



P.O. Box 1653
Durango, Colorado 81302
(970) 764-7356
www.cottonwoodconsulting.com

April 29, 2025

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

New Mexico State Land Office
4601 College Blvd.
Farmington, NM 87402

**RE: Closure Request – State Gas Com AA #001
API #30-045-28219; Incident ID nAPP2504231010
Simcoe LLC
Latitude/Longitude: 36.765335/-107.628349
San Juan County, New Mexico**

To Whom it May Concern,

Cottonwood Consulting, LLC (Cottonwood), on behalf of Simcoe LLC (Simcoe), is pleased to provide you with a closure summary for the release at Simcoe's State Gas Com AA #001 (API #30-045-28219; Incident ID nAPP2504231010) well site. Details regarding the release and associated sampling results are summarized below.

Background

On February 4, 2025, Simcoe observed a release near an above ground storage tank (AST) located on the State Gas Com AA #001 well site. Based on Simcoe's assessment, approximately 17.3 barrels of fluid were released within the bermed area of the AST. Approximately 10 barrels of fluid were recovered following the release. Initial soil samples were collected on March 21, 2025 for delineation purposes. Confirmation soil samples were collected on April 14, 2025 for closure purposes. This closure request includes results of soil sampling, site characterization maps, photo documentation, initial C-141 and State Land Office (SLO) notifications, and sampling notifications.

Site Characterization

Cottonwood conducted site characterization to determine the depth to groundwater at the site, distance to surface water features, surficial geology, and other geologic features. Figure 1 is a Site Characterization Map. Due to lack of groundwater data within ½ mile of the project area, Simcoe elected to assess the site relative to the most stringent New Mexico Oil Conservation Division (NMOCD) closure criteria when evaluating soil samples collected from the release area.

Methodology

Cottonwood conducted a site assessment, including delineation of the release area, on March 21, 2025. Horizontal delineation samples were collected in four cardinal directions surrounding the release area at depths of 0 – 12 inches (") below ground surface (bgs). Vertical delineation samples

Cottonwood Consulting LLC

were collected within the release area at depths of 0-12", 24-30", and 48-54" bgs. All delineation samples were grab samples collected using a stainless-steel hand auger and immediately transferred into a 4-ounce (oz.) glass jar for laboratory analysis. On April 14, 2025, five-point composite soil samples were collected every 200 square feet within the release area in accordance with NMOCD 19.15.29.12.D.1.c. Soil samples were collected using a decontaminated shovel, immediately transferred into a stainless-steel bowl to homogenize the sample and transferred into a 4 oz. glass jar for laboratory analysis. All soil samples were field screened prior to collection using a photoionization detector (PID). All samples were taken to Envirotech Laboratories LLC (Envirotech) in Bloomfield, New Mexico (NM) for analysis of total petroleum hydrocarbons (TPH); benzene, toluene, ethylbenzene, total xylenes (BTEX); and chloride. The location of all samples and the release area was recorded using a Trimble® global positioning system (GPS).

Results

Laboratory analytical results of all delineation and confirmation samples indicate compliance with the NMOCD's most stringent closure criteria. The highest chloride concentration detected was 556 milligrams per kilogram (mg/kg), and TPH and BTEX were non-detect in all soil samples collected. Figure 2 shows the locations of soil samples collected from the site, Table 1 shows the sample results, and laboratory analytical reports are included in Attachment 1. Photographs of the sample locations are included in Attachment 2.

Notifications

Per NMAC 19.15.29.10, NMOCD must be notified of releases. A notification of release was submitted to the NMOCD within 15 days of Simcoe discovering the release per NMAC 19.15.29.10.B. An additional notification was submitted to the SLO on February 4, 2025.

Per NMAC 19.15.29.12.D.1.a, notification should be made no less than two business days prior to conducting final sampling. Cottonwood submitted a notification of sampling on April 9, 2025, for sampling planned on Monday, April 14, 2025. The spill release notifications are included as Attachment 3 and notification of sampling is included as Attachment 4.

Remediation

Based on the delineation and confirmation soil sampling results, it appears no remediation is necessary at this time. All delineation and confirmation soil sample results were below the NMOCD most stringent closure criteria. Because the release area was located on the working surface of the State Gas Com AA #001 well pad, no reseeding or other reclamation activities have occurred. The release area will be reclaimed during final reclamation of the well pad.

Cultural Properties Protection Rule and Biologically Sensitive Areas

The release area is within the previously disturbed boundary of the facility and no work has occurred outside of the authorized pad area. Therefore, the project is exempt from the Cultural Properties Protection Rule per NMAC 19.2.24.10(A)(8). Additionally, because the release area is limited to the previously disturbed pad area, there are no impacts to biologically sensitive areas.

Conclusion

Confirmation soil sampling and delineation sampling indicate compliance with NMOCD's most stringent closure criteria. Based on these results, it appears that no remediation is necessary at this time and Simcoe respectfully requests closure of the release.

Should you have any questions regarding this closure request, please do not hesitate to contact me at 970-764-7356 or ksiesser@cottonwoodconsulting.com.

Sincerely,



Kyle Siesser, P.G.
Cottonwood Consulting, LLC

Attachments: Table 1 – Soil Sampling Results
Figure 1 – Site Characterization Map
Figure 2 – Project Map
Attachment 1 – Soil Sampling Laboratory Results
Attachment 2 – Photographic Log
Attachment 3 – Notifications of Release and Spill Release Report
Attachment 4 – Notification of Sampling



Table 1



Soil Sampling Results
State Gas Com AA #001
Simcoe LLC

Parameter	SS01 (0-10") 3/21/2025 West of Berm	SS02 (0-12") 3/21/2025 North of Berm	SS03 (0-12") 3/21/2025 East of Berm	SS04 (0-12") 3/21/2025 South of Berm	SS05 (0-12") 3/21/2025 Release Area	SS06 (24-30") 3/21/2025 Release Area	Units
Depth	0-10	0-12	0-12	0-12	0-12	24-30	inches bgs
PID	0.0	0.0	0.1	0.4	0.1	0.0	ppm
Chloride	57.9	465	367	<20.0	385	111	mg/kg
Benzene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Ethylbenzene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Toluene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Total Xylenes	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Total BTEX	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	mg/kg
TPH (GRO)	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	mg/kg
TPH (DRO)	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	mg/kg
TPH (EXT DRO)	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	mg/kg
Total TPH	<95.0	<95.0	<95.0	<95.0	<95.0	<95.0	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

ppm - parts per million

bgs - below ground surface

mg/kg - milligrams per kilogram



Soil Sampling Results
State Gas Com AA #001
Simcoe LLC

Parameter	SS07 (48-54") 3/21/2025 Release Area	SS08 (0-12") 4/14/2025 Release area	SS09 (0-12") 4/14/2025 Release area	SS10 (0-12") 4/14/2025 Release area	SS11 (0-12") 4/14/2025 Release area	SS12 (0-12") 4/14/2025 Release Area	Units
Depth	48-54	0-12	0-12	0-12	0-12	0-12	inches bgs
PID	0.0	0.9	1.0	0.6	0.8	1.1	ppm
Chloride	351	531	356	556	460	513	mg/kg
Benzene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Ethylbenzene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Toluene	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Total Xylenes	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	<0.0250	mg/kg
Total BTEX	<0.100	<0.100	<0.100	<0.100	<0.100	<0.100	mg/kg
TPH (GRO)	<20.0	<20.0	<20.0	<20.0	<20.0	<20.0	mg/kg
TPH (DRO)	<25.0	<25.0	<25.0	<25.0	<25.0	<25.0	mg/kg
TPH (EXT DRO)	<50.0	<50.0	<50.0	<50.0	<50.0	<50.0	mg/kg
Total TPH	<95.0	<95.0	<95.0	<95.0	<95.0	<95.0	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

ppm - parts per million

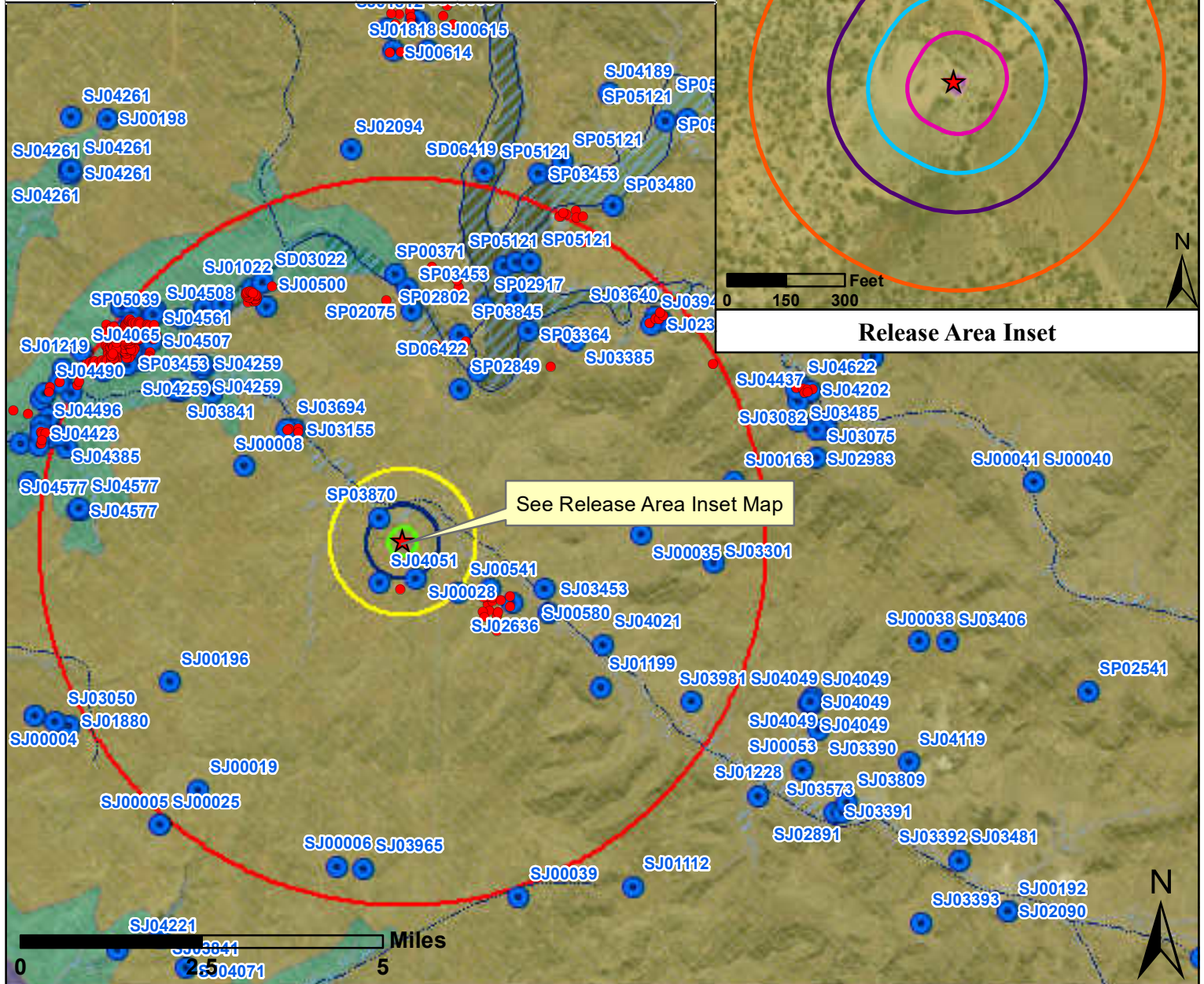
bgs - below ground surface

mg/kg - milligrams per kilogram



Figures

POD Number	Distance (feet)	Well Depth (feet)	Depth to Groundwater (feet)	Date Drilled or Authorized	Use
SP03870	2,526	-	-	1983	Diversion of San Juan contract water (not a water well)
SD00028	3,145	606	300	1952	Industrial



Notes: Water well data from the New Mexico Office of the State Engineer. Surficial geology data from the 1997 USGS Geologic Map of New Mexico. No lakes, municipal boundaries, subsurface mines, unstable areas, or karst geology located within the project area. Imagery date 6/9/2024. POD - Point of Diversion

