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 April 3, 2017

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

Type of action: ☐ Below grade tank registration
☐ Permit of a pit or proposed alternative method
BGT 1 ☑ Closure of a pit, below-grade tank, or proposed alternative method
☐ Modification to an existing permit/or registration
☐ Closure plan only submitted for an existing permitted or non-permitted pit, below-grade tank, or proposed alternative method

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 OGRID #: 329736
Address: 1199 Main Ave., Suite 101 Durango, CO 81301
Facility or well name: Gallegos Canyon Unit 021
API Number: 30-045-07420 OCD Permit Number: _____
U/L or Qtr/Qtr M Section 18 Township 28N Range 12W County: San Juan County
Center of Proposed Design: Latitude 36.6577 Longitude -108.15507 NAD83
Surface Owner: ☐ 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.
☑ **Below-grade tank:** Subsection I of 19.15.17.11 NMAC Tank ID: A
Volume: 95 bbl Type of fluid: Produc
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 - side walls 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 4' hogwire with single barbed wire

6.

Netting: Subsection E of 19.15.17.11 NMAC *(Applies to permanent pits and permanent open top tanks)*

☐ Screen ☐ Netting ☐ Other_____

☐ Monthly inspections (If netting or screening is not physically feasible)

7.

Signs: Subsection C of 19.15.17.11 NMAC

☐ 12"x 24", 2" lettering, providing Operator's name, site location, and emergency telephone numbers

☑ Signed in compliance with 19.15.16.8 NMAC

8.

Variances and Exceptions:

Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.

Please check a box if one or more of the following is requested, if not leave blank:

☐ Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.

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

9.

Siting Criteria (regarding permitting): 19.15.17.10 NMAC

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

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

Within 100 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Temporary Pit Non-low chloride drilling fluid	
Within 300 feet of a continuously flowing watercourse, or any other significant watercourse, or within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a private, domestic fresh water well used by less than five households for domestic or stock watering purposes, or 1000 feet of any other fresh water well or spring, in the existence at the time of the initial application; - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 300 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Permanent Pit or Multi-Well Fluid Management Pit	
Within 300 feet of a continuously flowing watercourse, or 200 feet of any other significant watercourse, or lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 1000 feet from a permanent residence, school, hospital, institution, or church in existence at the time of initial application. - Visual inspection (certification) of the proposed site; Aerial photo; Satellite image	☐ Yes ☐ No
Within 500 horizontal feet of a spring or a fresh water well used for domestic or stock watering purposes, in existence at the time of initial application. - NM Office of the State Engineer - iWATERS database search; Visual inspection (certification) of the proposed site	☐ Yes ☐ No
Within 500 feet of a wetland. - US Fish and Wildlife Wetland Identification map; Topographic map; Visual inspection (certification) of the proposed site	☐ Yes ☐ No

10.

Temporary Pits, Emergency Pits, and Below-grade Tanks Permit Application Attachment Checklist: Subsection B of 19.15.17.9 NMAC

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

☑ Hydrogeologic Report (Below-grade Tanks) - based upon the requirements of Paragraph (4) of Subsection B of 19.15.17.9 NMAC
☐ Hydrogeologic Data (Temporary and Emergency Pits) - based upon the requirements of Paragraph (2) of Subsection B of 19.15.17.9 NMAC
☑ Siting Criteria Compliance Demonstrations - based upon the appropriate requirements of 19.15.17.10 NMAC
☑ Design Plan - based upon the appropriate requirements of 19.15.17.11 NMAC
☑ Operating and Maintenance Plan - based upon the appropriate requirements of 19.15.17.12 NMAC
☑ Closure Plan (Please complete Boxes 14 through 18, if applicable) - based upon the appropriate requirements of Subsection C of 19.15.17.9 NMAC and 19.15.17.13 NMAC

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

11.

Multi-Well Fluid Management Pit Checklist: Subsection B of 19.15.17.9 NMAC

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

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

☐ Previously Approved Design (attach copy of design) API Number: _____ or Permit Number: _____

12.
Permanent Pits Permit Application Checklist: Subsection B of 19.15.17.9 NMAC
Instructions: Each of the following items must be attached to the application. Please indicate, by a check mark in the box, that the documents are attached.

