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

13109 10

OIL CONS. DIV DIST. 3

SEP 14 2015

45-11870

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: D.J. SIMMONS INC. OGRID #: 005578
Address: 1009 RIDGEWAY PLACE – SUITE 200, FARMINGTON, NM 87401
Facility or well name: SIMMONS #12 (PC)
API Number: 30-045-11870 OCD Permit Number: N/A
U/L or Qtr/Qtr O Section 29 Township 29N Range 9W County: SAN JUAN COUNTY, NM
Center of Proposed Design: Latitude 36.692462 Longitude -107.800247 NAD: ☐ 1927 ☒ 1983
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: 210 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☐ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☒ Visible sidewalls and liner ☐ Visible sidewalls only ☐ Other _____
Liner type: Thickness 12 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: Jonathan D. Kelly **Approval Date:** 10/5/2015

Title: Compliance Officer **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:** 7/16/2015

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) - **N/A**
- ☐ Plot Plan (for on-site closures and temporary pits) - **N/A per phone conversation with Cory Smith on 7/17/15**
- ☒ Confirmation Sampling Analytical Results (if applicable)
- ☒ Waste Material Sampling Analytical Results (required for on-site closure)
- ☐ Disposal Facility Name and Permit Number - **N/A per phone conversation with Cory Smith on 7/17/15**
- ☒ Soil Backfilling and Cover Installation-
- ☒ Re-vegetation Application Rates and Seeding Technique
- ☒ Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude 36.692462 Longitude -107.800247 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): Jackie Shaw Title: Agent/Regulatory Specialist

Signature: JShaw Date: 9/11/2015

e-mail address: jackie.shaw@tegrecorp.com Telephone: 970-828-4732

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons PC12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

Prepared on Behalf of:

1009 Ridgeway Place – Suite 200

Farmington, NM 87401

(505) 326-3753

Prepared by:

Tegre Corporation

1199 Main Avenue – Suite 101

Durango, Colorado 81301

(970) 828-4732

SEPTEMBER 2015

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons (PC) #12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

1. PROJECT BACKGROUND

A Notice of Intent to Plug and Abandon was approved by the BLM-FFO on December 6, 2012. The Simmons (PC) #12 was plugged and abandoned on March 15, 2013. Subsequently, reclamation activities were completed and the well pad was recontoured and reseeded. Following reclamation, hydrocarbons were present in soil located on site and remediation of this area was required. Remediation was implemented on July 6, 2015, and was approved by the BLM-FFO on July 7, 2015. The pit was approved for closure after lab results were sent to Mr. Cory Smith at the NMOCD and Ms. Shari Ketcham of the BLM-FFO on July 14, 2015. The pit was backfilled and recontoured on July 16, 2015. The remediated area was reseeded on September 5, 2015.

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons (PC) #12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

2. CLOSURE PLAN

DJ Simmons, Inc.
San Juan Basin
Below Grade Tank Closure Plan

In Accordance with Rule 19.15.1 7.12 NM.AC the following information describes the closure requirements of Below Grade Tanks (BGTs) on DJ Simmons, Inc. locations, hereinafter known as DJ Simmons locations, in the San Juan Basin of New Mexico. This is DJ Simmons standard procedure for all BGTs. A separate plan would be submitted and utilized for any BGT which does not conform to this plan.

All closure activities will include proper documentation as stipulated by 19. I 5.17 NM.AC and will be submitted to OCD within 60 days of the closure on a Closure Report using Division Form C-144. The Report will include the following:

- Details on Capping and Covering, where applicable
- Plot Plan (Pit Diagram)
- Inspection reports
- Sampling Results

Copy of Deed Notice filed with the County Clerk (format to meet County requirements)

General Requirements:

1. DJ Simmons shall close a below-grade tank within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that, if the division requires due to any imminent danger to fresh water, public health or the environment.
   COMPLETED

2. DJ Simmons shall close an existing below grade tank that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 1 9.15.17.11 NMAC or is not included in Paragraphs (5) of Subsection I of 19.1 5.17.11 NMAC within five years after 16 June 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of I 9.1 5.17.11 NMAC.
   N/A

3. DJ Simmons shall close a permitted below-grade tank within 60 days of cessation of the below grade tank's operation or as required by the transitional provisions of Subsection B of 19. I 5.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report would be filed on a C-144 form.
   COMPLETED

4. DJ Simmons shall remove all free standing liquids and sludge from a below grade tank prior to implementation of a closure method. Liquids will be removed in a manner that the appropriate District Office approves including: recycled, reused, reclaimed, evaporated, and/or disposed of in a Division-approved facility.
   NO LIQUIDS OR SLUDGE WERE PRESENT IN THE BGT AT TIME OF REMOVAL.

5. DJ Simmons shall remove the below-grade tank and dispose of it at a licensed disposal facility (probably San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426) and/or recycled, reused, or reclaimed in a manner that the appropriate division district office approves.
   THE BGT WAS TRANSPORTED TO A STORAGE AREA FOR SALE AND/OR RE-USE.

6. If there is any on-site equipment associated with a below grade tank, DJ Simmons shall remove the equipment, unless the equipment is required for some other purpose(s).
ALL EQUIPMENT ASSOICATED WITH THE BGT HAS BEEN REMOVED.

7. DJ Simmons shall test the soils beneath the BGT tank to determine whether a release has occurred. DJ Simmons shall collect at a minimum, a five point, composite sample. The samples would be taken of the affected area using sampling tools and all samples tested per 19.15.17.13(B) (1) (b) NMAC. In the event that the criteria are not met (See Table I), all contents will be handled per 19.15.17.13(B) (1) (a) (i.e. dig and haul to a Division-approved facility). Approval to haul will be requested of the Aztec District office prior to initiation. Collected samples would include individual grab samples from any area that is wet, discolored or showing other evidence of a release: and analyze samples for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021 B or 8260B or other EPA methodology that the division approves, does not exceed 50mg/kg: the TPH concentration, as determined by the EPA method 418.1 or other EPA methodology that the division approves, does not exceed 100mg/kg: and the chloride concentration, as determined by the EPA method 300.1 or other EPA methodology that the division approves, does not exceed 250 mg/kg, or the background concentration, which may be greater. DJ Simmons shall notify the division of its results on Form C-141.
REMOVAL AND TESTING OF BGT SOIL SAMPLES INDICATED A HISTORIC RELEASE OF CONDENSATE. SOIL SAMPLES WERE TAKEN TO A DEPTH OF 36" AND LAB RESULTS INDICATED SOILS WITH ELEVATED LEVELS OF TPH (418.1). A C-141 FORM WAS SUBMITTED TO THE NMOCD-AZTEC OFFICE.