Legend

★	Point of Release	100 ft Buffer	FEMA Flood Zone
Release Area (3/21/2025)		200 ft Buffer	A; 100-year Floodplain
POD		300 ft Buffer	X; Moderate Hazard
Perennial Surface Water		500 ft Buffer	Surficial Geology
Intermittent Stream		1,000 ft Buffer	Qa; Alluvium
Wetland		1/2 Mile Buffer	Tn; Nacimiento Formation
Riparian Area		1 Mile Buffer	Tsj; San Jose Formation
Building		5 Mile Buffer	

Figure 1
State Gas Com AA #001
Site Characterization Map
Simcoe LLC

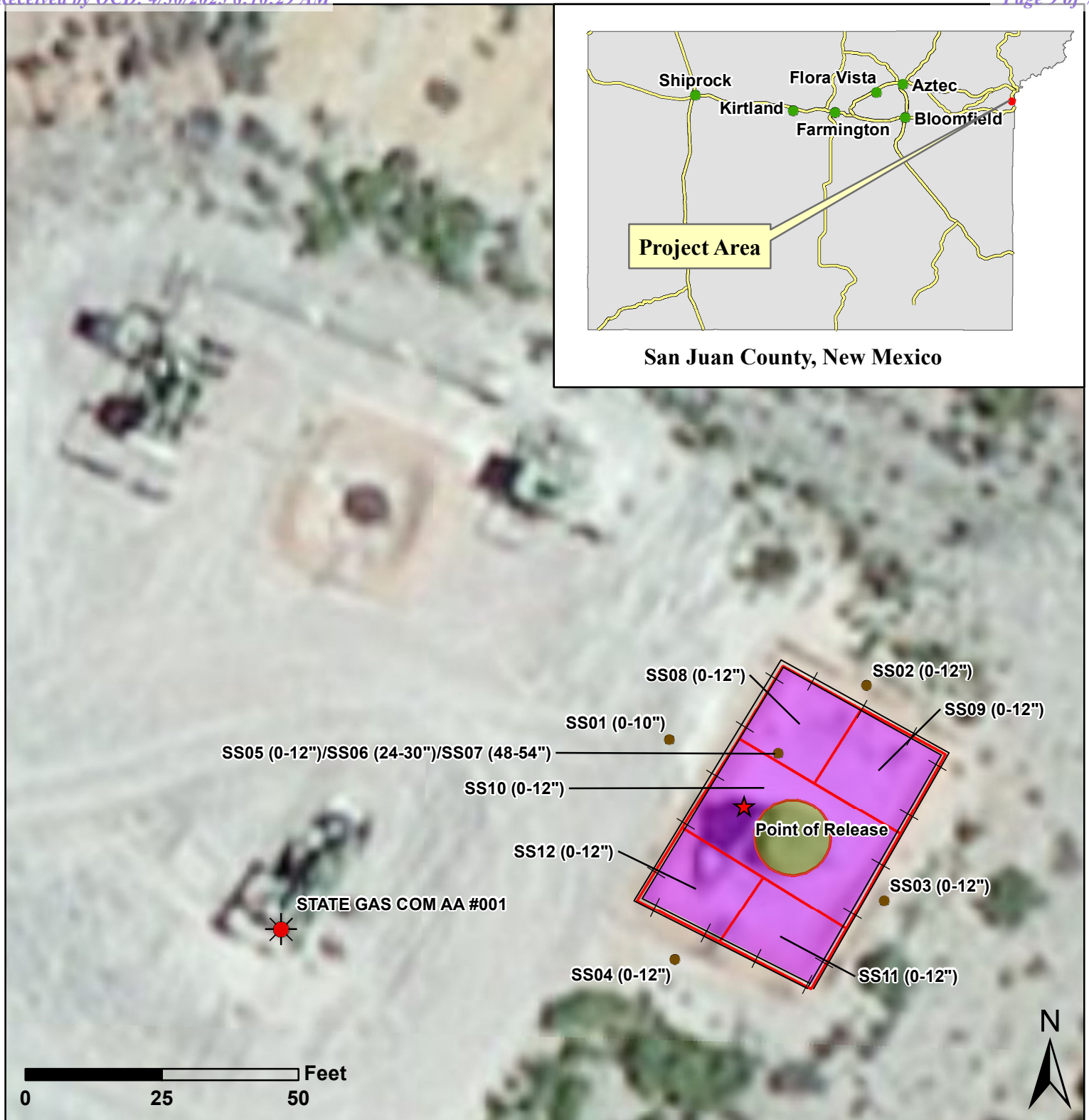
Cottonwood
CONSULTING

Mapping by: E. Millar, 4/29/2025

Coordinate System:








NAD 1983 UTM Zone 13 N

Location: T30N R8W NMPM



Notes: SS01 through SS07 are discrete samples collected 3/21/2025. SS08 through SS12 are 5-point composite samples collected 4/14/2025.

Legend

-  Oil & Gas Wells
-  Point of Release
-  Soil Sample
-  Earthen Berm
-  AST
-  Sample Area (4/14/2025)
-  Release Area (3/21/2025)

Cottonwood
CONSULTING

Mapping by: K. O'Brien, 4/14/2025
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: T30N R8W NMPM

Hi wt g'4
State Gas Com AA #001"
Project Map
Simcoe LLC



Attachment 1

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: State Gas Com AA #001

Work Order: E504108

Job Number: 20035-C-0001

Received: 4/14/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
4/21/25

5796 U.S. Hwy 64
Farmington, NM 87401

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



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

Date Reported: 4/21/25

Kyle Siesser
PO Box 1653
Durango, CO 81302



Project Name: State Gas Com AA #001
Workorder: E504108
Date Received: 4/14/2025 11:43:00AM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 4/14/2025 11:43:00AM, under the Project Name: State Gas Com AA #001.

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

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

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

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

Respectfully,

Walter Hinchman
Laboratory Director
Office: 505-632-1881
Cell: 775-287-1762
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mgonzaless@envirotech-inc.com

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Sample Summary

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	04/21/25 08:14

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS08 (0-12")	E504108-01A	Soil	04/14/25	04/14/25	Glass Jar, 4 oz.
SS09 (0-12")	E504108-02A	Soil	04/14/25	04/14/25	Glass Jar, 4 oz.
SS10 (0-12")	E504108-03A	Soil	04/14/25	04/14/25	Glass Jar, 4 oz.
SS11 (0-12")	E504108-04A	Soil	04/14/25	04/14/25	Glass Jar, 4 oz.
SS12 (0-12")	E504108-05A	Soil	04/14/25	04/14/25	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting PO Box 1653 Durango CO, 81302	Project Name: State Gas Com AA #001 Project Number: 20035-C-0001 Project Manager: Kyle Siesser	Reported: 4/21/2025 8:14:57AM
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SS08 (0-12")

E504108-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Benzene	ND	0.0250	1	04/14/25	04/15/25	
Ethylbenzene	ND	0.0250	1	04/14/25	04/15/25	
Toluene	ND	0.0250	1	04/14/25	04/15/25	
o-Xylene	ND	0.0250	1	04/14/25	04/15/25	
p,m-Xylene	ND	0.0500	1	04/14/25	04/15/25	
Total Xylenes	ND	0.0250	1	04/14/25	04/15/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		98.6 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/14/25	04/15/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		90.7 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: HM		Batch: 2516046	
Diesel Range Organics (C10-C28)	ND	25.0	1	04/15/25	04/16/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/15/25	04/16/25	
<i>Surrogate: n-Nonane</i>		110 %	61-141	04/15/25	04/16/25	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: RAS		Batch: 2516044	
Chloride	531	20.0	1	04/15/25	04/15/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
4/21/2025 8:14:57AM

SS09 (0-12")

E504108-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg	Analyst: SL		Batch: 2516007
Benzene	ND	0.0250	1	04/14/25	04/15/25	
Ethylbenzene	ND	0.0250	1	04/14/25	04/15/25	
Toluene	ND	0.0250	1	04/14/25	04/15/25	
o-Xylene	ND	0.0250	1	04/14/25	04/15/25	
p,m-Xylene	ND	0.0500	1	04/14/25	04/15/25	
Total Xylenes	ND	0.0250	1	04/14/25	04/15/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		98.2 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg	Analyst: SL		Batch: 2516007
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/14/25	04/15/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		90.4 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg	Analyst: HM		Batch: 2516046
Diesel Range Organics (C10-C28)	ND	25.0	1	04/15/25	04/16/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/15/25	04/16/25	
<i>Surrogate: n-Nonane</i>		105 %	61-141	04/15/25	04/16/25	
Anions by EPA 300.0/9056A		mg/kg	mg/kg	Analyst: RAS		Batch: 2516044
Chloride	356	20.0	1	04/15/25	04/15/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
4/21/2025 8:14:57AM

SS10 (0-12")

E504108-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Benzene	ND	0.0250	1	04/14/25	04/15/25	
Ethylbenzene	ND	0.0250	1	04/14/25	04/15/25	
Toluene	ND	0.0250	1	04/14/25	04/15/25	
o-Xylene	ND	0.0250	1	04/14/25	04/15/25	
p,m-Xylene	ND	0.0500	1	04/14/25	04/15/25	
Total Xylenes	ND	0.0250	1	04/14/25	04/15/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	99.1 %	70-130		04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/14/25	04/15/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	93.3 %	70-130		04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: HM		Batch: 2516046	
Diesel Range Organics (C10-C28)	ND	25.0	1	04/15/25	04/16/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/15/25	04/16/25	
<i>Surrogate: n-Nonane</i>						
	104 %	61-141		04/15/25	04/16/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: RAS		Batch: 2516044	
Chloride	556	40.0	2	04/15/25	04/15/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
4/21/2025 8:14:57AM

SS11 (0-12")

E504108-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Benzene	ND	0.0250	1	04/14/25	04/15/25	
Ethylbenzene	ND	0.0250	1	04/14/25	04/15/25	
Toluene	ND	0.0250	1	04/14/25	04/15/25	
o-Xylene	ND	0.0250	1	04/14/25	04/15/25	
p,m-Xylene	ND	0.0500	1	04/14/25	04/15/25	
Total Xylenes	ND	0.0250	1	04/14/25	04/15/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
		101 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2516007	
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/14/25	04/15/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
		95.6 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: HM		Batch: 2516046	
Diesel Range Organics (C10-C28)	ND	25.0	1	04/15/25	04/16/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/15/25	04/16/25	
<i>Surrogate: n-Nonane</i>						
		102 %	61-141	04/15/25	04/16/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: RAS		Batch: 2516044	
Chloride	460	20.0	1	04/15/25	04/15/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
4/21/2025 8:14:57AM

SS12 (0-12")

E504108-05

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B		mg/kg	mg/kg	Analyst: SL		Batch: 2516007
Benzene	ND	0.0250	1	04/14/25	04/15/25	
Ethylbenzene	ND	0.0250	1	04/14/25	04/15/25	
Toluene	ND	0.0250	1	04/14/25	04/15/25	
o-Xylene	ND	0.0250	1	04/14/25	04/15/25	
p,m-Xylene	ND	0.0500	1	04/14/25	04/15/25	
Total Xylenes	ND	0.0250	1	04/14/25	04/15/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>		101 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - GRO		mg/kg	mg/kg	Analyst: SL		Batch: 2516007
Gasoline Range Organics (C6-C10)	ND	20.0	1	04/14/25	04/15/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>		94.5 %	70-130	04/14/25	04/15/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO		mg/kg	mg/kg	Analyst: HM		Batch: 2516046
Diesel Range Organics (C10-C28)	ND	25.0	1	04/15/25	04/16/25	
Oil Range Organics (C28-C36)	ND	50.0	1	04/15/25	04/16/25	
<i>Surrogate: n-Nonane</i>		103 %	61-141	04/15/25	04/16/25	
Anions by EPA 300.0/9056A		mg/kg	mg/kg	Analyst: RAS		Batch: 2516044
Chloride	513	20.0	1	04/15/25	04/15/25	



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	4/21/2025 8:14:57AM

Volatile Organics by EPA 8021B

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2516007-BLK1)

Prepared: 04/14/25 Analyzed: 04/14/25

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	7.37		8.00		92.2	70-130			

LCS (2516007-BS1)