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

13.
Proposed Closure: 19.15.17.13 NMAC
Instructions: Please complete the applicable boxes, Boxes 14 through 18, in regards to the proposed closure plan.

Type: ☐ Drilling ☐ Workover ☐ Emergency ☐ Cavitation ☐ P&A ☐ Permanent Pit ☑ Below-grade Tank ☐ Multi-well Fluid Management Pit ☐ Alternative

Proposed Closure Method: ☑ Waste Excavation and Removal
☐ Waste Removal (Closed-loop systems only)
☐ On-site Closure Method (Only for temporary pits and closed-loop systems)
☐ In-place Burial ☐ On-site Trench Burial
☐ Alternative Closure Method

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

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

15.
Siting Criteria (regarding on-site closure methods only): 19.15.17.10 NMAC
Instructions: Each siting criteria requires a demonstration of compliance in the closure plan. Recommendations of acceptable source material are provided below. Requests regarding changes to certain siting criteria require justifications and/or demonstrations of equivalency. Please refer to 19.15.17.10 NMAC for guidance.

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

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

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

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

17.
Operator Application Certification:

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

Name (Print): Sabre Beebe Title: Field Environmental Coordinator

Signature: Sabre Beebe Date: 1/27/2022

e-mail address: sabre.beebe@ikavenergy.com Telephone: 970-852-5172

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

OCD Representative Signature: CRWhitehead **Approval Date:** February 3, 2022

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:** 12/02/2021

20.
Closure Method:

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

☐ If different from approved plan, please explain.

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

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

On-site Closure Location: Latitude 36.6577 Longitude -108.15507 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): Sabre Beebe Title: Field Environmental Coordinator

Signature: Sabre Beebe Date: 2/3/2021

e-mail address: sabre.beebe@ikavenergy.com Telephone: 970-852-5172

SIMCOE LLC (Previously BP America)
SAN JUAN BASIN, NORTHWEST NEW MEXICO
Gallegos Canyon Unit 021
Tank ID A
Unit Letter M, Section 18, T28N, R12W

Below-Grade Tank Closure Plan

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGTs) on this SIMCOE, LLC well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, SIMCOE, LLC 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. SIMCOE, LLC 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 SIMCOE, LLC NMOCD approved BGT design attached to the SIMCOE, LLC Design and Construction Plan. SIMCOE, LLC 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 SIMCOE, LLC NMOCD approve BGT Design attached to the SIMCOE, LLC Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. SIMCOE, LLC 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. SIMCOE, LLC 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. SIMCOE, LLC 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 is Attached

3. SIMCOE, LLC 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 utilized are:

    a. JFJ Land farm, Permit NM-01-010(B) (Solids and Sludge)
    b. Basin Disposal, Permit NM-01-0005 (Liquids)
    c. Envirotech Inc Soil Remediation Facility, Permit NM-01-0011 (Solids and Sludge)
    d. Simcoe, LLC Operated 13 GCU SWD # 1, API 30-045-28601 (Liquids)
    e. Simcoe, LLC Operated GCU 259 SWD, API 30-045-20006(Liquids)
    f. Simcoe, LLC Operated GCU 306 SWD, API30-045-24286 (Liquids)
    g. Simcoe, LLC Operated GCU 307 SWD, API30-045-24248 (Liquids)

h. Simcoe, LLC Operated GCU 328 SWD, API 30-045-24735(Liquids)
i. Simcoe, LLC Operated Pritchard SWD #1, API 30-045-28351 (Liquids)

Any liquids and/or sludge within the tank were removed and sent to one of the above NMOCD facilities for disposal.

4. Simcoe, LLC 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 tank was transported for reuse or recycling. No liner present.

5. Simcoe, LLC shall remove any on-site equipment associated with a BGT unless the equipment is required for well production. Equipment associated with the tank was removed.

6. Simcoe, LLC shall sample the soils beneath the BGT to determine whether a release has occurred. Simcoe, LLC 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.

Table 1
Closure Criteria for Soils Beneath Below-Grade Tanks

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

Soil beneath tank sampled for TPH, BTEX, and Chloride. TPH and BTEX were non-detect and chloride was below current NMOCD standard for BGT closures and releases.

