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

State of New Mexico
Energy Minerals and Natural Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party SIMCOE LLC	OGRID 329736
Contact Name Kyle Siesser	Contact Telephone (970) 764-7356
Contact email ksiesser@cottonwoodconsulting.com	Incident # *(assigned by OCD)*
Contact mailing address PO Box 1653 Durango, CO 81302	

Location of Release Source

Latitude 36.665036 Longitude -108.079329
(NAD 83 in decimal degrees to 5 decimal places)

Site Name Gallegos Canyon Unit #207	Site Type Natural Gas Well
Date Release Discovered 9/5/2023	API# *(if applicable)* 30-045-11587

Unit Letter	Section	Township	Range	County
G	14	28N	12W	San Juan

Surface Owner: ☐ State ☒ Federal ☐ Tribal ☐ Private (*Name:* _____)

Nature and Volume of Release

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

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☒ Produced Water	Volume Released (bbls) 22 bbls	Volume Recovered (bbls) 0 bbls
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☒ No
☐ Condensate	Volume Released (bbls)	Volume Recovered (bbls)
☐ Natural Gas	Volume Released (Mcf)	Volume Recovered (Mcf)
☐ Other (describe)	Volume/Weight Released (provide units)	Volume/Weight Recovered (provide units)

Cause of Release: During replacement of the BGT on location, stained soils with a hydrocarbon odor were observed beneath the BGT. The BGT is being evaluated and the cause of release is currently under investigation.

Form C-141
Page 2

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

Was this a major release as defined by 19.15.29.7(A) NMAC? ☐ Yes ■ No	If YES, for what reason(s) does the responsible party consider this a major release?
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?	

Initial Response

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

- ■ The source of the release has been stopped.
- ■ The impacted area has been secured to protect human health and the environment.
- ■ Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices.
- ■ All free liquids and recoverable materials have been removed and managed appropriately.

If all the actions described above have not been undertaken, explain why:

Upon discovery, stained soils beneath the BGT were excavated until bedrock was encountered. The impacted soils were hauled to Envirotech landfill in Bloomfield, NM for disposal. A 5-point composite confirmation soil sample was collected at the base of the excavation and results indicate elevated levels of Total BTEX and TPH. Remediation options are currently being evaluated.

Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.

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

Printed Name: Kyle Siesser
Title: Consultant
Signature: Kyle D. Siesser
Date: 9/20/2023
email: ksiesser@cottonwoodconsulting.com
Telephone: (970) 764-7356

OCD Only

Received by: Scott Rodgers
Date: 09/20/2023

Incident ID	
District RP	
Facility ID	
Application ID	

Site Assessment/Characterization

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

What is the shallowest depth to groundwater beneath the area affected by the release?	>50 (ft bgs)
Did this release impact groundwater or surface water?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	☐ Yes ☑ No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	☐ Yes ☑ No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	☐ Yes ☑ No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	☐ Yes ☑ No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	☐ Yes ☑ No
Are the lateral extents of the release within 300 feet of a wetland?	☐ Yes ☑ No
Are the lateral extents of the release overlying a subsurface mine?	☐ Yes ☑ No
Are the lateral extents of the release overlying an unstable area such as karst geology?	☐ Yes ☑ No
Are the lateral extents of the release within a 100-year floodplain?	☐ Yes ☑ No
Did the release impact areas **not** on an exploration, development, production, or storage site?	☐ Yes ☑ No

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

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

- ☑ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☑ Field data
- ☑ Data table of soil contaminant concentration data
- ☑ Depth to water determination
- ☑ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☑ Photographs including date and GIS information
- ☑ Topographic/Aerial maps
- ☑ Laboratory data including chain of custody

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

Form C-141
Page 4

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

Printed Name: Kyle Siesser Title: Consultant

Signature: Kyle D. Siesser Date: 9/20/2023

email: ksiesser@cottonwoodconsulting.com Telephone: (970) 764-7356

OCD Only

Received by: Scott Rodgers Date: 09/20/2023

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
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Application ID	

Remediation Plan

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

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

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

☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.

☐ Extents of contamination must be fully delineated.

☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

OCD Only

Received by: _____ Date: _____

☐ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: _____ Date: _____

Incident ID	
District RP	
Facility ID	
Application ID	

Closure

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

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

☐ A scaled site and sampling diagram as described in 19.15.29.11 NMAC

☐ Photographs of the remediated site prior to backfill or photos of the liner integrity if applicable (Note: appropriate OCD District office must be notified 2 days prior to liner inspection)

☐ Laboratory analyses of final sampling (Note: appropriate ODC District office must be notified 2 days prior to final sampling)

☐ Description of remediation activities

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

Printed Name: _____ Title: _____

Signature: _____ Date: _____

email: _____ Telephone: _____

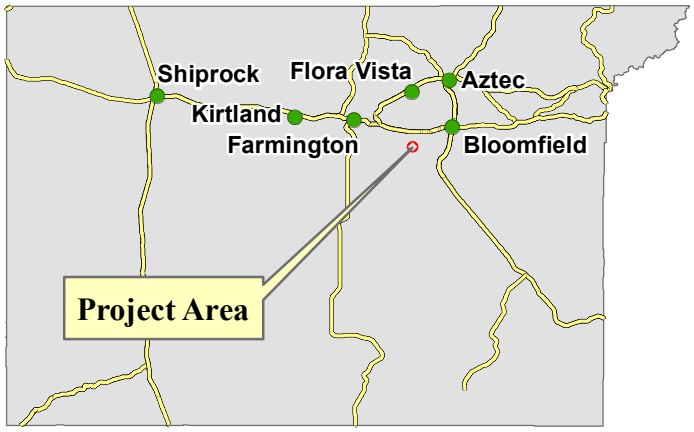
OCD Only

Received by: _____ Date: _____

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

Closure Approved by: _____ Date: _____

Printed Name: _____ Title: _____



San Juan County, New Mexico

5PC-TB@6.5'(95)

GALLEGOS CANYON UNIT #207

Feet
0
50
100

N

Notes: Sample collected 9/5/2023. 5PC-TB@6.5'(95) is a five-point composite sample.

Legend

- Soil Sample
- Below Grade Tank
- Impacted/Excavated Area
- Oil & Gas Wells

Cottonwood CONSULTING

Mapping by: E. Millar, 9/20/2023
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: SWNE Sec 14 T28N R12W NMPM

GCU #207
Project Map
Simcoe LLC

Cottonwood CONSULTING

Date: 9/5/23 Client: Simcoe

Environmental Specialist(s): KS Contractor: Kelley Oilfield

Page: 1 of 1

BGT Closure Field Form

Site Information

Well Name: GCU 207 Well API#: 30-045-11587 Lease: Federal / State / Fee / Indian

Well Location: Unit: G Sec: 14 T: 28N R: 12W Cty: San Juan St: NM

BGT Information

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

Notes: BGT being removed and replaced w/ 95 bbls D/D

BGT label says 100 bbls.

