District I
1625 N. French Dr., Hobbs, NM 88240
District II
1301 W. Grand Avenue, 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
July 21, 2008

**For temporary pits, closed-loop systems, and below-grade tanks**, submit to the appropriate NMOCD District Office.
**For permanent pits and exceptions** submit to the Santa Fe Environmental Bureau office and provide a copy to the appropriate NMOCD District Office.

# Pit, Closed-Loop System, Below-Grade Tank, or Proposed Alternative Method Permit or Closure Plan Application

Type of action: ☐ Permit of a pit, closed-loop system, below-grade tank, or proposed alternative method
☒ Closure of a pit, closed-loop system, below-grade tank, or proposed alternative method
☐ Modification to an existing permit
☐ Closure plan only submitted for an existing permitted or non-permitted pit, closed-loop system, below-grade tank, or proposed alternative method

***Instructions: Please submit one application (Form C-144) per individual pit, closed-loop system, 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 OGRID #: 329736
Address: 1199 Main Ave., Suite 101, Durango, CO 81301
Facility or well name: NORTHEAST BLANCO UNIT 016A
APPNumber: 3003921722 OCD Permit Number:
U/L or Qtr/Qtr J Section 3.0 Township 30.0N Range 07W County: Rio Arriba
Center of Proposed Design: Latitude 36.838108 Longitude -107.554248 NAD: ☐1927 ☒ 1983
Surface Owner: ☒ Federal ☐ State ☐ Private ☐ Tribal Trust or Indian Allotment

2.
☐ **Pit:** Subsection F or G of 19.15.17.11 NMAC
Temporary: ☐ Drilling ☐ Workover
☐ Permanent ☐ Emergency ☐ Cavitation ☐ P&A
☐ 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.
☐ **Closed-loop System:** Subsection H of 19.15.17.11 NMAC
Type of Operation: ☐ P&A ☐ Drilling a new well ☐ Workover or Drilling (Applies to activities which require prior approval of a permit or notice of intent)
☐ Drying Pad ☐ Above Ground Steel Tanks ☐ Haul-off Bins ☐ Other _____
☐ Lined ☐ Unlined Liner type: Thickness _____mil ☐ LLDPE ☐ HDPE ☐ PVC ☐ Other _____
Liner Seams: ☐ Welded ☐ Factory ☐ Other _____

4.
☒ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC **Tank ID:** B
Volume: 25.0 bbl Type of fluid: Produced Water
Tank Construction material: Steel
☒ Secondary containment with leak detection ☐ Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off
☐ Visible sidewalls and liner ☒ Visible sidewalls only ☐ Other DOUBLE WALLED DOUBLE BOTTOMED
Liner type: Thickness _____mil ☐ HDPE ☐ PVC ☐ Other _____

5.
☐ **Alternative Method:**
Submittal of an exception request is required. Exceptions must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

6.

**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_____

7.

**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)

8.

**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

9.

**Administrative Approvals 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:***

☐ Administrative approval(s): Requests must be submitted to the appropriate division district or the Santa Fe Environmental Bureau office for consideration of approval.

☐ Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

10.

**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. Requests regarding changes to certain siting criteria may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Applicant must attach justification for request. Please refer to 19.15.17.10 NMAC for guidance.*** **Siting criteria does not apply to drying pads or above-grade tanks associated with a closed-loop system.**

| | |
|---|---|
| Ground water is less than 50 feet below the bottom of the temporary pit, permanent pit, or below-grade tank.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No |
| 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).<br>- 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. *(Applies to temporary, emergency, or cavitation pits and below-grade tanks)*<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No ☐ NA |
| Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. *(Applies to permanent pits)*<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No ☐ NA |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | ☐ Yes ☐ No |
| Within a 100-year floodplain.<br>- FEMA map | ☐ Yes ☐ No |

11.
**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: _____

12.
**Closed-loop Systems 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.***

- ☐ Geologic and Hydrogeologic Data (only for on-site closure) - based upon the requirements of Paragraph (3) of Subsection B of 19.15.17.9
- ☐ Siting Criteria Compliance Demonstrations (only for on-site closure) - 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: _____

☐ Previously Approved Operating and Maintenance Plan API Number: _____ (*Applies only to closed-loop system that use above ground steel tanks or haul-off bins and propose to implement waste removal for closure)*

13.
**Permanent Pits Permit Application Checklist:** Subsection B of 19.15.17.9 NMAC
***Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.***

- ☐ Hydrogeologic Report - based upon the requirements of Paragraph (1) of Subsection B of 19.15.17.9 NMAC
- ☐ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
- ☐ Climatological Factors Assessment
- ☐ Certified Engineering Design Plans - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Dike Protection and Structural Integrity Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Leak Detection Design - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Liner Specifications and Compatibility Assessment - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Quality Control/Quality Assurance Construction and Installation Plan
- ☐ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
- ☐ Freeboard and Overtopping Prevention Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
- ☐ Nuisance or Hazardous Odors, including $H_2S$, Prevention Plan
- ☐ Emergency Response Plan
- ☐ Oil Field Waste Stream Characterization
- ☐ Monitoring and Inspection Plan
- ☐ Erosion Control Plan
- ☐ Closure Plan - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

14.
**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 ☐ Closed-loop System ☐ 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 (Exceptions must be submitted to the Santa Fe Environmental Bureau for consideration)

15.
**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 F 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 I of 19.15.17.13 NMAC
- ☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

16.
**Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:** (19.15.17.13.D NMAC)
***Instructions: Please indentify the facility or facilities for the disposal of liquids, drilling fluids and drill cuttings. Use attachment if more than two facilities are required.***

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Will any of the proposed closed-loop system operations and associated activities occur on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please provide the information below) ☐ No

*Required for impacted areas which will not be used for future service and operations:*
☐ 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 I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