Prepared: 04/14/25 Analyzed: 04/14/25

Benzene	4.30	0.0250	5.00		86.1	70-130			
Ethylbenzene	4.29	0.0250	5.00		85.7	70-130			
Toluene	4.32	0.0250	5.00		86.3	70-130			
o-Xylene	4.26	0.0250	5.00		85.2	70-130			
p,m-Xylene	8.57	0.0500	10.0		85.7	70-130			
Total Xylenes	12.8	0.0250	15.0		85.5	70-130			
Surrogate: 4-Bromochlorobenzene-PID	7.54		8.00		94.2	70-130			

LCS Dup (2516007-BSD1)

Prepared: 04/14/25 Analyzed: 04/14/25

Benzene	4.31	0.0250	5.00		86.2	70-130	0.111	20	
Ethylbenzene	4.30	0.0250	5.00		86.0	70-130	0.310	20	
Toluene	4.33	0.0250	5.00		86.5	70-130	0.212	20	
o-Xylene	4.27	0.0250	5.00		85.4	70-130	0.208	20	
p,m-Xylene	8.59	0.0500	10.0		85.9	70-130	0.261	20	
Total Xylenes	12.9	0.0250	15.0		85.7	70-130	0.243	20	
Surrogate: 4-Bromochlorobenzene-PID	7.44		8.00		93.0	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	4/21/2025 8:14:57AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2516007-BLK1) Prepared: 04/14/25 Analyzed: 04/14/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.84		8.00		98.0	70-130			

LCS (2516007-BS2) Prepared: 04/14/25 Analyzed: 04/14/25

Gasoline Range Organics (C6-C10)	49.4	20.0	50.0		98.7	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	8.15		8.00		102	70-130			

LCS Dup (2516007-BSD2) Prepared: 04/14/25 Analyzed: 04/15/25

Gasoline Range Organics (C6-C10)	52.7	20.0	50.0		105	70-130	6.49	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.88		8.00		98.5	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	4/21/2025 8:14:57AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: HM

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2516046-BLK1)					Prepared: 04/15/25 Analyzed: 04/16/25				
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	50.2		50.0		100	61-141			

LCS (2516046-BS1)					Prepared: 04/15/25 Analyzed: 04/16/25				
Diesel Range Organics (C10-C28)	277	25.0	250		111	66-144			
Surrogate: n-Nonane	51.3		50.0		103	61-141			

Matrix Spike (2516046-MS1)					Source: E504108-05		Prepared: 04/15/25 Analyzed: 04/16/25		
Diesel Range Organics (C10-C28)	284	25.0	250	ND	113	56-156			
Surrogate: n-Nonane	52.9		50.0		106	61-141			

Matrix Spike Dup (2516046-MSD1)					Source: E504108-05		Prepared: 04/15/25 Analyzed: 04/16/25		
Diesel Range Organics (C10-C28)	291	25.0	250	ND	116	56-156	2.52	20	
Surrogate: n-Nonane	51.4		50.0		103	61-141			



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	4/21/2025 8:14:57AM

Anions by EPA 300.0/9056A

Analyst: RAS

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2516044-BLK1)					Prepared: 04/15/25 Analyzed: 04/15/25				
Chloride	ND	20.0							
LCS (2516044-BS1)					Prepared: 04/15/25 Analyzed: 04/15/25				
Chloride	253	20.0	250		101	90-110			
Matrix Spike (2516044-MS1)					Source: E504108-04		Prepared: 04/15/25 Analyzed: 04/15/25		
Chloride	720	20.0	250	460	104	80-120			
Matrix Spike Dup (2516044-MSD1)					Source: E504108-04		Prepared: 04/15/25 Analyzed: 04/15/25		
Chloride	695	20.0	250	460	94.0	80-120	3.65	20	

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



Definitions and Notes

Cottonwood Consulting	Project Name:	State Gas Com AA #001	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	04/21/25 08:14

- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- RPD Relative Percent Difference
- DNI Did Not Ignite
- DNR Did not react with the addition of acid or base.

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

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



Client: Cottonwood Consulting Project: Safate Gas Com AA #001 Project Manager: Kyle Siesser Address: PO Box 1653 City, State, Zip: Durango, CO 81302 Phone: 970-764-7356 Email: ksiesser@cottonwoodconsulting.com Report due by:				Bill To				Attention: Address: City, State, Zip: Phone: Email:				Lab Use Only				TAT				EPA Program			
								Lab WO# E504108 Job Number 2035-C-0001				1D 2D 3D Standard x				CWA SDWA							
								Analysis and Method								State							
																NM CO UT AZ TX x							
																Remarks							

Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0								
1000	4/14/2025	Soil	1	SS08 (0-12")	1	✓	✓	✓		✓									
1605	4/14/2025	Soil	1	SS09 (0-12")	2	↓	↓	↓		↓									
1010	4/14/2025	Soil	1	SS10 (0-12")	3	↓	↓	↓		↓									
1015	4/14/2025	Soil	1	SS11 (0-12")	4	↓	↓	↓		↓									
1020	4/14/2025	Soil	1	SS12 (0-12")	5	↓	↓	↓		↓									
	4/14/2025	Soil	1	SS13 () 100															

Additional Instructions:
 please cc emillar@cottonwoodconsulting.com, kobrien@cottonwoodconsulting.com, jlafortune@cottonwoodconsulting.com, and dsonger@cottonwoodconsulting.com with results

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action.
Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 6 °C on subsequent days.

Relinquished by: (Signature) _____		Date	Time	Received by: (Signature) _____		Date	Time	Lab Use Only Received on ice: Y / N T1 _____ T2 _____ T3 _____ AVG Temp °C <u>4</u>	
Relinquished by: (Signature) _____		Date	Time	Received by: (Signature) _____		Date	Time		
Relinquished by: (Signature) _____		Date	Time	Received by: (Signature) _____		Date	Time		

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other _____ Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

Envirotech Analytical Laboratory

Printed: 4/14/2025 11:53:36AM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

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

Client:	Cottonwood Consulting	Date Received:	04/14/25 11:43	Work Order ID:	E504108
Phone:	970-764-7356	Date Logged In:	04/14/25 11:45	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	04/21/25 17:00 (5 day TAT)		

Chain of Custody (COC)

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

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

Carrier: Kelsey O' BienComments/ResolutionSample Turn Around Time (TAT)

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

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

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

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

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

Date



envirotech Inc.

Report to:
Kyle Siesser



envirotech

Practical Solutions for a Better Tomorrow

Analytical Report

Cottonwood Consulting

Project Name: State Gas Com AA #001

Work Order: E503186

Job Number: 20035-C-0001

Received: 3/21/2025

Revision: 1

Report Reviewed By:

Walter Hinchman
Laboratory Director
3/28/25

5796 U.S. Hwy 64
Farmington, NM 87401

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



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

Date Reported: 3/28/25



Kyle Siesser
PO Box 1653
Durango, CO 81302

Project Name: State Gas Com AA #001
Workorder: E503186
Date Received: 3/21/2025 11:57:00AM

Kyle Siesser,

Thank you for choosing Envirotech, Inc. as your analytical testing laboratory for the sample(s) received on, 3/21/2025 11:57:00AM, under the Project Name: State Gas Com AA #001.

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

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

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

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

Respectfully,

Walter Hinchman
Laboratory Director
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Cell: 775-287-1762
whinchman@envirotech-inc.com

Raina Schwanz
Laboratory Administrator
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Envirotech Web Address: www.envirotech-inc.com

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Sample Summary

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	03/28/25 09:21

Client Sample ID	Lab Sample ID	Matrix	Sampled	Received	Container
SS01 (0-10")	E503186-01A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS02 (0-12")	E503186-02A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS03 (0-12")	E503186-03A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS04 (0-12")	E503186-04A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS05 (0-12")	E503186-05A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS06 (24-30")	E503186-06A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.
SS07 (48-54")	E503186-07A	Soil	03/21/25	03/21/25	Glass Jar, 4 oz.



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS01 (0-10")

E503186-01

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	78.6 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	96.5 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	92.7 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	57.9	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS02 (0-12")

E503186-02

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	77.8 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	96.4 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	99.1 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	465	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS03 (0-12")

E503186-03

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	80.6 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	97.1 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	97.1 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	367	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS04 (0-12")

E503186-04

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>	81.4 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>	97.4 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>	93.6 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	ND	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS05 (0-12")

E503186-05

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	79.0 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	96.4 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	102 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	385	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS06 (24-30")

E503186-06

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	80.4 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	95.5 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	95.7 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	111	20.0	1	03/24/25	03/25/25	



Sample Data

Cottonwood Consulting
PO Box 1653
Durango CO, 81302

Project Name: State Gas Com AA #001
Project Number: 20035-C-0001
Project Manager: Kyle Siesser

Reported:
3/28/2025 9:21:38AM

SS07 (48-54")

E503186-07

Analyte	Result	Reporting Limit	Dilution	Prepared	Analyzed	Notes
Volatile Organics by EPA 8021B						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Benzene	ND	0.0250	1	03/24/25	03/24/25	
Ethylbenzene	ND	0.0250	1	03/24/25	03/24/25	
Toluene	ND	0.0250	1	03/24/25	03/24/25	
o-Xylene	ND	0.0250	1	03/24/25	03/24/25	
p,m-Xylene	ND	0.0500	1	03/24/25	03/24/25	
Total Xylenes	ND	0.0250	1	03/24/25	03/24/25	
<i>Surrogate: 4-Bromochlorobenzene-PID</i>						
	78.3 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - GRO						
	mg/kg	mg/kg	Analyst: SL		Batch: 2513003	
Gasoline Range Organics (C6-C10)	ND	20.0	1	03/24/25	03/24/25	
<i>Surrogate: 1-Chloro-4-fluorobenzene-FID</i>						
	95.6 %	70-130		03/24/25	03/24/25	
Nonhalogenated Organics by EPA 8015D - DRO/ORO						
	mg/kg	mg/kg	Analyst: KH		Batch: 2513010	
Diesel Range Organics (C10-C28)	ND	25.0	1	03/24/25	03/25/25	
Oil Range Organics (C28-C36)	ND	50.0	1	03/24/25	03/25/25	
<i>Surrogate: n-Nonane</i>						
	102 %	61-141		03/24/25	03/25/25	
Anions by EPA 300.0/9056A						
	mg/kg	mg/kg	Analyst: JM		Batch: 2513013	
Chloride	351	20.0	1	03/24/25	03/25/25	



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	3/28/2025 9:21:38AM

Volatile Organics by EPA 8021B

Analyst: SL

Analyte	Result	Reporting Limit	Spike Level	Source Result	Rec	Rec Limits	RPD	RPD Limit	Notes
	mg/kg	mg/kg	mg/kg	mg/kg	%	%	%	%	

Blank (2513003-BLK1) Prepared: 03/24/25 Analyzed: 03/24/25

Benzene	ND	0.0250							
Ethylbenzene	ND	0.0250							
Toluene	ND	0.0250							
o-Xylene	ND	0.0250							
p,m-Xylene	ND	0.0500							
Total Xylenes	ND	0.0250							
Surrogate: 4-Bromochlorobenzene-PID	6.40		8.00		80.0	70-130			

LCS (2513003-BS1) Prepared: 03/24/25 Analyzed: 03/24/25

Benzene	5.27	0.0250	5.00		105	70-130			
Ethylbenzene	5.03	0.0250	5.00		101	70-130			
Toluene	5.18	0.0250	5.00		104	70-130			
o-Xylene	4.98	0.0250	5.00		99.7	70-130			
p,m-Xylene	10.2	0.0500	10.0		102	70-130			
Total Xylenes	15.2	0.0250	15.0		101	70-130			
Surrogate: 4-Bromochlorobenzene-PID	6.40		8.00		80.0	70-130			

Matrix Spike (2513003-MS1) Source: E503186-05 Prepared: 03/24/25 Analyzed: 03/24/25

Benzene	5.15	0.0250	5.00	ND	103	70-130			
Ethylbenzene	4.92	0.0250	5.00	ND	98.4	70-130			
Toluene	5.06	0.0250	5.00	ND	101	70-130			
o-Xylene	4.85	0.0250	5.00	ND	97.1	70-130			
p,m-Xylene	9.97	0.0500	10.0	ND	99.7	70-130			
Total Xylenes	14.8	0.0250	15.0	ND	98.8	70-130			
Surrogate: 4-Bromochlorobenzene-PID	6.23		8.00		77.9	70-130			