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

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

8. If it is found that a release has occurred, then Simcoe, LLC will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate. No evidence of a release. See attached C-141.

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. No evidence of a release. Area was backfilled/re-graded. AST to be installed at location of former BGT.

10. Simcoe, LLC 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, LLC 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. 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. No evidence of a release. Area was backfilled/re-graded. AST to be installed at location of former BGT.

11. Simcoe, LLC shall seed the disturbed area the first growing season after closure of the BGT. Seeding will be conducted 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-affected 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. Area was backfilled/re-graded. AST to be installed at location of former BGT.

12. Simcoe, LLC 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. AST to be installed at location of former BGT. Seeding will occur after eventual AST removal.

13. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, Simcoe, LLC shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation. AST to be installed at location of former BGT. Seeding will occur after eventual AST removal.

14. Within 60 days of closure completion, Simcoe, LLC 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. Disposal Facility Name and Permit Number

Closure report on Form C-144 is included in and contains the required information.

15. Simcoe, LLC 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. Certification section of Form C-144 has been completed.

Miles Venzara
Surface Land Negotiator

IKAV ENERGY
1199 Main Ave. Suite 101
Durango, Colorado 81301
Telephone: 970-852-5145
miles.venzara@ikavenergy.com

November 29, 2021

B Square Ranch
C/O Tommy Bolack
3901 Bloomfield Hwy
Farmington, NM 87401

Re: Notification of plans to close/remove a below grade tank
Well Name: Gallegos Canyon Unit 021
API# - 30-045-07420
M-18-28N-12W
San Juan County, NM

Dear Mr. Bolack,

As part of the New Mexico "Pit Rule": 19.15.17.13 Closure Requirements, Paragraph E (1). SIMCOE LLC (SIMCOE) is required to notify the surface owner of SIMCOE's plans to close/remove a below grade tank. SIMCOE wishes to inform you of our plans to close/remove the below grade tank on its well pad located on your surface. SIMCOE plans to commence this work on or about December 1, 2021 at 10 a.m. Barring any unforeseen issues, the work should be completed within 10 working days.

As a point of clarification, SIMCOE 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 you have any questions, please don't hesitate to contact me at 970-852-5145.

Sincerely,

Miles Venzara

Kyle Siesser

From: Gina Doerner <gina.doerner@ikavenergy.com>
Sent: Tuesday, November 16, 2021 10:41 AM
To: ocd.enviro@state.nm.us
Cc: Smith, Cory, EMNRD; Don Buller; Julie Best
Subject: SIMCOE LLC - Gallegos Canyon Unit 021 Below Grade Tank (BGT) Closure

SENT VIA E-MAIL

November 16, 2021

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

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

Gallegos Canyon Unit 021
API 30-045-07420
M-18-28N-12W
San Juan County, New Mexico

To Whom It May Concern:

With regards to the captioned subject well and requirements of the NMOCD Pit Rule 19.15.17.13, this letter is notification that SIMCOE LLC is planning to close a 95 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around December 1, 2021 at 10:00 AM.

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

Sincerely,

Gina Doerner
Regulatory Analyst

IKAV Energy Inc.
SIMCOE LLC

1199 Main Ave., Ste 101
Durango, CO 81301
Direct: 970- 852-0082
Mobile: 970- 247-2178
Gina.Doerner@ikavenergy.com

Kyle Siesser

From: Gina Doerner <gina.doerner@ikavenergy.com>
Sent: Tuesday, November 16, 2021 10:34 AM
To: Julie Best; Miles Venzara
Subject: FW: Well Name: GALLEGOS CANYON UNIT, Well Number: 21, Notification of Sundry Received

FYI

From: AFMSS <blm-afmss-notifications@blm.gov>
Sent: Tuesday, November 16, 2021 10:29 AM
To: Gina Doerner <gina.doerner@ikavenergy.com>
Subject: Well Name: GALLEGOS CANYON UNIT, Well Number: 21, Notification of Sundry Received

The Bureau of Land Management

Notice Of Intent Receipt

- Operator Name: **SIMCOE LLC**
- Well Name: **GALLEGOS CANYON UNIT**
- Well Number: **21**
- US Well Number: **3004507420**
- Sundry ID: **2644473**

The BLM received your Notice Of Intent, Other sundry on 11/16/2021. This is to notify you that we are processing your sundry.

