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

1586

OIL CONS. DIV DIST. 3

APR 02 2015

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

45-11870

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 Farmington, NM 87401
Facility or well name: Simmons #12
API Number: 30-045-11870 OCD Permit Number:
U/L or Qtr/Qtr O Section 29 Township 29N Range 9W County: San Juan
Center of Proposed Design: Latitude 36.692462 Longitude -107.800247 NAD: ☐ 1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

DENIED *Incomplete Resubmit complete Package. *Done 10/7/15

BY: Cory Smith
DATE: 4/28/15 (505) 334-6178 Ext. 115

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 _____

25

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: 30-045-11870 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): CARLOS S. LOPEZ Title: LAND MANAGER CSL

Signature: CARLOS S. LOPEZ Date: 3/31/15

e-mail address: CLOPEZ@DJSIMMONS.COM Telephone: (505) 326-3753

18.
OCD Approval: ☐ Permit Ap **DENIED** (only) ☐ OCD Conditions (see attachment)

OCD Representative Signatur **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 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): Chris S. Lopez Title: Land Manager

Signature: Chris S. Lopez Date: ~~3/25/2015~~ 3/31/2015

e-mail address: clopez@djsimmons.com Telephone: (505) 326-3753

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

In Accordance with Rule 19.15.17.12 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 19.15.17 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 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.
   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 19.15.17.17 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.
   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 ASSOCIATED WITH THE BGT HAS BEEN REMOVED

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 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 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 not 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	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
Chloride	EPA SW-846 Method 300.1	1000

*Preferred method

SOIL UNDER THE BGT WAS SAMPLED AND TPH, BTEX AND CHLORIDE LEVELS WERE BELOW LEVEL 10 OF THE NMOCD SPILL GUIDELINES. ANALYTICAL RESULTS ARE ATTACHED.

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.
C-141 IS ATTACHED
SOIL UNDER THE BGT WAS SAMPLED AND TPH, BTEX AND CHLORIDE LEVELS WERE BELOW LEVEL 10 OF THE NMOCD SPILL GUIDELINES. ANALYTICAL RESULTS 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 1993 mandate, when remediating identified contaminates.
ANALYTICAL RESULTS INDICATE NO CONTAMINATION OCCURED

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.
C-141 IS ATTACHED
THE AREA UNDER THE BGT WAS BACKFILLED WITH CLEAN SOIL, COMPACTED, RE-CONTOURED AND RE-VEGETATED AS PART OF THE PLUGGING AND ABANDONMENT OF THE WELL AND LOCATION.

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)
NOTICE OF BGT CLOSURE 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.

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
NOTICE OF BGT CLOSURE 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.

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 IS COMPLETE

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 growthoccurs.
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 HAS BEEN RE-SEEDED SUBSEQUENT TO THE PLUGGING AND ABANDONMENT OF THE LOCATION.

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.

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 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.

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Analytical Laboratory

Analytical Report

Report Summary

Client: D. J. Simmons, Inc.

Chain Of Custody Number:

Samples Received: 3/13/2015 1:15:00PM

Job Number: 06114-0006

Work Order: P503045

Project Name/Location: Simmons #12 BGT/ T29N, R9W, S29

Entire Report Reviewed By: _____ Date: 3/24/15

Tim Cain, Laboratory Manager

5796 US Highway 64, Farmington, NM 87401 Ph (505) 632-0615 Fx (505) 632-1865
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envirotech-inc.com
laboratory@envirotech-inc.com

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Simmons #12 BGT	P503045-01A	Soil	03/13/15	03/13/15	Glass Jar, 4 oz.

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Simmons #12 BGT

P503045-01 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Toluene	ND	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Ethylbenzene	**0.77**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
p,m-Xylene	**2.13**	0.20	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
o-Xylene	**0.74**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Total Xylenes	**2.87**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Total BTEX	**3.64**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Surrogate: 4-Bromochlorobenzene-PID		*101 %*		*50-150*	*1512012*	*03/17/15*	*03/23/15*	*EPA 8021B*	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	**141**	9.99	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8015D	
Diesel Range Organics (C10-C28)	**731**	29.9	mg/kg	1	1512013	03/17/15	03/23/15	EPA 8015D	
Surrogate: o-Terphenyl		*87.1 %*		*50-200*	*1512013*	*03/17/15*	*03/23/15*	*EPA 8015D*	
Surrogate: 4-Bromochlorobenzene-FID		*104 %*		*50-150*	*1512012*	*03/17/15*	*03/23/15*	*EPA 8015D*	
Cation/Anion Analysis									
Chloride	ND	8.06	mg/kg	0.8	1512016	03/18/15	03/19/15	EPA 300.0	