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

New Tank ID: 95 bbls single / double -wall single / double -bottom sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)

Notes: black staining, PHC beneath tank.

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

Soil Sampling

Sample ID: SPC-TB@6.5'(95) Time: ~~1005~~ 1135 Sample Type: Grab / Composite - pts PID: 3388 ppm Lab: CAL

Notes: grey weathered sandstone, moist to v. moist, stain, PHC odor

Soil Sampling

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

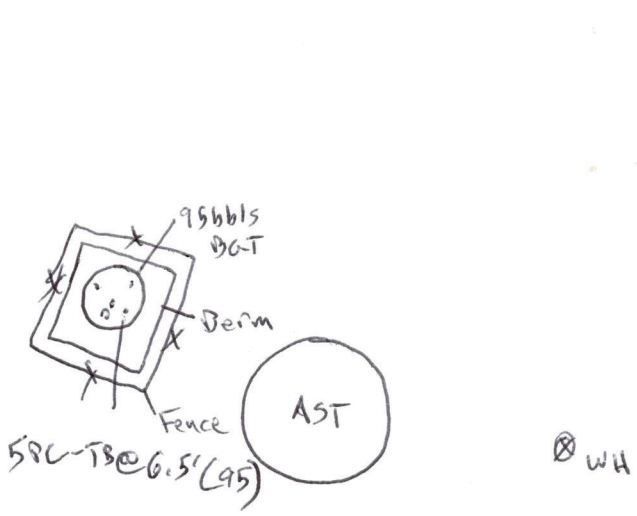
Notes: _____

Soil Sampling

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

Notes: _____

Site Sketch



Notes

BGT replacement

Evidence of release.

Black staining + PHC odor.

Remove stained material beneath BGT and collect sample of weathered sandstone.

PID Calibration Date: 9/5/23

Cottonwood CONSULTING

Table 1
Soil Sampling Results
Gallegos Canyon Unit #207
Simcoe LLC

Parameter	5PC-TB@6.5'(95) 9/5/2023	Units
Depth	6.5	feet bgs
PID	3,388	ppm
Chloride	<11.1	mg/kg
Benzene	<2.00	mg/kg
Toluene	14.6	mg/kg
Ethylbenzene	15.0	mg/kg
Total Xylenes	193	mg/kg
Total BTEX	223	mg/kg
TPH (GRO)	3,770	mg/kg
TPH (DRO)	1,670	mg/kg
TPH (EXT DRO)	<10.0	mg/kg

Notes:
PID - Photoionization Detector
BTEX - Benzene, Toluene, Ethylbenzene, Total Xylenes
TPH - Total Petroleum Hydrocarbons
GRO - Gasoline Range Organics
DRO - Diesel Range Organics
EXT - Extended
bgs - below ground surface
ppm - parts per million
mg/kg - milligrams per kilogram

SITING AND HYDRO-GEOLOGICAL REPORT FOR GALLEGOS CANYON UNIT 207

SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be greater than 100 feet. This estimation is based on data from Stone and others (1983), and depth to groundwater data obtained from water wells permitted by the New Mexico State Engineer's Office (OSE, Figure 1). Local topography and proximity to adjacent water features are also considered. A topographic map of the site is provided as Figure 2 and demonstrates that the below grade tank (BGT) is not within 300 feet of any continuously flowing watercourse or within 200 feet of any other significant watercourse, lakebed, sinkhole or playa lake as measured from the ordinary high water mark. Figure 3 demonstrates that the BGT is not within 300 feet of a permanent residence, school, hospital, institution or church. Figure 4 demonstrates, based on a search of the OSE database and USGS topographic maps, that there are no freshwater wells or springs within 1000 feet of the BGT. Figure 5 demonstrates that the BGT is not within a municipal boundary or a defined municipal freshwater well field. Figure 6 demonstrates that the BGT is not within 500 feet of a wetland. Figure 7 demonstrates that the BGT is not in an area overlying a subsurface mine. The BGT is not located in an unstable area. Figure 8 demonstrates that the BGT is not within the mapped FEMA 100-year floodplain.

Local Geology and Hydrology

This particular site is located on a slope east of Gallegos Canyon. Broad shaley hills are interspersed with occasional sandstone outcrops, and systems of dry washes and their tributaries are common. The predominant geologic formation is the Nacimiento Formation of Tertiary age, which underlies surface soils and is often exposed. Deposits of Quaternary alluvial and eolian sands occur prominently near the surface of the area, especially near washes.

Regional Geology and Hydrology

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

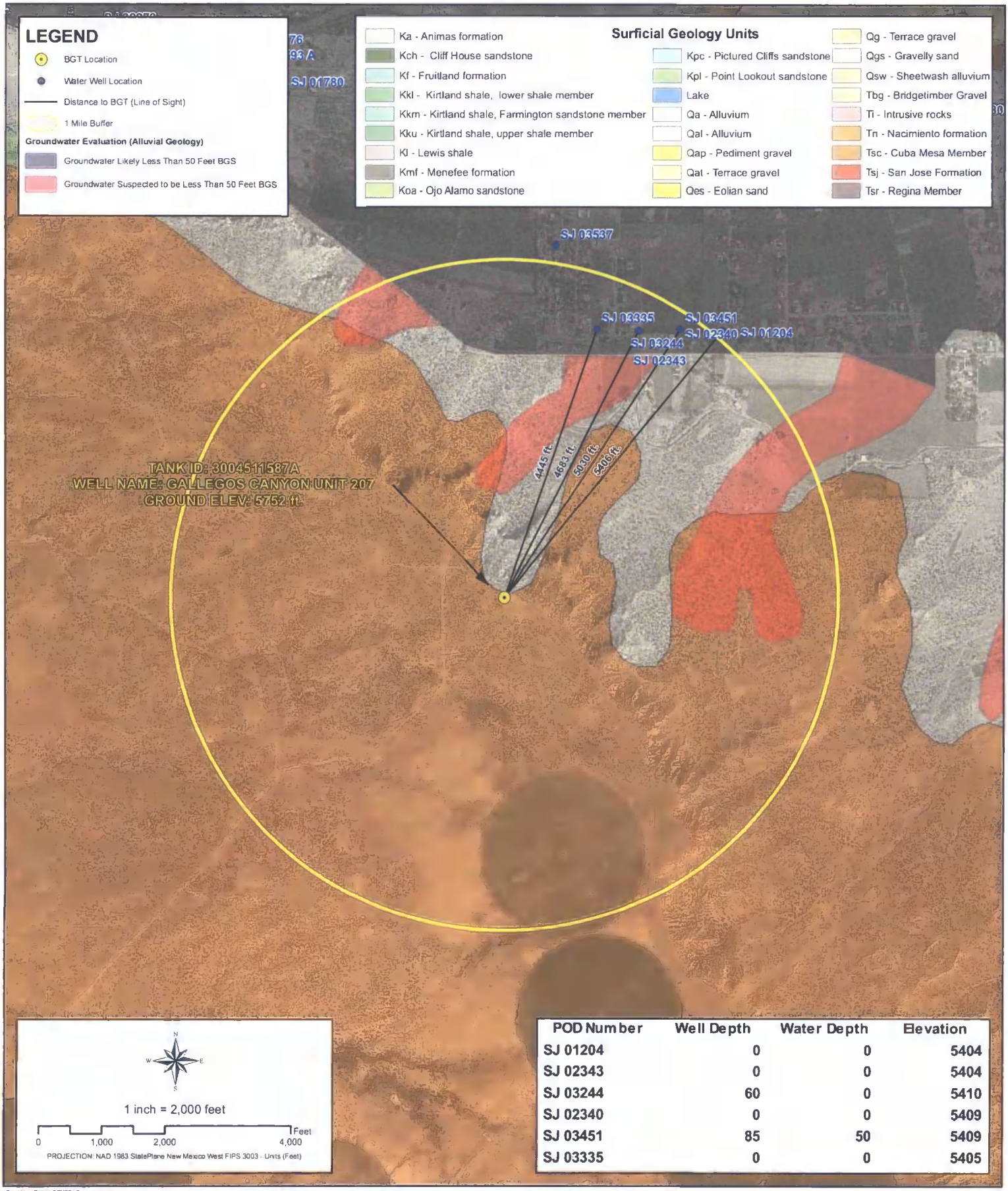
Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). In most of the proposed area, the Nacimiento Formation lies at the surface and grades into the Animas Formation to the west. The lower part of the Nacimiento Formation is composed of interbedded black, carbonaceous mudstones and