8. If DJ Simmons or the division determines that a release has occurred, DJ Simmons shall comply with 1 9.15.17.116 NMAC and 1 9.1 5.1.19 NMAC stipulations as appropriate.
SOILS WITH ELEVATED LEVELS OF TPH WERE EXCAVATED AND DISPOSED OF AT IEI (AZTEC, NM) BEGINNING ON JULY 6, 2015. LIMITS FROM THE NMOCD GUIDELINES FOR THE REMEDIATION OF LEAKS, SPILLS AND RELEASES DOCUMENT WERE UTILIZED IN IDENTIFYING ELEVATED TPH IN SOILS. FINALS LABS AND A SKETCH INDICATING WHERE SOIL SAMPLES WERE TAKEN FROM ARE ATTACHED.

9. If contamination is confirmed by field sampling, DJ Simmons will follow the *Guidelines for Remediation of Leaks, Spills, and Releases* per NMOCD August 1 993 mandate, when remediating identified contaminates.

AN ESTIMATED 567 CUBIC YARDS OF ELEVATED TPH SOIL WAS REMOVED FROM THE PROJECT AREA. THE FLOORS AND WALLS OF THE REMEDIATION AREA WERE SPRAYED WITH 7.5 LBS OF POTASSIUM PERMANGANATE MIXED INTO 150 GALLONS OF WATER PRIOR TO BACKFILLING. FINAL SOIL SAMPLES WERE TAKEN. THE FINAL LAB RESULTS ARE ATTACHED.

10. If the sampling program demonstrates that a release has occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.1 3 NMAC, then DJ Simmons shall backfill the excavation with compacted, non-waste containing, earthen material: construct a division prescribed soil cover: re-contour and re-vegetate the site.
CLEAN, WEED-FREE, FILL MATERIAL FROM A BLM-AUTHORIZED OFFSITE LOCATION WAS BROUGHT IN TO BACKFILL AND CLOSE THE REMEDIATION AREA. THE AREA WAS GRADED TO FLOW AWAY FROM THE CLEANUP SITE. RECLAMATION AND RE-SEEDING OF THE AFFECTED AREA IS PROJECTED TO BEGIN JULY 30, 2015.

11. Notice of Closure will be given to the Aztec Division office between 72 and 7 days (one Week) of the closure via e-email, or verbally. The notification of closure will include the following:
    I. Operator's name (DJ Simmons)
    II. Well Name and API Number
    III. Location (USTR)

FINAL LAB RESULTS WERE SENT TO MR. CORY SMITH OF THE AZTEC DIVISION OFFICE AND MS. SHARI KETCHAM OF THE BLM-FFO TO REVIEW AND APPROVE COMMENNCEMENT OF CLOSURE. MR. SMITH APPROVED THE LABS AND NOTICE OF BGT CLOSURE WAS GIVEN TO THE AZTEC DIVISION OFFICE ON JULY 14, 2015.

12. All closure activities will include proper documentation and be available for review per request and will be submitted to OCD within 60 days of closure of the below grade tank. The closure report will be filed on a C-144 form and incorporate the following:

I. Details on Capping and Covering, where applicable
II. Inspection reports
III. Sampling Results

A C-144 FORM WILL BE FILED 60 DAYS OF THE CLOSURE COMPLETION DATE OF JULY 16, 2015.

13. Re-contouring of the location would match the original geographic features and topographic fit, lines, form, shape and texture of the surrounding topographical contours. Re-shaping of the contour would include establishment or reestablishment of drainages to control sedimentation, total dissolved solids (TDS), and to mitigate ponding and prevent erosion. Natural drainages will be unimpeded and appropriate hydrologic BMPs such as water bars and/or silt traps will be placed in areas where needed to prevent erosion and sediment movement on a large scale. The final re- contour shall have a uniform appearance with smooth surface, fitting the aesthetic of the surrounding natural landscape.
    RE-CONTOURING OF THE LOCATION WAS COMPLETED ON JULY 17, 2015.

14. DJ Simmons shall seed the disturbed areas within the first growing season after the operator has closed the pit. Seeding will be accomplished via drill on the contour whenever possible or by other division approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs. *Note: DJ Simmons assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) or Land owner as part of a surface use agreement or APD are Division-approved methods unless notified by the Division of their unacceptability.* The Operator would be responsible for monitoring vegetative stand development and for eradicating all noxious/invasive weeds within the re-vegetated area.
    THE LOCATION WAS RESEEDED SUBSEQUENT TO THE PLUGGING AND ABANDONMENT OF THE LOCATION. BECAUSE THE REMEDIATION AREA DISTURBED THE INITIAL RESEEDING, RESEEDING OF THE REMEDIATION AREA OCCURRED ON SEPTEMBER 5, 2015.

15. A Minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material to establish vegetation at the site, or the background thickness of topsoil whichever maybe greater.
    FOUR FEET OF COVER WAS ACHIEVED DURING RECLAMATION OPERATIONS SUBSEQUENT TO THE PLUGGING AND ABANDONMENT OF THE LOCATION.

16. The surface owner shall be notified of DJ Simmons proposed below-grade tank closure plan using a means that provides proof of notice (i.e. certified mail/return receipt requested)

    NOTICE OF BGT CLOSURE PLAN WAS MISSED DURING THE PLUGGING AND ABANDONMENT OPERATIONS. DJ SIMMONS COMMITS TO ENSURING THIS DOES NOT OCCUR AGAIN IN THE FUTURE AND WILL WORK WITH THE NMOCD AZTEC OFFICE AND BLM FARMINGTON FIELD OFFICE. NOTICE OF PIT REMEDIATION AND CLOSURE WAS FILED VIA SUNDRY NOTICE ON JUNE 12, 2015. A SUNDRY NOTICE AND SUBSEQUENT REPORT OF PIT REMEDIATION WAS FILED ON JULY 23, 2015.