17.
**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 may require administrative approval from the appropriate district office or may be considered an exception which must be submitted to the Santa Fe Environmental Bureau office for consideration of approval. Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17.10 NMAC for guidance.***

| | |
|---|---|
| Ground water is less than 50 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| Ground water is between 50 and 100 feet below the bottom of the buried waste<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| Ground water is more than 100 feet below the bottom of the buried waste.<br>- NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells | ☐ Yes ☐ No ☐ NA |
| 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).<br>- 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.<br>- Visual inspection (certification) of the proposed site; Aerial photo; Satellite image | ☐ Yes ☐ No |
| Within 500 horizontal feet of a private, domestic fresh water well or spring that less than five households use for domestic or stock watering purposes, or within 1000 horizontal feet of any other fresh water well or spring, in existence at the time of initial application.<br>- NM Office of the State Engineer - iWATERS database; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended.<br>- Written confirmation or verification from the municipality; Written approval obtained from the municipality | ☐ Yes ☐ No |
| Within 500 feet of a wetland.<br>- US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site | ☐ Yes ☐ No |
| Within the area overlying a subsurface mine.<br>- Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division | ☐ Yes ☐ No |
| Within an unstable area.<br>- Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map | ☐ Yes ☐ No |
| Within a 100-year floodplain.<br>- FEMA map | ☐ Yes ☐ No |

18.
**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 F of 19.15.17.13 NMAC
☐ Construction/Design Plan of Burial Trench (if applicable) based upon the appropriate requirements 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 Subsection F of 19.15.17.13 NMAC
☐ Waste Material Sampling Plan - based upon the appropriate requirements of Subsection F 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 I of 19.15.17.13 NMAC
☐ Site Reclamation Plan - based upon the appropriate requirements of Subsection G of 19.15.17.13 NMAC

19.
**Operator Application Certification:**
I hereby certify that the information submitted with this application is true, accurate and complete to the best of my knowledge and belief.

Name (Print): _____ Title: _____

Signature: _____ Date: _____

e-mail address: _____ Telephone: _____

20.
**OCD Approval:** ☐ Permit Application (including closure plan) ☒ Closure ~~Plan~~ Report (only) ☐ OCD Conditions (see attachment)

**OCD Representative Signature:** Victoria Venegas **Approval Date:** 12/22/2021

**Title:** Environmental Specialist **OCD Permit Number:** _____

21.
**Closure Report (required within 60 days of closure completion):** Subsection K of 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:** 09\11\2020

22.
**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.

23.
**Closure Report Regarding Waste Removal Closure For Closed-loop Systems That Utilize Above Ground Steel Tanks or Haul-off Bins Only:**
***Instructions: Please indentify the facility or facilities for where the liquids, drilling fluids and drill cuttings were disposed. Use attachment if more than two facilities were utilized.***

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Disposal Facility Name: _____ Disposal Facility Permit Number: _____

Were the closed-loop system operations and associated activities performed on or in areas that *will not* be used for future service and operations?
☐ Yes (If yes, please demonstrate compliance to the items below) ☐ No

*Required for impacted areas which will not be used for future service and operations:*
☐ Site Reclamation (Photo Documentation)
☐ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique

24.
**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)
☐ Plot Plan (for on-site closures and temporary pits)
☒ Confirmation Sampling Analytical Results (if applicable)
☐ Waste Material Sampling Analytical Results (required for on-site closure)
☒ Disposal Facility Name and Permit Number
☒ Soil Backfilling and Cover Installation
☐ Re-vegetation Application Rates and Seeding Technique
☒ Site Reclamation (Photo Documentation)
On-site Closure Location: Latitude 36.838108 Longitude -107.554248 NAD: ☐ 1927 ☒ 1983

25.
**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): Steve Moskal Title: Contract Environmental Coordinator

Signature: Steven Moskal 2020.11.11 09:05:16 -07'00' Date: 11/11/2020

e-mail address: Steve.Moskal@bpx.com Telephone: (505) 330-9179

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: _____

# SIMCOE LLC

*(BP as contractor)*

SAN JUAN BASIN, NORTHWEST NEW MEXICO

BELOW-GRADE TANK CLOSURE PLAN

**Northeast Blanco Unit # 16A – Tank ID: B**
**API #: 3003921722**
**Unit Letter J, Section 3, T30N, R07W**

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on SIMCOE LLC (BP as contractor) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, BP shall close a BGT within the time periods provided in 19.15.17.13 NMAC, or by an earlier date that the New Mexico Oil Conservation Division (NMOCD) requires because of imminent danger to fresh water, public health, safety or the environment. If deviations from this plan are necessary, any specific changes will be included on form C-144 and approved by the NMOCD. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC or is not included in Paragraph (5) of Subsection I of 19.15.17.11 NMAC within five years after June 16, 2008, if not retrofit with a BGT that complies with the BPX's NMOCD approved BGT design attached to the BP Design and Construction Plan. BP shall close an existing BGT that does not meet the requirements of Paragraphs (1) through (4) of Subsection I of 19.15.17.11 NMAC, if not previously retrofitted to comply with the BP's NMOCD approve BGT Design attached to the BP Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. BP shall close the permitted BGT within 60 days of cessation of the BGTs operation or as required by the transitional provisions of Subsection B, D, or E of 19.15.17.17 NMAC.