white coarse-grained sandstones. The upper part is comprised of mudstone and sandstone. It is generally slope-forming, even within the sandstone units. Thickness of the Nacimiento ranges from 418 to 2232 feet (Stone et al., 1983). Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation are between 0 and 1000 feet deep in this section of the basin. Wells within these bodies flow from 16 to 100 gallons per minute (gpm), and transmissivities are expected to be 100 ft^2/d (Stone et al, 1983). Groundwater within these aquifers flows toward the San Juan River.

References

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

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



POD Number	Well Depth	Water Depth	Elevation
SJ 01204	0	0	5404
SJ 02343	0	0	5404
SJ 03244	60	0	5410
SJ 02340	0	0	5409
SJ 03451	85	50	5409
SJ 03335	0	0	5405

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Created by: PRW
Reviewed by: AGH

bp

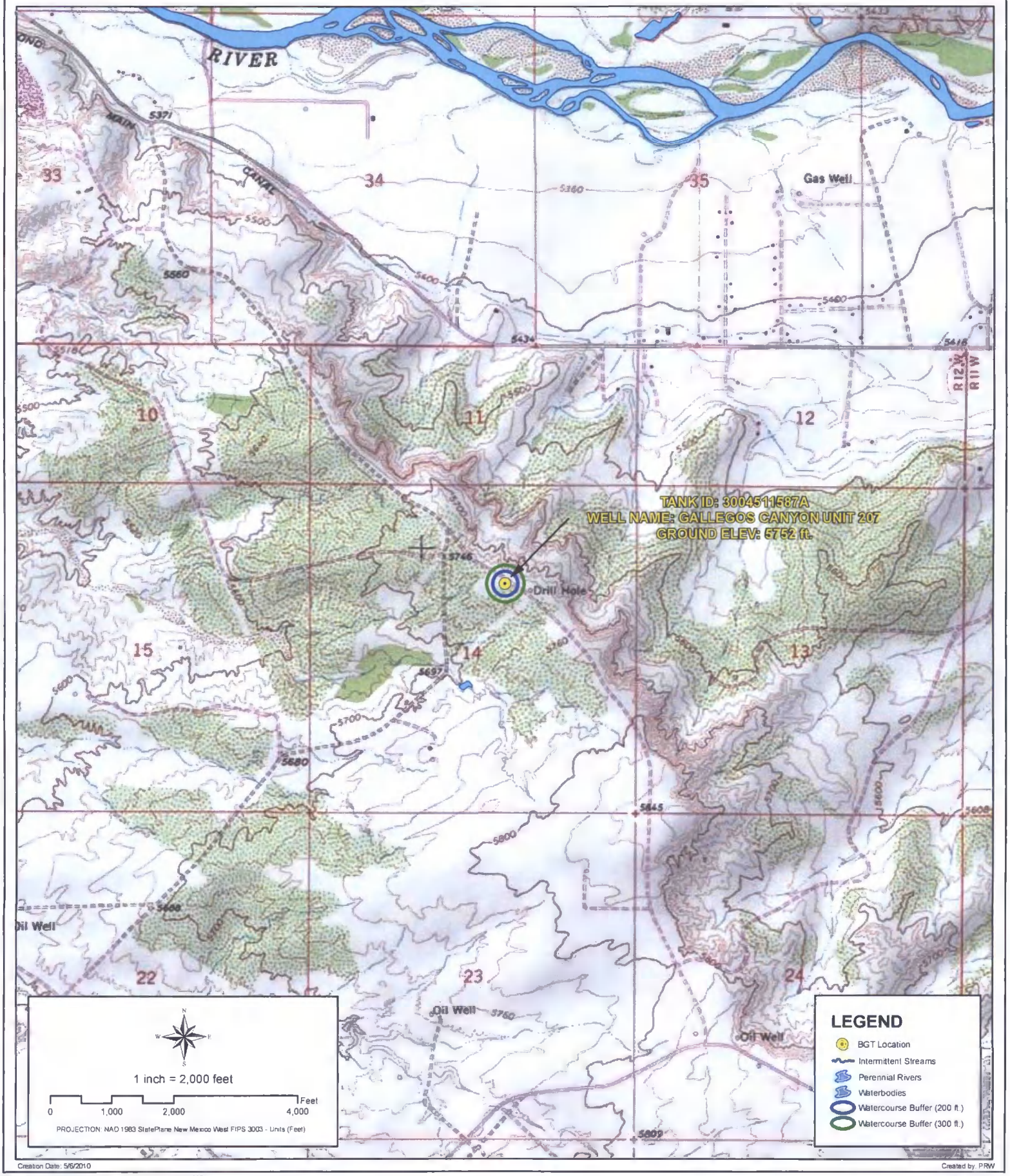
GROUNDWATER LESS THAN 50 FT.