You may contact the field office if you have any questions.

If we need more information we will contact you. Thank you.

This notification is automatically generated. Please do not reply to this message as this account is not monitored.

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

State of New Mexico
Energy Minerals and Natural Resources Department

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party **SIMCOE, LLC**	OGRID **329736**
Contact Name **Julie Best**	Contact Telephone **(970) 828-4060**
Contact email **julie.best@ikavenergy.com**	Incident # *(assigned by OCD)*
Contact mailing address **1199 Main Ave., Suite 101 Durango, CO 81303**	

Location of Release Source

Latitude **36.657748** Longitude **-108.155003**
(NAD 83 in decimal degrees to 5 decimal places)

Site Name **Gallegos Canyon Unit 021**	Site Type **Natural Gas Well**
Date Release Discovered 12/14/21	API# *(if applicable)* **3004507420**

Unit Letter	Section	Township	Range	County
M	**18**	**28N**	**12W**	**San Juan**

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

Nature and Volume of Release

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

☐ Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
☐ Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	☐ Yes ☐ No Unknown
☐ 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 **Soil beneath BGT was sampled following BGT removal. TPH and BTEX were non-detect and chloride was below the current NMOCD standard for BGT closures and releases. No sign of release in the field based on visual and olfactory observations. No sign of BGT leakage.**

State of New Mexico
Oil Conservation Division

Incident ID	
District RP	
Facility ID	
Application ID	

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

Initial Response

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

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

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

No evidence of released materials in the field. No free liquids or recoverable materials observed. Area backfilled and AST to be installed at former location of BGT.

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.

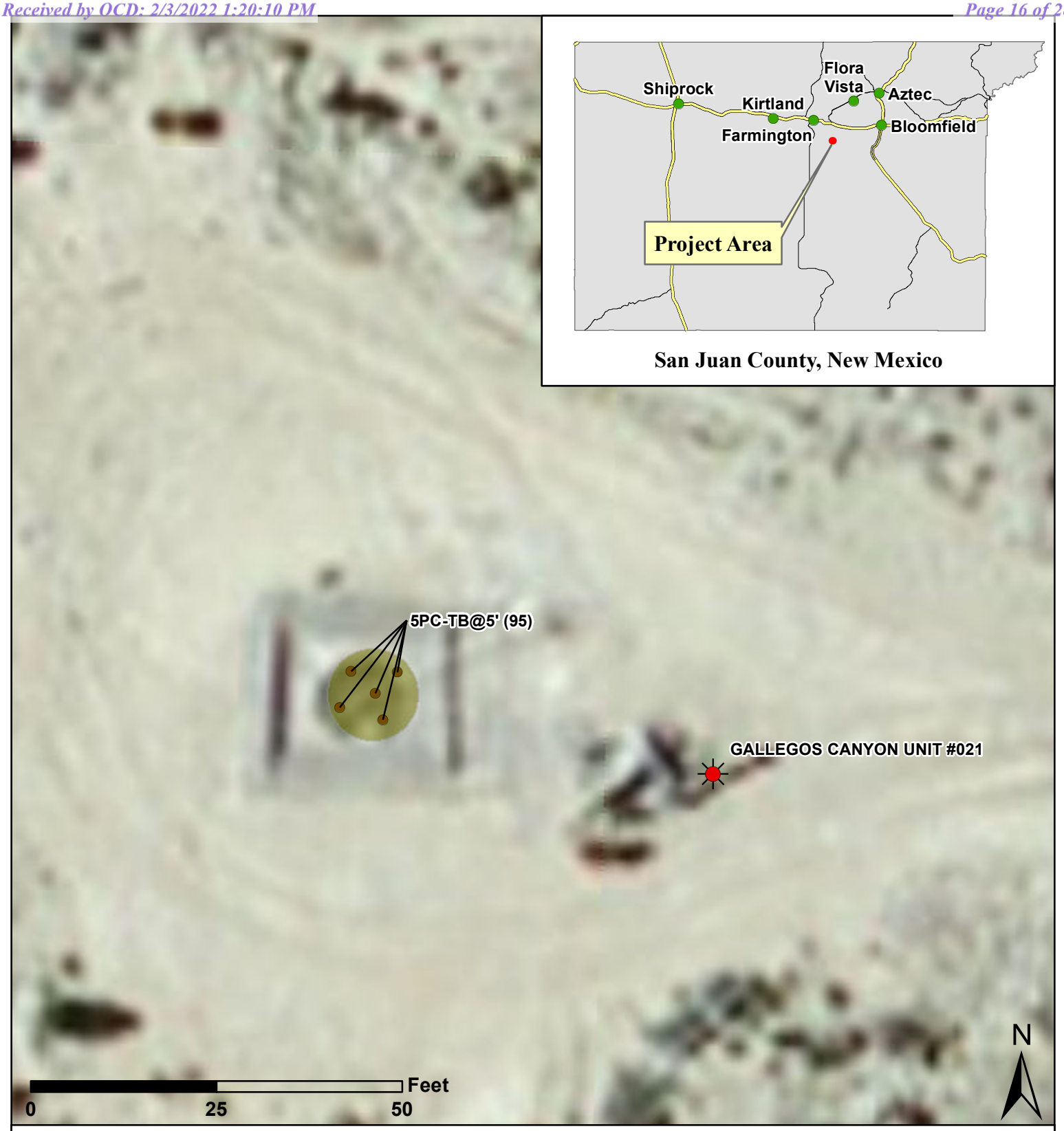
Printed Name: Julie Best Title: HSE and Measurement Manager

