

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

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

Form C-144
Revised June 6, 2013

For temporary pits, below-grade tanks, and multi-well fluid management pits, submit to the appropriate NMOCD District Office.
For permanent pits submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

Pit, Below-Grade Tank, or
Proposed Alternative Method Permit or Closure Plan Application

BGT A

- Type of action:
[ ] Below grade tank registration
[ ] Permit of a pit or proposed alternative method
[ ] Closure of a pit, below-grade tank, or proposed alternative method
[X] Modification to an existing permit/or registration
[ ] Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

Instructions: Please submit one application (Form C-144) per individual pit, below-grade tank or alternative request

Please be advised that approval of this request does not relieve the operator of liability should operations result in pollution of surface water, ground water or the environment. Nor does approval relieve the operator of its responsibility to comply with any other applicable governmental authority's rules, regulations or ordinances.

1. Operator: SIMCOE LLC operated by BP America Production Co. OGRID #: 329736
Address: 1199 Main Ave., Suite 101, Durango, CO 81301
Facility or well name: DAY A LS 007
API Number: 3004520118 OCD Permit Number:
U/L or Qtr/Qtr P Section 7.0 Township 29.0N Range 08W County: San Juan
Center of Proposed Design: Latitude 36.735419 Longitude -107.710258 NAD: [ ] 1927 [X] 1983
Surface Owner: [X] Federal [ ] State [ ] Private [ ] Tribal Trust or Indian Allotment

2. [ ] Pit: Subsection F, G or J of 19.15.17.11 NMAC
Temporary: [ ] Drilling [ ] Workover
[ ] Permanent [ ] Emergency [ ] Cavitation [ ] P&A [ ] Multi-Well Fluid Management Low Chloride Drilling Fluid [ ] yes [ ] no
[ ] Lined [ ] Unlined Liner type: Thickness mil [ ] LLDPE [ ] HDPE [ ] PVC [ ] Other
[ ] String-Reinforced
Liner Seams: [ ] Welded [ ] Factory [ ] Other Volume: bbl Dimensions: L x W x D

3. [X] Below-grade tank: Subsection I of 19.15.17.11 NMAC TANK ID: A
Volume: 95.0 bbl Type of fluid: Produced Water
Tank Construction material: Steel
[X] Secondary containment with leak detection [ ] Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
[ ] Visible sidewalls and liner [ ] Visible sidewalls only [ ] Other Double Walled Double Bottom Sidewalls not visible
Liner type: Thickness mil [ ] HDPE [ ] PVC [ ] Other

4. [ ] Alternative Method:
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

5. Fencing: Subsection D of 19.15.17.11 NMAC (Applies to permanent pits, temporary pits, and below-grade tanks)
[ ] Chain link, six feet in height, two strands of barbed wire at top (Required if located within 1000 feet of a permanent residence, school, hospital, institution or church)
[ ] Four foot height, four strands of barbed wire evenly spaced between one and four feet
[ ] Alternate. Please specify

6.  
**Netting:** Subsection E of 19.15.17.11 NMAC (*Applies to permanent pits and permanent open top tanks*)  
 Screen  Netting  Other \_\_\_\_\_  
 Monthly inspections (If netting or screening is not physically feasible)

7.  
**Signs:** Subsection C of 19.15.17.11 NMAC  
 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers  
 Signed in compliance with 19.15.16.8 NMAC

8.  
**Variations and Exceptions:**  
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
 Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

9.  
**Siting Criteria (regarding permitting):** 19.15.17.10 NMAC  
*Instructions: The applicant must demonstrate compliance for each siting criteria below in the application. Recommendations of acceptable source material are provided below. Siting criteria does not apply to drying pads or above-grade tanks.*

<u>General siting</u>	
<b><u>Ground water is less than 25 feet below the bottom of a low chloride temporary pit or below-grade tank.</u></b> - <input checked="" type="checkbox"/> NM Office of the State Engineer - iWATERS database search; <input type="checkbox"/> USGS; <input type="checkbox"/> Data obtained from nearby wells	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
<b><u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u></b> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. <b>(Does not apply to below grade tanks)</b> - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. <b>(Does not apply to below grade tanks)</b> - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b><u>Below Grade Tanks</u></b>	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Within 200 horizontal feet of a spring or a fresh water well used for public or livestock consumption; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b><u>Temporary Pit using Low Chloride Drilling Fluid</u></b> (maximum chloride content 15,000 mg/liter)	
Within 100 feet of a continuously flowing watercourse, or any other significant watercourse or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). (Applies to low chloride temporary pits.) - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 300 feet from a occupied permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within 200 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 300feet of any other fresh water well or spring, in existence at the time of the initial application. NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input type="checkbox"/> No

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

13. **Proposed Closure:** 19.15.17.13 NMAC

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

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

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

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

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

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

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

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

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

- Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- Proof of Surface Owner Notice - based upon the appropriate requirements of Subsection E of 19.15.17.13 NMAC
- Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements of Subsection K of 19.15.17.11 NMAC
- Construction/Design Plan of Temporary Pit (for in-place burial of a drying pad) - based upon the appropriate requirements of 19.15.17.11 NMAC
- Protocols and Procedures - based upon the appropriate requirements of 19.15.17.13 NMAC
- Confirmation Sampling Plan (if applicable) - based upon the appropriate requirements of 19.15.17.13 NMAC
- Waste Material Sampling Plan - based upon the appropriate requirements of 19.15.17.13 NMAC
- Disposal Facility Name and Permit Number (for liquids, drilling fluids and drill cuttings or in case on-site closure standards cannot be achieved)
- Soil Cover Design - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Re-vegetation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC
- Site Reclamation Plan - based upon the appropriate requirements of Subsection H of 19.15.17.13 NMAC

17. **Operator Application Certification:**

I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): Steve Moskal Title: Contract Environmental Coordinator  
 Steven Moskal

Signature:  2020.08.13 12:59:34 Date: 08/13/2020  
 -06'00'

e-mail address: steven.moskal@bpx.com Telephone: (505) 330-9179

18. **OCD Approval:**  Permit Application (including closure plan)  Closure Plan (only)  OCD Conditions (see attachment)

OCD Representative Signature:  Approval Date: 03/19/2021  
 Title: Environmental Specialist OCD Permit Number: BGT A

19. **Closure Report (required within 60 days of closure completion):** 19.15.17.13 NMAC  
*Instructions: Operators are required to obtain an approved closure plan prior to implementing any closure activities and submitting the closure report. The closure report is required to be submitted to the division within 60 days of the completion of the closure activities. Please do not complete this section of the form until an approved closure plan has been obtained and the closure activities have been completed.*

Closure Completion Date: \_\_\_\_\_

20. **Closure Method:**

Waste Excavation and Removal  On-Site Closure Method  Alternative Closure Method  Waste Removal (Closed-loop systems only)

If different from approved plan, please explain.

21. **Closure Report Attachment Checklist:** *Instructions: Each of the following items must be attached to the closure report. Please indicate, by a check mark in the box, that the documents are attached.*

- Proof of Closure Notice (surface owner and division)
- Proof of Deed Notice (required for on-site closure for private land only)
- Plot Plan (for on-site closures and temporary pits)
- Confirmation Sampling Analytical Results (if applicable)
- Waste Material Sampling Analytical Results (required for on-site closure)
- Disposal Facility Name and Permit Number
- Soil Backfilling and Cover Installation
- Re-vegetation Application Rates and Seeding Technique
- Site Reclamation (Photo Documentation)

On-site Closure Location: Latitude \_\_\_\_\_ Longitude \_\_\_\_\_ NAD:  1927  1983

22.

**Operator Closure Certification:**

I hereby certify that the information and attachments submitted with this closure report is true, accurate and complete to the best of my knowledge and belief. I also certify that the closure complies with all applicable closure requirements and conditions specified in the approved closure plan.

Name (Print): \_\_\_\_\_ Title: \_\_\_\_\_

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

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

## SITING AND HYDRO-GEOLOGICAL REPORT: DAY A LS 007

### SITING CRITERIA 19.15.17.10 NMAC

Depth to groundwater at the site is estimated to be well in excess of 100 feet (**ft.**) below ground surface (**bgs**). This estimation is based on data from Stone and others (1983), the New Mexico Office of the State Engineer (NMOSE), and depth to water data obtained from a deep ground bed cathodic protection well located south of the site. The data was obtained within the New Mexico Oil Conservation Division's online well files. Local topography and proximity to adjacent water features were also reviewed.

There are no water wells within 200 ft. from the below-grade tank (**BGT**). Document verification can be viewed in Figure 1 and attached NMOSE files. A topographic map (Figure 2) demonstrates that the BGT is not within 100 feet of any continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland, or playa lake as measured from the ordinary high water mark.

### LOCAL GEOLOGY AND HYDROLOGY

This particular site is located on top of Manzanares Mesa near Manzanares Canyon, approximately 250 feet higher in elevation than the surface of the wash. Regional topography of Manzanares Canyon is composed of mesas dissected by deep, narrow canyons and arroyos. The more resistant cliff-forming sandstones of the San Jose Formation cap the interbedded siltstones, shales and sandstones of the Nacimiento Formation. Accumulations of talus and eroded sands at the base of canyon walls form steep to gentle slopes that transition into flat-bottomed arroyos within the canyons. Deposits of Quaternary alluvial and eolian sands occur prominently near the surface of Manzanares Canyon, especially near streams and washes.