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 1



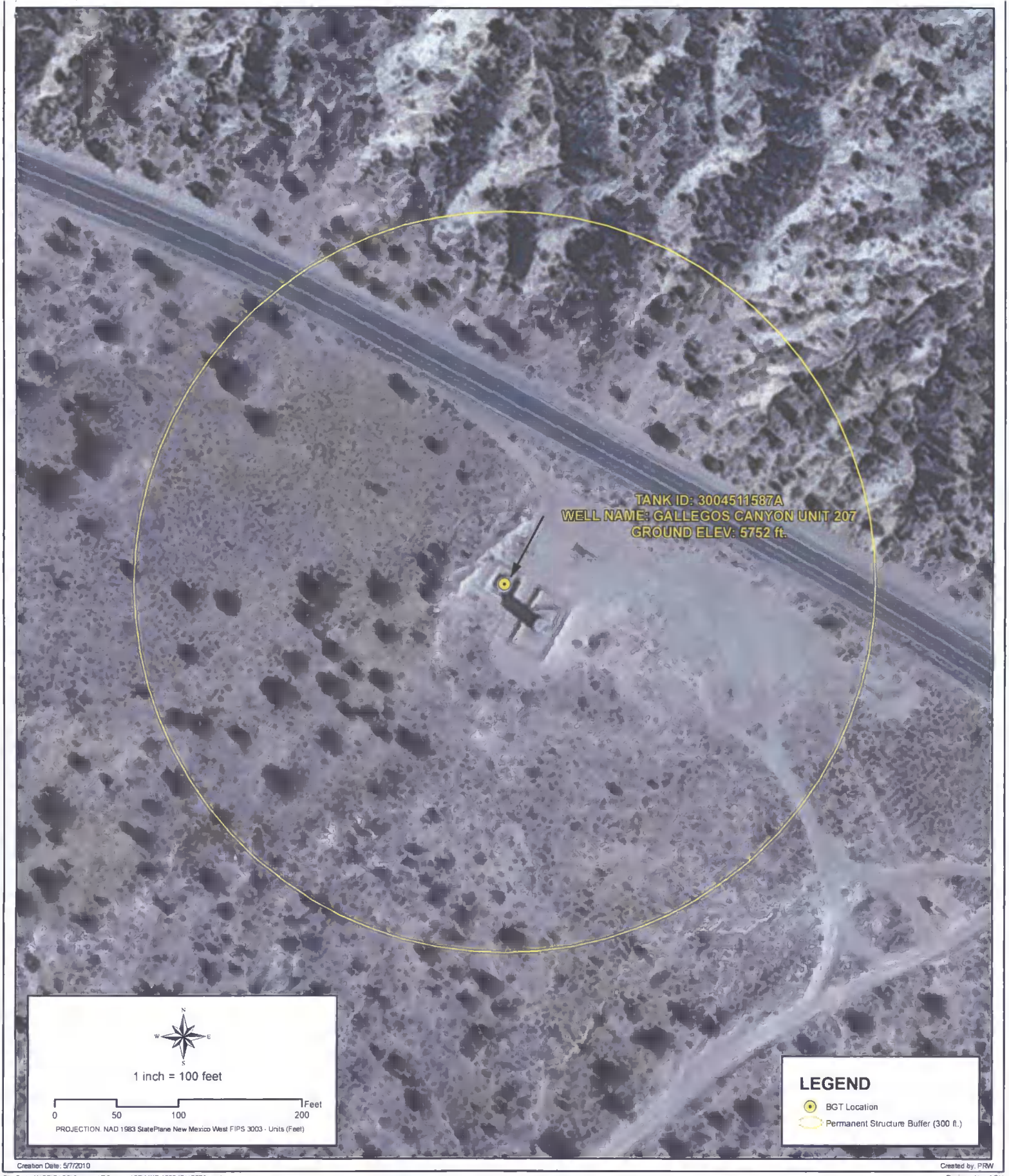
PROXIMITY TO WATERCOURSES

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 2



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PROXIMITY TO PERMANENT STRUCTURE

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 3

Creation Date: 5/7/2010 Created by: PRW

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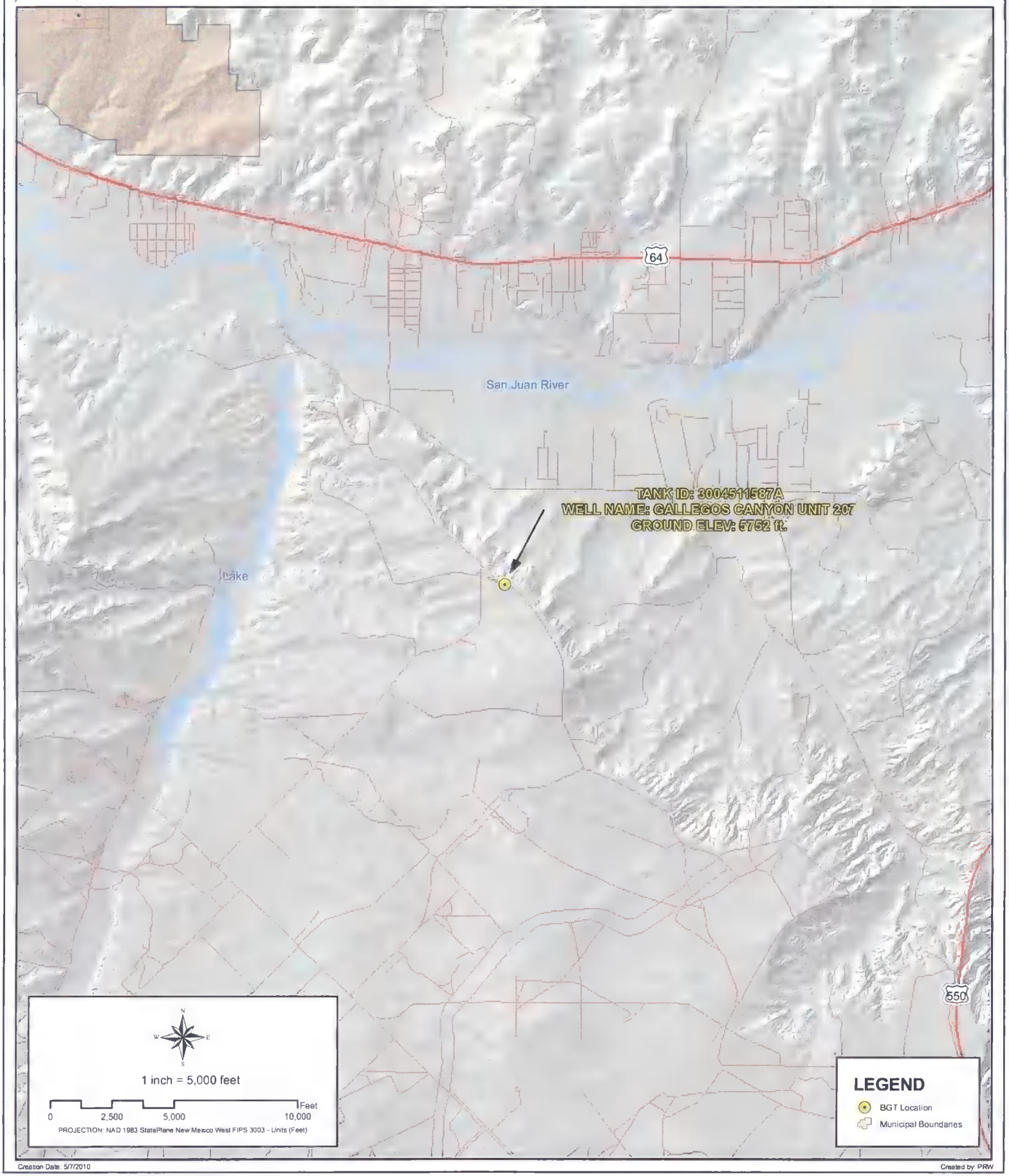
PROXIMITY TO WATER WELLS