## General Closure Plan

1. BP shall notify the surface owner by certified mail that it plans to close a BGT. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.
   **Notice is attached.**

2. BP shall notify the division District III office verbally or by other means at least 72 hours, but not more than one (1) week, prior to any closure operation. The notice shall include the operator's name, and the location 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.
   **Notice was provided and documented in the attached email.**

3. BP shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD's division-approved facility. The facilities to be used are:
   a. BP 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. BP Operated E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
   f. BP Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
   g. BP Operated GCU 259 SWD, API 30-045-20006 (Liquids)
   h. BP Operated GCU 306 SWD, API 30-045-24286 (Liquids)
   i. BP Operated GCU 307 SWD, API 30-045-24248 (Liquids)
   j. BP Operated GCU 328 SWD, API 30-045-24735 (Liquids)
   k. BP Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

   **All liquids and/or sludge within the BGT were removed and sent to one of the above NMOCD approved facilities for disposal.**

4. BP shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the NMOCD approves. If a liner is present and must be disposed of it will be cleaned by scraping any soils or other attached materials on the liner to a de minimus amount and disposed at a permitted solid waste facility, pursuant to Subparagraph (m) of Paragraph (1) of Subsection C of 19.15.35.8 NMAC. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.
**The BGT was transported for recycling.**

5. BP shall remove any on-site equipment associated with a BGT unless the equipment is required for well production.
**All equipment associated with the BGT has been removed.**

6. BP shall test the soils beneath the BGT to determine whether a release has occurred. BP shall collect at a minimum: a five (5) point composite sample and individual grab samples from any area that is wet, discolored or showing other evidence of a release and analyze for BTEX, TPH and chlorides. The testing methods for those constituents are as follows;

| Constituents | Testing Method | Release Verification (mg/Kg) | Composite Results |
|---|---|---|---|
| Benzene | US EPA Method SW-846 8021B or 8260B | 0.2 | <0.022 |
| Total BTEX | US EPA Method SW-846 8021B or 8260B | 50 | <0.089 |
| TPH | US EPA Method SW-846 418.1 | 100 | <46 |
| Chlorides | US EPA Method 300.0 or 4500B | 250 or background | <60 |

**Notes:** **mg/Kg = milligram per kilogram, pcs = point composite sample, BTEX = benzene, toluene, ethylbenzene, and total xylenes, TPH = total petroleum hydrocarbons. Other EPA methods that the division approves may be applied to all constituents listed. Chloride closure standards will be determined by which ever concentration level is greatest.**

**Soils beneath the BGT were sampled for TPH, BTEX, and chloride. All test parameters were below the stated limits. A field and laboratory reports are attached.**

7. BP shall notify the division District III office of its results on form C-141.
**Form C-141 is attached.**

8. If it is determined that a release has occurred, then BP will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.
**Sampling results reveal no evidence of a release had occurred.**

9. If the sampling demonstrates that a release has not occurred or that any release does not exceed the concentrations specified above, then BP shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and re-vegetate the location. The location will be reclaimed if it is not with in the active process area.
**Sampling results reveal no evidence of a release had occurred. BGT area has been backfilled with clean, earthen material after remedial activity has been completed.**

10. BP 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. BP 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 Subsection H of 19.15.17.13 NMAC, re-contour the location and associated areas to a contour that approximates the original contour and blends with the surrounding topography and re-vegetate according to Subsection I of 19.15.17.13 NMAC.
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**

11. The soil cover for closures where the BGT has been removed or remediated to the NMOCD's satisfaction shall consist of the background thickness of topsoil or one foot of suitable material to establish vegetation at the site, whichever is greater. 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.
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**

12. BP shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be accomplished by drilling on the contour whenever practical or by other division-approved methods. Vegetative cover will be, at a minimum, 70% of the native perennial vegetative cover (un-impacted by overgrazing, fire or other intrusion damaging to native vegetation), consisting of at least three native plant species, including at least one grass, but not including noxious weeds, and maintenance of that cover through two successive growing seasons. During the two growing seasons that prove viability, there shall be no artificial irrigation of the vegetation.
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**

13. BP shall seed, plant and re-seed pursuant to Paragraph (3) of Subsection I of 19.15.17.13 NMAC, until the location successfully achieves the required vegetative cover.
**BGT area has been backfilled with clean, earthen material. Reclamation will be completed within the allowable timeframe and will meet the specified requirements of 19.15.17.13 NMAC.**

14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, BP shall notify the NMOCD when it has seeded or planted and when it successfully achieves re-vegetation.
**BP will notify NMOCD when re-vegetation is successfully completed.**

15. Within 60 days of closure completion, BP shall submit a closure report on NMOCD's form C-144, and will include the following;
    a. proof of closure notification (surface owner and NMOCD)
    b. sampling analytical reports; information required by 19.15.17 NMAC;
    c. disposal facility name and permit number
    d. details on back-filling, capping, covering, and where applicable re-vegetation application rates and seeding techniques and
    e. site reclamation, photo documentation.

    **Closure report on Form C-144 form is included & contains a photo of the current reclamation requirements completed.**

16. BP 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.
17. **Certification section of Form C-144 has been completed.**

**From:** Patti Campbell
**Sent:** Wednesday, August 26, 2020 3:35 PM
**To:** 'Smith, Cory, EMNRD' <Cory.Smith@state.nm.us>
**Cc:** Steven Moskal <Steven.Moskal@BPX.COM>; Don Buller <DON.BULLER@BPX.COM>; nvelez@cottonwoodconsulting.com; 'jharter@cottonwoodconsulting.com' <jharter@cottonwoodconsulting.com>; 'ksiesser@cottonwoodconsulting.com' <ksiesser@cottonwoodconsulting.com>
**Subject:** BGT Closure Notification - Northeast Blanco Unit 016A

SENT VIA E-MAIL TO: CORY.SMITH@STATE.NM.US

August 26, 2020

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

**RE: Notice of Proposed Below-Grade Tank (BGT) Closure**

Northeast Blanco Unit 016A
API 30-039-21722
(J) Section 03 – T30N – R07W
~~San Juan~~ County, New Mexico
**Rio Arriba** NV 11/03/2020

Dear Mr. Cory Smith,

In regards to the captioned subject and requirements of the NMOCD pit rule, this letter is notification that BP is planning to close a 35 bbl BGT that will no longer be operational at this well site. We anticipate this work to start on or around September 2, 2020 at 10 AM.