The shallowest potential groundwater level is estimated at 173 ft. bgs. This approximation is based on Google Earth's aerial photography (Imagery date: 10/5/2016) elevation difference between the site's ground level (6,348 ft.) and a cathodic groundbed protection well (CGPW) associated with SIMCOE's Day A LS 012 well site (attached) who's ground level elevation is listed as 6,425 ft. The CGPW (attached) was installed in December 1967 and recorded depth to water at 250 ft. bgs. This CGPW is located in the northeast quadrant of section 18, T29N, R8W, or approximately 0.46 miles S5°E from the BGT (see Figure 3A).

An important distinction to rectify future consideration in determining depth to water in this mesa top area concerns a specific water well, namely SJ00004 (attached), which was obtained from NMOSE database. This well was installed in November 1952 by El Paso Natural Gas Company near the Day 003A well site currently operated by Hilcorp. Depth to water was recorded at 70 ft. bgs. and drilled to a total depth of 591 ft. With its ground level elevation at 6,428 ft., the groundwater elevation comes to 6,358 ft. Also noteworthy, is the water bearing stratification being between 520 to 565 ft. bgs. SJ00004 was temporarily abandoned in February 1985 (attached) and no other records of any depth to water measurements have been documented. Additionally, water well SJ00003, also installed in November 1952 by the US Government and with the same coordinates as SJ00004, did not record any depth to water measurement and had a total depth of 525 ft. A CGPW associated with the Day 003A well site (attached), did not encounter any groundwater and was drilled to a total depth of 680 ft. Lastly, water well SJ03050 (attached) was installed in October 2000 for livestock watering purposes, did not record any depth to water data, and had a total depth of 600 ft. Please refer to Figures 3 and/or 3A for locations and additional data.

Based on the above information, especially the total depth recorded for all water wells and CGPWs, SIMCOE's position is that groundwater in these areas are at a much greater depths than the one time recorded measurement of 70 ft. bgs in SJ00004 and finds this depth to water to be highly suspect.

## **REGIONAL GEOLOGY AND HYDROLOGY**

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

Cretaceous and Tertiary sandstones, as well as Quaternary Alluvial deposits, serve as the primary aquifers in the San Juan Basin (Stone et al., 1983). The San Jose Formation of Eocene age occurs in both New Mexico and Colorado, and its outcrop forms the land surface over much of the eastern half of the central basin. It overlies the Nacimiento Formation in the area generally south of the Colorado-New Mexico border and overlies the Animas Formation in the general area north of the State Line. The San Jose Formation was deposited in various fluvial-type environments. In general, the unit consists of an interbedded sequence of sandstone, siltstone, and shale. Thickness of the San Jose Formation increases from west to east.

Groundwater is associated with alluvial and fluvial sandstone aquifers. The occurrence of groundwater is mainly controlled by distribution of sandstone in the formation. The reported or measured discharge from numerous water wells completed in the formation range from 0.15 to 61 gallons per minute (gpm) and with a median of 5 gpm. Most of the wells provide water for livestock and domestic purposes. The formation is suitable for recharge from precipitation due to overlying soils being sandy, highly permeable and absorbent. Low annual precipitation, relatively high transpiration and evaporation rates and deep dissection of the formation by the San Juan River and its main tributaries all tend to reduce the effective recharge to the formation. Aquifers within the coarser and continuous sandstone bodies of the Nacimiento Formation of Paleocene age are between 0 and 1,000 feet deep in the majority of the basin as well (Stone et al., 1983).

## **REFERENCES**

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

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

Longitude

-107.710258

Latitude

36.735419

Convert

UTM Northing

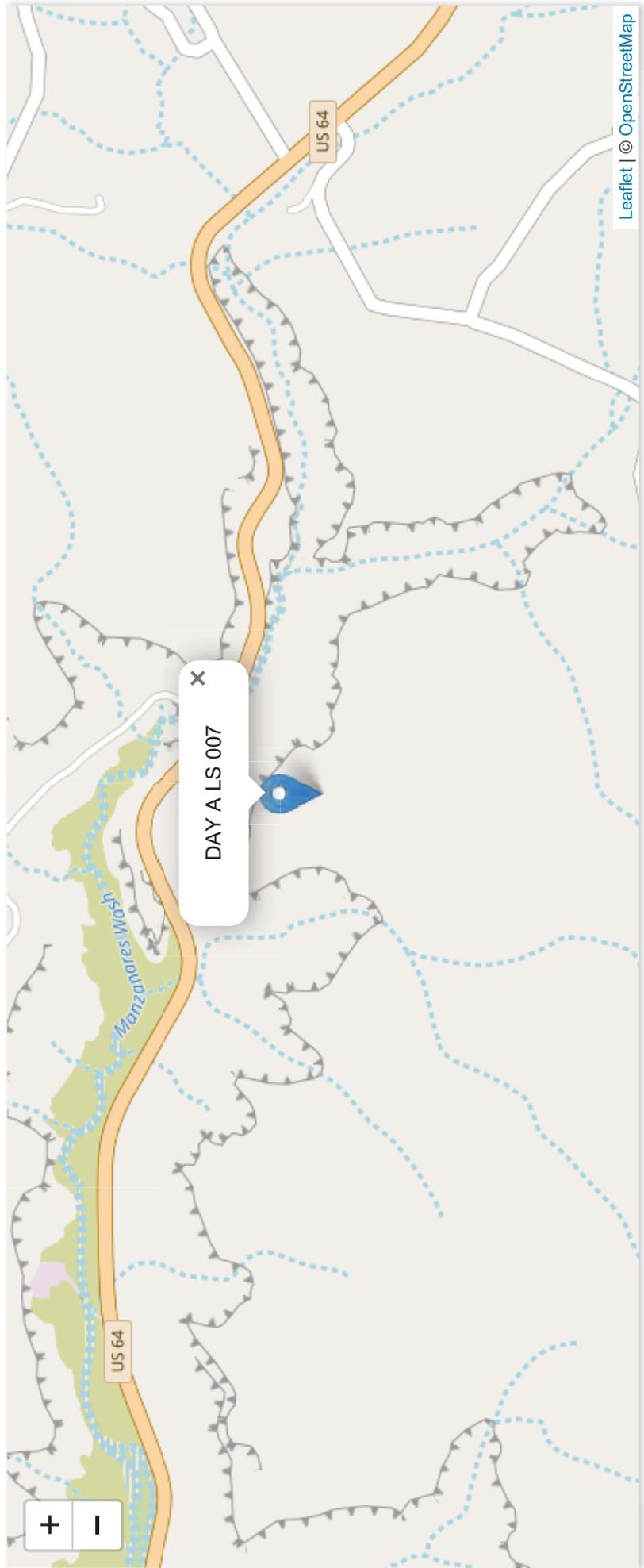
4068947.2

UTM Easting

257993.03

UTM Zone

13S





# New Mexico Office of the State Engineer Wells with Well Log Information

No wells found.

**Basin/County Search:**

**Basin:** San Juan      **Subbasin:** San Juan

**UTMAD83 Radius Search (in meters):**

**Easting (X):** 257993      **Northing (Y):** 4068947.2      **Radius:** 60.96 = 200 ft.

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



# New Mexico Office of the State Engineer

## Wells Without Well Log Information

---

No wells found.

**Basin/County Search:**

**Basin:** San Juan

**Subbasin:** San Juan

**UTMNAD83 Radius Search (in meters):**

**Easting (X):** 257993

**Northing (Y):** 4068947.2

**Radius:** 60.96 = 200 ft.



# New Mexico Office of the State Engineer Point of Diversion with Meter Attached

No PODs found.

Basin/County Search:

**Basin:** San Juan

**Subbasin:** San Juan

UTM/NAD83 Radius Search (in meters):

**Easting (X):** 257993

**Northing (Y):** 4068947.2

**Radius:** 60.96 = **200 ft.**

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

5- 30-045-23975

12- 30-045-20812

DATA SHEET FOR DEEP GROUND BED CATHODIC PROTECTION WELLS  
NORTHWESTERN NEW MEXICO

(Submit 3 copies to OCD Aztec Office)

Operator TENNECO Location: Unit NE Sec. 18 Twp 29 Rng 8

Name of Well/Wells or Pipeline Serviced DAY A #5, DAY A #12

cps 78w

Elevation 6425' Completion Date 12/4/67 Total Depth 395' Land Type\* N/A

Casing, Sizes, Types & Depths N/A

If Casing is cemented, show amounts & types used N/A

If Cement or Bentonite Plugs have been placed, show depths & amounts use  
N/A

Depths & thickness of water zones with description of water when possible

Fresh, Clear, Salty, Sulphur, Etc. 250'

**R E U**  
**D**

MAY 31 1991

Depths gas encountered: N/A

**OIL CON. DIV.**  
**DIST. 3**

Type & amount of coke breeze used: 3720 lbs.

Depths anodes placed: 365', 359', 353', 347', 341', 335', 329', 275', 269', 263'

Depths vent pipes placed: 365' OF 3/4" HOSE

Vent pipe perforations: 365'

Remarks: qb #2 ANODES DID NOT RESPOND TO COKE.

not a MERIDIAN well.