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512012 - Purge and Trap EPA 5030A										
Blank (1512012-BLK1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	ND	0.10	mg/kg							
Toluene	ND	0.10	"							
Ethylbenzene	ND	0.10	"							
p,m-Xylene	ND	0.20	"							
o-Xylene	ND	0.10	"							
Total Xylenes	ND	0.10	"							
Total BTEX	ND	0.10	"							
Surrogate: 4-Bromochlorobenzene-PID	*0.402*		"	*0.397*		*101*	*50-150*			
LCS (1512012-BS1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	20.7	0.10	mg/kg	19.8		104	75-125			
Toluene	19.9	0.10	"	19.8		100	70-125			
Ethylbenzene	19.0	0.10	"	19.8		95.9	75-125			
p,m-Xylene	37.1	0.20	"	39.7		93.4	80-125			
o-Xylene	17.9	0.10	"	19.8		90.0	75-125			
Surrogate: 4-Bromochlorobenzene-PID	*0.331*		"	*0.397*		*83.4*	*50-150*			
Matrix Spike (1512012-MS1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	21.0	0.10	mg/kg	19.9	ND	105	75-125			
Toluene	20.9	0.10	"	19.9	ND	105	70-125			
Ethylbenzene	20.2	0.10	"	19.9	ND	102	75-125			
p,m-Xylene	39.7	0.20	"	39.8	ND	99.7	80-125			
o-Xylene	19.1	0.10	"	19.9	ND	96.0	75-125			
Surrogate: 4-Bromochlorobenzene-PID	*0.334*		"	*0.398*		*84.0*	*50-150*			
Matrix Spike Dup (1512012-MSD1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	21.5	0.10	mg/kg	19.8	ND	108	75-125	2.23	15	
Toluene	21.3	0.10	"	19.8	ND	107	70-125	1.95	15	
Ethylbenzene	20.6	0.10	"	19.8	ND	104	75-125	1.88	15	
p,m-Xylene	40.4	0.20	"	39.6	ND	102	80-125	1.73	15	
o-Xylene	19.4	0.10	"	19.8	ND	97.7	75-125	1.30	15	
Surrogate: 4-Bromochlorobenzene-PID	*0.342*		"	*0.396*		*86.2*	*50-150*			

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512012 - Purge and Trap EPA 5030A										
Blank (1512012-BLK1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	ND	9.92	mg/kg							
Surrogate: 4-Bromochlorobenzene-FID	*0.394*		"	*0.397*		*99.2*	*50-150*			
LCS (1512012-BS1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	242	9.92	mg/kg	264		91.5	80-120			
Surrogate: 4-Bromochlorobenzene-FID	*0.321*		"	*0.397*		*81.0*	*50-150*			
Matrix Spike (1512012-MS1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	257	9.95	mg/kg	265	ND	97.1	75-125			
Surrogate: 4-Bromochlorobenzene-FID	*0.325*		"	*0.398*		*81.6*	*50-150*			
Matrix Spike Dup (1512012-MSD1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	261	9.91	mg/kg	264	ND	98.9	75-125	1.48	15	
Surrogate: 4-Bromochlorobenzene-FID	*0.330*		"	*0.396*		*83.4*	*50-150*			

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512013 - DRO Extraction EPA 3550M										
Blank (1512013-BLK1)				Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	ND	24.8	mg/kg							
Surrogate: o-Terphenyl	*43.3*		"	*39.7*		*109*	*50-200*			
LCS (1512013-BS1)				Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	502	24.7	mg/kg	494		102	38-132			
Surrogate: o-Terphenyl	*40.2*		"	*39.5*		*102*	*50-200*			
Matrix Spike (1512013-MS1)		**Source: P503036-01**		Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	525	24.9	mg/kg	499	ND	105	38-132			
Surrogate: o-Terphenyl	*45.5*		"	*39.9*		*114*	*50-200*			
Matrix Spike Dup (1512013-MSD1)		**Source: P503036-01**		Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	529	24.9	mg/kg	497	ND	106	38-132	0.766	20	
Surrogate: o-Terphenyl	*44.3*		"	*39.8*		*111*	*50-200*			