Should you have any questions, please feel free to contact BP.

*Patti Campbell*
*Regulatory Analyst*
BP America Production Company
BPX Energy Inc.
*(970) 712-5997*
*patti.campbell@bpx.com*

bpx energy

On Mon, Aug 31, 2020 at 8:19 AM -0600, "Steven Moskal" <Steven.Moskal@BPX.COM> wrote:

Cory,

We have the NEBU 017A BGT closure scheduled for 11:00 today. Can you approve this permit or provide approval to proceed with the closure?

Thank you,

Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

---

**From:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
**Sent:** Monday, August 31, 2020 2:51:57 PM
**To:** Steven Moskal <Steven.Moskal@BPX.COM>
**Cc:** Nelson Velez <nvelez@cottonwoodconsulting.com>
**Subject:** Re: [EXT] Re: Northeast Blanco Unit 017A BGT Question

**OCD approves the closure for today following all applicable regulations per 19.15.17 NMAC**

**Since OCD has not reviewed the depth to water please treat this as the most stringent standard as of now if there is an issue with the sample results please email me ASAP and we can discuss the ground water.**

**Please include this approval in you closure packet**

**Thank you**

---

**From:** Steven Moskal <Steven.Moskal@BPX.COM>
**Sent:** Monday, August 31, 2020 3:07 PM
**To:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
**Cc:** Nelson Velez <nvelez@cottonwoodconsulting.com>
**Subject:** Re: [EXT] Re: Northeast Blanco Unit 017A BGT Question

Thank you Cory.

Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

**From:** Smith, Cory, EMNRD <Cory.Smith@state.nm.us>
**Sent:** Monday, August 31, 2020 3:08:36 PM
**To:** Steven Moskal <Steven.Moskal@BPX.COM>
**Subject:** RE: [EXT] Re: Northeast Blanco Unit 017A BGT Question

Steve,

Sorry for the late reply I sent that out via my Ipad this morning apparently it didn't go out till I got home.

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

---

**From:** Steven Moskal
**Sent:** Monday, August 31, 2020 3:17 PM
**To:** Smith, Cory, EMNRD
**Cc:** Nelson Velez
**Subject:** Re: [EXT] Re: Northeast Blanco Unit 017A BGT Question

No problem. Thanks for following up.

**We do have two more closures with similar situations scheduled for tomorrow and Wednesday at 11:00 each. They are the NEBU 018 and 016A. Please review and let me know.**

Thanks,

Steve Moskal
Environmental Coordinator
BP - West Business Unit
(505) 330-9179

bp

BP America Production Company
1199 Main Ave., Suite 101

August 26, 2020

Bureau of Land Management
Abiodun Adeloye
6251 College, Suite A
Farmington, NM 87402

**VIA EMAIL**

Re: Notification of plans to close/remove a below grade tank
Well Name: Northeast Blanco Unit 016A
API# - 3003921722

Dear Mr. Adeloye,

As part of the NM "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph J. BP America Production Company (BP) as a contractor operator for SIMCOE LLC is required to notify the surface owner of SIMCOE LLC's plans to close/remove a below grade tank. BP wishes to inform you of SIMCOE's plans to close/remove the below grade tank on its well pad located on your surface. BP plans to commence this work on or about September 2, 2020 at 10 a.m. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, BP will be closing the below grade tank and either operating without one or replacing it with an above ground tank, the well site will continue to operate.

If witnessing of the tank removal is required, please contact Steve Moskal for a specific time (505)-330-9179.

Sincerely,

Patti Campbell

Patti Campbell
BPX – San Juan
Regulatory Analyst

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

State of New Mexico
Energy Minerals and Natural Resources Department

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

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

| | |
|---|---|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

# Release Notification

## Responsible Party

| | |
|---|---|
| Responsible Party **SIMCOE LLC** (BP as contractor) | OGRID **329736** |
| Contact Name **Steve Moskal** | Contact Telephone **(505) 330-9179** |
| Contact email **Steven.Moskal@bpx.com** | Incident # *(assigned by OCD)* |
| Contact mailing address **1199 Main Ave., Suite 101, Durango, CO 81301** | |

## Location of Release Source

Latitude **36.838108** Longitude **-107.554248**
*(NAD 83 in decimal degrees to 5 decimal places)*

| | |
|---|---|
| Site Name **NORTHEAST BLANCO UNIT 016A** | Site Type **Natural Gas Well** |
| Date Release Discovered | API# *(if applicable)* **3003921722** |

| Unit Letter | Section | Township | Range | County |
|---|---|---|---|---|
| **J** | **3** | **30N** | **07W** | **Rio Arriba** |

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

## Nature and Volume of Release

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

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

Cause of Release **TPH, BTEX, & chloride all below below-grade tank (BGT) permit closure standards. No evidence of a release had occurred.**

| | |
|---|---|
| Incident ID | |
| District RP | |
| Facility ID | |
| Application ID | |

| | |
|---|---|
| Was this a major release as defined by 19.15.29.7(A) NMAC?<br><br>☐ Yes ☒ No | If YES, for what reason(s) does the responsible party consider this a major release? |

If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)?