Matrix Spike Dup (2513003-MSD1) Source: E503186-05 Prepared: 03/24/25 Analyzed: 03/24/25

Benzene	4.85	0.0250	5.00	ND	97.0	70-130	6.06	27	
Ethylbenzene	4.63	0.0250	5.00	ND	92.5	70-130	6.18	26	
Toluene	4.76	0.0250	5.00	ND	95.1	70-130	6.13	20	
o-Xylene	4.61	0.0250	5.00	ND	92.1	70-130	5.22	25	
p,m-Xylene	9.40	0.0500	10.0	ND	94.0	70-130	5.81	23	
Total Xylenes	14.0	0.0250	15.0	ND	93.4	70-130	5.62	26	



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	3/28/2025 9:21:38AM

Nonhalogenated Organics by EPA 8015D - GRO

Analyst: SL

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2513003-BLK1) Prepared: 03/24/25 Analyzed: 03/24/25

Gasoline Range Organics (C6-C10)	ND	20.0							
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.60		8.00		95.0	70-130			

LCS (2513003-BS2) Prepared: 03/24/25 Analyzed: 03/24/25

Gasoline Range Organics (C6-C10)	41.8	20.0	50.0		83.5	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.76		8.00		97.0	70-130			

Matrix Spike (2513003-MS2) Source: E503186-05 Prepared: 03/24/25 Analyzed: 03/24/25

Gasoline Range Organics (C6-C10)	35.8	20.0	50.0	ND	71.5	70-130			
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.71		8.00		96.4	70-130			

Matrix Spike Dup (2513003-MSD2) Source: E503186-05 Prepared: 03/24/25 Analyzed: 03/25/25

Gasoline Range Organics (C6-C10)	43.2	20.0	50.0	ND	86.4	70-130	18.8	20	
Surrogate: 1-Chloro-4-fluorobenzene-FID	7.64		8.00		95.6	70-130			



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	3/28/2025 9:21:38AM

Nonhalogenated Organics by EPA 8015D - DRO/ORO

Analyst: KH

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2513010-BLK1)					Prepared: 03/24/25 Analyzed: 03/25/25				
Diesel Range Organics (C10-C28)	ND	25.0							
Oil Range Organics (C28-C36)	ND	50.0							
Surrogate: n-Nonane	45.9		50.0		91.9	61-141			

LCS (2513010-BS1)					Prepared: 03/24/25 Analyzed: 03/25/25				
Diesel Range Organics (C10-C28)	223	25.0	250		89.3	66-144			
Surrogate: n-Nonane	45.2		50.0		90.4	61-141			

Matrix Spike (2513010-MS1)					Source: E503186-02		Prepared: 03/24/25 Analyzed: 03/25/25		
Diesel Range Organics (C10-C28)	246	25.0	250	ND	98.5	56-156			
Surrogate: n-Nonane	48.3		50.0		96.5	61-141			

Matrix Spike Dup (2513010-MSD1)					Source: E503186-02		Prepared: 03/24/25 Analyzed: 03/25/25		
Diesel Range Organics (C10-C28)	244	25.0	250	ND	97.5	56-156	0.964	20	
Surrogate: n-Nonane	48.7		50.0		97.4	61-141			



QC Summary Data

Cottonwood Consulting	Project Name:	State Gas Com AA #001	Reported:
PO Box 1653	Project Number:	20035-C-0001	
Durango CO, 81302	Project Manager:	Kyle Siesser	3/28/2025 9:21:38AM

Anions by EPA 300.0/9056A

Analyst: JM

Analyte	Result mg/kg	Reporting Limit mg/kg	Spike Level mg/kg	Source Result mg/kg	Rec %	Rec Limits %	RPD %	RPD Limit %	Notes
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Blank (2513013-BLK1)					Prepared: 03/24/25 Analyzed: 03/25/25				
Chloride	ND	20.0							
LCS (2513013-BS1)					Prepared: 03/24/25 Analyzed: 03/25/25				
Chloride	258	20.0	250		103	90-110			
Matrix Spike (2513013-MS1)					Source: E503186-03		Prepared: 03/24/25 Analyzed: 03/25/25		
Chloride	621	20.0	250	367	102	80-120			
Matrix Spike Dup (2513013-MSD1)					Source: E503186-03		Prepared: 03/24/25 Analyzed: 03/25/25		
Chloride	631	20.0	250	367	106	80-120	1.66	20	

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



Definitions and Notes

Cottonwood Consulting	Project Name:	State Gas Com AA #001	
PO Box 1653	Project Number:	20035-C-0001	Reported:
Durango CO, 81302	Project Manager:	Kyle Siesser	03/28/25 09:21

- ND Analyte NOT DETECTED at or above the reporting limit
 - NR Not Reported
 - RPD Relative Percent Difference
 - DNI Did Not Ignite
 - DNR Did not react with the addition of acid or base.
- Note (1): Methods marked with ** are non-accredited methods.
- Note (2): Soil data is reported on an "as received" weight basis, unless reported otherwise.

Project Information

Chain of Custody

Page 1 of 1

Client: Cottonwood Consulting Project: State Gas Com AA #001 Project Manager: Kyle Siesser Address: PO Box 1653 City, State, Zip: Durango, CO 81302 Phone: 970-764-7356 Email: ksiesser@cottonwoodconsulting.com Report due by:					Bill To Attention: _____ Address: _____ City, State, Zip: _____ Phone: _____ Email: _____					Lab Use Only Lab WO# E503186 Job Number 2035C-0001 Analysis and Method					TAT 1D 2D 3D Standard x				EPA Program CWA SDWA RCRA	
														State NM CO UT AZ TX x						
														Remarks						
Time Sampled	Date Sampled	Matrix	No. of Containers	Sample ID	Lab Number	DRO 8015	GRO/DRO by 8015	BTEX by 8021	VOC by 8260	Metals 6010	Chloride 300.0									
1015	3/21/2025	Soil	1	SS01 (0-10")	1	✓	✓	✓		✓										
1020	3/21/2025	Soil	1	SS02 (0-12")	2	X	X	X		X										
1025	3/21/2025	Soil	1	SS03 (0-12")	3	X	X	X		X										
1030	3/21/2025	Soil	1	SS04 (0-12")	4	X	X	X		X										
1035	3/21/2025	Soil	1	SS05 (0-12")	5	X	X	X		X										
1040	3/21/2025	Soil	1	SS06 (24-30")	6	X	X	X		X										
1050	3/21/2025	Soil	1	SS07 (48-54")	7	X	X	X		X										

Additional Instructions:
 please cc emillar@cottonwoodconsulting.com, kobrien@cottonwoodconsulting.com, jlafortune@cottonwoodconsulting.com, and dsonger@cottonwoodconsulting.com with results

I, (field sampler), attest to the validity and authenticity of this sample. I am aware that tampering with or intentionally mislabelling the sample location, date or time of collection is considered fraud and may be grounds for legal action.

Sampled by: Kelsey O'Brien / Joseph LaFortune

Samples requiring thermal preservation must be received on ice the day they are sampled or received packed in ice at an avg temp above 0 but less than 5 °C on subsequent days.

Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	Lab Use Only Received on ice: (Y) / N T1 _____ T2 _____ T3 _____ AVG Temp °C 4
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	
Relinquished by: (Signature)	Date	Time	Received by: (Signature)	Date	Time	

Sample Matrix: S - Soil, Sd - Solid, Sg - Sludge, A - Aqueous, O - Other _____

Container Type: g - glass, p - poly/plastic, ag - amber glass, v - VOA

Note: Samples are discarded 30 days after results are reported unless other arrangements are made. Hazardous samples will be returned to client or disposed of at the client expense. The report for the analysis of the above samples is applicable only to those samples received by the laboratory with this COC. The liability of the laboratory is limited to the amount paid for on the report.

Envirotech Analytical Laboratory

Printed: 3/21/2025 1:10:45PM

Sample Receipt Checklist (SRC)

Instructions: Please take note of any NO checkmarks.

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

Client:	Cottonwood Consulting	Date Received:	03/21/25 11:57	Work Order ID:	E503186
Phone:	970-764-7356	Date Logged In:	03/21/25 13:07	Logged In By:	Caitlin Mars
Email:	ksiesser@cottonwoodconsulting.com	Due Date:	03/28/25 17:00 (5 day TAT)		

Chain of Custody (COC)

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

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

Carrier: CourierComments/ResolutionSample Turn Around Time (TAT)

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

Sample Cooler

7. Was a sample cooler received? Yes
8. If yes, was cooler received in good condition? Yes
9. Was the sample(s) received intact, i.e., not broken? Yes
10. Were custody/security seals present? No
11. If yes, were custody/security seals intact? NA
12. Was the sample received on ice? If yes, the recorded temp is 4°C, i.e., 6°±2°C? Yes

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

13. If no visible ice, record the temperature. Actual sample temperature: 4°C

Sample Container

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

Field Label

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

Sample Preservation

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

Multiphase Sample Matrix

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

Subcontract Laboratory

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

Client Instruction

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

Date



envirotech Inc.



Attachment 2



State Gas Com AA #001
Photographic Log
Simcoe LLC



Photo 1: State Gas Com AA #001 well sign.

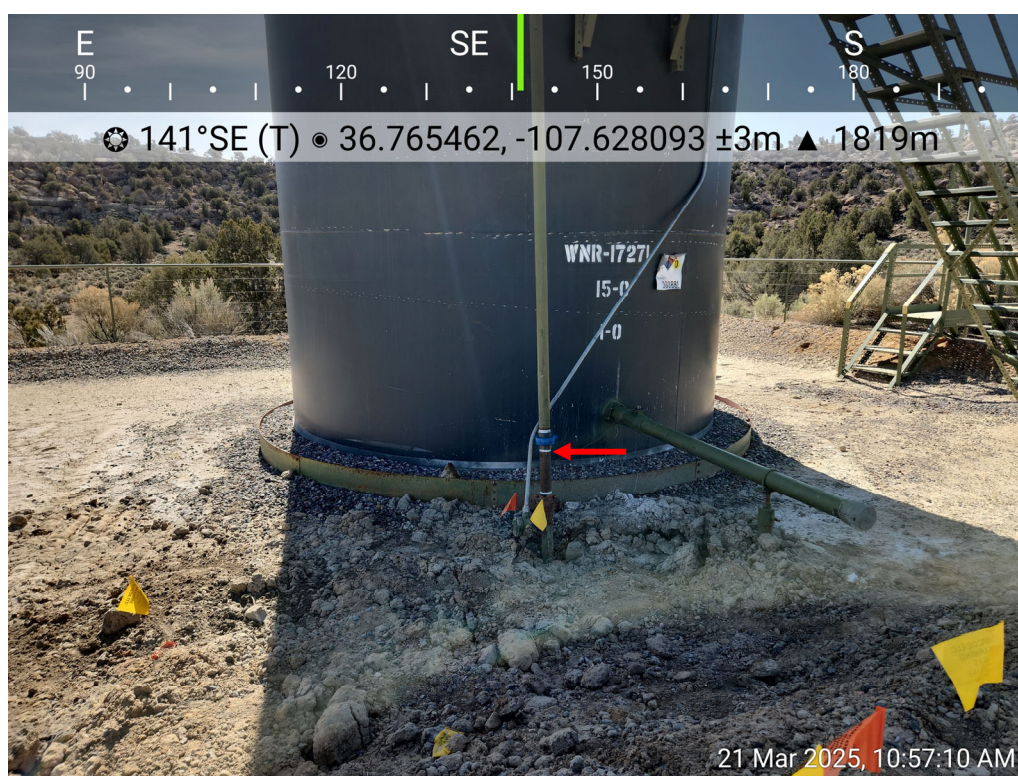


Photo 2: Point of release.



State Gas Com AA #001
Photographic Log
Simcoe LLC



Photo 3: Release area.

