source: E512179-31

Prepared: 12/19/25 Analyzed: 12/19/25

Benzene	5.48	0.0250	5.00	ND	110	70-130			
Ethylbenzene	5.24	0.0250	5.00	ND	105	70-130			
Toluene	5.38	0.0250	5.00	ND	108	70-130			
o-Xylene	5.27	0.0250	5.00	ND	105	70-130			
p,m-Xylene	10.7	0.0500	10.0	ND	107	70-130			
Total Xylenes	15.9	0.0250	15.0	ND	106	70-130			
Surrogate: 4-Bromochlorobenzene-PID	8.36		8.00		104	70-130			

#### Matrix Spike Dup (2551129-MSD1)

Source: E512179-31

Prepared: 12/19/25 Analyzed: 12/19/25

Benzene	5.30	0.0250	5.00	ND	106	70-130	3.35	27	
Ethylbenzene	5.06	0.0250	5.00	ND	101	70-130	3.41	26	
Toluene	5.20	0.0250	5.00	ND	104	70-130	3.36	20	
o-Xylene	5.12	0.0250	5.00	ND	102	70-130	2.95	25	
p,m-Xylene	10.3	0.0500	10.0	ND	103	70-130	3.34	23	
Total Xylenes	15.4	0.0250	15.0	ND	103	70-130	3.21	26	
Surrogate: 4-Bromochlorobenzene-PID	8.34		8.00		104	70-130			



### QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/2025 9:54:11AM
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#### Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2551129-BLK1)**

Prepared: 12/19/25 Analyzed: 12/22/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.20		8.00		90.0	70-130			

**LCS (2551129-BS2)**

Prepared: 12/19/25 Analyzed: 12/19/25

Gasoline Range Organics (C6-C10)	55.6	20.0	50.0		111	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.31		8.00		91.4	70-130			

**Matrix Spike (2551129-MS2)**

Source: E512179-31

Prepared: 12/19/25 Analyzed: 12/20/25

Gasoline Range Organics (C6-C10)	55.5	20.0	50.0	ND	111	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.28		8.00		91.0	70-130			

**Matrix Spike Dup (2551129-MSD2)**

Source: E512179-31

Prepared: 12/19/25 Analyzed: 12/20/25

Gasoline Range Organics (C6-C10)	54.9	20.0	50.0	ND	110	70-130	1.15	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.27		8.00		90.9	70-130			



### QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/2025 9:54:11AM
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#### Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2551135-BLK1)**

Prepared: 12/19/25 Analyzed: 12/19/25

Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: <i>n</i> -Nonane	49.9		50.0		99.7	61-141			

**LCS (2551135-BS1)**

Prepared: 12/19/25 Analyzed: 12/19/25

Diesel Range Organics (C10-C28)	271	25.0	250		108	66-144			
Surrogate: <i>n</i> -Nonane	51.1		50.0		102	61-141			

**Matrix Spike (2551135-MS1)**

Source: E512174-45

Prepared: 12/19/25 Analyzed: 12/19/25

Diesel Range Organics (C10-C28)	282	25.0	250	ND	113	56-156			
Surrogate: <i>n</i> -Nonane	51.4		50.0		103	61-141			

**Matrix Spike Dup (2551135-MSD1)**

Source: E512174-45

Prepared: 12/19/25 Analyzed: 12/19/25

Diesel Range Organics (C10-C28)	284	25.0	250	ND	114	56-156	0.705	20	
Surrogate: <i>n</i> -Nonane	51.4		50.0		103	61-141			



### QC Summary Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: Hughes LS 001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	<b>Reported:</b> 12/29/2025 9:54:11AM
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#### Anions by EPA 300.0/9056A

Analyst: TP

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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**Blank (2551147-BLK1)**

Prepared: 12/19/25 Analyzed: 12/20/25

Chloride	ND	20.0							
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**LCS (2551147-BS1)**

Prepared: 12/19/25 Analyzed: 12/20/25

Chloride	255	20.0	250		102	90-110			
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**Matrix Spike (2551147-MS1)**

Source: E512171-04

Prepared: 12/19/25 Analyzed: 12/20/25

Chloride	309	20.0	250	53.6	102	80-120			
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**Matrix Spike Dup (2551147-MSD1)**

Source: E512171-04

Prepared: 12/19/25 Analyzed: 12/20/25

Chloride	310	20.0	250	53.6	102	80-120	0.358	20	
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QC Summary Report Comment:

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



### Definitions and Notes

Cottonwood Consulting	Project Name:	Hughes LS 001	
PO Box 1653	Project Number:	20035-C-0001	<b>Reported:</b>
Durango CO, 81302	Project Manager:	Kyle Siesser	12/29/25 09:54

ND Analyte NOT DETECTED at or above the reporting limit

NR Not Reported

RPD Relative Percent Difference

DNI Did Not Ignite

DNR Did not react with the addition of acid or base.

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

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





### Envirotech Analytical Laboratory

Printed: 12/18/2025 2:08:42PM

#### Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

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

Client:	Cottonwood Consulting	Date Received:	12/17/25 15:08	Work Order ID:	E512177
Phone:	970-764-7356	Date Logged In:	12/18/25 14:07	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	12/29/25 17:00 (5 day TAT)		

#### Chain of Custody (COC)

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

Carrier: Dylan Songer

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

#### Comments/Resolution

#### Sample Turn Around Time (TAT)

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

#### Sample Cooler

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

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

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

#### Sample Container

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

#### Field Label

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

#### Sample Preservation

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

#### Multiphase Sample Matrix

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

#### Subcontract Laboratory

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

#### Client Instruction

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

Date



envirotech Inc.

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

General Information  
Phone: (505) 629-6116

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

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

CONDITIONS

Action 552649

**CONDITIONS**

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 552649
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

**CONDITIONS**

Created By	Condition	Condition Date
joel.stone	Upon the cessation of all production operations in the area associated with well API 30-045-07950 (Huges LS #001), the operator shall complete the requirements of 19.15.17.13 NMAC for the area associated with this below-grade tank and notify the OCD when restoration, reclamation, and re-vegetation are complete.	2/20/2026