If any of the above data is unavailable, please indicate so. Copies of a logs, including Drillers Log, Water Analyses & Well Bore Schematics should be submitted when available. Unplugged abandoned wells are to be included.

\*Land Type may be shown: F-Federal; I-Indian; S-State; P-Fee. If Federal or Indian, add Lease Number.



# New Mexico Office of the State Engineer Wells with Well Log Information

A CLW#### in the POD suffix indicates the POD has been replaced & no longer serves a water right (file.)

(R=POD has been replaced, O=orphaned, C=the file is closed)

(quarters are 1=NW 2=NE 3=SW 4=SE)  
(quarters are smallest to largest)

(NAD83 UTM in meters)

(in feet)

POD Number	POD Sub-	Code	basin	County	Source	q	q	q	q	Sec	Tws	Rng	X	Y	Distance	Start Date	Finish Date	Log File	Depth Well	Depth Water	Driller	License Number
SJ 00003	SJ	SJ		SJ	Shallow	1	18	29N	08W	257290	4068219*	1012	4068219*	4068219*	1012	08/28/1952	11/20/1952	11/17/1953	525	525	MCCONNELL	
SJ 00004	SJ	SJ		SJ	Shallow	1	18	29N	08W	257290	4068219*	1012	4068219*	4068219*	1012	11/23/1952	11/23/1952	11/17/1953	591	591		70

Record Count: 2

**Basin/County Search:**

**Basin:** San Juan      **Subbasin:** San Juan

**UTMAD83 Radius Search (in meters):**

**Easting (X):** 257993      **Northing (Y):** 4068947.2      **Radius:** 1609.3 = 1 mile

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.



# New Mexico Office of the State Engineer

## Point of Diversion Summary

<b>Well Tag</b>	<b>POD Number</b> SJ 00004	(quarters are 1=NW 2=NE 3=SW 4=SE) (quarters are smallest to largest)	<b>Q64 Q16 Q4 Sec Tws Rng</b>	(NAD83 UTM in meters) <b>X Y</b>
			1 18 29N 08W	257290 4068219*

<b>Driller License:</b>	<b>Driller Company:</b>	
<b>Driller Name:</b>		
<b>Drill Start Date:</b> 11/23/1952	<b>Drill Finish Date:</b> 11/23/1952	<b>Plug Date:</b>
<b>Log File Date:</b> 11/17/1953	<b>PCW Rcv Date:</b>	<b>Source:</b> Shallow
<b>Pump Type:</b>	<b>Pipe Discharge Size:</b>	<b>Estimated Yield:</b> 20 GPM
<b>Casing Size:</b> 6.63	<b>Depth Well:</b> 591 feet	<b>Depth Water:</b> 70 feet

Water Bearing Stratifications:	Top	Bottom	Description
	520	565	Other/Unknown

Casing Perforations:	Top	Bottom
	520	565

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

Day WW #2

TN 220932

(This form is to be executed in triplicate)

# WELL RECORD

Date of Receipt November 17, 1953

Misc. ~~1-55-38~~  
Permit No. Misc. 175  
59-4

Name of permittee, El Paso Natural Gas Company

Street or P. O. Box 997 City and State Farmington, N.M.

1. Well location and description: The shallow well is located in 1/4, 1/4,  
(shallow or artesian)  
NW 1/4 of Section 18, Township 29N, Range 8W; Elevation of top of  
casing above sea level, 591 feet; diameter of hole, 591 inches; 591 feet;  
depth to water upon completion, 70 feet; drilling was commenced 11-23-52, 1952,  
and completed 12-7-52, 1952; name of drilling contractor  
; Address,  
; Driller's License No.

### 2. Principal Water-bearing Strata:

No.	Depth in Feet		Thickness	Description of Water-bearing Formation
	From	To		
No. 1	520	565	45	
No. 2				
No. 3				
No. 4				
No. 5				

### 3. Casing Record:

Diameter in inches	Founds per ft.	Threads per inch	Depth of Casing or Liner		Feet of Casing	Type of Shoe	Perforation	
			Top	Bottom			From	To
6-5/8					590		520	565

4. If above construction replaces old well to be abandoned, give location: 1/4, 1/4, 1/4  
of Section 18, Township 29N, Range 8W; name and address of plugging contractor,  
El Paso Natural Gas Company

date of plugging 12-7-52, 1952; describe how well was plugged:  
Plugged with cement

STATE ENGINEER - O&G FS, N. M.  
**RECEIVED**  
NOV 17 1953  
7 8 9 10 11 12 1 2 3 4 5 6

25-4 59-4  
Misc 1-6-54







# New Mexico Office of the State Engineer

## Point of Diversion Summary

<b>Well Tag</b>	<b>POD Number</b>	(quarters are 1=NW 2=NE 3=SW 4=SE)			(NAD83 UTM in meters)
	SJ 00003	(quarters are smallest to largest)	<b>Q64 Q16 Q4 Sec Tws Rng</b>	<b>X</b>	<b>Y</b>
			1 18 29N 08W	257290	4068219*

<b>Driller License:</b>	<b>Driller Company:</b>	
<b>Driller Name:</b> MCCONNELL		
<b>Drill Start Date:</b> 08/28/1952	<b>Drill Finish Date:</b> 11/20/1952	<b>Plug Date:</b> 02/07/1985
<b>Log File Date:</b> 11/17/1953	<b>PCW Rcv Date:</b>	<b>Source:</b> Shallow
<b>Pump Type:</b>	<b>Pipe Discharge Size:</b>	<b>Estimated Yield:</b>
<b>Casing Size:</b> 5.50	<b>Depth Well:</b> 525 feet	<b>Depth Water:</b>

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.





# New Mexico Office of the State Engineer

## Active & Inactive Points of Diversion

(with Well Drill Dates & Depths)

(R=POD has been replaced and no longer serves this file, (quarters are 1=NW 2=NE 3=SW 4=SE)  
C=the file is closed) (quarters are smallest to largest) (NAD83 UTM in meters)

WR File Nbr	Sub	basin	Use	Diversion	County	POD Number	Well Tag	Code	Grant	Source	q	q	q	q	Sec	Tws	Rng	X	Y	Start Date	Finish Date	Depth Well	Depth (in feet)
<a href="#">SJ 03050</a>	SJ	STK		3	SJ	<a href="#">SJ 03050</a>					2	3	2	18	29N	08W	257759	4068102*				600	600

**GPS Coord.: 36.727749,-107.712608**

Record Count: 1

POD Search:

POD Number: SJ 03050

Sorted by: File Number

\*UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

8/8/20 9:16 AM

Page 1 of 1

ACTIVE & INACTIVE POINTS OF DIVERSION



# New Mexico Office of the State Engineer

## Water Right Summary



**WR File Number:** SJ 03050

**Subbasin:** SJ

**Cross Reference:** -

**Primary Purpose:** STK 72-12-1 LIVESTOCK WATERING

**Primary Status:** PMT PERMIT

**Total Acres:**

**Subfile:** -

**Header:** -

**Total Diversion:** 3

**Cause/Case:** -

**Owner:** MARIAN NOBLES

**Documents on File**

Trn #	Doc	File/Act	Status		Transaction Desc.	From/	Acres	Diversion	Consumptive
			1	2		To			
<a href="#">get images</a> 203284	72121	2000-10-20	PMT	APR	SJ 03050	T		3	

**Current Points of Diversion**

POD Number	Well Tag	Source	Q Q Q			X	Y	Other Location Desc
			64	16	4			
<a href="#">SJ 03050</a>			2	3	2	18	29N 08W	257759 4068102*

(NAD83 UTM in meters)

\*An (\*) after northing value indicates UTM location was derived from PLSS - see Help

The data is furnished by the NMOSE/ISC and is accepted by the recipient with the expressed understanding that the OSE/ISC make no warranties, expressed or implied, concerning the accuracy, completeness, reliability, usability, or suitability for any particular purpose of the data.

\$5.00

READ INSTRUCTIONS ON BACK

Revised June 1991

IRN# 203284

APPLICATION TO APPROPRIATE UNDERGROUND WATERS IN ACCORDANCE WITH SECTION 72-12-1 NEW MEXICO STATUTES

1. Name and mailing address of applicant: File No. SJ-3050
Marian Nobles
6759 US Highway 64
Bloomfield, NM 87413

2. Describe well location under one of the following subheadings:
a. NE 1/4 SW 1/4 NE 1/4 of Sec. 18 Twp. 29N Rge. 8W NMPH, in San Juan County.
b. X = feet, Y = feet, New Mexico Coordinate System Zone in the Grant.

3. Approximate depth (if known) 600 feet; outside diameter of casing 5 inches.
Name of driller (if known) Hargis

4. Use of water (check use applied for):
One household, non-commercial trees, lawn and garden not to exceed one acre.
[X] Livestock watering.
More than one household, non-commercial trees, lawns and gardens not to exceed a total of one acre.
Drill and test a well intended to be used for domestic, drinking and sanitary or stock water purposes in conjunction with the building or dwelling unit.
Drinking and sanitary purposes and the irrigation of non-commercial trees, shrubs and lawns in conjunction with a commercial operation.
Prospecting, mining or drilling operations to discover or develop natural resources.
Construction of public works, highways and roads.