**Not required.**

## Initial Response

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

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

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

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

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

Printed Name: Steve Moskal Title: Environmental Coordinator

Signature: _____ Date: _____

email: Steve.Moskal@bpx.com Telephone: (505) 330-9179

**OCD Only**

Received by: _____ Date: _____

CLIENT: SIMCOE

**COTTONWOOD CONSULTING LLC**
**P.O. BOX 1653, DURANGO, COLO. 81303**
**(970) 764-7356**

API #: 3003921722

TANK ID (if applicble): B

# FIELD REPORT:

(circle one): BGT CONFIRMATION / RELEASE INVESTIGATION / OTHER:

PAGE #: 1 of 1

## SITE INFORMATION:

SITE NAME: NEBU # 16A

DATE STARTED: 09/02/20

DATE FINISHED:

QUAD/UNIT: J SEC: 3 TWP: 30N RNG: 7W PM: NM CNTY: RA ST: NM

1/4 -1/4/FOOTAGE: 1,450'S / 1,450'E NW/SE LEASE TYPE: FEDERAL / STATE / FEE / INDIAN

LEASE #: SF079001 PROD. FORMATION: MV CONTRACTOR: KELLEY O.F.S. SIMCOE - D. BULLER

ENVIRONMENTAL SPECIALIST(S): NJV

## REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.838319 X 107.554142 GL ELEV.: 6,316'

1) 25 BGT (DW/DB) GPS COORD.: 36.838108 X 107.554248 DISTANCE/BEARING FROM P&A: 83', S22W

2) GPS COORD.: DISTANCE/BEARING FROM P&A:

3) GPS COORD.: DISTANCE/BEARING FROM P&A:

4) GPS COORD.: DISTANCE/BEARING FROM P&A:

## SAMPLING DATA:

CHAIN OF CUSTODY RECORD(S) # OR LAB USED: HALL

| | SAMPLE ID: | SAMPLE DATE: | SAMPLE TIME: | LAB ANALYSIS: | OVM READING (ppm) |
|---|---|---|---|---|---|
| 1) | 5PC-TB @ 4' (25) | 09/02/20 | 1010 | 8015B/8021B/300.0 (Cl) | 1.1 |
| 2) | | | | | |
| 3) | | | | | |
| 4) | | | | | |
| 5) | | | | | |

## SOIL DESCRIPTION:

SOIL TYPE: SAND / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER

SOIL COLOR: DARK YELLOWISH BROWN

COHESION (ALL OTHERS): NON COHESIVE / SLIGHTLY COHESIVE / COHESIVE / HIGHLY COHESIVE

CONSISTENCY (NON COHESIVE SOILS): LOOSE / FIRM / DENSE / VERY DENSE

MOISTURE: DRY / SLIGHTLY MOIST / MOIST / WET / SATURATED / SUPER SATURATED

SAMPLE TYPE: GRAB / COMPOSITE - # OF PTS. 5

DISCOLORATION/STAINING OBSERVED: YES / NO EXPLANATION -

PLASTICITY (CLAYS): NON PLASTIC / SLIGHTLY PLASTIC / COHESIVE / MEDIUM PLASTIC / HIGHLY PLASTIC

DENSITY (COHESIVE CLAYS & SILTS): SOFT / FIRM / STIFF / VERY STIFF / HARD

HC ODOR DETECTED: YES / NO EXPLANATION -

ANY AREAS DISPLAYING WETNESS: YES / NO EXPLANATION -

## SITE OBSERVATIONS:

LOST INTEGRITY OF EQUIPMENT: YES / NO EXPLANATION -

APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED : YES / NO EXPLANATION:

EQUIPMENT SET OVER RECLAIMED AREA: YES / NO EXPLANATION -

OTHER: NMOCD / BLM REPS. NOT PRESENT TO WITNESS CONFIRMATION SAMPLING.

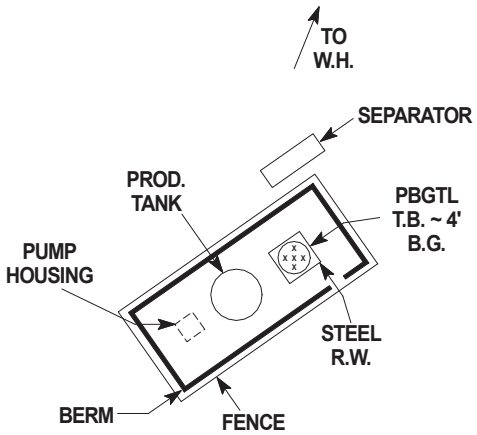
EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards) : NA

DEPTH TO GROUNDWATER: >100' NEAREST WATER SOURCE: >1,000' NEAREST SURFACE WATER: 300'<x<1,000' NMOCD TPH CLOSURE STD: 2,500 ppm

## SITE SKETCH

BGT Located : off / on site

PLOT PLAN circle: attached




OVM CALIB. READ. = 98.7 ppm RF =1.00

OVM CALIB. GAS = 100 ppm

TIME: 10:22 am/pm DATE: 08/31/20

## MISCELL. NOTES

PO:

AFE #:

SIO #:

GL #:

Permit date(s):

OCD Appr. date(s):

| Tank ID | OVM = Organic Vapor Meter ppm = parts per million |
|---|---|
| B | BGT Sidewalls Visible: Y / N |
| | BGT Sidewalls Visible: Y / N |
| | BGT Sidewalls Visible: Y / N |

Magnetic declination: 10° E

NOTES: BGT = BELOW-GRADE TANK; E.D. = EXCAVATION DEPRESSION; B.G. = BELOW GRADE; B = BELOW; T.H. = TEST HOLE; ~ = APPROX.; W.H. = WELL HEAD; T.B. = TANK BOTTOM; PBGTL = PREVIOUS BELOW-GRADE TANK LOCATION; SPD = SAMPLE POINT DESIGNATION; R.W. = RETAINING WALL; NA - NOT APPLICABLE OR NOT AVAILABLE; SW - SINGLE WALL; DW - DOUBLE WALL; SB - SINGLE BOTTOM; DB - DOUBLE BOTTOM.