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons (PC) #12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

3. PROOF OF CLOSURE NOTICE

Please see the attached emails notifying the surface owner (BLM-FFO) and division (NMOCD-Aztec) of closure activities. Ms. Shari Ketchem of the BLM-FFO granted approval of closure after the review of the final lab results on July 14, 2015. In addition, Mr. Cory Smith of the NMOCD granted approval of closure after the review of the final labs on July 14, 2015.

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons (PC) #12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

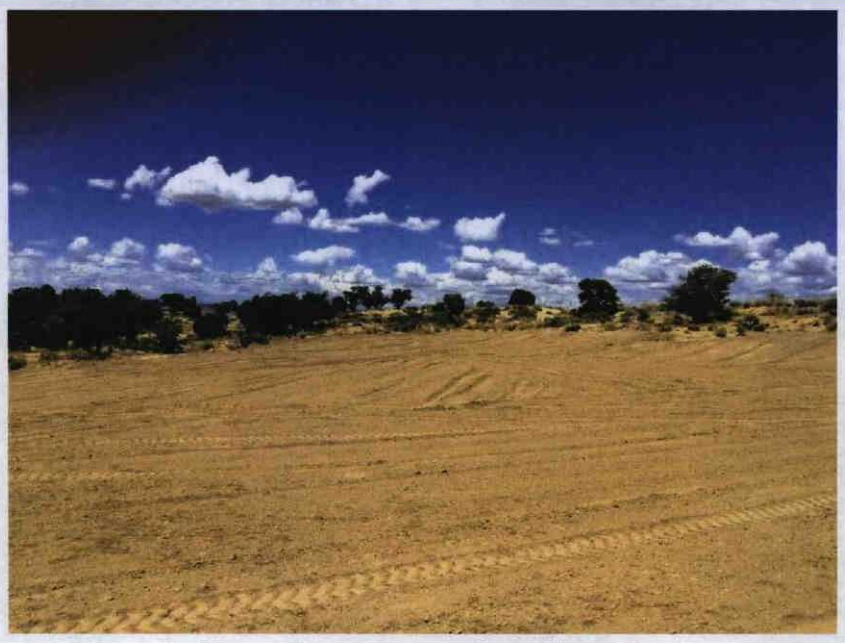
4. CONFIRMATION SAMPLING ANALYTICAL RESULTS

Please see attached lab results dated July 14, 2015.

5. WASTE MATERIAL SAMPLING ANALYTICAL RESULTS

Please see the attached lab results dated June 22, 2015.

6. SOIL BACKFILLING AND COVER INSTALLATION PHOTOS



Looking north at recontoured remediation area.

Looking north passed P&A marker at recontoured remediation area.

Looking south at recontoured remediation area.

Looking southwest at recontoured remediation area.

7. RECLAMATION, RE-VEGETATION AND SEEDING TECHNIQUES

The following Surface Reclamation Plan was submitted to Mr. Mark Kelley of the BLM-FFO on July 23, 2015. This reclamation plan was approved via email on August 6, 2015.

Earth moving portions of this plan were completed as part of the site's approved remediation plan. Reseeding occurred on September 5, 2015.

The BLM-FFO was notified prior to commencing reclamation work and upon completion of reclamation work.

WASTE MATERIAL HANDLING AND DISPOSAL

Prior to recontouring and reseeding the pad, waste debris and trash, if any, shall be removed from the location and disposed of at an approved waste facility.

SURFACE RECONSTRUCTION AND STABILIZATION

D.J. Simmons will avoid disturbance to well-established, mature vegetation on the pad perimeter to the greatest extent practicable and will focus reclamation efforts toward decompaction, re-establishing natural drainage patterns, and revegetating the abandoned well pad.

WELL PAD RECLAMATION

Reclamation activities including the recontouring of the pad, pits, material storage piles, cut-and-fill slopes, and stormwater control features to the match the topography of original landforms occurred in 2012.

Final abandonment of pipelines and flowlines including the purging, proper disposal of fluids, and plugging at specific intervals also occurred in 2012. All pipelines associated with the well were also removed.

In accordance with the approved Remediation Plan, clean soil for backfilling the remediation area was obtained from a private surface owner near the Simmons PC12 location. The chosen material is of clean fill-dirt, not land-farmed remediated soil, resulting from excavation of a stock pond on the private parcel. The property is located in the NWSE of Section 24, Township 29 North, Range 10 West, N.M.P.M. (37.70814 N, -107.83162 E). This material was inspected and approved by Heather Perry, Natural Resource Specialist of the BLM-FFO, on July 10, 2015. The clean fill was moved into the remediated area on July 14, 2015. The area was re-contoured, in accordance with the Guidelines for Remediation of Leaks, Spills, and Releases (NMOCD 1993).

Following recontouring, all backfilled, or otherwise disturbed surfaces, salvaged topsoil will be evenly redistributed. The below revegetation measures will then be implemented.

REVEGETATION

Final seedbed preparation of the well pad shall include scarifying such as disking, pitting, contour cultivating, raking or harrowing to alleviate compaction and surface crusts.

All disturbed surfaces shall be seeded with the Pinon-Juniper seed mix as requested by the BLM-FFO (Table 1.1). All seed mixtures will be certified weed-free.

Table 1.1: Pinon-Juniper Seed Mix

Species	#'s PLS/Acre
Antelope bitterbrush (*Purshia tridentata*)	2.0
Bottlebrush squirreltail (*Elymus elymoides*)	3.0
Needle and thread (*Hesperostipa comata*)	3.0
Indian ricegrass (*Achnatherum hymenoides*)	3.5
Blue grama (*Bouteloua gracilis*)	2.0
Muttongrass (*Poa fendleriana*)	2.0
Scarlet globemallow (*Sphaeralcea coccinea*)	0.25
TOTAL	**15.75**

If seed is drilled, it will be on contour, generally at a depth no greater than one-half inch (1/2), unless seed types require differently. In areas that cannot be drilled, seed will be broadcast at double the seeding rate and raked into soil if seeded more than 24 hours after seedbed prep.