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Cation/Anion Analysis - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512016 - Anion Extraction EPA 300.0										
Blank (1512016-BLK1)				Prepared & Analyzed: 18-Mar-15						
Chloride	ND	9.58	mg/kg							
LCS (1512016-BS1)				Prepared & Analyzed: 18-Mar-15						
Chloride	420	9.17	mg/kg	459		91.5	90-110			
Matrix Spike (1512016-MS1)	**Source: P503035-01**			Prepared & Analyzed: 18-Mar-15						
Chloride	443	9.48	mg/kg	474	10.0	91.3	80-120			
Matrix Spike Dup (1512016-MSD1)	**Source: P503035-01**			Prepared & Analyzed: 18-Mar-15						
Chloride	460	9.81	mg/kg	491	10.0	91.6	80-120	3.75	20	

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

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
RPD	Relative Percent Difference

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laboratory@envirotech-inc.com

CHAIN OF CUSTODY RECORD

17844

Client:	Project Name / Location:
D. J. Simmons, Inc.	Simmons #12 BGT / T29N, R9W, S.29
Email results to:	Sampler Name:
CLOPEZ@DJSIMMONS.COM	Chris S. Lopez
Client Phone No.:	Client No.:
(505) 699-9832	06114-0006

Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers	Preservative			TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
					HNO_3	HCl		ANALYSIS / PARAMETERS														
Simmons #12 BGT	3/13/15	1:15pm	P503045-01	1-4oz.				X	X								X				Y	Y

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Chris S. Lopez	3/13/15	1:15pm		3/13/15	1315
Relinquished by: (Signature)			Received by: (Signature)		

Sample Matrix

Soil ☒ Solid ☐ Sludge ☐ Aqueous ☐ Other ☐ _____

☐ Sample(s) dropped off after hours to secure drop off area.

11.1 °C

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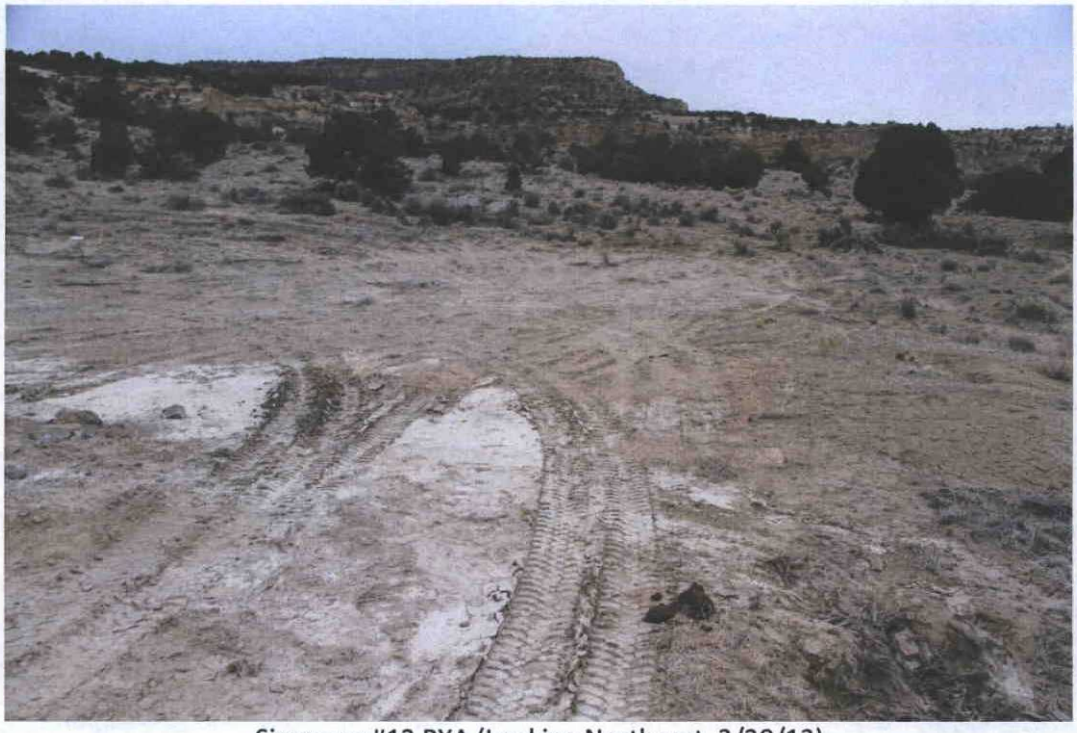
Simmons #12 (PXA)
API #30-045-11870
Unit O, Section 29, T29N, R9W, NMPM
San Juan County, NM

Simmons #12 (PXA)
API #30-045-11870
Unit O, Section 29, T29N, R9W, NMPM
San Juan County, NM