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 4



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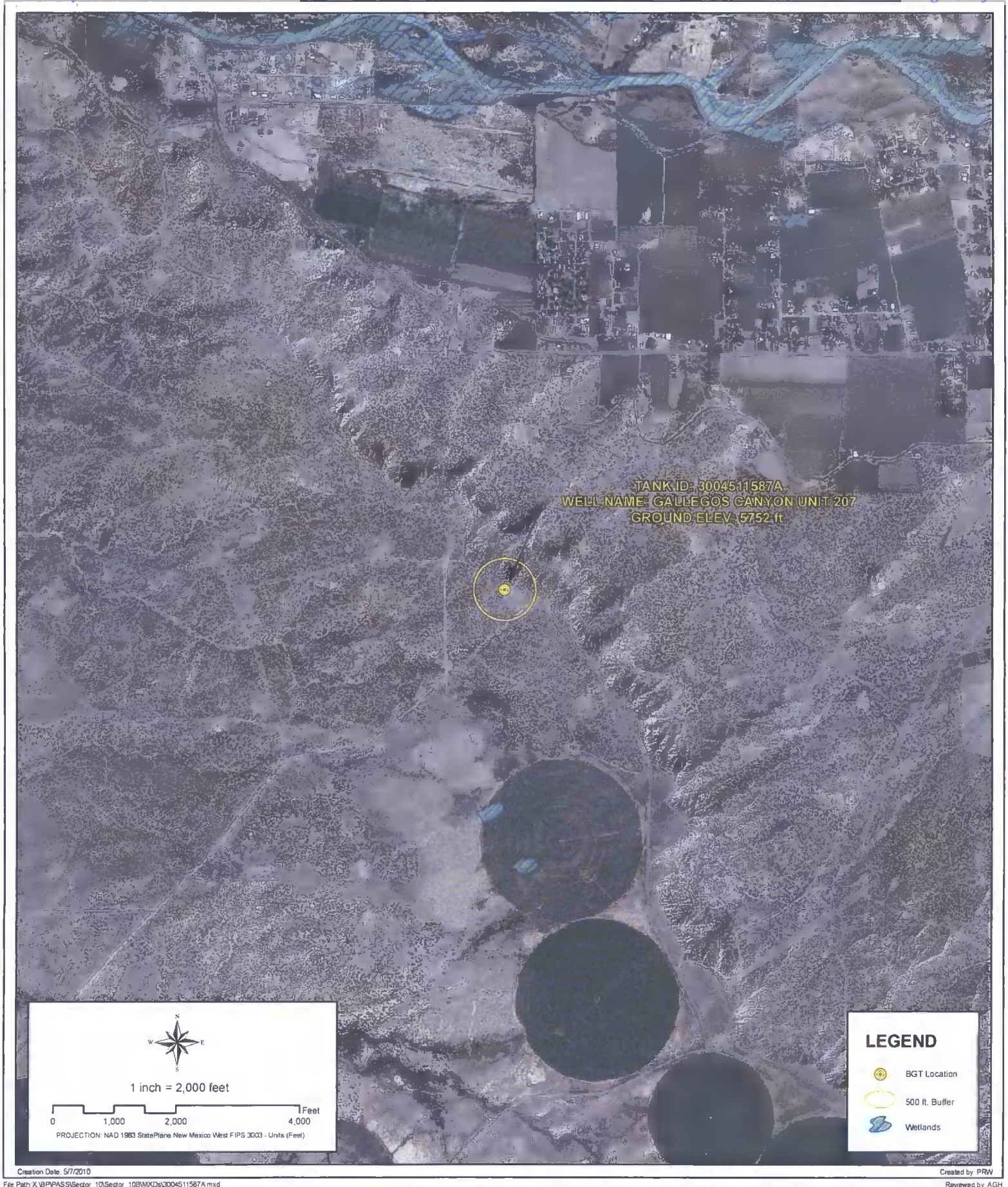
PROXIMITY TO MUNICIPAL BOUNDARY

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 5



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Reviewed by: AGH

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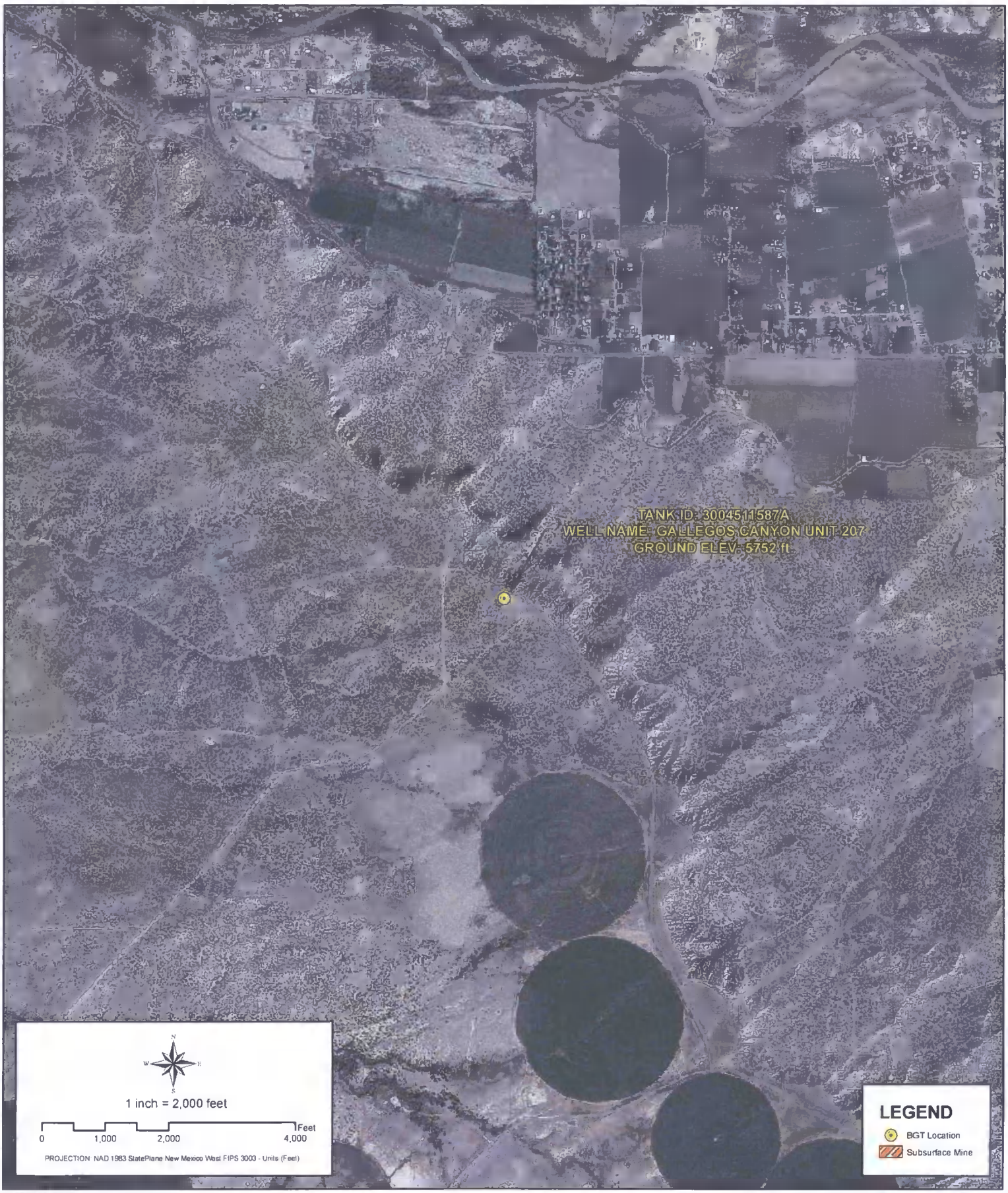
PROXIMITY TO WETLANDS