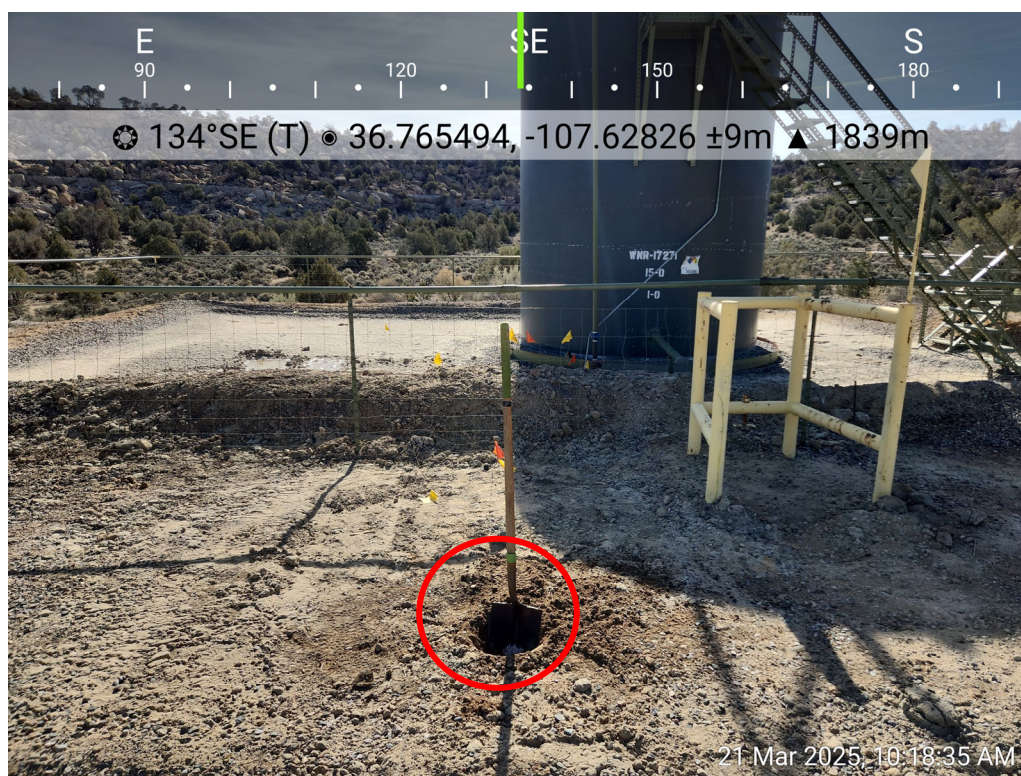


Photo 4: SS01 (0-10") collected on west side of berm.



State Gas Com AA #001
Photographic Log
Simcoe LLC

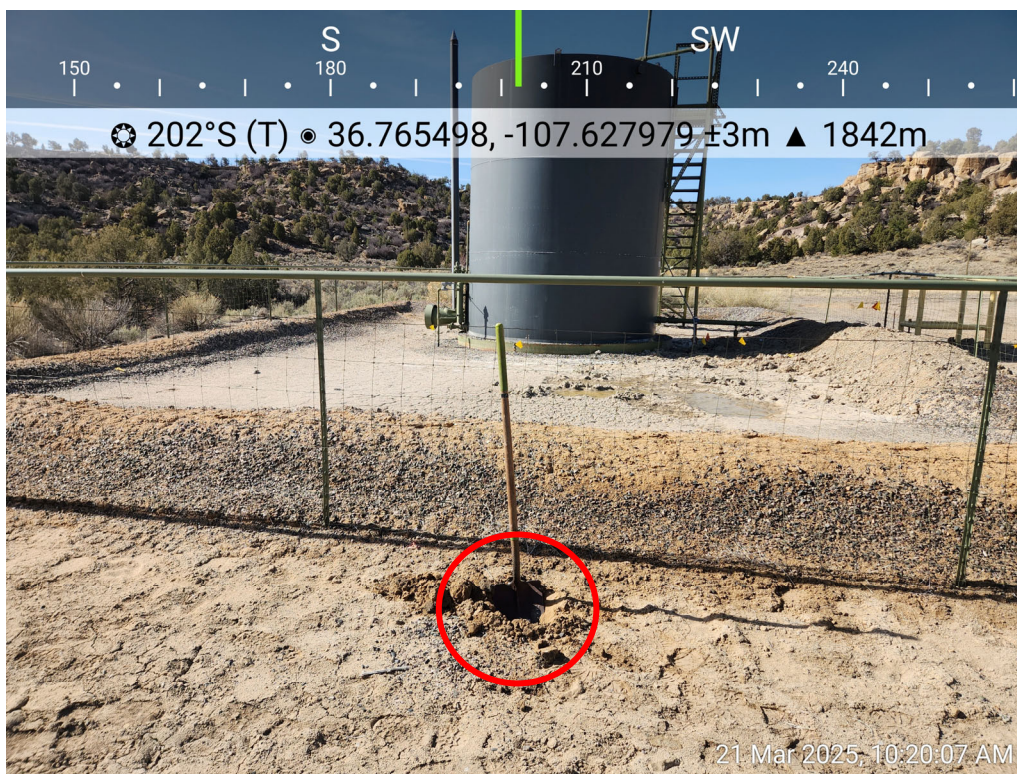


Photo 5: SS02 (0-12") collected on north side of berm.

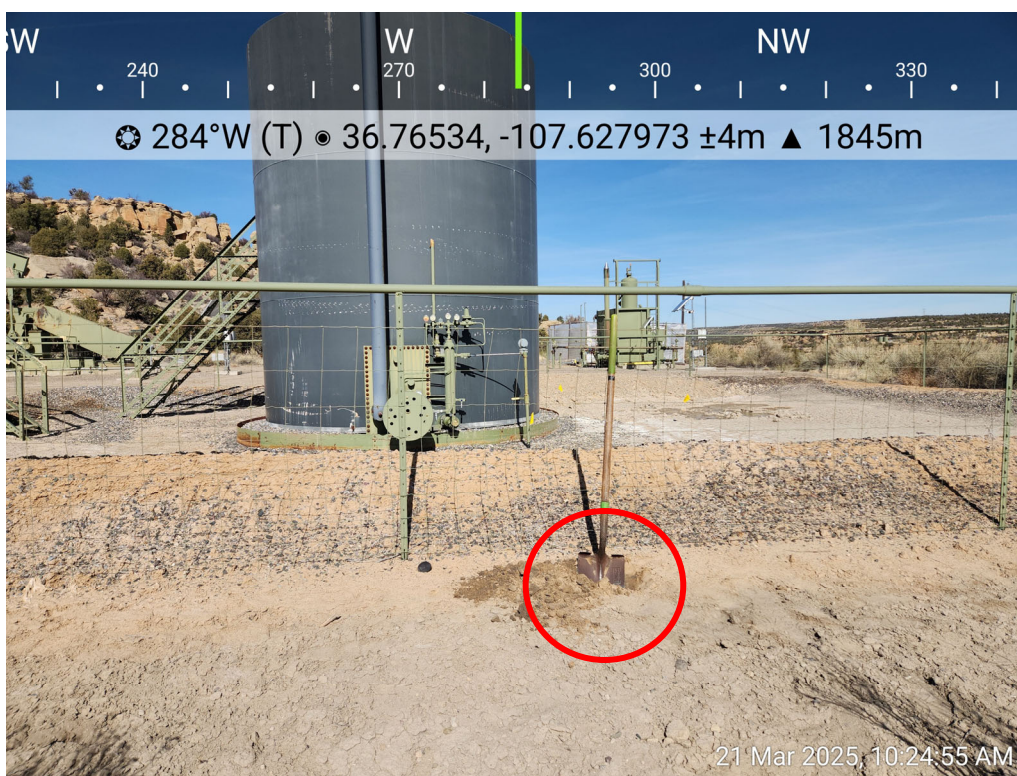


Photo 6: SS03 (0-12") collected on east side of berm.

Cottonwood Consulting LLC



State Gas Com AA #001
Photographic Log
Simcoe LLC

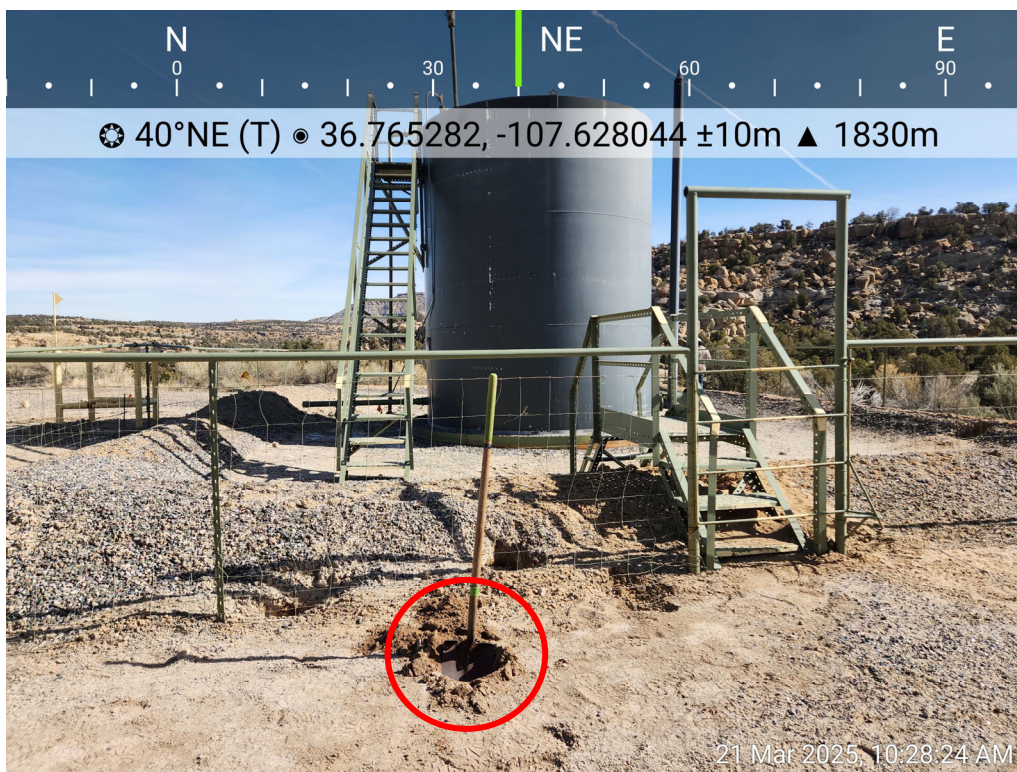


Photo 7: SS04 (0-12") collected on south side of berm.

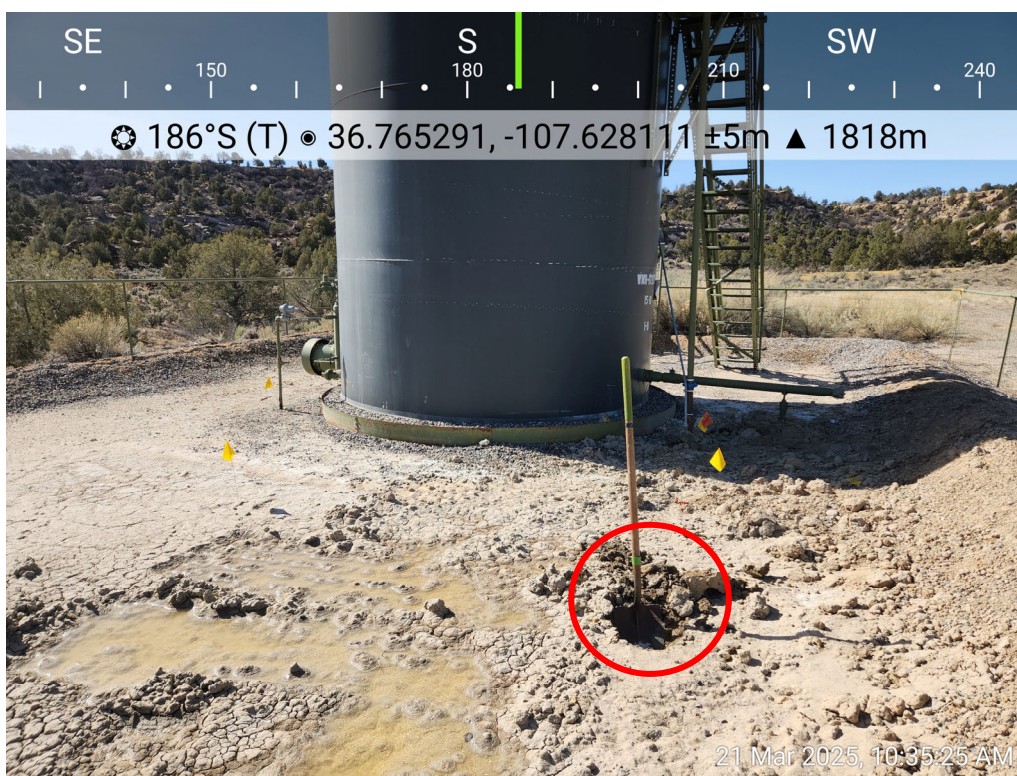


Photo 8: SS05 (0-12") collected from release area.