Simmons #12 PXA (Looking Southwest, 3/20/13)



Simmons #12 PXA (Looking Northeast, 3/20/13)

OIL CONS. DIV DIST. 3

APR 02 2015

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

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☒ Initial Report ☐ Final Report

Name of Company: D. J. Simmons, Inc.	Contact: Chris S. Lopez, Land Manager
Address: 1009 Ridgeway Place, Farmington, NM 87401	Telephone No.: (505) 326-3753 Ext. 127
Facility Name: Simmons S 1C	Facility Type: Gas

Surface Owner: BLM	Mineral Owner: BLM	API No.: 30-045-11870

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	29	29N	9W	1,070'	South	1,630'	East	San Juan County, NM

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release: None	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: Below Grade Tank (210 bbl)	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom? N/A	
By Whom? : N/A	Date and Hour: N/A	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Sampling of the soil beneath the BGT will be done to ensure no soil impacts from the BGT. Soil analysis will include TPH, BTEX and chlorides.

Describe Area Affected and Cleanup Action Taken.*
BGT will be removed and the area beneath sampled. The excavated area will be backfilled, compacted, re-contoured and re-vegetated during Plugging and Abandonment operations.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Chris S. Lopez	Approved by Environmental Specialist:	
Title: Land Manager	Approval Date:	Expiration Date:
E-mail Address: clopez@djsimmons.com	Conditions of Approval:	Attached ☐
Date: 3/25/2015 Phone: (505) 326-3753 Ext. 127		

* Attach Additional Sheets If Necessary

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

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

Form C-141
Revised August 8, 2011

Submit 1 Copy to appropriate District Office in accordance with 19.15.29 NMAC.

Release Notification and Corrective Action

OPERATOR

☐ Initial Report ☒ Final Report

Name of Company: D. J. Simmons, Inc.	Contact: Chris S. Lopez, Land Manager
Address: 1009 Ridgeway Place, Farmington, NM 87401	Telephone No.: (505) 326-3753 Ext. 127
Facility Name: Simmons S 1C	Facility Type: Gas

Surface Owner: BLM	Mineral Owner: BLM	API No.: 30-045-11870

LOCATION OF RELEASE

Unit Letter	Section	Township	Range	Feet from the	North/South Line	Feet from the	East/West Line	County
O	29	29N	9W	1,070'	South	1,630'	East	San Juan County, NM

Latitude_____ **Longitude**_____

NATURE OF RELEASE

Type of Release: None	Volume of Release: N/A	Volume Recovered: N/A
Source of Release: Below Grade Tank (210 bbl)	Date and Hour of Occurrence N/A	Date and Hour of Discovery N/A
Was Immediate Notice Given? ☐ Yes ☐ No ☒ Not Required	If YES, To Whom? N/A	
By Whom? : N/A	Date and Hour: N/A	
Was a Watercourse Reached? ☐ Yes ☒ No	If YES, Volume Impacting the Watercourse.	

If a Watercourse was Impacted, Describe Fully.*

Describe Cause of Problem and Remedial Action Taken.*
Sampling of the soil beneath the BGT was done to ensure no soil impacts from the BGT. Soil analysis resulted in TPH, BTEX and chlorides below standards. Analysis results are attached.

Describe Area Affected and Cleanup Action Taken.*
BGT was removed and the area beneath the BGT was sampled. The excavated area was backfilled, compacted, re-contoured and re-vegetated during Plugging and Abandonment operations.

I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to NMOCD 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 NMOCD marked as "Final Report" does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to ground water, surface water, human health or the environment. In addition, NMOCD 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.

Signature:	OIL CONSERVATION DIVISION	
Printed Name: Chris S. Lopez	Approved by Environmental Specialist:	
Title: Land Manager	Approval Date:	Expiration Date:
E-mail Address: clopez@djsimmons.com	Conditions of Approval:	Attached ☐
Date: 3/25/2015 Phone: (505) 326-3753 Ext. 127		

* Attach Additional Sheets If Necessary

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Analytical Laboratory

Analytical Report

Report Summary

Client: D. J. Simmons, Inc.

Chain Of Custody Number:

Samples Received: 3/13/2015 1:15:00PM

Job Number: 06114-0006

Work Order: P503045

Project Name/Location: Simmons #12 BGT/ T29N, R9W, S29

Entire Report Reviewed By: _____ Date: 3/24/15

Tim Cain, Laboratory Manager

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Analyical Report for Samples

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
Simmons #12 BGT	P503045-01A	Soil	03/13/15	03/13/15	Glass Jar, 4 oz.