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 6



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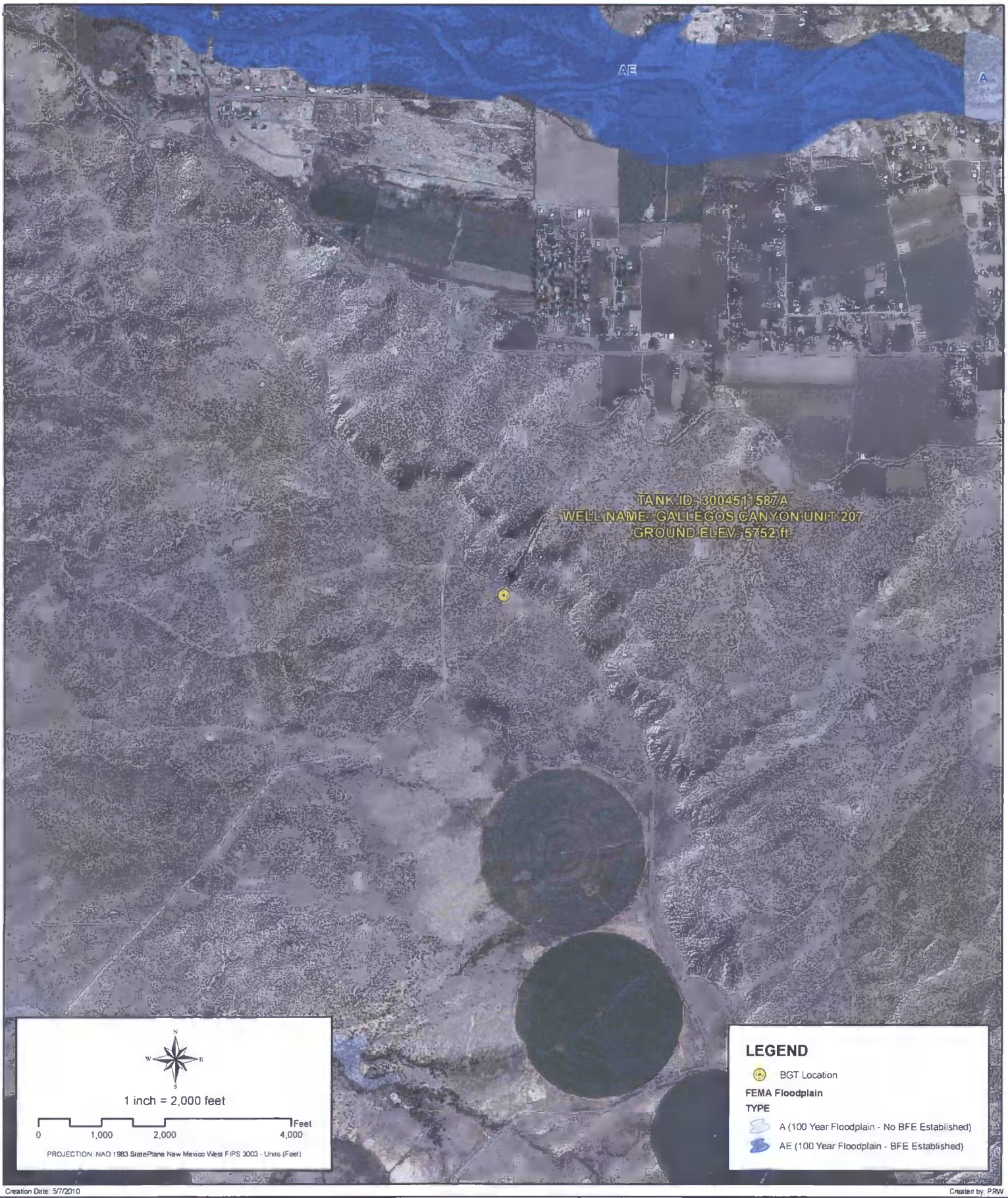
PROXIMITY TO SUBSURFACE MINES

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M.NM23

FIGURE 7



Creation Date: 5/7/2010 Created by: PRW

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PROXIMITY TO FLOODPLAIN

WELL NAME: GALLEGOS CANYON UNIT 207

API NUMBER: 3004511587 TANK ID: 3004511587A

SECTION 14, TOWNSHIP 28.0N, RANGE 12W, P.M. NM23

FIGURE 8

Cottonwood CONSULTING

GCU #207
Photographic Log
Simcoe, LLC

Photo 1: GCU #207 well sign, 9/5/2023.

Photo 2: BGT prior to removal, 9/5/2023.

Cottonwood CONSULTING

GCU #207
Photographic Log
Simcoe, LLC

Photo 3: Location of BGT following removal, 9/5/2023.