State Gas Com AA #001
Photographic Log
Simcoe LLC

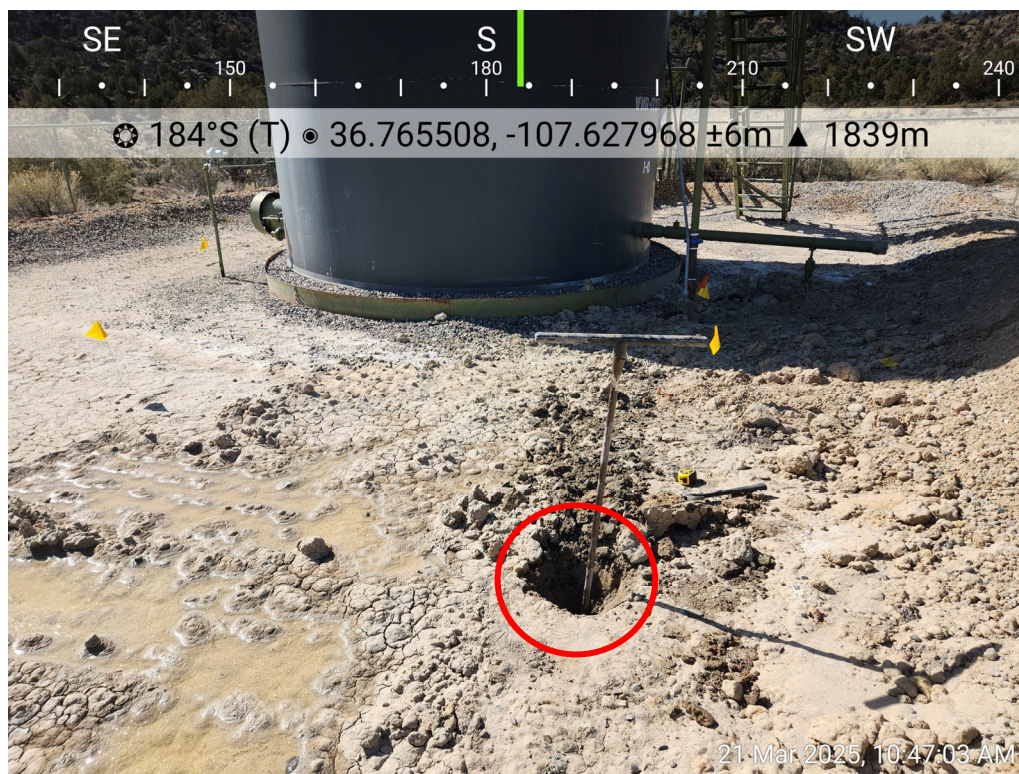


Photo 9: SS06 (24-30'') collected from release area.



Photo 10: SS07 (48-54'') collected from release area.



State Gas Com AA #001
Photographic Log
Simcoe LLC

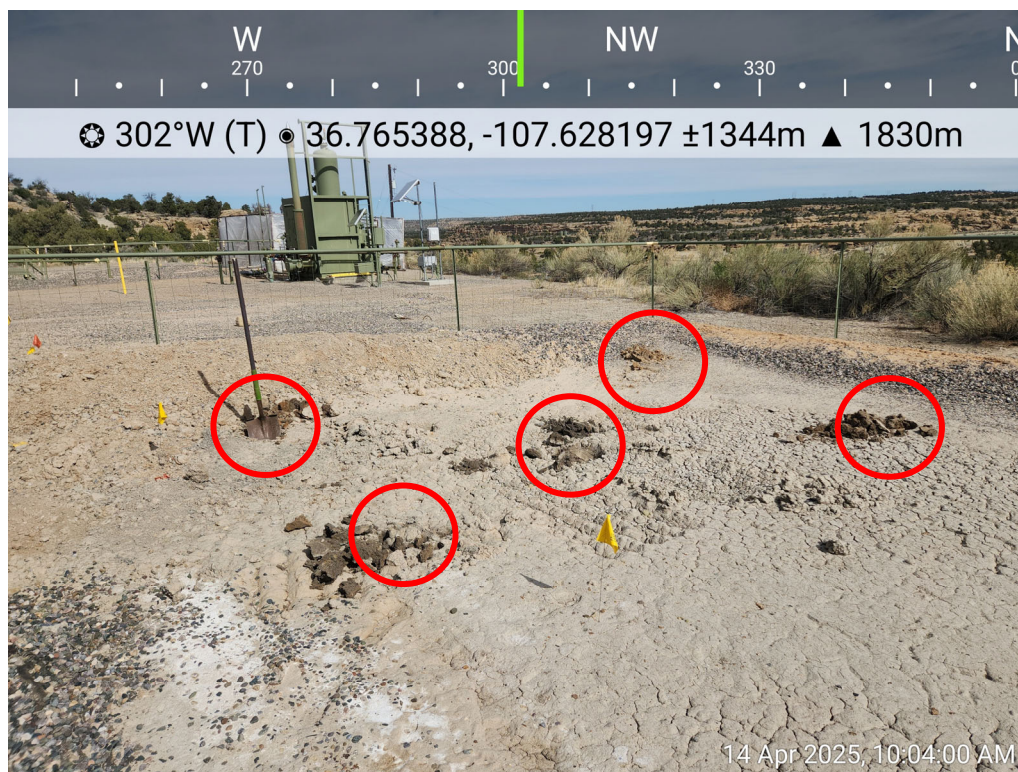


Photo 11: SS08 (0-12") collected as a five-point composite from release area.

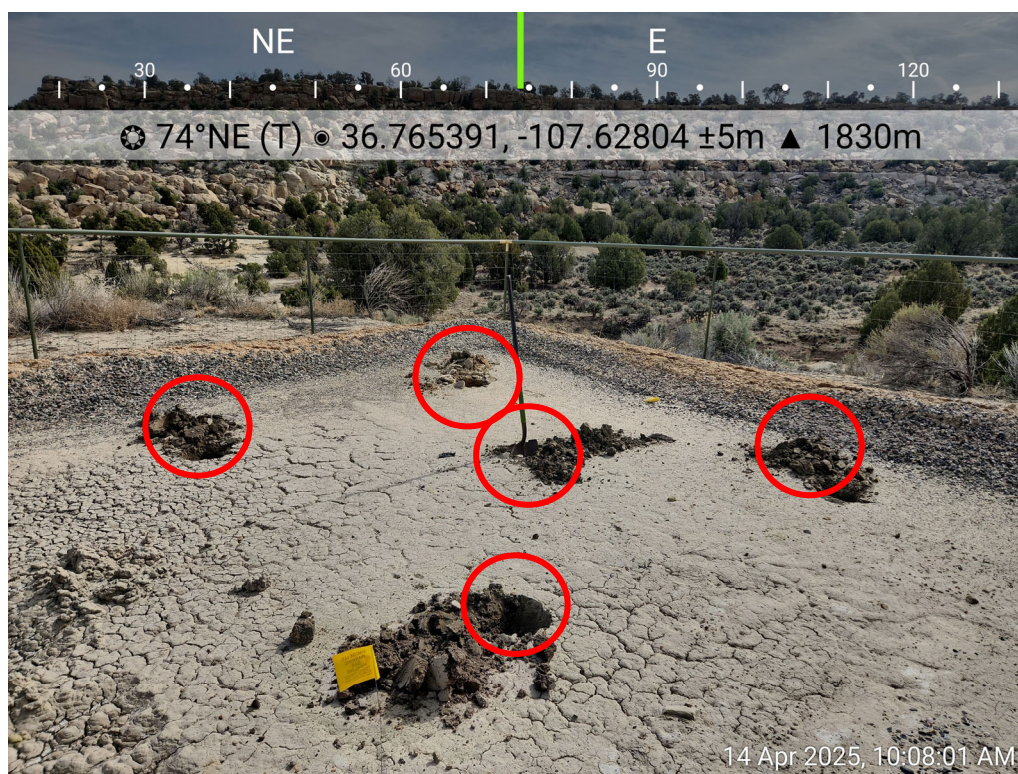


Photo 12: SS09 (0-12") collected as a five-point composite from release area.

Cottonwood Consulting LLC



State Gas Com AA #001
Photographic Log
Simcoe LLC

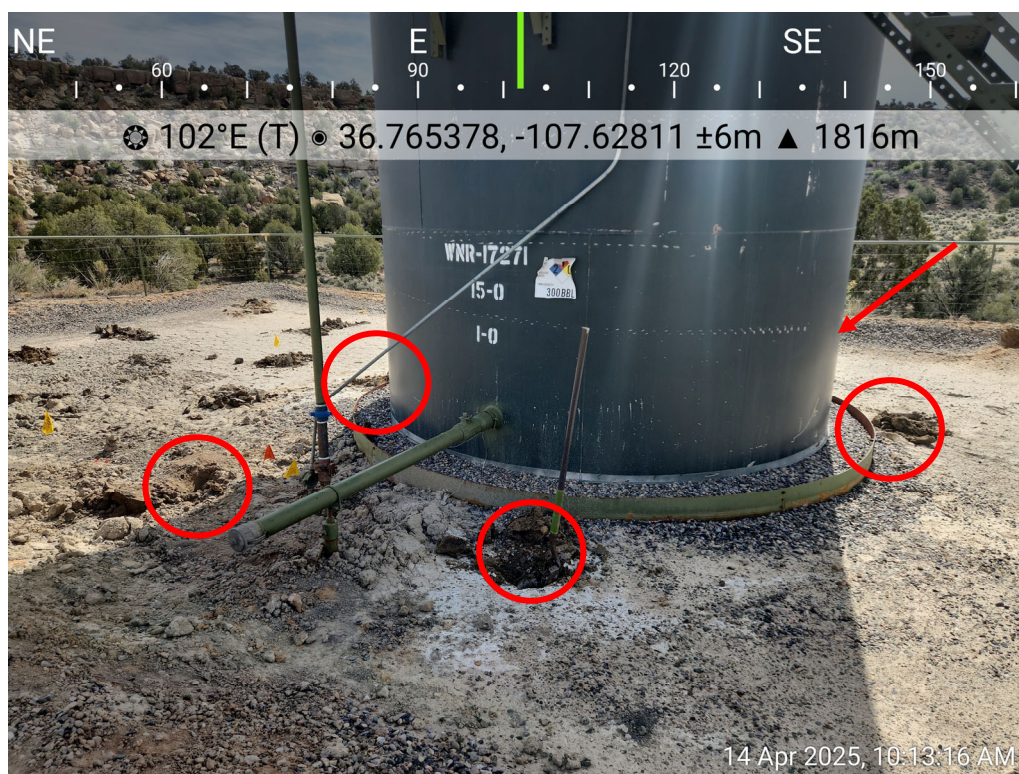


Photo 13: SS10 (0-12") collected as a five-point composite from release area.



Photo 14: SS11 (0-12") collected as a five-point composite from release area.