WEED MANAGEMENT

Control of noxious weeds may be required and will be achieved through successful vegetation establishment and herbicide application.

8. SITE RECLAMATION PHOTOS

Looking west at the recontoured and reseeded remediation area.

Looking north at recontoured and reseeded remediation area.

Another view looking north at the recontoured and reseeded remediation area.

Looking southwest at recontoured and reseeded remediation area.

CLOSURE REPORT

D.J. Simmons, Inc.

Simmons (PC) #12

Location: Sec. 29, T.29N., R.9W., NMPM

San Juan County, New Mexico

API: 30-045-11870

9. COPY OF C-141: FINAL REPORT

Please see the attached C-141: Final Report which was mailed to the NMOCD on July 23, 2015.

Jackie Shaw

From: Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
Sent: Tuesday, July 14, 2015 11:43 AM
To: Jackie Shaw
Subject: RE: DJ Simmons: Simmons #12 Pit Remediation Lab Results

Mrs. Shaw,

Thank you for the notification, I would like to point out that in the future for Release under Part 29, TPH is typically EPA Method 8015(GRO+DRO) and not EPA method 418.1. However after reviewing the laboratory data it appears the base and walls are under the regulatory limits and DJ Simmons Can proceeded to backfill using clean like kind material.

OCD approval to backfill does not relieve DJ Simmons of any other requirements imposed by other regulatory agencies.

If you have any questions please give me a call.

Cory Smith
Environmental Specialist
Oil Conservation Division
Energy, Minerals, & Natural Resources
1000 Rio Brazos, Aztec, NM 87410
(505)334-6178 ext 115
cory.smith@state.nm.us

From: Jackie Shaw [mailto:jackie.shaw@tegrecorp.com]
Sent: Tuesday, July 14, 2015 9:21 AM
To: Smith, Cory, EMNRD
Subject: DJ Simmons: Simmons #12 Pit Remediation Lab Results

Mr. Smith,

On behalf of D.J. Simmons, I am attaching the final lab results for the pit remediation for the Simmons #12. In addition, I am seeking your approval to close this pit with fresh material currently located on site. If you have any questions please feel free to give me or Mr. Milton Williams (970-551-0010) a call. Milton is currently onsite.

Thank you!

Jackie Shaw
Land/Office Administrator
Tegre Corporation
1199 Main Avenue – Suite 101
Durango, CO 81301
970-828-4732x113
jackie.shaw@tegrecorp.com

Jackie Shaw

From: Ketcham, Shari <sketcham@blm.gov>
Sent: Tuesday, July 14, 2015 9:55 AM
To: Jackie Shaw
Subject: Re: FW: DJ Simmons: Simmons #12 Pit Remediation Lab Results

Since soil sample results are below regulatory standards of a ranking score of 10, DJ Simmons can close the excavation and reseed with the provided seed mix at the Simmons #12 location. The location will need to be seeded where any disturbance has occurred (including areas where people parked their vehicles). In addition, the location will need to be re-contoured back to its original state (meaning prior to the well being approved and drilled). I am sure that your reclamation plan will cover this.

Thank you!

Shari Ketcham
Natural Resource Specialist, Spills Biologist
BLM Farmington Field Office
6251 College Blvd Suite A
Farmington, NM 87402
Office: (505) 564-7713
Fax: (505) 564-7607

On Tue, Jul 14, 2015 at 9:50 AM, Ketcham, Shari <sketcham@blm.gov> wrote:
I have attached the PJ seed mix to be used on the Simmons #12 location.

Shari Ketcham
Natural Resource Specialist, Spills Biologist
BLM Farmington Field Office
6251 College Blvd Suite A
Farmington, NM 87402
Office: (505) 564-7713
Fax: (505) 564-7607

On Tue, Jul 14, 2015 at 9:25 AM, Jackie Shaw <jackie.shaw@tegrecorp.com> wrote:

Ms. Ketcham,

On behalf of D.J. Simmons, I am attaching the final lab results for the pit remediation for the Simmons #12. In addition, I am seeking your approval to close this pit with fresh material currently located on site. If you have any questions please feel free to give me or Mr. Milton Williams (970-551-0010) a call. Milton is currently onsite.

Also, a reclamation plan has been requested by Mr. Mark Kelly for this project. Could you please let me know which seed mix you would like us to use on this site so I can complete and submit this plan to Mr. Kelly.

Thank you!

Jackie Shaw
Land/Office Administrator

Tegre Corporation

1199 Main Avenue – Suite 101

Durango, CO 81301

970-828-4732x113

jackie.shaw@tegrecorp.com

Green Analytical Laboratories

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14 July 2015

Milton Williams
Tegre Corp
1199 Main Avenue, Suite 101
Durango, CO 81301

RE: Simmons 12

Enclosed are the results of analyses for samples received by the laboratory on 07/09/15 14:17.
If you need any further assistance, please feel free to contact me.

Sincerely,

Debbie Zufelt

Debbie Zufelt
Reports Manager

All accredited analytes contained in this report are denoted by an asterisk (*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at http://greenanalytical.com/certifications/

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water

Green Analytical Laboratories
dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303
www.GreenAnalytical.com

Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SIM 12 - Floor	1507100-01	Solid	07/09/15 11:27	07/09/15 14:17
SIM 12 - NW	1507100-02	Solid	07/09/15 11:45	07/09/15 14:17
SIM 12 - EW	1507100-03	Solid	07/09/15 11:57	07/09/15 14:17
SIM 12 - SW	1507100-04	Solid	07/09/15 12:13	07/09/15 14:17
SIM 12 - WW	1507100-05	Solid	07/09/15 12:26	07/09/15 14:17

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Debbie Zufelt, Reports Manager