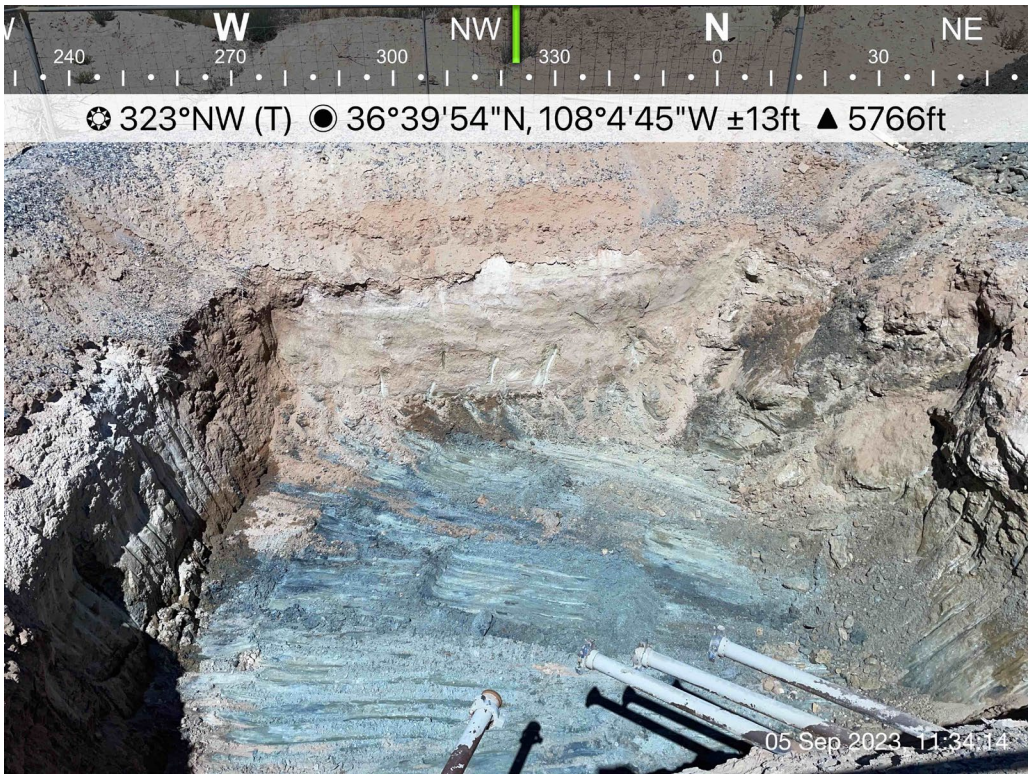

Photo 4: Location of BGT following excavation, 9/5/2023.

Cottonwood CONSULTING

GCU #207
Photographic Log
Simcoe, LLC

Photo 5: Bottom of BGT following removal, 9/5/2023.

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

14 September 2023

Kyle Siesser
Cottonwood Consulting
PO Box 1653
Durango, CO 81302

RE: GCU 207

Enclosed are the results of analyses for samples received by the laboratory on 09/05/23 13:14. The data to follow was performed, in whole or in part, by Green Analytical Laboratories. Any data that was performed by a subcontract laboratory is included within the GAL report, or with an additional report attached.

If you need any further assistance, please feel free to contact me.

Sincerely,

Veronica Wells
Project 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. TNI Certificate Number: T104704514-23-17

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 through the Colorado Department of Public Health and Environment and EPA region 8. TNI Certificate Number: T104704398-23-16

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

Cottonwood Consulting	Project: BTEX/TPH, Cl	
PO Box 1653	Project Name / Number: GCU 207	**Reported:**
Durango CO, 81302	Project Manager: Kyle Siesser	09/14/23 16:26

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
5PC-TB@6.5' (95)	2309028-01	Solid	09/05/23 11:35	09/05/23 13:14	

Green Analytical Laboratories

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Durango CO, 81302	Project Manager: Kyle Siesser	09/14/23 16:26

5PC-TB@6.5' (95)

2309028-01 (Soil)
Sampled Date: 09/05/23 11:35

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
General Chemistry									
% Dry Solids	**90.3**			%	1	09/12/23 11:17	EPA160.3/1684		CAI
Soluble (DI Water Extraction)									
Chloride	<11.1	11.1	0.615	mg/kg dry	10	09/14/23 00:06	EPA300.0		AWG

Subcontracted -- **Cardinal Laboratories 101 East Marland Hobbs, NM 88240**

Volatile Organic Compounds by EPA Method 8021									
Benzene*	<2.00	2.00	0.194	mg/kg	2000	09/07/23 08:53	8021B		JH/
Toluene*	**14.6**	2.00	0.172	mg/kg	2000	09/07/23 08:53	8021B		JH/
Ethylbenzene*	**15.0**	2.00	0.152	mg/kg	2000	09/07/23 08:53	8021B		JH/
Total Xylenes*	**193**	6.00	0.500	mg/kg	2000	09/07/23 08:53	8021B		JH/
Total BTEX	**223**	12.0	1.19	mg/kg	2000	09/07/23 08:53	8021B		JH/
Surrogate: 4-Bromofluorobenzene (PID)			*115 %*	*71.5-134*		*09/07/23 08:53*	*8021B*		JH/
Petroleum Hydrocarbons by GC FID								**S-04**	
GRO C6-C10*	**3770**	10.0	6.25	mg/kg	1	09/06/23 18:22	8015B		MS
DRO >C10-C28*	**1670**	10.0	4.26	mg/kg	1	09/06/23 18:22	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	4.26	mg/kg	1	09/06/23 18:22	8015B		MS
Surrogate: 1-Chlorooctane			*249 %*	*48.2-134*		*09/06/23 18:22*	*8015B*		MS
Surrogate: 1-Chlorooctadecane			*99.5 %*	*49.1-148*		*09/06/23 18:22*	*8015B*		MS

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Cottonwood Consulting	Project: BTEX/TPH, Cl	
PO Box 1653	Project Name / Number: GCU 207	**Reported:**
Durango CO, 81302	Project Manager: Kyle Siesser	09/14/23 16:26

Soluble (DI Water Extraction) - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch B232740 - IC- Ion Chromatograph										
Blank (B232740-BLK1)			Prepared & Analyzed: 09/13/23							
Chloride	ND	10.0	mg/kg wet							
LCS (B232740-BS1)			Prepared & Analyzed: 09/13/23							
Chloride	250	10.0	mg/kg wet	250		99.8	85-115			
LCS Dup (B232740-BSD1)			Prepared & Analyzed: 09/13/23							
Chloride	254	10.0	mg/kg wet	250		102	85-115	1.73	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 3090623 - Volatiles										
Blank (3090623-BLK1)			Prepared: 09/06/23 Analyzed: 09/07/23							
Surrogate: 4-Bromofluorobenzene (PID)	*0.0579*		mg/kg	*0.0500*		*116*	*71.5-134*			
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 (3090623-BS1)			Prepared: 09/06/23 Analyzed: 09/07/23							
Surrogate: 4-Bromofluorobenzene (PID)	*0.0515*		mg/kg	*0.0500*		*103*	*71.5-134*			
Benzene	1.99	0.050	mg/kg	2.00		99.3	82.8-130			
Ethylbenzene	2.09	0.050	mg/kg	2.00		104	85.9-128			
m,p-Xylene	4.17	0.100	mg/kg	4.00		104	89-129			
o-Xylene	2.04	0.050	mg/kg	2.00		102	86.1-125			
Toluene	2.07	0.050	mg/kg	2.00		104	86-128			
Total Xylenes	6.21	0.150	mg/kg	6.00		103	88.2-128			
LCS Dup (3090623-BSD1)			Prepared: 09/06/23 Analyzed: 09/07/23							
Surrogate: 4-Bromofluorobenzene (PID)	*0.0528*		mg/kg	*0.0500*		*106*	*71.5-134*			
Benzene	1.97	0.050	mg/kg	2.00		98.3	82.8-130	0.981	15.8	
Ethylbenzene	2.11	0.050	mg/kg	2.00		106	85.9-128	1.13	16	
m,p-Xylene	4.22	0.100	mg/kg	4.00		106	89-129	1.37	16.2	