Cottonwood Consulting LLC



State Gas Com AA #001
Photographic Log
Simcoe LLC

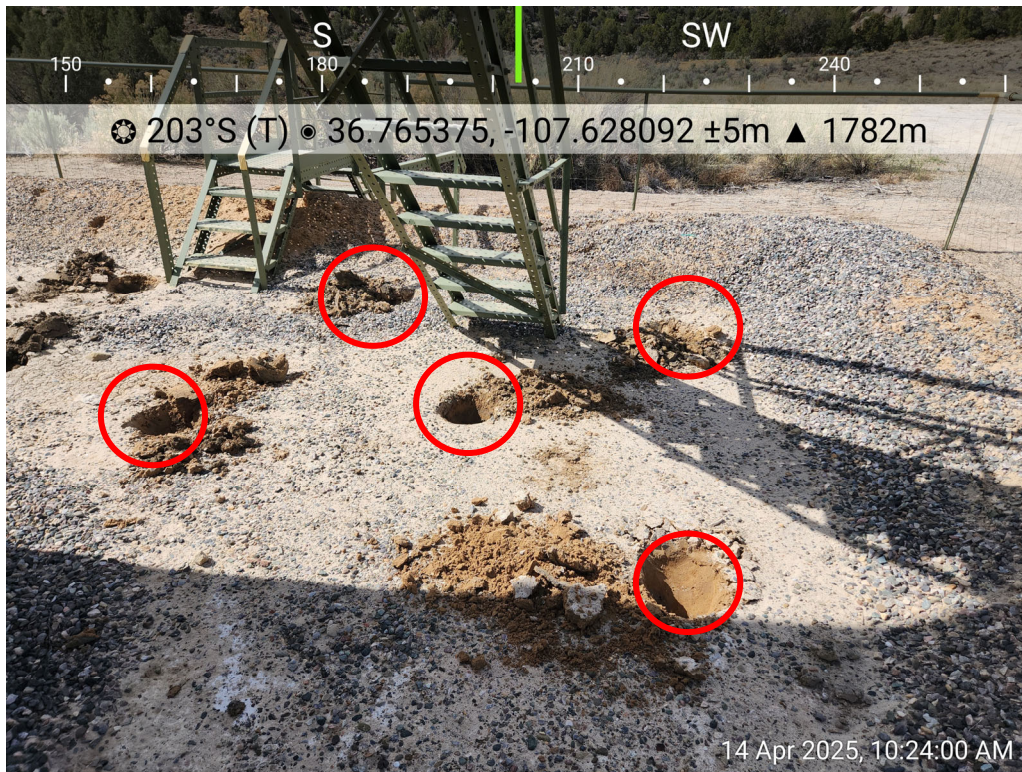


Photo 15: SS12 (0-12") collected as a five-point composite from release area.



Attachment 3

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Release (NOR) Application

Submission Information

Submission ID:	430523	Districts:	Aztec
Operator:	[329736] SIMCOE LLC	Counties:	San Juan
Description:	SIMCOE LLC [329736] , State Gas Com AA 001 , nAPP2504231010		
Status:	APPROVED		
Status Date:	02/11/2025		
References (2):	30-045-28219, nAPP2504231010		

Forms

This application type does not have attachments.

Questions

Location of Release Source

Please answer all the questions in this group.

Site Name	State Gas Com AA 001
Date Release Discovered	02/04/2025
Surface Owner	State

Incident Details

Please answer all the questions in this group.

Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release

Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.

Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Dump Line Produced Water Released: 17 BBL Recovered: 10 BBL Lost: 7 BE

Are there **additional details** for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts) *Not answered.*

Nature and Volume of Release (continued)

Is this a gas only submission (i.e. only significant Mcf values reported) **No, according to supplied volumes this does not appear to be a “gas only” report.**

Was this a major release as defined by Subsection A of 19.15.29.7 NMAC **No**

Reasons why this would be considered a submission for a notification of a major release *Unavailable.*

With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.

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 **True**

The impacted area has been secured to protect human health and the environment **True**

Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices **True**

All free liquids and recoverable materials have been removed and managed appropriately **True**

If all the actions described above have not been undertaken, explain why *Not answered.*

Per Paragraph 4 of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow up 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 prepare and attach all information needed for closure evaluation in the follow-up C-141 su

Acknowledgments

- ☒ I acknowledge that I am authorized to submit notification of a release on behalf of my operator.
- ☒ I acknowledge that upon submitting this application, I will be creating a new incident file (assigned to my operator) to track the notification(s) and corrective action(s) for a release, pursuant to NMAC 19.15.29.
- ☒ I acknowledge that creating a new incident file will require my operator to file subsequent submission(s) of form "C-141, Application for administrative approval of a release notification and corrective action", pursuant to NMAC 19.15.29.
- ☒ 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.
- ☒ I acknowledge the fact that 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.
- ☒ I acknowledge the fact that, 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.

Comments

No comments found for this submission.

Conditions

Summary: *jbrann (2/11/2025), When submitting future reports regarding this release, please submit the calculations used or specific justification for the volumes reported on the initial C-141.*

Fees

No fees found for this submission.

Go Back

From: [SLO Spills](#)
To: [Jerrid Brann](#)
Subject: RE: State Gas Com AA 001 Spill and release report
Date: Tuesday, February 11, 2025 11:05:18 AM
Attachments: [image003.png](#)
[image002.png](#)

Thank you for notifying the NMSLO Environmental Compliance Office (ECO) of the incident or release noted in the subject line above and the potential impact to State Trust Land. Once the release is stopped and contained, your cooperation in completing the subsequent remediation tasks is appreciated:

1. Identify compliance requirements for the Cultural Properties Protection (CPP) Rule.
2. Identify avoidance, minimization, or mitigation measures for impact to any biologically sensitive areas.
3. Apply for a Right of Entry (ROE) for Remediation if any part of the remediation occurs off of the active lease of the responsible party. A site delineation plan and reclamation plan are required for the ROE application. (<https://www.nmstatelands.org/resources/forms-and-applications/>)
4. If the remediation closure report is not submitted within 90 days of discovery of the release, a site delineation plan must be submitted to eco@nmslo.gov for review and approval. (If delineation and remediation happen concurrently, a remediation plan must be submitted to eco@nmslo.gov in place of a site delineation plan.)
5. Subsequent reports that must be submitted to ECO include:
 - **remediation plan;**
 - **reclamation plan, if applicable; or**
 - **remediation with reclamation plan;**
 - **remediation closure report; or**
 - **remediation closure report with reclamation activities report;**
 - **reclamation activities report;**
 - **final reclamation report, if applicable.**

SAMPLING NOTIFICATIONS

Written notification of the confirmation sampling event must be submitted to ECO a minimum of two (2) business days before the sampling event, or as directed by ECO. Please submit notifications to eco@nmslo.gov with the subject line as follows: **(Sampling Notification) Company-Location Name (API/Incident #)-Date of Incident.**

NMSLO RESOURCES

- RIGHT OF ENTRY FORMS: Rights of Way Forms - <https://www.nmstatelands.org/resources/forms-and-applications/>
- ECO GUIDANCE DOCUMENTS: Environmental Compliance Office - <https://www.nmstatelands.org/resources/forms-and-applications/> (PENDING)
- LEASE STATUS MAP: <https://mapservice.nmstatelands.org/LandStatus/>
- NMSLO OIL & GAS MANUAL: https://www.nmstatelands.org/wp-content/uploads/2023/07/Oil-and-Gas-Manual-2023-_WEB.pdf

- NMSLO LEASE SEARCH: <https://secure.slo.state.nm.us/Applications/SLOConnect/>

CULTURAL PROPERTIES PROTECTION RULE (19.2.24 NMAC) FOR REMEDIATION AND RECLAMATION ACTIVITIES

- A. As soon as possible, when a new release or damage occurs on STL, contact a Cultural Resource Consultant who will:
1. Conduct an Archaeological Records Management System (ARMS) review to determine if any known cultural properties have been previously identified within the remediation area and if the area has been surveyed for cultural resources.
 2. Advise as to whether an archaeological monitor should be present during initial containment activities and subsequent remediation efforts.
 3. Advise as to whether a full cultural properties survey will be required after containment and before full remediation.
- B. A list of cultural resource consultants permitted to conduct work on state lands is maintained here: <https://www.nhistoricpreservation.org/programs/permits.html>.
- C. To learn more about NMSLO's Cultural Properties Protection Rule visit: <https://www.nmstatelands.org/divisions/cultural-resources-office/culturalproperties/>. CRO can be contacted via email at croinfo@nmslo.gov or call 505-827-5781.

BIOLOGICAL COMPLIANCE & REPORTING

ECO recommends utilizing the resources below to determine if the site activities are occurring in a sensitive or restricted area. Also, when additional assistance is needed, ECO recommends consulting with a qualified third-party biologist for evaluation of potential impacts to threatened, endangered, and sensitive wildlife and plant species, environmentally sensitive areas, surface waters, cave and karst features, and sensitive soils before conducting remediation and reclamation activities.

BIOLOGICAL COMPLIANCE RESOURCES

- New Mexico State Land Office Land Status Map <https://mapservice.nmstatelands.org/LandStatus>
- U.S. Fish and Wildlife Services [Information for Planning and Consultation:](https://ipac.ecosphere.fws.gov/)
<https://ipac.ecosphere.fws.gov/>
- BISON-M database: <https://bison-m.org/>
- New Mexico Department of Game and Fish Environmental Review Tool (ERT):
<https://nmert.org/content/map>
- Open Enviro Map Wetlands: <https://gis.web.env.nm.gov/oem/?map=wetlands>

Thank you for working with ECO, and your efforts to protect State Trust Land.

Environmental Compliance Office Surface Resources Division

eco@nmslo.gov
nmstatelands.org

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From: Jerriid Brann <jerrid.brann@ikavenergy.com>
Sent: Tuesday, February 11, 2025 10:19 AM
To: SLO Spills <spills@nmslo.gov>
Subject: [EXTERNAL] State Gas Com AA 001 Spill and release report

To whom it may concern,

This is the spill report for the State Gas Com AA 001 produced water spill that occurred on 2/4/2025. Please let me know if there is additional information needed.

Thanks,



Jerriid Brann

Environmental Coordinator

jerrid.brann@ikavenergy.com

970-394-0250

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Spill and Release Notification Form

Submit Completed Form to spills@slo.state.nm.us

Reporting Party:	Operator Name:
Reporting Party Phone:	NMOCD Incident #:
Reporting Party Email:	Operator Contact Info:
Lessee Name:	NMSLO Lease/ROW/ROE #:
Site Name:	Site Type: Choose an item.
Discovery Date:	API # (if applicable):

Location of Spill or Release

Unit Letter	Section	Township	Range	County

Latitude _____ Longitude _____
(NAD 83 in decimal degrees to 5 decimal places)

Nature and Volume of Spill or Release

Material:	Volume Released/Units:	Volume Recovered/Units:
*Was a sensitive receptor directly impacted? Is a sensitive receptor under imminent threat of impact?	Cause of Spill or Release:	

*(i.e. groundwater, continuously flowing or significant watercourse, lakebed, sinkhole, playa lake, spring, drinking water source, or wetland; or any regularly occupied structure including, school, daycare, church, clinic, or residence; or any threatened, endangered, or sensitive wildlife or plant species habitat; or cave or other critical karst features; or sensitive soils.)

Initial Response

- ☐ The source of the spill or release has been stopped and the released materials have been contained.
- ☐ The impacted area has been secured to protect human health and the environment.
- ☐ All free liquids and recoverable materials have been removed and managed appropriately.
- ☐ The applicable regulatory agency (NMOCD, NMED, or EPA) been notified.
- ☐ Compliance with NMSLO Cultural Properties Protection (CPP) Rule, where applicable.
- ☐ Compliance with applicable NMSLO Threatened and Endangered Species policies or CCAAs, where applicable.

If any of the above have not been completed, explain why:

Site Assessment/Characterization

Complete this section with the most current information available at the time of the notification.
Revisions can be submitted to eco@slo.state.nm.us if new information becomes available.