If any of the last three items were marked, give name and nature of business under Remarks (if any).
5. Remarks:

I, Marian Nobles, affirm that the foregoing statements are true to the best of my knowledge and belief and that development shall not commence until approval of the permit has been obtained.
Marian Nobles, Applicant
By: Date: October 20, 2000

ACTION OF STATE ENGINEER

This application is approved for the use indicated, subject to all general conditions and to specific conditions numbered 4 on the reverse side hereof. This permit will automatically expire unless this well is drilled or driven and the well record filed on or before October 20, 2001.

Thomas C. Turney, State Engineer
By: Bill Enebach
Bill Enebach

Date: October 20, 2000

File No. SJ-3050

STATE ENGINEER OFFICE ALBUQUERQUE NEW MEXICO 00 NOV -3 PM :29 STATE ENGINEER OFFICE ALBUQUERQUE NEW MEXICO 00 OCT 20 PM 4 00





200 ft

**FIGURE 1**

**SIMCOE - DAY A LS 007**

(P) Section 7, T29N, R8W  
API#: 3004520118

Imagery date: 10/5/2016  
WH GPS Coord.: 36.735402, -107.710204  
95 bgt GPS Coord.: 36.735419, -107.710258

**95 bbl BGT**  
**Ground Level Elevation: 6,348 ft.**

**200 ft. radius**

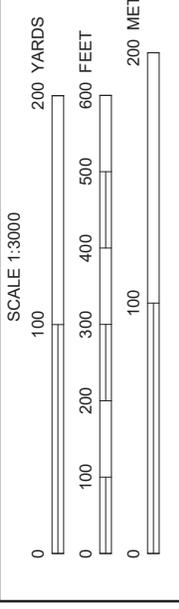
**Spring & Water Well Proximity**

**FIGURE 2**

100 ft. radius  
from 95 bgt center

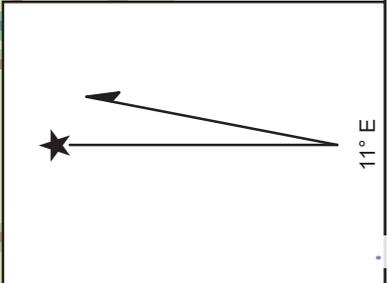
95 bbl BGT  
GPS Coordinates:  
36.735419,-107.710258  
Ground Level Elevation: 6,348 ft.

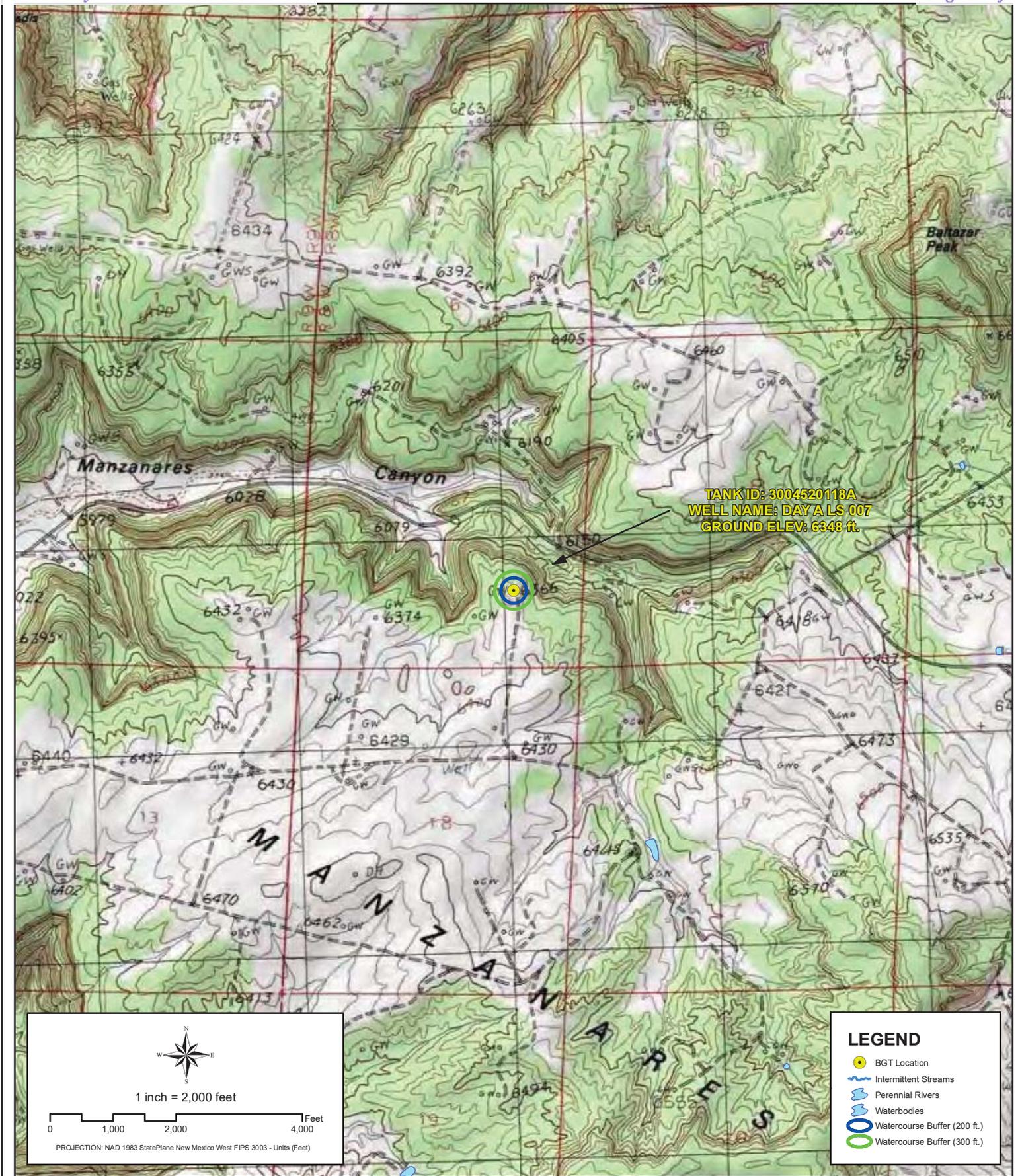
**Proximity to Watercourses**



**SIMCOE LLC - Day A LS 007**  
API #: 3004520118  
Tank ID: 3004520118A  
(P) Section 7, Township 29.0N, Range 08W, P.M. NM 23

Surface gradient  
direction: NE





Creation Date: 5/3/2010

Created by: EBB

File Path: X:\BP\PASS\Sector\_7\Sector\_7\AIMXD\3004520118A.mxd

Reviewed by: AGH



# PROXIMITY TO WATERCOURSES

**WELL NAME: DAY A LS 007**

API NUMBER: 3004520118 TANK ID: 3004520118A

SECTION 7, TOWNSHIP 29.0N, RANGE 08W, P.M. NM23

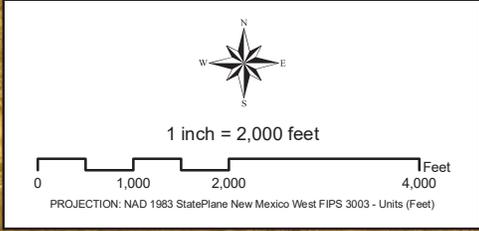
# FIGURE 2A

**LEGEND**

- BGT Location
- Water Well Location
- Distance to BGT (Line of Sight)
- 1 Mile Buffer
- Groundwater Evaluation (Alluvial Geology)**
- Groundwater Likely Less Than 50 Feet BGS
- Groundwater Suspected to be Less Than 50 Feet BGS

Surficial Geology Units	
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Ka - Animas formation	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qg - Terrace gravel
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kch - Cliff House sandstone	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qgs - Gravelly sand
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kf - Fruitland formation	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qsw - Sheetwash alluvium
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kkl - Kirtland shale, lower shale member	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Tbg - Bridgetimber Gravel
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kkm - Kirtland shale, Farmington sandstone member	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Ti - Intrusive rocks
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kku - Kirtland shale, upper shale member	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Tn - Nacimiento formation
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kl - Lewis shale	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Tsc - Cuba Mesa Member
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kmf - Menefee formation	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Tsj - San Jose Formation
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Koa - Ojo Alamo sandstone	<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Tsr - Regina Member
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kpc - Pictured Cliffs sandstone	
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Kpl - Point Lookout sandstone	
<span style="background-color: #d9ead3; width: 15px; height: 10px; display: inline-block;"></span> Lake	
<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qa - Alluvium	
<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qal - Alluvium	
<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qap - Pediment gravel	
<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qat - Terrace gravel	
<span style="background-color: #fff2cc; width: 15px; height: 10px; display: inline-block;"></span> Qes - Eolian sand	

TANK ID: 3004520118A  
 WELL NAME: DAY A LS 007  
 GROUND ELEV: 6348 ft.