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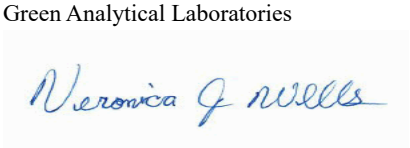

Veronica Wells, Project Manager

GREEN ANALYTICAL LABORATORIES

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Cottonwood Consulting	Project: BTEX/TPH, Cl	
PO Box 1653	Project Name / Number: GCU 207	**Reported:**
Durango CO, 81302	Project Manager: Kyle Siesser	09/14/23 16:26

Volatile Organic Compounds by EPA Method 8021 - Quality Control (Continued)

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 3090623 - Volatiles (Continued)										
LCS Dup (3090623-BSD1) (Continued)			Prepared: 09/06/23 Analyzed: 09/07/23							
o-Xylene	2.08	0.050	mg/kg	2.00		104	86.1-125	1.82	16.7	
Toluene	2.11	0.050	mg/kg	2.00		105	86-128	1.55	15.9	
Total Xylenes	6.30	0.150	mg/kg	6.00		105	88.2-128	1.52	16.3	

Petroleum Hydrocarbons by GC FID - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
Batch 3090621 - General Prep - Organics										
Blank (3090621-BLK1)			Prepared & Analyzed: 09/06/23							
Surrogate: 1-Chlorooctadecane	*51.9*		mg/kg	*50.0*		*104*	*49.1-148*			
Surrogate: 1-Chlorooctane	*46.4*		mg/kg	*50.0*		*92.8*	*48.2-134*			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							
LCS (3090621-BS1)			Prepared & Analyzed: 09/06/23							
Surrogate: 1-Chlorooctadecane	*59.0*		mg/kg	*50.0*		*118*	*49.1-148*			
Surrogate: 1-Chlorooctane	*50.5*		mg/kg	*50.0*		*101*	*48.2-134*			
DRO >C10-C28	209	10.0	mg/kg	200		104	66.5-118			
GRO C6-C10	206	10.0	mg/kg	200		103	66.4-123			
Total TPH C6-C28	414	10.0	mg/kg	400		104	77.6-123			
LCS Dup (3090621-BSD1)			Prepared & Analyzed: 09/06/23							
Surrogate: 1-Chlorooctadecane	*58.5*		mg/kg	*50.0*		*117*	*49.1-148*			
Surrogate: 1-Chlorooctane	*49.4*		mg/kg	*50.0*		*98.9*	*48.2-134*			
DRO >C10-C28	213	10.0	mg/kg	200		107	66.5-118	2.27	21	
GRO C6-C10	206	10.0	mg/kg	200		103	66.4-123	0.0889	17.7	
Total TPH C6-C28	419	10.0	mg/kg	400		105	77.6-123	1.19	18.5	

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Cottonwood Consulting	Project: BTEX/TPH, Cl	
PO Box 1653	Project Name / Number: GCU 207	**Reported:**
Durango CO, 81302	Project Manager: Kyle Siesser	09/14/23 16:26

Notes and Definitions

S-04	The surrogate recovery for this sample is outside of established control limits due to a sample matrix effect.
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

Veronica J Wells

Veronica Wells, Project Manager

CHAIN-OF-CUSTODY AND ANALYSIS REQUEST

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

Company Name: Cottonwood Consulting LLC
Project Manager: Kyle Siesser
Address: PO Box 1653
City: Durango **State:** CO **Zip:** 81302
Phone #: 970-764-7356 **Email:** ksiesser@cottonwoodconsulting.com
Additional Report To:
Project Name: GCU 207
Project Number:
Sampler Name (Print): Kyle Siesser

Bill to (if different):
P.O. #:
Company:
Attn:
Address:
City:
State: Zip:
Phone #:
Fax or Email:

ANALYSIS REQUEST

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:	BTEX	TPH	Chloride
2309-028 C1	SPC-TB@6.5' (95)	9/5/23	~~1005~~ 1135					X		3						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: 9/5/23 Time: 1314	Received By:
Relinquished By:	Date: Time:	Received By:
Relinquished By:	Date: Time:	Received By:

ADDITIONAL REMARKS:

Report to State? (Circle) Yes (No)

Delivered By: (Circle One) Sampler - UPS - FedEx - Kangaroo - Other: laser #2 on ice

Temperature at reciept: 24.9°C

CHECKED BY: MRN

† 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.

GAL Analytical Laboratories

SAMPLE CONDITION RECEIPT FORM

Client Name: Cottonwood Consulting Work Order # 2309-028

Courier: ☐Fed Ex ☐UPS ☐USPS ☒Client ☐Kangaroo

Custody Seals on Box/Cooler Present: ☐ Yes ☒No Seals Intact: ☐ Yes ☒ No

Thermometer Used: 2 Samples on ice, cooling process has begun: ☒ Yes ☐ No

Type of Ice: ☒ Wet ☐ Blue ☐ None

Cooler Temp: Observed Temp: 24.9 °C Correction Factor: 0 °C Final Temp: 24.9 °C

*Temp should be above freezing to 6°C

Date/Initials of person examining contents: 9/5/23

Labeled by Initials: (If different than above)

Chain of Custody Present:	☒Yes ☐No	1.
Chain of Custody Filled Out:	☒Yes ☐No	2.
Chain of Custody Relinquished:	☒Yes ☐No	3.
Sampler Name and Signature on COC:	☒Yes ☐No	4.
Samples arrived within hold time:	☒Yes ☐No	5.
Short Hold Time Analysis (<72hr):	☐Yes ☒No	6.
Rush Turn Around Time Requested:	☐Yes ☒No	7.
Sufficient Volume:	☒Yes ☐No	8.
Correct Containers Used:	☒Yes ☐No	9.
Containers Intact:	☒Yes ☐No	10.
Dissolved Testing Needed: Field Filtered: ☐Yes ☐No	☐Yes ☒No	11.
Sample Labels match COC: -Includes Date/Time/ID	☒Yes ☐No	12.
Matrix:	WT SL OT	
Trip Blank Present:	☐Yes ☐No ☒N/A	13.
Trip Blank Custody Seals Present:	☐Yes ☐No ☒N/A	

Client Notification/Resolution:

Person Contacted: _____ Date/Time: _____

Comments/Resolution: _____

FORM-039, Rev 1 Page 1 of 1

District I
1625 N. French Dr., Hobbs, NM 88240
Phone:(575) 393-6161 Fax:(575) 393-0720
District II
811 S. First St., Artesia, NM 88210
Phone:(575) 748-1283 Fax:(575) 748-9720
District III
1000 Rio Brazos Rd., Aztec, NM 87410
Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
1220 S. St Francis Dr., Santa Fe, NM 87505
Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 267569
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
scott.rodgers	When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141	9/20/2023