What is the shallowest depth to groundwater beneath the area affected by the spill? Depth to water well determined using SJ-04051	_____ ft bgs
Did the spill impact areas not on an exploration, development, production, or storage site?	Yes No
Did this spill impact groundwater or surface water?	Yes No
Did the spill occur in an area where groundwater is potentially less than 50 ft bgs?	Yes No
Are the lateral extents of the spill within 300 feet of a continuously flowing watercourse or any other significant watercourse?	Yes No
Are the lateral extents of the spill 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 spill within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	Yes No
Are the lateral extents of the spill 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 spill within 1,000 feet of any other fresh water well or spring?	Yes No
Are the lateral extents of the spill within incorporated municipal boundaries or within a defined municipal fresh water well field?	Yes No
Are the lateral extents of the spill within 300 feet of a wetland?	Yes No
Are the lateral extents of the spill overlying a subsurface mine?	Yes No
Are the lateral extents of the spill overlying an unstable area such as karst geology?	Yes No
Are the lateral extents of the spill within a 100-year floodplain?	Yes No
Is the spill within 500 feet of any other sensitive receptor not documented above? If yes, list the receptor:	Yes No

- If remediation has begun, please attach a narrative of actions to date with this initial spill notification.
- Submit subsequent workplans and closure reports to eco@slo.state.nm.us



Attachment 4

OCD Permitting

Home Operator Data Action Status Action Search Results Action Status Item Details

[NOTIFY] Notification Of Sampling (C-141N) Application

Submission Information

Submission ID:	450498	Districts:	Aztec
Operator:	[329736] SIMCOE LLC	Counties:	San Juan
Description:	SIMCOE LLC [329736] , State Gas Com AA 001 , nAPP2504231010		
Status:	APPROVED		
Status Date:	04/09/2025		
References (2):	30-045-28219, nAPP2504231010		

Forms

This application type does not have attachments.

Questions

Prerequisites

Incident ID (n#)	nAPP2504231010
Incident Name	NAPP2504231010 STATE GAS COM AA 001 @ 30-045-28219
Incident Type	Produced Water Release
Incident Status	Initial C-141 Approved
Incident Well	[30-045-28219] STATE GAS COM AA #001

Location of Release Source

Site Name	State Gas Com AA 001
Date Release Discovered	02/04/2025
Surface Owner	State

Sampling Event General Information

Please answer all the questions in this group.

What is the sampling surface area in square feet	1,100
What is the estimated number of samples that will be gathered	6
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	04/14/2025
Time sampling will commence	10:00 AM
Warning: Notification can not be less than two business days prior to conducting final sampling.	
Please provide any information necessary for observers to contact samplers	Joseph LaFortune (970) 946 6877 Kelsey O'Brien (409) 939-7305
Please provide any information necessary for navigation to sampling site	Lat/Long: 36.7653046,-107.6284103

Comments

No comments found for this submission.

Conditions

Summary: *ksiemer (4/9/2025)*, Failure to notify the OCD of sampling events including any changes in date/time per the requirements of 19.15.29.12.D.(1).(a) NMAC, may result in the remediation closure samples not being accepted.

Reasons

No reasons found for this submission.

Fees

No fees found for this submission.

Go Back

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

General Information
Phone: (505) 629-6116

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

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

QUESTIONS

Action 456578

QUESTIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 456578
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Prerequisites	
Incident ID (n#)	nAPP2504231010
Incident Name	NAPP2504231010 STATE GAS COM AA 001 @ 30-045-28219
Incident Type	Produced Water Release
Incident Status	Remediation Closure Report Received
Incident Well	[30-045-28219] STATE GAS COM AA #001

Location of Release Source	
<i>Please answer all the questions in this group.</i>	
Site Name	State Gas Com AA 001
Date Release Discovered	02/04/2025
Surface Owner	State

Incident Details	
<i>Please answer all the questions in this group.</i>	
Incident Type	Produced Water Release
Did this release result in a fire or is the result of a fire	No
Did this release result in any injuries	No
Has this release reached or does it have a reasonable probability of reaching a watercourse	No
Has this release endangered or does it have a reasonable probability of endangering public health	No
Has this release substantially damaged or will it substantially damage property or the environment	No
Is this release of a volume that is or may with reasonable probability be detrimental to fresh water	No

Nature and Volume of Release	
<i>Material(s) released, please answer all that apply below. Any calculations or specific justifications for the volumes provided should be attached to the follow-up C-141 submission.</i>	
Crude Oil Released (bbls) Details	Not answered.
Produced Water Released (bbls) Details	Cause: Equipment Failure Dump Line Produced Water Released: 17 BBL Recovered: 10 BBL Lost: 7 BBL.
Is the concentration of chloride in the produced water >10,000 mg/l	No
Condensate Released (bbls) Details	Not answered.
Natural Gas Vented (Mcf) Details	Not answered.
Natural Gas Flared (Mcf) Details	Not answered.
Other Released Details	Not answered.
Are there additional details for the questions above (i.e. any answer containing Other, Specify, Unknown, and/or Fire, or any negative lost amounts)	Not answered.

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

QUESTIONS, Page 2

Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:
	329736
	Action Number:
	456578
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Nature and Volume of Release (continued)	
Is this a gas only submission (i.e. only significant Mcf values reported)	No, according to supplied volumes this does not appear to be a "gas only" report.
Was this a major release as defined by Subsection A of 19.15.29.7 NMAC	No
Reasons why this would be considered a submission for a notification of a major release	Unavailable.
With the implementation of the 19.15.27 NMAC (05/25/2021), venting and/or flaring of natural gas (i.e. gas only) are to be submitted on the C-129 form.	

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	True
The impacted area has been secured to protect human health and the environment	True
Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices	True
All free liquids and recoverable materials have been removed and managed appropriately	True
If all the actions described above have not been undertaken, explain why	Not answered.

Per Paragraph (4) of Subsection B of 19.15.29.8 NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please prepare and attach a narrative of actions to date in the follow-up C-141 submission. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see Subparagraph (a) of Paragraph (5) of Subsection A of 19.15.29.11 NMAC), please prepare and attach all information needed for closure evaluation in the follow-up C-141 submission.

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.

I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 04/30/2025
--	--

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Phone: (505) 476-3441

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

QUESTIONS, Page 3

Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:
	329736
	Action Number:
	456578
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Site Characterization	
<i>Please answer all the questions in this group (only required when seeking remediation plan approval and beyond). This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
What is the shallowest depth to groundwater beneath the area affected by the release in feet below ground surface (ft bgs)	Between 100 and 500 (ft.)
What method was used to determine the depth to ground water	Attached Document
Did this release impact groundwater or surface water	No
What is the minimum distance, between the closest lateral extents of the release and the following surface areas:	
A continuously flowing watercourse or any other significant watercourse	Between ½ and 1 (mi.)
Any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)	Between 1 and 5 (mi.)
An occupied permanent residence, school, hospital, institution, or church	Between 1 and 5 (mi.)
A spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes	Between 1000 (ft.) and ½ (mi.)
Any other fresh water well or spring	Between ½ and 1 (mi.)
Incorporated municipal boundaries or a defined municipal fresh water well field	Greater than 5 (mi.)
A wetland	Between 1 and 5 (mi.)
A subsurface mine	Greater than 5 (mi.)
An (non-karst) unstable area	Greater than 5 (mi.)
Categorize the risk of this well / site being in a karst geology	None
A 100-year floodplain	Between 1 and 5 (mi.)
Did the release impact areas not on an exploration, development, production, or storage site	No

Remediation Plan	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
Requesting a remediation plan approval with this submission	Yes
<i>Attach a comprehensive report demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined, pursuant to 19.15.29.11 NMAC and 19.15.29.13 NMAC.</i>	
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
Soil Contamination Sampling: (Provide the highest observable value for each, in milligrams per kilograms.)	
Chloride (EPA 300.0 or SM4500 Cl B)	556
TPH (GRO+DRO+MRO) (EPA SW-846 Method 8015M)	0
GRO+DRO (EPA SW-846 Method 8015M)	0
BTEX (EPA SW-846 Method 8021B or 8260B)	0
Benzene (EPA SW-846 Method 8021B or 8260B)	0
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
On what estimated date will the remediation commence	04/14/2025
On what date will (or did) the final sampling or liner inspection occur	04/14/2025
On what date will (or was) the remediation complete(d)	04/14/2025
What is the estimated surface area (in square feet) that will be reclaimed	0
What is the estimated volume (in cubic yards) that will be reclaimed	0
What is the estimated surface area (in square feet) that will be remediated	0
What is the estimated volume (in cubic yards) that will be remediated	0
<i>These estimated dates and measurements are recognized to be the best guess or calculation at the time of submission and may (be) change(d) over time as more remediation efforts are completed.</i>	
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

QUESTIONS, Page 4

Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:
	329736
	Action Number:
	456578
Action Type:	
[C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Remediation Plan (continued)	
<i>Please answer all the questions that apply or are indicated. This information must be provided to the appropriate district office no later than 90 days after the release discovery date.</i>	
This remediation will (or is expected to) utilize the following processes to remediate / reduce contaminants:	
<i>(Select all answers below that apply.)</i>	
(Ex Situ) Excavation and off-site disposal (i.e. dig and haul, hydrovac, etc.)	No
(Ex Situ) Excavation and on-site remediation (i.e. On-Site Land Farms)	No
(In Situ) Soil Vapor Extraction	No
(In Situ) Chemical processing (i.e. Soil Shredding, Potassium Permanganate, etc.)	No
(In Situ) Biological processing (i.e. Microbes / Fertilizer, etc.)	No
(In Situ) Physical processing (i.e. Soil Washing, Gypsum, Disking, etc.)	No
Ground Water Abatement pursuant to 19.15.30 NMAC	No
OTHER (Non-listed remedial process)	Yes
Other Non-listed Remedial Process. Please specify	Based on the results of delineation and closure sampling, no impacts above NMOCD standards were observed in the release area. No excavation or in-situ remediation has occurred.
<i>Per Subsection B of 19.15.29.11 NMAC unless the site characterization report includes completed efforts at remediation, the report must include a proposed remediation plan in accordance with 19.15.29.12 NMAC, which includes the anticipated timelines for beginning and completing the remediation.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 04/30/2025
<i>The OCD recognizes that proposed remediation measures may have to be minimally adjusted in accordance with the physical realities encountered during remediation. If the responsible party has any need to significantly deviate from the remediation plan proposed, then it should consult with the division to determine if another remediation plan submission is required.</i>	

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

General Information
Phone: (505) 629-6116

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

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

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Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 456578
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Deferral Requests Only	
Only answer the questions in this group if seeking a deferral upon approval this submission. Each of the following items must be confirmed as part of any request for deferral of remediation.	
Requesting a deferral of the remediation closure due date with the approval of this submission	No

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QUESTIONS, Page 6

Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID:
	329736
	Action Number:
	456578
Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)	

QUESTIONS

Sampling Event Information	
Last sampling notification (C-141N) recorded	450498
Sampling date pursuant to Subparagraph (a) of Paragraph (1) of Subsection D of 19.15.29.12 NMAC	04/14/2025
What was the (estimated) number of samples that were to be gathered	6
What was the sampling surface area in square feet	1100

Remediation Closure Request	
<i>Only answer the questions in this group if seeking remediation closure for this release because all remediation steps have been completed.</i>	
Requesting a remediation closure approval with this submission	Yes
Have the lateral and vertical extents of contamination been fully delineated	Yes
Was this release entirely contained within a lined containment area	No
All areas reasonably needed for production or subsequent drilling operations have been stabilized, returned to the sites existing grade, and have a soil cover that prevents ponding of water, minimizing dust and erosion	Yes
What was the total surface area (in square feet) remediated	0
What was the total volume (cubic yards) remediated	0
All areas not reasonably needed for production or subsequent drilling operations have been reclaimed to contain a minimum of four feet of non-waste contain earthen material with concentrations less than 600 mg/kg chlorides, 100 mg/kg TPH, 50 mg/kg BTEX, and 10 mg/kg Benzene	Yes
What was the total surface area (in square feet) reclaimed	0
What was the total volume (in cubic yards) reclaimed	0
Summarize any additional remediation activities not included by answers (above)	No impacts were identified over NMOCD closure criteria.
<i>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 (in .pdf format) 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.</i>	
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.	
I hereby agree and sign off to the above statement	Name: Kyle Siesser Title: Principal, Cottonwood Consulting Email: ksiesser@cottonwoodconsulting.com Date: 04/30/2025

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QUESTIONS, Page 7

Action 456578

QUESTIONS (continued)

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 456578
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

QUESTIONS

Reclamation Report	
Only answer the questions in this group if all reclamation steps have been completed.	
Requesting a reclamation approval with this submission	No

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CONDITIONS

Action 456578

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 456578
	Action Type: [C-141] Remediation Closure Request C-141 (C-141-v-Closure)

CONDITIONS

Created By	Condition	Condition Date
rhamlet	We have received your Remediation Closure Report for Incident #NAPP2504231010 STATE GAS COM AA 001, thank you. This Remediation Closure Report is approved.	5/1/2025