POD Number	Well Depth	Water Depth	Elevation
SJ 01880	NA	NA	6418
SJ 03050	600	NA	6418
SJ 00003	525	NA	6423
SJ 00004	591	70	6423
SJ 00196	1624	500	6489

NA - Not Available

**GROUNDWATER LESS THAN 50 FT.**

**WELL NAME: DAY A LS 007**

API NUMBER: 3004520118 TANK ID: 3004520118A

SECTION 7, TOWNSHIP 29.0N, RANGE 08W, P.M. NM23

**FIGURE  
3**

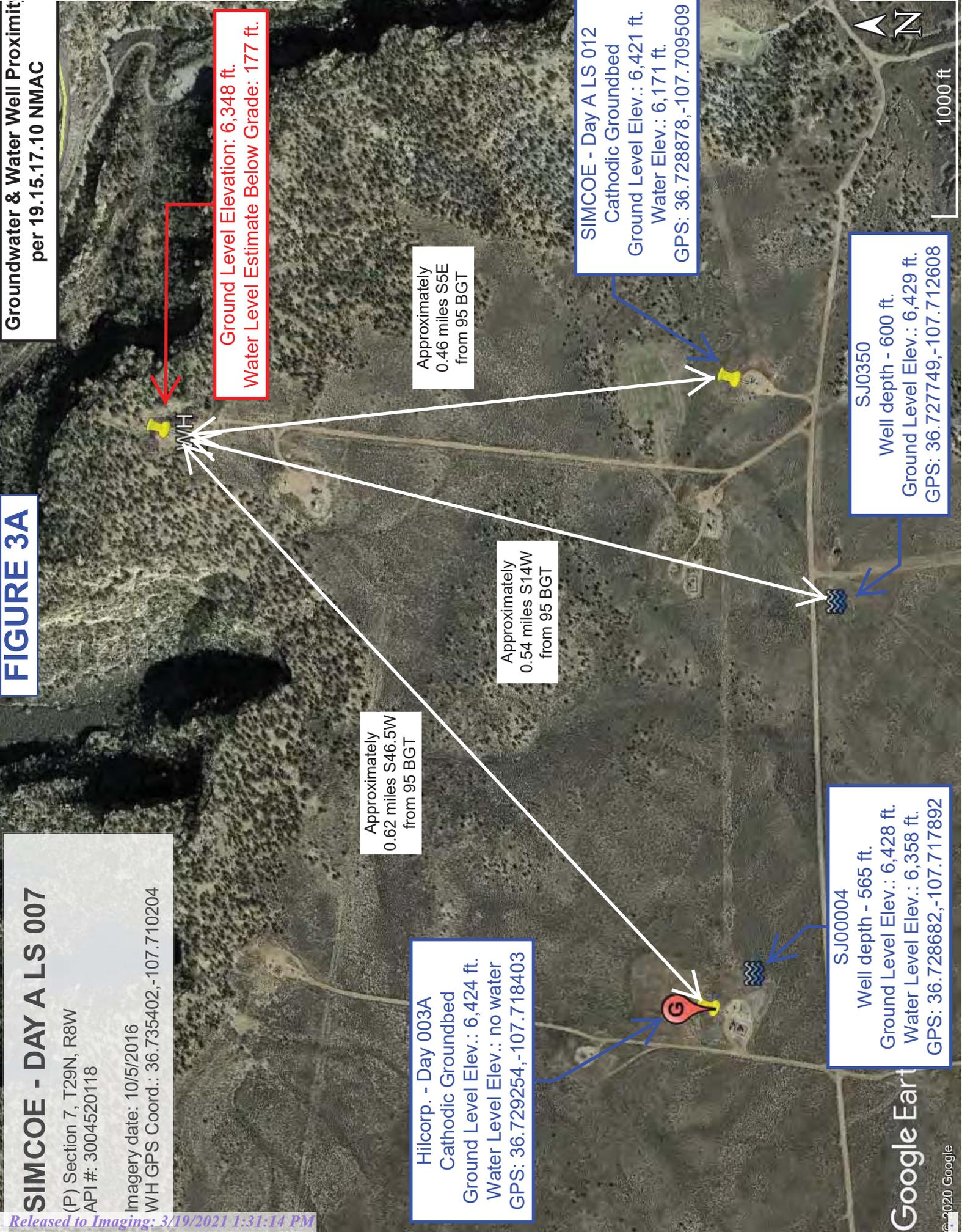


Groundwater & Water Well Proximity per 19.15.17.10 NMAC

FIGURE 3A

**SIMCOE - DAY A LS 007**

(P) Section 7, T29N, R8W  
API#: 3004520118  
Imagery date: 10/5/2016  
WH GPS Coord.: 36.735402,-107.710204



Ground Level Elevation: 6,348 ft.  
Water Level Estimate Below Grade: 177 ft.

Approximately 0.46 miles S5E from 95 BGT

SIMCOE - Day A LS 012  
Catholic Groundbed  
Ground Level Elev.: 6,421 ft.  
Water Elev.: 6,171 ft.  
GPS: 36.728878,-107.709509

SJ0350  
Well depth - 600 ft.  
Ground Level Elev.: 6,429 ft.  
GPS: 36.727749,-107.712608

Approximately 0.54 miles S14W from 95 BGT

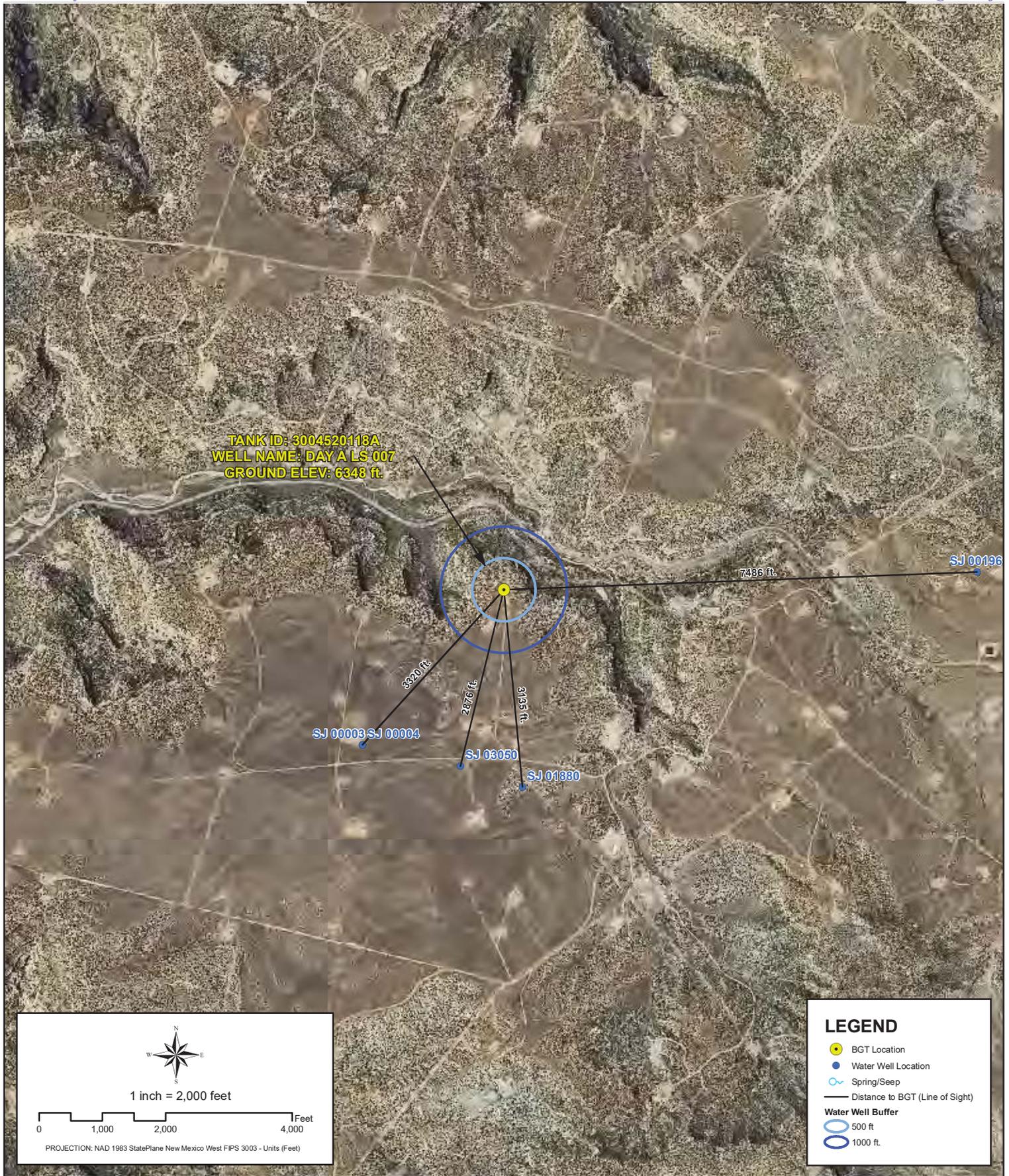
Approximately 0.62 miles S46.5W from 95 BGT

Hilcorp. - Day 003A  
Catholic Groundbed  
Ground Level Elev.: 6,424 ft.  
Water Level Elev.: no water  
GPS: 36.729254,-107.718403

SJ00004  
Well depth - 565 ft.  
Ground Level Elev.: 6,428 ft.  
Water Level Elev.: 6,358 ft.  
GPS: 36.728682,-107.717892