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

SIM 12 - Floor

1507100-01 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Subcontracted -- **Cardinal Laboratories**									
Organic Compounds									
TPH 418.1	**581**	100	13.5	mg/kg	10	07/13/15	418.1		CK
Volatile Organic Compounds by EPA Method 8021									
Benzene*	<0.050	0.050	0.010	mg/kg	50	07/13/15	8021B		MS
Toluene*	<0.050	0.050	0.015	mg/kg	50	07/13/15	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	07/13/15	8021B		MS
Total Xylenes*	<0.150	0.150	0.018	mg/kg	50	07/13/15	8021B		MS
Total BTEX	<0.300	0.300		mg/kg	50	07/13/15	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			*118 %*	*61-154*		*07/13/15*	*8021B*		MS

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

SIM 12 - NW

1507100-02 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Subcontracted -- **Cardinal Laboratories**									
Organic Compounds									
TPH 418.1	**230**	100	13.5	mg/kg	10	07/13/15	418.1		CK
Volatile Organic Compounds by EPA Method 8021									
Benzene*	<0.050	0.050	0.010	mg/kg	50	07/13/15	8021B		MS
Toluene*	<0.050	0.050	0.015	mg/kg	50	07/13/15	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	07/13/15	8021B		MS
Total Xylenes*	<0.150	0.150	0.018	mg/kg	50	07/13/15	8021B		MS
Total BTEX	<0.300	0.300		mg/kg	50	07/13/15	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			*114 %*	*61-154*		*07/13/15*	*8021B*		MS

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

SIM 12 - EW

1507100-03 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Subcontracted -- **Cardinal Laboratories**									
Organic Compounds									
TPH 418.1	**100**	100	13.5	mg/kg	10	07/13/15	418.1		CK
Volatile Organic Compounds by EPA Method 8021									
Benzene*	<0.050	0.050	0.010	mg/kg	50	07/13/15	8021B		MS
Toluene*	<0.050	0.050	0.015	mg/kg	50	07/13/15	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	07/13/15	8021B		MS
Total Xylenes*	<0.150	0.150	0.018	mg/kg	50	07/13/15	8021B		MS
Total BTEX	<0.300	0.300		mg/kg	50	07/13/15	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			*112 %*	*61-154*		*07/13/15*	*8021B*		MS

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

SIM 12 - SW

1507100-04 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Subcontracted -- **Cardinal Laboratories**									
Organic Compounds									
TPH 418.1	**143**	100	13.5	mg/kg	10	07/13/15	418.1		CK
Volatile Organic Compounds by EPA Method 8021									
Benzene*	<0.050	0.050	0.010	mg/kg	50	07/13/15	8021B		MS
Toluene*	<0.050	0.050	0.015	mg/kg	50	07/13/15	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	07/13/15	8021B		MS
Total Xylenes*	<0.150	0.150	0.018	mg/kg	50	07/13/15	8021B		MS
Total BTEX	<0.300	0.300		mg/kg	50	07/13/15	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			*114 %*	*61-154*		*07/13/15*	*8021B*		MS

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

SIM 12 - WW

1507100-05 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
Subcontracted -- **Cardinal Laboratories**									
Organic Compounds									
TPH 418.1	<100	100	13.5	mg/kg	10	07/13/15	418.1		CK
Volatile Organic Compounds by EPA Method 8021									
Benzene*	<0.050	0.050	0.010	mg/kg	50	07/13/15	8021B		MS
Toluene*	<0.050	0.050	0.015	mg/kg	50	07/13/15	8021B		MS
Ethylbenzene*	<0.050	0.050	0.008	mg/kg	50	07/13/15	8021B		MS
Total Xylenes*	<0.150	0.150	0.018	mg/kg	50	07/13/15	8021B		MS
Total BTEX	<0.300	0.300		mg/kg	50	07/13/15	8021B		MS
Surrogate: 4-Bromofluorobenzene (PID)			*115 %*	*61-154*		*07/13/15*	*8021B*		MS

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

Organic Compounds - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 5071305 - Solvent Extraction										
Blank (5071305-BLK1)				Prepared & Analyzed: 07/13/15						
TPH 418.1	ND	100	mg/kg							
LCS (5071305-BS1)				Prepared & Analyzed: 07/13/15						
TPH 418.1	5520	100	mg/kg	5000		110	70-130			
LCS Dup (5071305-BSD1)				Prepared & Analyzed: 07/13/15						
TPH 418.1	5610	100	mg/kg	5000		112	70-130	1.53	20	

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Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

Volatile Organic Compounds by EPA Method 8021 - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 5071001 - Volatiles										
Blank (5071001-BLK1)				Prepared: 07/10/15 Analyzed: 07/13/15						
Surrogate: 4-Bromofluorobenzene (PID)	*0.0527*		mg/kg	*0.0500*		*105*	*61-154*			
Benzene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Total Xylenes	ND	0.150	mg/kg							
LCS (5071001-BS1)				Prepared: 07/10/15 Analyzed: 07/13/15						
Surrogate: 4-Bromofluorobenzene (PID)	*0.0480*		mg/kg	*0.0500*		*96.0*	*61-154*			
Benzene	2.13	0.050	mg/kg	2.00		107	77.1-114			
Ethylbenzene	1.82	0.050	mg/kg	2.00		91.1	63.5-121			
Toluene	1.90	0.050	mg/kg	2.00		95.2	67-114			
Total Xylenes	5.38	0.150	mg/kg	6.00		89.6	62.4-125			
LCS Dup (5071001-BSD1)				Prepared: 07/10/15 Analyzed: 07/13/15						
Surrogate: 4-Bromofluorobenzene (PID)	*0.0479*		mg/kg	*0.0500*		*95.9*	*61-154*			
Benzene	2.21	0.050	mg/kg	2.00		111	77.1-114	3.67	16.4	
Ethylbenzene	1.90	0.050	mg/kg	2.00		95.0	63.5-121	4.21	17	
Toluene	1.98	0.050	mg/kg	2.00		98.9	67-114	3.76	16.2	
Total Xylenes	5.64	0.150	mg/kg	6.00		94.0	62.4-125	4.75	17	

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Debbie Zufelt, Reports Manager

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www.GreenAnalytical.com

Tegre Corp	Project: Simmons 12	
1199 Main Avenue, Suite 101	Project Name / Number: Simmons 12	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	07/14/15 08:20