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Analytical Laboratory

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Simmons #12 BGT

P503045-01 (Solid)

Analyte	Result	Reporting Limit	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
Volatile Organics by EPA 8021									
Benzene	ND	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Toluene	ND	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Ethylbenzene	**0.77**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
p,m-Xylene	**2.13**	0.20	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
o-Xylene	**0.74**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Total Xylenes	**2.87**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Total BTEX	**3.64**	0.10	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8021B	
Surrogate: 4-Bromochlorobenzene-PID		*101 %*		*50-150*	*1512012*	*03/17/15*	*03/23/15*	*EPA 8021B*	
Nonhalogenated Organics by 8015									
Gasoline Range Organics (C6-C10)	**141**	9.99	mg/kg	1	1512012	03/17/15	03/23/15	EPA 8015D	
Diesel Range Organics (C10-C28)	**731**	29.9	mg/kg	1	1512013	03/17/15	03/23/15	EPA 8015D	
Surrogate: o-Terphenyl		*87.1 %*		*50-200*	*1512013*	*03/17/15*	*03/23/15*	*EPA 8015D*	
Surrogate: 4-Bromochlorobenzene-FID		*104 %*		*50-150*	*1512012*	*03/17/15*	*03/23/15*	*EPA 8015D*	
Cation/Anion Analysis									
Chloride	ND	8.06	mg/kg	0.8	1512016	03/18/15	03/19/15	EPA 300.0	

D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Volatile Organics by EPA 8021 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512012 - Purge and Trap EPA 5030A										
Blank (1512012-BLK1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	ND	0.10	mg/kg							
Toluene	ND	0.10	"							
Ethylbenzene	ND	0.10	"							
p,m-Xylene	ND	0.20	"							
o-Xylene	ND	0.10	"							
Total Xylenes	ND	0.10	"							
Total BTEX	ND	0.10	"							
Surrogate: 4-Bromochlorobenzene-PID	*0.402*		"	*0.397*		*101*	*50-150*			
LCS (1512012-BS1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	20.7	0.10	mg/kg	19.8		104	75-125			
Toluene	19.9	0.10	"	19.8		100	70-125			
Ethylbenzene	19.0	0.10	"	19.8		95.9	75-125			
p,m-Xylene	37.1	0.20	"	39.7		93.4	80-125			
o-Xylene	17.9	0.10	"	19.8		90.0	75-125			
Surrogate: 4-Bromochlorobenzene-PID	*0.331*		"	*0.397*		*83.4*	*50-150*			
Matrix Spike (1512012-MS1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	21.0	0.10	mg/kg	19.9	ND	105	75-125			
Toluene	20.9	0.10	"	19.9	ND	105	70-125			
Ethylbenzene	20.2	0.10	"	19.9	ND	102	75-125			
p,m-Xylene	39.7	0.20	"	39.8	ND	99.7	80-125			
o-Xylene	19.1	0.10	"	19.9	ND	96.0	75-125			
Surrogate: 4-Bromochlorobenzene-PID	*0.334*		"	*0.398*		*84.0*	*50-150*			
Matrix Spike Dup (1512012-MSD1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Benzene	21.5	0.10	mg/kg	19.8	ND	108	75-125	2.23	15	
Toluene	21.3	0.10	"	19.8	ND	107	70-125	1.95	15	
Ethylbenzene	20.6	0.10	"	19.8	ND	104	75-125	1.88	15	
p,m-Xylene	40.4	0.20	"	39.6	ND	102	80-125	1.73	15	
o-Xylene	19.4	0.10	"	19.8	ND	97.7	75-125	1.30	15	
Surrogate: 4-Bromochlorobenzene-PID	*0.342*		"	*0.396*		*86.2*	*50-150*			

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512012 - Purge and Trap EPA 5030A										
Blank (1512012-BLK1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	ND	9.92	mg/kg							
Surrogate: 4-Bromochlorobenzene-FID	*0.394*		"	*0.397*		*99.2*	*50-150*			
LCS (1512012-BS1)				Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	242	9.92	mg/kg	264		91.5	80-120			
Surrogate: 4-Bromochlorobenzene-FID	*0.321*		"	*0.397*		*81.0*	*50-150*			
Matrix Spike (1512012-MS1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	257	9.95	mg/kg	265	ND	97.1	75-125			
Surrogate: 4-Bromochlorobenzene-FID	*0.325*		"	*0.398*		*81.6*	*50-150*			
Matrix Spike Dup (1512012-MSD1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 19-Mar-15						
Gasoline Range Organics (C6-C10)	261	9.91	mg/kg	264	ND	98.9	75-125	1.48	15	
Surrogate: 4-Bromochlorobenzene-FID	*0.330*		"	*0.396*		*83.4*	*50-150*			