1000 ft





# PROXIMITY TO WATER WELLS

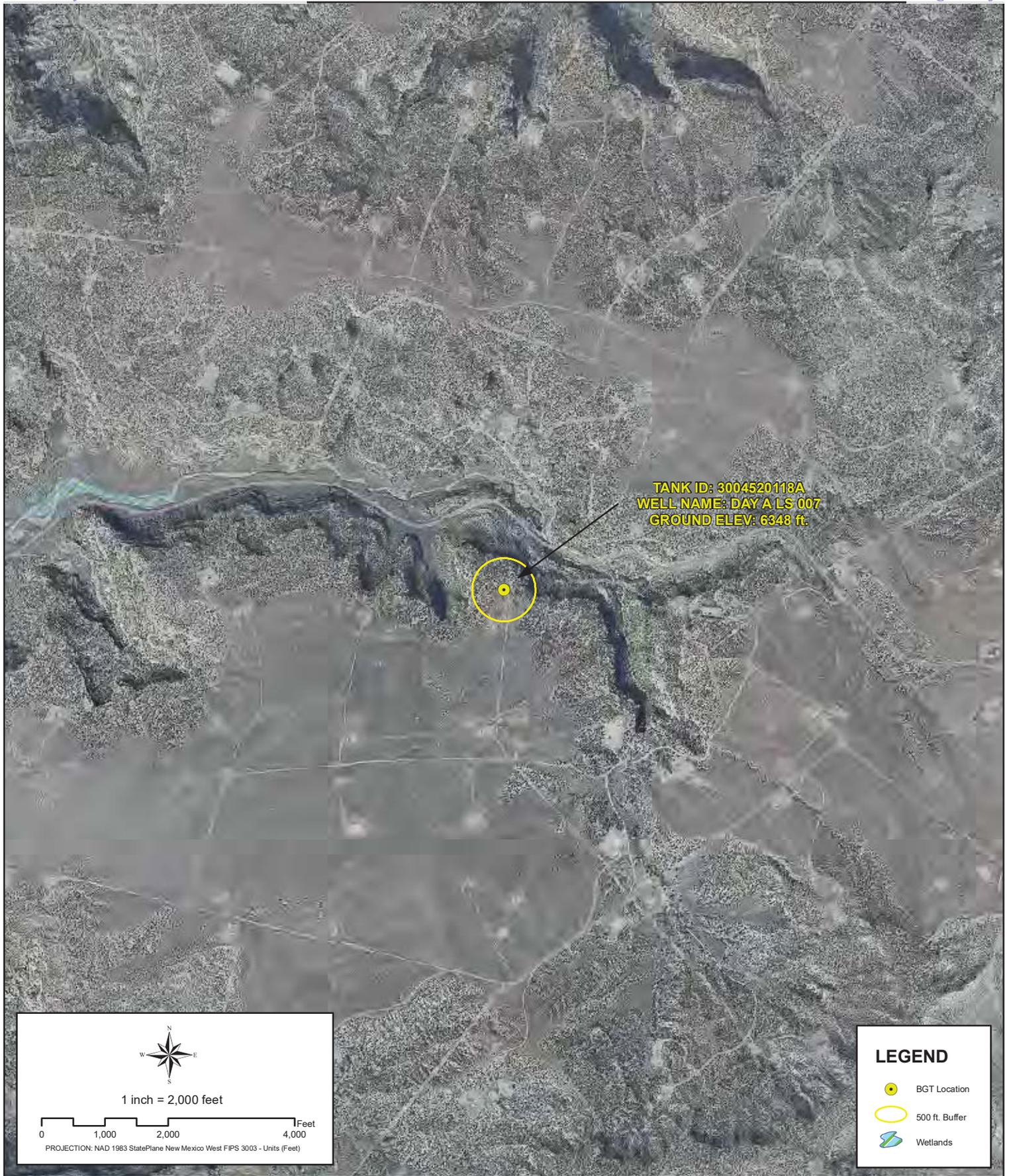
WELL NAME: DAY A LS 007

API NUMBER: 3004520118 TANK ID: 3004520118A

SECTION 7, TOWNSHIP 29.0N, RANGE 08W, P.M. NM23

FIGURE

4



File Path: X:\BPPASS\Sector\_7\Sector\_7\AMXD\3004520118A.mxd

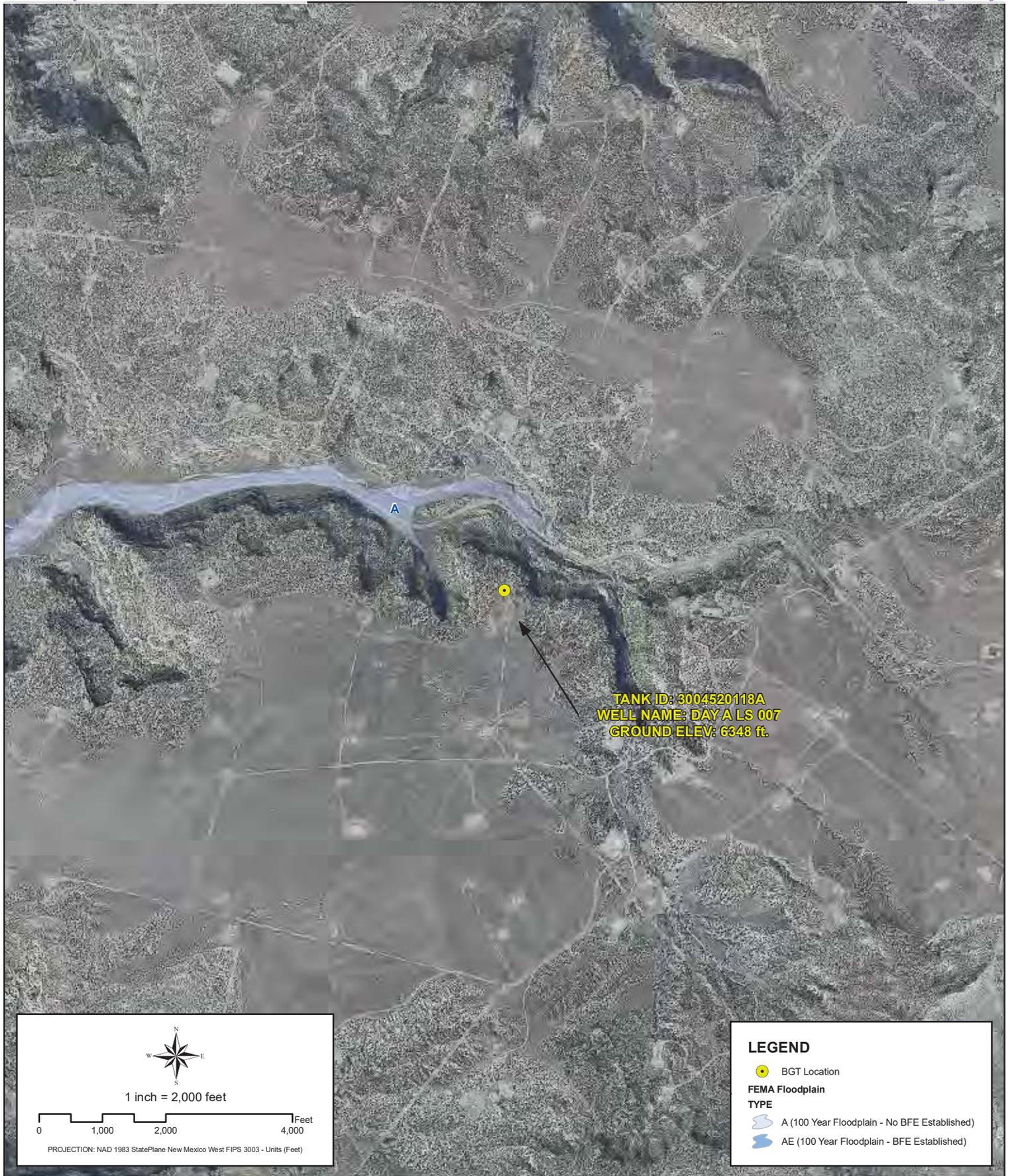


# PROXIMITY TO WETLANDS

**WELL NAME: DAY A LS 007**

API NUMBER: 3004520118 TANK ID: 3004520118A  
**SECTION 7, TOWNSHIP 29.0N, RANGE 08W, P.M. NM23**

# FIGURE 5



File Path: X:\BP\PASS\Sector\_7\Sector\_7A\MXD\3004520118A.mxd



# PROXIMITY TO FLOODPLAIN

**WELL NAME: DAY A LS 007**

API NUMBER: 3004520118 TANK ID: 3004520118A

**SECTION 7, TOWNSHIP 29.0N, RANGE 08W, P.M. NM23**

# FIGURE 6

**SIMCOE LLC (formerly BPX Energy Inc.)**  
SAN JUAN BASIN, NORTHWEST NEW MEXICO  
BELOW-GRADE TANK DESIGN AND CONSTRUCTION PLAN

Pursuant to Rule 19.15.17.11 NMAC, SIMCOE LLC (SIMCOE) shall construct a below-grade tank (BGT) or modify an existing permitted BGT according to the following plan. Any deviations from this plan will be addressed on the New Mexico Oil Conservation Division's (NMOCD) form C-144 at the time of submittal.