Notes and Definitions

DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
	*Results reported on as received basis unless designated as dry.
RPD	Relative Percent Difference
LCS	Laboratory Control Sample (Blank Spike)
RL	Report Limit
MDL	Method Detection Limit

Green Analytical Laboratories

Debbie Zufelt

Debbie Zufelt, Reports Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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Fax: (970) 247-4227
service@greenanalytical.com or dzufelt@greenanalytical.com
75 Suttle St Durango, CO 81303

Company Name: TEGRE	Bill to (if different):
Project Manager: MILTON WILLIAMS	P.O. #:
Address: 1199 MAIN STE 101	Company:
City: DRO State: CO Zip: 81301	Attn:
Phone #: 9705510010 Email: MILTON WILLIAMS @ TEGRECORP.COM	Address:
Additional Report To:	City:
Project Name: SIMMONS 12	State: Zip:
Project Number:	Phone #:
Sampler Name (Print): MILTON WILLIAMS	Fax or Email:

FOR LAB USE ONLY Lab I.D.	Sample Name or Location	Collected Date	Collected Time	Matrix (check one) GROUNDWATER	SURFACEWATER	WASTEWATER	PRODUCEDWATER	SOIL	OTHER :	# of containers No preservation (general)	HNO_3	HCl	H_2SO_4	Other:	Other:	Other:	ANALYSIS REQUEST BTEX	418 TPH
~~SIM12-FLOOR~~																		
1507-100-01	SIM12 - FLOOR	7/9	1127					X									X	X
02	SIM12 - ~~NW~~ NW	7/9	1145					X									X	X
03	SIM12 EW	7/9	1157					X									X	X
04	SIM12 SW	7/9	1213					X									X	X
05	SIM12 NWC	7/9	1226					X									X	X

Relinquished By:	Date: 7/9 Time: 2:17	Received By: Dublin Zufelt
MILTON WILLIAMS		
Relinquished By:	Date: Time:	Received By:
Relinquished By:	Date: Time:	Received By:

ADDITIONAL REMARKS: Report to State? (Circle) Yes No

RUSH ASAP (1)-2 day if possible

Delivered By: (Circle One)
Sampler - UPS - FedEx - Kangaroo - Other:

~~#9~~ Temperature at reciept: 3.5°C on ice

CHECKED BY: DZ

† GAL cannot always accept verbal changes. Please fax or email written change requests.

*. Chain of Custody must be signed in "Reliquished By:" as an acceptance of services and all applicable charges.

Green Analytical Laboratories

75 Suttle Street
Durango, CO 81303
970.247.4220 Phone
970.247.4227 Fax
www.greenanalytical.com

22 June 2015

Milton Williams
Tegre Corp
1199 Main Avenue, Suite 101
Durango, CO 81301

RE: RCRA TCLP,CI, Paint Filter

Enclosed are the results of analyses for samples received by the laboratory on 06/15/15 16:30.
If you need any further assistance, please feel free to contact me.

Sincerely,

Debbie Zufelt

Debbie Zufelt
Reports Manager

All accredited analytes contained in this report are denoted by an asterisk (*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at http://greenanalytical.com/certifications/

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water

Green Analytical Laboratories
dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303
www.GreenAnalytical.com

Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received
SIM12 - 6 15	1506129-01	Solid	06/15/15 15:03	06/15/15 16:30

Green Analytical Laboratories

Debbie Zufelt

Debbie Zufelt, Reports Manager

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Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

SIM12 - 6 15

1506129-01 (Solid)

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
General Chemistry									
% Dry Solids	**78.4**			%	1	06/17/15	EPA160.3/2540C		ABP
Soluble (DI Water Extraction)									
Chloride	<40.0	40.0	20.0	mg/kg dry	4	06/22/15	4500-Cl- C		LLG
TCLP Metals by ICP									
Arsenic	<0.100	0.100	0.049	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Barium	**0.128**	0.010	0.003	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Cadmium	<0.050	0.050	0.001	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Chromium	<0.050	0.050	0.004	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Lead	<0.100	0.100	0.025	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Selenium	<0.200	0.200	0.069	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
Silver	<0.050	0.050	0.002	mg/L	1	06/19/15	EPA200.7/6010 B		JGS
TCLP Mercury by CVAA									
Mercury	<0.0002	0.0002	0.00002	mg/L	1	06/18/15	245.1		JGS

Subcontracted -- **Cardinal Laboratories**

Inorganic Compounds									
Paint Filter Test	PASS			N/A	1	06/18/15	9095		AP

Green Analytical Laboratories

Debbie Zufelt

Debbie Zufelt, Reports Manager

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www.GreenAnalytical.com

Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

Soluble (DI Water Extraction) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B506207 - General Prep - Wet Chem										
Blank (B506207-BLK1)				Prepared & Analyzed: 06/22/15						
Chloride	ND	10.0	mg/kg wet							
LCS (B506207-BS1)				Prepared & Analyzed: 06/22/15						
Chloride	105	10.0	mg/kg wet	100		105	85-115			
LCS Dup (B506207-BSD1)				Prepared & Analyzed: 06/22/15						
Chloride	95.0	10.0	mg/kg wet	100		95.0	85-115	10.0	20	

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Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

TCLP Metals by ICP - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B506190 - EPA 200.2										
Blank (B506190-BLK1)				Prepared: 06/18/15 Analyzed: 06/19/15						
Arsenic	ND	0.100	mg/L							
Barium	ND	0.010	mg/L							
Cadmium	ND	0.050	mg/L							
Chromium	ND	0.050	mg/L							
Lead	ND	0.100	mg/L							
Selenium	ND	0.200	mg/L							
Silver	ND	0.050	mg/L							
LCS (B506190-BS1)				Prepared: 06/18/15 Analyzed: 06/19/15						
Arsenic	3.91	0.100	mg/L	4.00		97.7	85-115			
Barium	1.89	0.010	mg/L	2.00		94.5	85-115			
Cadmium	1.98	0.050	mg/L	2.00		99.0	85-115			
Chromium	1.96	0.050	mg/L	2.00		97.8	85-115			
Lead	2.02	0.100	mg/L	2.00		101	85-115			
Selenium	8.02	0.200	mg/L	8.00		100	85-115			
Silver	0.092	0.050	mg/L	0.100		92.1	85-115			
LCS Dup (B506190-BSD1)				Prepared: 06/18/15 Analyzed: 06/19/15						
Arsenic	3.83	0.100	mg/L	4.00		95.7	85-115	2.03	20	
Barium	1.87	0.010	mg/L	2.00		93.5	85-115	1.04	20	
Cadmium	1.95	0.050	mg/L	2.00		97.7	85-115	1.31	20	
Chromium	1.93	0.050	mg/L	2.00		96.3	85-115	1.53	20	
Lead	2.00	0.100	mg/L	2.00		100	85-115	0.885	20	
Selenium	7.94	0.200	mg/L	8.00		99.2	85-115	1.02	20	
Silver	0.091	0.050	mg/L	0.100		91.1	85-115	1.10	20	