NOTES: GOOGLE EARTH IMAGERY DATE: 10/5/2016 ONSITE: 09/02/20

**Analytical Report**
Lab Order **2009207**
Date Reported: **9/11/2020**

# Hall Environmental Analysis Laboratory, Inc.

**CLIENT:** SIMCOE/Cottonwood Consulting
**Client Sample ID:** 5PC-TB @ 4' (25)
**Project:** NEBU 16A
**Collection Date:** 9/2/2020 10:10:00 AM
**Lab ID:** 2009207-001 **Matrix:** MEOH (SOIL) **Received Date:** 9/3/2020 8:00:00 AM

| Analyses | Result | RL | Qual | Units | DF | Date Analyzed |
|---|---|---|---|---|---|---|
| **EPA METHOD 8015M/D: DIESEL RANGE ORGANICS** | | | | | | Analyst: **BRM** |
| Diesel Range Organics (DRO) | ND | 9.3 | | mg/Kg | 1 | 9/3/2020 10:29:35 AM |
| Motor Oil Range Organics (MRO) | ND | 46 | | mg/Kg | 1 | 9/3/2020 10:29:35 AM |
| Surr: DNOP | 84.5 | 30.4-154 | | %Rec | 1 | 9/3/2020 10:29:35 AM |
| **EPA METHOD 8015D: GASOLINE RANGE** | | | | | | Analyst: **NSB** |
| Gasoline Range Organics (GRO) | ND | 4.5 | | mg/Kg | 1 | 9/3/2020 9:03:22 AM |
| Surr: BFB | 91.3 | 75.3-105 | | %Rec | 1 | 9/3/2020 9:03:22 AM |
| **EPA METHOD 8021B: VOLATILES** | | | | | | Analyst: **NSB** |
| Benzene | ND | 0.022 | | mg/Kg | 1 | 9/3/2020 9:03:22 AM |
| Toluene | ND | 0.045 | | mg/Kg | 1 | 9/3/2020 9:03:22 AM |
| Ethylbenzene | ND | 0.045 | | mg/Kg | 1 | 9/3/2020 9:03:22 AM |
| Xylenes, Total | ND | 0.089 | | mg/Kg | 1 | 9/3/2020 9:03:22 AM |
| Surr: 4-Bromofluorobenzene | 94.7 | 80-120 | | %Rec | 1 | 9/3/2020 9:03:22 AM |
| **EPA METHOD 300.0: ANIONS** | | | | | | Analyst: **MRA** |
| Chloride | ND | 60 | | mg/Kg | 20 | 9/3/2020 11:56:17 AM |

Refer to the QC Summary report and sample login checklist for flagged QC data and preservation information.

**Qualifiers:**

| | | | |
|---|---|---|---|
| * | Value exceeds Maximum Contaminant Level. | B | Analyte detected in the associated Method Blank |
| D | Sample Diluted Due to Matrix | E | Value above quantitation range |
| H | Holding times for preparation or analysis exceeded | J | Analyte detected below quantitation limits |
| ND | Not Detected at the Reporting Limit | P | Sample pH Not In Range |
| PQL | Practical Quanitative Limit | RL | Reporting Limit |
| S | % Recovery outside of range due to dilution or matrix | | |

# Chain-of-Custody Record

Client: SIMCOE LLC / COTTONWOOD CONSULTING

Mailing Address: 1100 MAIN ST.
DURANGO, COLO. 81301

Phone #: (505) 330-9179

email or Fax#:

QA/QC Package:
☑ Standard ☐ Level 4 (Full Validation)

Accreditation:
☐ NELAP ☐ Other
☐ EDD (Type)

Turn-Around Time:
☐ Standard ☑ Rush SAME DAY

Project Name:
**NEBU # 16A**

Project #:

Project Manager:
**STEVE MOSKAL**

Sampler: N.V.

On Ice: ☒ Yes ☐ No

Sample Temperature: 5.3 ± 0 = 5.3

**HALL ENVIRONMENTAL ANALYSIS LABORATORY**
www.hallenvironmental.com
4901 Hawkins NE - Albuquerque, NM 87109
Tel. 505-345-3975 Fax 505-345-4107

Analysis Request

| Date | Time | Matrix | Sample Request ID | Container Type and # | Preservative Type | HEAL No. | BTEX ~~+ MTBE + TMB's~~ (8021B) | BTEX + MTBE + TPH (Gas only) | TPH 8015B (GRO / DRO / MRO) | TPH (Method 418.1) | EDB (Method 504.1) | PAH (8310 or 8270SIMS) | RCRA 8 Metals | Anions ($F,Cl,NO_3,NO_2,PO_4,SO_4$) | 8081 Pesticides / 8082 PCB's | 8260B (VOA) | 8270 (Semi-VOA) | Chloride (soil - 300.0 / water - 300.1) | | Grab sample | 5 pt. composite sample | Air Bubbles (Y or N) |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 9/2/20 | 1010 | SOIL | 5PC - TB @ 4' (25) | 4 oz. - 1 | Cool | -001 | ✓ | | ✓ | | | | | | | | | ✓ | | | ✓ | |

| Date: | Time: | Relinquished by: | Received by: | Date | Time |
|---|---|---|---|---|---|
| 9/2/20 | 1447 | | | 9/2/2020 | 1447 |
| 9/2/2020 | 1839 | | | 9/3/20 | 0800 |

Remarks: BILL DIRECTLY TO SIMCOE LLC USING INFORMATION BELOW.

CONTACT: Steve Moskal / Don Buller

PO #: Related to 2020 BGT Compliance

If necessary, samples submitted to Hall Environmental may be subcontracted to other accredited laboratories. This serves as notice of this possibility. Any sub-contracted data will be clearly notated on the analytical report.