### **Design and Construction Plan**

1. SIMCOE will design and construct a BGT which will be constructed to contain liquids and prevent contamination of fresh water and protect public health and the environment.
2. SIMCOE is the well operator and shall install and maintain a well sign that is in compliance with 19.15.16.8 NMAC. The sign will be posted at the well site to address, at a minimum;
  - a. Well Number
  - b. Property name
  - c. Operators name
  - d. Location by footage, quarter-quarter section, township and range (or unit letter)
  - e. API number
  - f. Emergency contact information
3. SIMCOE will fence or enclose its BGTs in a manner that prevents unauthorized access and shall maintain its fence in good repair.
4. SIMCOE will fence or enclose a BGT located within 1,000 feet of a permanent residence, school, hospital, institution or church with, at a minimum a chain link security fence at least six (6) feet in height with at least two (2) strands of barbed wire at the top. SIMCOE will ensure that all gates associated with the fence are closed and locked when responsible personnel are not on-site.
5. SIMCOE is requesting NMOCD's approval for an alternative fence design that provides, at a minimum, equivalent protection to the design specified in Paragraph 3 of Subsection D of 19.15.17.11 NMAC for BGTs beyond the stated distance in paragraph 4 of this document. SIMCOE's proposed design for its BGTs will utilize 48" steel mesh field-fence (hogwire) with a metal or steel top rail. Perimeter T-post will be installed roughly every 10 feet.
6. SIMCOE will construct an expanded metal covering that completely covers the top of the BGT. The covering will be constructed such that it will prevent hazardous conditions to wildlife, including migratory birds
7. SIMCOE shall construct the BGT of materials that are resistant to produced water, any contained liquids, and damage from sunlight. SIMCOE's BGTs will be constructed of carbon steel that meets the requirements of ASTM A36.
8. SIMCOE's BGTs shall have a properly constructed earthen foundation consisting of a level base free of rocks, debris, sharp edges, or irregularities as to prevent punctures, cracks or indentations to the tank bottom as demonstrated on the design drawing.
9. SIMCOE will construct and operate the BGT to prevent surface water run-on by using both earthen berms and leaving a portion of the BGT above the original grade as demonstrated on the design drawing.
10. SIMCOE will construct and operate the BGT to prevent overflow and overfilling of the BGT. Overflow will be prevented by use of an electronic high fluid level detector that will automatically engage an electronic shut-off valve when a 1 foot freeboard is reached. The Hi-level automatic alarm notifies well optimizers when liquid level has reached within a pre-set distance to the top of the BGT. The Hi Hi alarm will trigger the Hi-level automatic shutdown valve which will close in the well until the liquid level can be lowered.

11. SIMCOE will construct and install a double-walled tank design per Subparagraph (b) of Paragraph (4) of Subsection I of 19.15.17.11 NMAC with a two (2) inch diameter leak detection port. The floor supports located in the annular space of the tank bottom will be channeled to allow outward movement of liquid between the walls. Leak detection will be monitored per SIMCOE's Operating and Maintenance Plan. The walls of the BGT will be constructed of carbon steel that meets the ASTM A36 standard. SIMCOE's BGT design will insure containment of tank contents and protect underlying groundwater. The production equipment line drain is an automated drain that allows water level in production equipment (generally the separator) to be maintained within the equipment's operating parameters. The environmental drain is a manually operated drain that is used to drain liquids off of equipment. The tank drain is a manually operated drain, typically in the closed position that is used to rid the condensate tank of any water accumulation. The vent drain is a manually operated drain off the discharge of production equipment (usually the separator) and is used to blowdown the wellsite. The swab drain line is a manually operated drain originating between the wellhead and separator and is used during well workovers when large amounts of liquid are removed from the well and sent straight to the BGT.
12. SIMCOE owned and operated single walled BGTs constructed and installed prior to June 16, 2008 that has the side walls open for visual inspection and that does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT and remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
13. SIMCOE owned and operated single walled BGTs constructed and installed prior to June 16, 2008 and where any portion of the tank sidewall is below the ground surface and not visible shall equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, or close it, by June 16, 2013. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
14. SIMCOE owned and operated double walled BGTs constructed and installed prior to June 16, 2008 and which does not meet all the requirements in Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC is not required to equip or retrofit the BGT to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC so long as it demonstrates integrity. If the existing BGT does not demonstrate integrity, SIMCOE shall promptly drain the BGT, remove it from service and comply with the closure requirements of 19.15.17.13 NMAC.
15. The general specifications for the design and construction of the BGT have been provided in the attached SIMCOE design and construction schematic.



**SIMCOE LLC (formerly BPX Energy Inc.)**  
SAN JUAN BASIN, NORTHWEST NEW MEXICO  
BELOW-GRADE TANK OPERATING AND MAINTENANCE PLAN

Pursuant to Rule 19.15.17.12 NMAC, SIMCOE LLC (SIMCOE) shall maintain and operate a below-grade tank (BGT) by following the plan shown below. Deviations from this plan will be addressed with a submittal to the New Mexico Oil Conservation Division (NMOCD) using form C-144 at the time of the BGT registration or modification to an existing BGT registration.

**Operating and Maintenance Plan**

1. SIMCOE's BGTs will be operated to contain liquids and solids. SIMCOE will maintain the integrity of the BGT and secondary containment system as to prevent impacts to fresh water and to protect public health and the environment. SIMCOE will use automated high fluid level alarms and automated shut-off valves to insure that liquids are contained within the vessel and that the vessel does not overflow. These alarms and shut-off valves will be consistent with those demonstrated in the design plan.
2. SIMCOE will not knowingly discharge to or store any hazardous waste in a BGT.
3. If a BGT develops a leak below the liquid surface, SIMCOE shall remove all liquid above the damage or leak within 48 hours of discovery, notify the appropriate division office pursuant to 19.15.29 NMAC and repair the damage or replace the BGT as applicable.
4. SIMCOE will adhere to Subsection D of 19.15.17.12 NMAC. The requirements are as follows;
  - a. SIMCOE shall not allow a below-grade tank to overflow or allow surface water run-on to enter the BGT.
  - b. SIMCOE shall remove any measurable layer of oil from the fluid surface of a BGT.
  - c. SIMCOE shall inspect the BGT for leakage and damage at least monthly and will document the integrity of each tank at least annually and maintain a written record of the integrity for five years.
  - d. SIMCOE shall maintain adequate freeboard to prevent overtopping of the below-grade tank.
  - e. If SIMCOE discovers that the BGT tank does not demonstrate integrity or that the BGT develops any of the conditions identified in Paragraph (5) of Subsection A of 19.15.17.12 NMAC, SIMCOE shall repair the damage or close the existing BGT pursuant to the closure requirements of 19.15.17.13 NMAC.
  - f. If any of SIMCOE's BGTs are equipped or retrofitted to comply with Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, then SIMCOE shall visually inspect the area beneath the BGT during the retrofit and document any areas that are wet, discolored or showing other evidence of a release on form C-141. SIMCOE will attempt to measure and report to the division the concentration of contaminants in the wet or discolored soil with respect to the standards set forth in Table I of 19.15.17.13 NMAC. If there is no wet or discolored soil or if the concentration of contaminants in the wet or discolored soil is less than the standard set forth in Table I of 19.15.17.13 NMAC, then SIMCOE shall proceed with the closure requirements of 19.15.17.13 NMAC prior to initiating the retrofit or replacement.



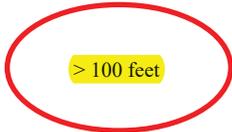
**SIMCOE LLC (formerly BPX Energy Inc.)**  
**SAN JUAN BASIN, NORTHWEST NEW MEXICO**

**BELOW-GRADE TANK CLOSURE PLAN**

This plan will address the method, procedures, and protocols for closure of below-grade tanks (BGTs) on SIMCOE LLC (SIMCOE) well sites pursuant to Subsection A of 19.15.17.13 NMAC. As stipulated in Paragraph (1) of Subsection C of 19.15.17.13 NMAC, SIMCOE will not commence closure without first obtaining approval of the closure plan submitted pursuant to Paragraph (3) of Subsection B of 19.15.17.9 NMAC. If deviations from this plan are necessary, SIMCOE will request preapproval from the Division District III office of any specific changes and will be included on form C-144. SIMCOE shall close its BGTs within 60 days of cessation of the operation as required by Paragraph (4) of Subsection G of 19.15.17.13 NMAC.

**General Closure Plan**

1. SIMCOE shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
2. SIMCOE shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.
3. Within 60 days of cessation of operations, SIMCOE shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD approved facility. The facilities to be used are:
  - a. SIMCOE LLC Crouch Mesa Landfarm, Permit NM-02-003 (Solids)
  - b. JFJ Landfarm, Permit NM-01-010(B) (Solids and Sludge)
  - c. Basin Disposal, Permit NM-01-0005 (Liquids)
  - d. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
  - e. SIMCOE LLC Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
  - f. SIMCOE LLC Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
  - g. SIMCOE LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
  - h. SIMCOE LLC Operated GCU 306 SWD, API 30-045-24286 (Liquids)
  - i. SIMCOE LLC Operated GCU 307 SWD, API 30-045-24248 (Liquids)
  - j. SIMCOE LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
  - k. SIMCOE LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)
4. SIMCOE shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
5. Within six months of cessation of operations, SIMCOE shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.
6. SIMCOE shall test the soils beneath the BGT to determine whether a release has occurred. SIMCOE shall collect at a minimum: a five (5) point composite sample to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed as required for the constituents listed in Table I within Subparagraph (a) of Paragraph (3) of Subsection C of 19.15.17.13 NMAC (see Table 1 on following page).