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Nonhalogenated Organics by 8015 - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512013 - DRO Extraction EPA 3550M										
Blank (1512013-BLK1)				Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	ND	24.8	mg/kg							
Surrogate: o-Terphenyl	*43.3*		"	*39.7*		*109*	*50-200*			
LCS (1512013-BS1)				Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	502	24.7	mg/kg	494		102	38-132			
Surrogate: o-Terphenyl	*40.2*		"	*39.5*		*102*	*50-200*			
Matrix Spike (1512013-MS1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	525	24.9	mg/kg	499	ND	105	38-132			
Surrogate: o-Terphenyl	*45.5*		"	*39.9*		*114*	*50-200*			
Matrix Spike Dup (1512013-MSD1)	**Source: P503036-01**			Prepared: 17-Mar-15 Analyzed: 20-Mar-15						
Diesel Range Organics (C10-C28)	529	24.9	mg/kg	497	ND	106	38-132	0.766	20	
Surrogate: o-Terphenyl	*44.3*		"	*39.8*		*111*	*50-200*			

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

Cation/Anion Analysis - Quality Control

Envirotech Analytical Laboratory

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 1512016 - Anion Extraction EPA 300.0										
Blank (1512016-BLK1)				Prepared & Analyzed: 18-Mar-15						
Chloride	ND	9.58	mg/kg							
LCS (1512016-BS1)				Prepared & Analyzed: 18-Mar-15						
Chloride	420	9.17	mg/kg	459		91.5	90-110			
Matrix Spike (1512016-MS1)	**Source: P503035-01**			Prepared & Analyzed: 18-Mar-15						
Chloride	443	9.48	mg/kg	474	10.0	91.3	80-120			
Matrix Spike Dup (1512016-MSD1)	**Source: P503035-01**			Prepared & Analyzed: 18-Mar-15						
Chloride	460	9.81	mg/kg	491	10.0	91.6	80-120	3.75	20	

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D. J. Simmons, Inc.	Project Name:	Simmons #12 BGT/ T29N, R9W, S29	
PO Box 1469	Project Number:	06114-0006	**Reported:**
Farmington NM, 87499	Project Manager:	Chris Lopez	24-Mar-15 09:17

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
RPD	Relative Percent Difference

CHAIN OF CUSTODY RECORD

17844

Client:	Project Name / Location:
D. J. Simmons, Inc.	Simmons #12 BGT / T29N, R9W, S.29
Email results to:	Sampler Name:
CLOPEZ@DJSIMMONS.COM	Chris S. Lopez
Client Phone No.:	Client No.:
(505) 699-9832	06114-0006

Sample No./ Identification	Sample Date	Sample Time	Lab No.	No./Volume of Containers	Preservative			ANALYSIS / PARAMETERS														
					HNO_3	HCl		TPH (Method 8015)	BTEX (Method 8021)	VOC (Method 8260)	RCRA 8 Metals	Cation / Anion	RCI	TCLP with H/P	CO Table 910-1	TPH (418.1)	CHLORIDE				Sample Cool	Sample Intact
Simmons #12 BGT	3/13/15	1:15pm	P503045-01	1-4oz.				X	X								X				Y	Y

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time
Chris S. Lopez	3/13/15	1:15pm		3/13/15	1315
Relinquished by: (Signature)			Received by: (Signature)		

Sample Matrix

Soil ☒ Solid ☐ Sludge ☐ Aqueous ☐ Other ☐ _____

☐ Sample(s) dropped off after hours to secure drop off area.

11.1 °C

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Analytical Laboratory

5795 US Highway 64 • Farmington, NM 87401 • 505-632-0615 • Three Springs • 65 Mercado Street, Suite 115, Durango, CO 81301 • laboratory@envirotech-inc

Simmons #12 (PXA)
API #30-045-11870
Unit O, Section 29, T29N, R9W, NMPM
San Juan County, NM

Simmons #12 (PXA)
API #30-045-11870
Unit O, Section 29, T29N, R9W, NMPM
San Juan County, NM

Simmons #12 PXA (Looking Southwest, 3/20/13)

Simmons #12 PXA (Looking Northeast, 3/20/13)