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **2009207**

***11-Sep-20***

**Client:** SIMCOE/Cottonwood Consulting

**Project:** NEBU 16A

Sample ID: **MB-54923** SampType: **mblk** TestCode: **EPA Method 300.0: Anions**
Client ID: **PBS** Batch ID: **54923** RunNo: **71625**
Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2503572** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | ND | 1.5 | | | | | | | | |

Sample ID: **LCS-54923** SampType: **lcs** TestCode: **EPA Method 300.0: Anions**
Client ID: **LCSS** Batch ID: **54923** RunNo: **71625**
Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2503573** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | 14 | 1.5 | 15.00 | 0 | 95.1 | 90 | 110 | | | |

Sample ID: **MB-54923** SampType: **mblk** TestCode: **EPA Method 300.0: Anions**
Client ID: **PBS** Batch ID: **54923** RunNo: **71593**
Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2503991** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | ND | 1.5 | | | | | | | | |

Sample ID: **LCS-54923** SampType: **lcs** TestCode: **EPA Method 300.0: Anions**
Client ID: **LCSS** Batch ID: **54923** RunNo: **71593**
Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2503992** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Chloride | 14 | 1.5 | 15.00 | 0 | 96.3 | 90 | 110 | | | |

**Qualifiers:**

| | |
|---|---|
| * | Value exceeds Maximum Contaminant Level. |
| D | Sample Diluted Due to Matrix |
| H | Holding times for preparation or analysis exceeded |
| ND | Not Detected at the Reporting Limit |
| PQL | Practical Quanitative Limit |
| S | % Recovery outside of range due to dilution or matrix |
| B | Analyte detected in the associated Method Blank |
| E | Value above quantitation range |
| J | Analyte detected below quantitation limits |
| P | Sample pH Not In Range |
| RL | Reporting Limit |

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **2009207**

***11-Sep-20***

**Client:** SIMCOE/Cottonwood Consulting

**Project:** NEBU 16A

Sample ID: **LCS-54917** SampType: **LCS** TestCode: **EPA Method 8015M/D: Diesel Range Organics**

Client ID: **LCSS** Batch ID: **54917** RunNo: **71591**

Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2501940** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Diesel Range Organics (DRO) | 57 | 10 | 50.00 | 0 | 113 | 70 | 130 | | | |
| Surr: DNOP | 4.9 | | 5.000 | | 97.5 | 30.4 | 154 | | | |

Sample ID: **MB-54917** SampType: **MBLK** TestCode: **EPA Method 8015M/D: Diesel Range Organics**

Client ID: **PBS** Batch ID: **54917** RunNo: **71591**

Prep Date: **9/3/2020** Analysis Date: **9/3/2020** SeqNo: **2501948** Units: **mg/Kg**

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Diesel Range Organics (DRO) | ND | 10 | | | | | | | | |
| Motor Oil Range Organics (MRO) | ND | 50 | | | | | | | | |
| Surr: DNOP | 8.5 | | 10.00 | | 85.1 | 30.4 | 154 | | | |

**Qualifiers:**

| | |
|---|---|
| * | Value exceeds Maximum Contaminant Level. |
| D | Sample Diluted Due to Matrix |
| H | Holding times for preparation or analysis exceeded |
| ND | Not Detected at the Reporting Limit |
| PQL | Practical Quanitative Limit |
| S | % Recovery outside of range due to dilution or matrix |
| B | Analyte detected in the associated Method Blank |
| E | Value above quantitation range |
| J | Analyte detected below quantitation limits |
| P | Sample pH Not In Range |
| RL | Reporting Limit |

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **2009207**

***11-Sep-20***

**Client:** SIMCOE/Cottonwood Consulting

**Project:** NEBU 16A

| Sample ID: **2.5ug gro lcs** | SampType: **LCS** | TestCode: **EPA Method 8015D: Gasoline Range** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **R71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503173** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Gasoline Range Organics (GRO) | 20 | 5.0 | 25.00 | 0 | 81.2 | 72.5 | 106 | | | |
| Surr: BFB | 1100 | | 1000 | | 106 | 75.3 | 105 | | | S |

| Sample ID: **2009207-001ams** | SampType: **MS** | TestCode: **EPA Method 8015D: Gasoline Range** |
|---|---|---|
| Client ID: **5PC-TB @ 4' (25)** | Batch ID: **R71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503196** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Gasoline Range Organics (GRO) | 20 | 4.5 | 22.36 | 0 | 90.8 | 61.3 | 114 | | | |
| Surr: BFB | 980 | | 894.5 | | 109 | 75.3 | 105 | | | S |

| Sample ID: **2009207-001amsd** | SampType: **MSD** | TestCode: **EPA Method 8015D: Gasoline Range** |
|---|---|---|
| Client ID: **5PC-TB @ 4' (25)** | Batch ID: **R71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503197** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Gasoline Range Organics (GRO) | 21 | 4.5 | 22.36 | 0 | 92.6 | 61.3 | 114 | 2.05 | 20 | |
| Surr: BFB | 990 | | 894.5 | | 111 | 75.3 | 105 | 0 | 0 | S |

| Sample ID: **mb1** | SampType: **MBLK** | TestCode: **EPA Method 8015D: Gasoline Range** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **R71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503199** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Gasoline Range Organics (GRO) | ND | 5.0 | | | | | | | | |
| Surr: BFB | 970 | | 1000 | | 96.8 | 75.3 | 105 | | | |

**Qualifiers:**

| | |
|---|---|
| * | Value exceeds Maximum Contaminant Level. |
| D | Sample Diluted Due to Matrix |
| H | Holding times for preparation or analysis exceeded |
| ND | Not Detected at the Reporting Limit |
| PQL | Practical Quanitative Limit |
| S | % Recovery outside of range due to dilution or matrix |
| B | Analyte detected in the associated Method Blank |
| E | Value above quantitation range |
| J | Analyte detected below quantitation limits |
| P | Sample pH Not In Range |
| RL | Reporting Limit |