<b>Table 1</b> <b>Closure Criteria for Soils Beneath Below-Grade Tanks</b>			
Depth below bottom of pit to groundwater less than 10,000 mg/l TDS	Constituent	Method*	Limit**
≤50 feet	Chloride	EPA 300.0	600 mg/kg
	TPH	EPA SW-846 Method 418.1	100 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
51 feet-100 feet	Chloride	EPA 300.0	10,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg
 > 100 feet	Chloride	EPA 300.0	20,000 mg/kg
	TPH	EPA SW-846 Method 418.1	2,500 mg/kg
	GRO+DRO	EPA SW-846 Method 8015M	1,000 mg/kg
	BTEX	EPA SW-846 Method 8021B or 8260B	50 mg/kg
	Benzene	EPA SW-846 Method 8021B or 8015M	10 mg/kg

Notes: mg/Kg = milligram per kilogram, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons, TDS = total dissolved solids.  
 \* - Or other test methods approved by the division  
 \*\* - Numerical limits or natural background level, whichever is greater

7. If any contaminant concentration exceeds those standards set in Table I, SIMCOE will acknowledge NMOCD's position to require additional delineation upon review of the results. SIMCOE will not proceed with any further closure activities until approval is first granted by NMOCD.
8. If the sampling demonstrates that all contaminant constituents do not exceed the concentrations specified in Table I, then SIMCOE shall backfill the excavation, with non-waste containing, uncontaminated, earthen material.
9. SIMCOE shall reclaim the BGT location and all areas associated with the BGT including associated access roads to a safe and stable condition that blends with the surrounding undisturbed area. SIMCOE shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in Paragraph (2) of Subsection H of 19.15.17.13 NMAC, re-contour the BGT location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Paragraph (5) of Subsection H of 19.15.17.13 NMAC.
10. SIMCOE may propose an alternative to the re-vegetation or recontouring requirement if it can demonstrate to the NMOCD's District III office that the proposed alternative provides equal or greater prevention of erosion, and protection of fresh water, public health and the environment. SIMCOE will seek surface owner approval of the proposed alternative and provide written documentation of the surface owner's approval to NMOCD for its approval.
11. Areas reasonably needed for production operations or for subsequent drilling operations shall be compacted, covered, paved, or otherwise stabilized and maintained in such a way as to minimize dust and erosion to the extent practicable.

12. The soil cover for closures after site contouring, where the BGT has been removed and if necessary remediated beneath the BGT to chloride concentrations less than 600 mg/kg as analyzed by EPA Method 300.0, shall consist of the background thickness of topsoil or one foot or suitable material, whichever is greater.
13. The soil cover will be constructed to the site's existing grade and all practicable efforts will be made to prevent ponding of water and erosion of the cover material.
14. All areas disturbed by the closure of the BGT, except areas reasonably needed for production operations or for subsequent drilling operations, shall be reclaimed as early and as nearly as practicable to their original condition or their final land use and shall be maintained to control dust and minimize erosion to the extent practicable.
15. Topsoils and subsoils shall be replaced to their original relative positions and contoured so as to achieve erosion control, long-term stability and preservation of surface water flow patterns. The disturbed area then shall be reseeded in the first favorable growing season following closure of the BGT.
16. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.
17. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of SIMCOE subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.
18. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.
19. Within 60 days of closure completion, SIMCOE shall submit a closure report on NMOCD's form C-144, and will include the following;
  - a. necessary attachments to document all closure activities
  - b. sampling results
  - c. information required by 19.15.17 NMAC
  - d. details on back-filling, capping and covering, where applicable.
20. SIMCOE shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.

## SOUTHERN SAN JUAN BASIN (SSJB) Figure Citation List

### **Figure 2: Proximity to Significant Watercourses**

**Layers: Topographic Imagery: USGS (1999)**

USGS 24k Topographic map series. 1:24000. Maps are seamless, scanned images of USGS paper topographic maps. Data created using Terrain Navigator, Copyright 1999, Maptech Inc.

### **Figure 3: Groundwater Greater Than 50 ft.**

**Layers: Water Wells: iWaters Database: NMOSE/ISC (Dec. 2009)** New Mexico Office of the State Engineer

/ISC iWaters database. (Data updated: 12/2009. Data received: 03/09/2010). Data available from:

[http://www.ose.state.nm.us/waters\\_db\\_index.html](http://www.ose.state.nm.us/waters_db_index.html).

**Cathodic Wells: Tierra Corrosion Control, Inc. (Aug. 2008)**

Tierra Corrosion Control, Inc. 1700 Schofield Ln. Farmington, NM 87401. Driller's Data Log. (Data collected: All data are associated with cathodic protection wells installed at BP facilities between 2008-2009. Data received: 05/06/2010).

**Hydrogeological Evaluation: Wright Water Engineers, Inc. (2008)**

Evaluation completed by Wright Water Engineers, Inc. Durango Office. Data created using digital statewide geology at 1:500,000 from USGS in combination with 10m Digital Elevation Model (DEM) from NRCS. (Data compiled: 2008.)

Results: Spatial Polygons representing "Groundwater likely to be less than 50 ft." and "Groundwater suspected to be less than 50 ft."

**Surficial Geology: USGS (1963/1987)**

Data digitized and rectified by Geospatial Consultants. (Data digitized: 03/23/2010). Original hard copy maps sourced from United States Geological Survey (USGS). Data available from: <http://pubs.er.usgs.gov/>.

*Geology, Structure and Uranium Deposits of the Shiprock Quadrangle, New Mexico and Arizona.* 1:250,000. I - 345. Compiled by Robert B. O'Sullivan and Helen M. Beikman. 1963.

*Geologic Map of the Aztec 1 x 2 Quadrangle, Northwestern New Mexico and Southern Colorado.* 1:250,000. I - 1730. Compiled by Kim Manley, Glenn R. Scott, and Reinhard A. Wobus. 1987.

**Aerial Imagery: Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD\_1983\_StatePlane\_New\_Mexico\_West\_FIPS\_3003\_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

**Layers:**

**Perennial Streams: NHD, USGS (2010)**

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital Representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

**Intermittent Streams: NHD, USGS (2010)**

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital Representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

**Water Bodies: NHD, USGS (2010)**

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

**USGS Topographic Maps: USGS (2007)**

USGS 24k Topographic map series. 1:24000. Maps are seamless, scanned images of USGS paper topographic maps.

Data available from: <http://store.usgs.gov>.

**Layers: Aerial Imagery: Google Earth Pro (4/6/2019)**

Evaluation completed by Blagg Engineering, Inc., Bloomfield, NM. (2019)

**Figure 4: Proximity to Water Wells**

**Layers: Water Wells: iWaters Database: NMOSE/ISC (Dec. 2009)** New Mexico Office of the State Engineer (OSE) /ISC iWaters database. (Data updated: 12/2009. Data received: 03/09/2010). Data available from:

[http://www.ose.state.nm.us/waters\\_db\\_index.html](http://www.ose.state.nm.us/waters_db_index.html).

**Springs/Seeps: NHD, USGS (2010)**

National Hydrography Dataset (NHD). U.S. Geological Survey. (Data last updated: 02/19/2010. Data received: 03/09/2010). High-resolution: 1:24,000. Digital representation of USGS 24k Topographic map series with field updates as required. Data available from: <http://nhd.usgs.gov/>.

**Aerial Imagery: Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD\_1983\_StatePlane\_New\_Mexico\_West\_FIPS\_3003\_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

### **Figure 5: Proximity to Wetlands**

**Layers: Wetlands:** **NWI (2010)** National Wetlands Inventory (NWI). U.S Fish and Wildlife Service. (Data last updated: 09/25/2009. Data received: 03/21/2010). Data available from: <http://www.fws.gov/wetlands/>.

**Aerial Imagery:** **Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD\_1983\_StatePlane\_New\_Mexico\_West\_FIPS\_3003\_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

### **Figure 6: Proximity to FEMA Floodplain**

**Layers: FEMA Floodplain:** **FEMA (varying years)** Data digitized and rectified by Wright Water Engineers, Inc. (Data digitized: August 2008). Digitized from hard copy Flood Insurance Rate Maps (FIRMs) (varying years) of San Juan County.

**Aerial Imagery:** **Conoco (Summer 2009)**

ConocoPhillips Company. (Flown: Summer 2009). 12 in. High Resolution Orthoimagery. Projected coordinate system name: NAD\_1983\_StatePlane\_New\_Mexico\_West\_FIPS\_3003\_Feet.

Provided as tiled .tiff images and indexed using polygon index layer.

**District I**  
 1625 N. French Dr., Hobbs, NM 88240  
 Phone:(575) 393-6161 Fax:(575) 393-0720

**District II**  
 811 S. First St., Artesia, NM 88210  
 Phone:(575) 748-1283 Fax:(575) 748-9720

**District III**  
 1000 Rio Brazos Rd., Aztec, NM 87410  
 Phone:(505) 334-6178 Fax:(505) 334-6170

**District IV**  
 1220 S. St Francis Dr., Santa Fe, NM 87505  
 Phone:(505) 476-3470 Fax:(505) 476-3462

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

CONDITIONS

Action 9697

**CONDITIONS OF APPROVAL**

Operator: SIMCOE LLC	1199 Main Ave., Suite 101 Durango, CO81301	OGRID: 329736	Action Number: 9697	Action Type: C-144
OCD Reviewer csmith		Condition None		