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dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303
www.GreenAnalytical.com

Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

TCLP Mercury by CVAA - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B506182 - EPA 245.1/7470										
Blank (B506182-BLK1)				Prepared & Analyzed: 06/18/15						
Mercury	ND	0.0002	mg/L							
LCS (B506182-BS1)				Prepared & Analyzed: 06/18/15						
Mercury	0.0021	0.0002	mg/L	0.00200		105	85-115			
LCS Dup (B506182-BSD1)				Prepared & Analyzed: 06/18/15						
Mercury	0.0021	0.0002	mg/L	0.00200		103	85-115	1.68	20	

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Debbie Zufelt, Reports Manager

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www.GreenAnalytical.com

Tegre Corp	Project: RCRA TCLP,Cl, Paint Filter	
1199 Main Avenue, Suite 101	Project Name / Number: [none]	**Reported:**
Durango CO, 81301	Project Manager: Milton Williams	06/22/15 16:53

Notes and Definitions

Z-01	PASS
DET	Analyte DETECTED
ND	Analyte NOT DETECTED at or above the reporting limit
NR	Not Reported
dry	Sample results reported on a dry weight basis
	*Results reported on as received basis unless designated as dry.
RPD	Relative Percent Difference
LCS	Laboratory Control Sample (Blank Spike)
RL	Report Limit
MDL	Method Detection Limit

Green Analytical Laboratories

Debbie Zufelt

Debbie Zufelt, Reports Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

GREEN GAL Analytical Laboratories
(970) 247-4220
Fax: (970) 247-4227
service@greenanalytical.com or dzufelt@greenanalytical.com
75 Suttle St Durango, CO 81303

Company Name: TEGRE CORP	Bill to (if different):
Project Manager: MILTON	P.O. #:
Address: 1199 MAIN STE 101	Company:
City: DRO State: CO Zip: 81301	Attn:
Phone #: 970 828 4732 Email: MILTON.WILLIAMS@TEGRECORP.COM	Address:
Additional Report To:	City:
Project Name:	State: Zip:
Project Number:	Phone #:
Sampler Name (Print):	Fax or Email:

FOR LAB USE ONLY Lab I.D.	Sample Name or Location	Collected Date	Collected Time	Matrix (check one) GROUNDWATER	SURFACEWATER	WASTEWATER	PRODUCEDWATER	SOIL	OTHER :	# of containers No preservation (general)	HNO_3	HCl	H_2SO_4	Other:	Other:	Other:	ANALYSIS REQUEST RCRA8 metals - TCLP	Chloride	Paint-Filter test						
1506129-1	SIM 12-6 15	6/15	3:03														X	X	X						

PLEASE NOTE: GAL's liability and client's exclusive remedy for any claim arising whether based in contract or tort, shall be limited to the amount paid by the client for the analyses. All claims including those for negligence and any other cause whatsoever shall be deemed waived unless made in writing and received by GAL within 30 days after completion. In no event shall GAL be liable for incidental or consequental damages, including without limitation, business interruptions, loss of use, or loss of profits incurred by client, its subsidiaries, affiliates or successors arising out of or related to the performance of services hereunder by GAL, regardless of whether such claim is based upon any of the above stated reasons or otherwise.

Relinquished By:	Date: 6-15-15 Time: 4:30	Received By:	ADDITIONAL REMARKS: Report to State? (Circle) Yes No
Relinquished By:	Date: Time:	Received By:	
Relinquished By:	Date: Time:	Received By:	
Delivered By: (Circle One) Sampler - UPS - FedEx - Kangaroo - Other:	Temperature at reciept: 26.0 °C	CHECKED BY:	

† GAL cannot always accept verbal changes. Please fax or email written change requests.
* Chain of Custody must be signed in "Reliquished By:" as an acceptance of services and all applicable charges.

DG Simmons, Inc
San Juan Basin
Below Grade Tank Closure Plan

In Accordance with Rule 19.15 17.12 NMAC the following information describes the closure requirements of Below Grad Tanks (BGTs) on DJ Simmons, Inc locations, hereinafter known as DJ Simmons locations. in the San Juan Basin of New Mexico. This is DJ Simmons's standard procedure for all BGTs A separate plan would be submitted and utilized for any BGT which does not conform to this plan.

All closure activities will include proper documentation as stipulated by 19.15.17 NMAC and will be submitted to OCD within 60 days of the closure on a Closure Report using Division Form C-144. The Report will include the following.

- Details on Capping and Covering, where applicable
- Plot Plan (Pit Diagram)
- Inspection reports
- Sampling Results

Copy of Deed Notice filed with the County Clerk (format to meet County requirements)

General Requirements:

1. DJ Simmons shall close a below-grad tank within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that, if the division requires due to any imminent danger to fresh water, public health or the environment.

2. DJ Simmons shall close an existing below grade tank 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 Paragraphs (5) of Subsection I of 19 15.17.11 NMAC within five years after 16 June 2008, if not retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15 17 11 NMAC

3. DJ Simmons shall close a permitted below-grade tank within 60 days of cessation of the below-grade tank's operation or as required by the transitional provisions of Subsection B of 19.15.17.17 NMAC in accordance with a closure plan that the appropriate division district office approves. The closure report would be filed on a C-144 form

4. DJ Simmons shall remove all free standing liquids and sludge from a below grade tank prior to implementation of a closure method. Liquids will be removed in a manner that the appropriate District Office approves including; recycled, reused, reclaimed, evaporated, and/or disposed of in a Division-approved facility.