# QC SUMMARY REPORT

## Hall Environmental Analysis Laboratory, Inc.

WO#: **2009207**

***11-Sep-20***

**Client:** SIMCOE/Cottonwood Consulting

**Project:** NEBU 16A

| Sample ID: **100NG BTEX LCS** | SampType: **LCS** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **LCSS** | Batch ID: **BS71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503207** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | 0.90 | 0.025 | 1.000 | 0 | 89.7 | 80 | 120 | | | |
| Toluene | 0.93 | 0.050 | 1.000 | 0 | 92.7 | 80 | 120 | | | |
| Ethylbenzene | 0.93 | 0.050 | 1.000 | 0 | 93.5 | 80 | 120 | | | |
| Xylenes, Total | 2.8 | 0.10 | 3.000 | 0 | 94.6 | 80 | 120 | | | |
| Surr: 4-Bromofluorobenzene | 0.99 | | 1.000 | | 99.2 | 80 | 120 | | | |

| Sample ID: **mb1** | SampType: **MBLK** | TestCode: **EPA Method 8021B: Volatiles** |
|---|---|---|
| Client ID: **PBS** | Batch ID: **BS71590** | RunNo: **71590** |
| Prep Date: | Analysis Date: **9/3/2020** | SeqNo: **2503233** Units: **mg/Kg** |

| Analyte | Result | PQL | SPK value | SPK Ref Val | %REC | LowLimit | HighLimit | %RPD | RPDLimit | Qual |
|---|---|---|---|---|---|---|---|---|---|---|
| Benzene | ND | 0.025 | | | | | | | | |
| Toluene | ND | 0.050 | | | | | | | | |
| Ethylbenzene | ND | 0.050 | | | | | | | | |
| Xylenes, Total | ND | 0.10 | | | | | | | | |
| Surr: 4-Bromofluorobenzene | 0.97 | | 1.000 | | 97.0 | 80 | 120 | | | |

**Qualifiers:**

| | |
|---|---|
| * | Value exceeds Maximum Contaminant Level. |
| D | Sample Diluted Due to Matrix |
| H | Holding times for preparation or analysis exceeded |
| ND | Not Detected at the Reporting Limit |
| PQL | Practical Quanitative Limit |
| S | % Recovery outside of range due to dilution or matrix |
| B | Analyte detected in the associated Method Blank |
| E | Value above quantitation range |
| J | Analyte detected below quantitation limits |
| P | Sample pH Not In Range |
| RL | Reporting Limit |

HALL ENVIRONMENTAL ANALYSIS LABORATORY

*Hall Environmental Analysis Laboratory*
*4901 Hawkins NE*
*Albuquerque, NM 87109*
*TEL: 505-345-3975 FAX: 505-345-4107*
*Website: clients.hallenvironmental.com*

# Sample Log-In Check List

Client Name: SIMCOE/Cottonwood Con  Work Order Number: 2009207  RcptNo: 1

Received By: Cheyenne Cason  9/3/2020 8:00:00 AM

Completed By: Isaiah Ortiz  9/3/2020 8:21:49 AM  I-OK

Reviewed By: EM 9/3/20

## Chain of Custody

| | | | |
|---|---|---|---|
| 1. Is Chain of Custody complete? | Yes ☑ | No ☐ | Not Present ☐ |
| 2. How was the sample delivered? | Courier | | |

## Log In

| | | | |
|---|---|---|---|
| 3. Was an attempt made to cool the samples? | Yes ☑ | No ☐ | NA ☐ |
| 4. Were all samples received at a temperature of >0° C to 6.0°C | Yes ☑ | No ☐ | NA ☐ |
| 5. Sample(s) in proper container(s)? | Yes ☑ | No ☐ | |
| 6. Sufficient sample volume for indicated test(s)? | Yes ☑ | No ☐ | |
| 7. Are samples (except VOA and ONG) properly preserved? | Yes ☑ | No ☐ | |
| 8. Was preservative added to bottles? | Yes ☐ | No ☑ | NA ☐ |
| 9. Received at least 1 vial with headspace <1/4" for AQ VOA? | Yes ☐ | No ☐ | NA ☑ |
| 10. Were any sample containers received broken? | Yes ☐ | No ☑ | |
| 11. Does paperwork match bottle labels? (Note discrepancies on chain of custody) | Yes ☑ | No ☐ | # of preserved bottles checked for pH: (<2 or >12 unless noted) |
| 12. Are matrices correctly identified on Chain of Custody? | Yes ☑ | No ☐ | Adjusted? |
| 13. Is it clear what analyses were requested? | Yes ☑ | No ☐ | |
| 14. Were all holding times able to be met? (If no, notify customer for authorization.) | Yes ☑ | No ☐ | Checked by: CM 9/3/20 |

## Special Handling (if applicable)

15. Was client notified of all discrepancies with this order? Yes ☐ No ☐ NA ☑

Person Notified: _____ Date: _____

By Whom: _____ Via: ☐ eMail ☐ Phone ☐ Fax ☐ In Person

Regarding: _____

Client Instructions: _____

16. Additional remarks:

17. Cooler Information

| Cooler No | Temp °C | Condition | Seal Intact | Seal No | Seal Date | Signed By |
|---|---|---|---|---|---|---|
| 1 | 5.3 | Good | Yes | | | |


SIMCOE LLC
In case of emergency, please call: 505-947-9900
N. E. BLANCO UNIT Nº 16A
1450' F/SL & 1450' F/EL
SEC. 3 - T 30N - R 7 W
SANTA FE 079001
RIO ARRIBA COUNTY . NEW MEXICO


Previous 25 bbl BGT
Position (Tank ID: B)
B

**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 11169

## CONDITIONS

| | |
|---|---|
| Operator:<br>SIMCOE LLC<br>1199 Main Ave., Suite 101<br>Durango, CO 81301 | OGRID:<br>329736 |
| | Action Number:<br>11169 |
| | Action Type:<br>[C-144] PIT Generic Plan (C-144) |

**CONDITIONS**

| Created By | Condition | Condition Date |
|---|---|---|
| vvenegas | None | 12/22/2021 |