5. DJ Simmons shall remove the below-grade tank and dispose of it at a licensed disposal facility (probably San Juan Regional Landfill operated by Waste Management under NMED Permit SWM-052426) and/or recycled, reused, or reclaimed in a manner that the appropriate division district office approves

6. If there is any on-site equipment associated with a below grade tank, DJ Simmons shall remove the equipment, unless the equipment is required for some other purpose(s).

7. DJ Simmons shall test the soils beneath the below-grad tank to determine whether a release has occurred DJ Simmons shall collect, at a minimum, a five point, composite sample The samples would be taken of the affected area using sampling tools and all samples tested per 19 15 17.13(B)(1)(b) NMAC. In the event that the criteria are not met (See Table 1), all contents will be handled per 19.15.17.13(B)(1)(a) (i e. dig and haul to a Division-approved facility). Approval to haul will be requested of the Aztec District office prior to initiation Collected samples would include individual grab samples from any area that is wet, discolored or showing other evidence of a release: and analyze samples for BTEX, TPH and chlorides to demonstrate that the benzene concentration, as determined by EPA SW-846 methods 8021B or 8260B or other EPA methodology that the division approves, does not exceed 50mg/kg: the TPH concentration, as

determined by the EPA method 418.1 or other EPA methodology that the division approves, does no exceed 100 mg/kg: and the chloride concentration , as determined by the EPA method 300.1 or other EPA methodology that the division approves, does not exceed 250 mg/kg, or the background concentration, which may be greater. DJ Simmons shall notify the division of its results on form C-141.

Table 1: Closure Criteria for Below Grade Tanks

Components	Testing Methods	Closure Limits (mg/Kg)
Benzene	EPA SW-846 Method 8021B or 8260B	0.2
BTEX	EPA SW-846 Method 8021B or 8260B	50
TPH	EPA SW-846 Method 8015 M(Full Range)* or Method 418.1	2500
GRO/DRO	EPA SW-846 Method 8015M (GRO/DRO)	500
Chlorides	EPA SW-846 Method 300.1	1000

* Preferred method

see above text for correct test result Limits

8. If DJ Simmons or the division determines that a release has occurred, DJ Simmons shall comply with 19.15 17.116 NMAC and 19 15.1.19 NMAC stipulations as appropriate.

9. If contamination is confirmed by field sampling, DJ Simmons will follow the *Guidelines For Remediation Of Leaks, Spills, and Releases* per NMOCD August 1993 mandate, when remediating identified contaminants

10. IF the sampling program demonstrates that a release has occurred or that any release does not exceed the concentrations specified in Paragraph (4) of Subsection E of 19.15.17.13 NMAC, then DJ Simmons shall backfill the excavation with compacted, non-waste containing., earthen material: construct a division prescribed soil cover re-contour and re-vegetate the site.

11. Notice of Closure will be given to the Aztec Division office between 72 and 7 days (one Week) of the closure via e-email, or verbally. The notification of closure will include the following
    i. Operator's name (DJ Simmons)
    ii. Well Name and API Number
    iii Location (USTR)

12. All closure activities will include proper documentation and be available for review per request and will be submitted to OCD within 60 days of closure of the below grade tank. The closure report will be filed on a C-144 form and incorporate the following:

    i. Details on Capping and Covering, where applicable
    ii. Inspection reports
    iii. Sampling Results

13. Re-contouring of the location would match the original geographic features and topographic fit, lines, form, shape and texture of the surrounding topographical contours. Re-shaping of the contour would include establishment or reestablishment of drainages to control sedimentation, total dissolved solids (TDS), and to mitigate ponding and prevent erosion Natural drainages will be unimpeded and appropriate hydrologic BMPs such as water bars and/or silt traps will be placed in areas where needed to prevent erosion and sediment movement on a large scale. The final re-contour shall have a uniform appearance with smooth surface, fitting the aesthetic of the surrounding natural landscape

14. DJ Simmons shall seed the disturbed areas within the first growing season after the operator has closed the pit. Seeding will be accomplished via drill on the contour whenever possible or by other division approved methods. Vegetative cover will equal 70% of the native perennial vegetative cover (un-impacted) consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintained that cover through two successive growing seasons. Repeat seeding or planting will be continued until successful vegetative growth occurs *Note: DJ Simmons assumes the seeding stipulations including mix and seeding methods specified by the Surface Management Agency (BLM, BOR, USFS, Tribal, etc.) or Land owner as part of a surface use agreement or APD are Division-approved methods unless notified by the Division of*

their unacceptability The Operator would be responsible for monitoring vegetative stand development and for eradicating all noxious/invasive weeds within the re-vegetated area.

15. A Minimum of four feet of cover shall be achieved and the cover shall include one foot of suitable material to establish vegetation at the site, or the background thickness of topsoil whichever maybe greater.

16. The surface owner shall be notified of DJ Simmons's proposed below-grade tank closure plan using a means that provides proof of notice (i e certified mail/return receipt requested)

September 11, 2015

State of New Mexico
Oil Conservation Division
1000 Rio Brazos Road
Aztec, NM 87505
Attn: Cory Smith

OIL CONS. DIV DIST. 3

SEP 14 2015

Re: Simmons (PC) #12
Form C144: Closure of Pit, Below-Grade Tank, or Proposed Alternative Method

Dear Mr. Smith,

On behalf of John Byrom and D. J. Simmons, I am submitting Form C-144 and the required attachments for the Simmons (PC) #12.

Should you have any questions or concerns with this submittal, please contact me at 970-828-4732x113 or via email at jackie.shaw@tegrecorp.com.

Thank you!

Jackie Shaw
Regulatory Specialist
Tegre Corporation
1199 Main Avenue, Suite 101
Durango, CO 81301
jackie.shaw@tegrecorp.com

Enclosures: Form C144 and Attachments

CC: John Byrom- D. J. Simmons, Inc.