Signature: Julie Best Date: 12/15/21

email: julie.best@ikavenergy.com Telephone: (970) 828-4060

OCD Only

Received by: _____ Date: _____



Notes: Sample collected 12/2/2021. Sample 5PC-TB@5' (95) is a five point composite sample.

Legend

- Soil Sample Location
- Oil & Gas Wells
- Approximate Former BGT Location

Cottonwood CONSULTING

Mapping by: E. Millar, 12/15/2021
Coordinate System:
NAD 1983 UTM Zone 13 N

Location: Sec 18 T28N R12W NMPM

Figure 1
Gallegos Canyon Unit #021
Project Map
Simcoe LLC

CLIENT: Simcoe LLC

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

API #: 3004507420
TANK ID (if applicble): A

FIELD REPORT:

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

PAGE #: 1 of 1

SITE INFORMATION:

SITE NAME: Gallegos Canyon Unit 021
DATE STARTED: 12/2/21
DATE FINISHED: 12/2/21
QUAD/UNIT: M SEC: 18 TWP: 28N RNG: 12W PM: NM CNTY: SJ ST: NM
1/4 -1/4/FOOTAGE: LEASE TYPE: (FEDERAL) / STATE / FEE / INDIAN
LEASE #: 013860-A/SF 078106 PROD. FORMATION: Pictured Cliffs CONTACT CONTRACTOR: Halo
ENVIRONMENTAL SPECIALIST(S): KS

REFERENCE POINT:

WELL HEAD (W.H.) GPS COORD.: 36.6577, -108.1548 GL ELEV.: 5646

1) 95 BBLs Steel tank "A"	GPS COORD.: 36.6577, -108.1550	DISTANCE/BEARING FROM P&A: 43', 276°
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)	SPC-TB@5'(95)	12/2/21	1020	8015 M/D, 8021B, 300.0 (Cl)	0.0
2)					
3)					
4)					
5)					

SOIL DESCRIPTION:

SOIL TYPE: (SAND) / SILTY SAND / SILT / SILTY CLAY / CLAY / GRAVEL / OTHER
SOIL COLOR: 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:

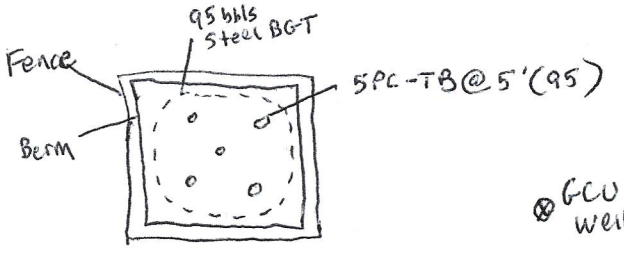
LOST INTEGRITY OF EQUIPMENT: YES / (NO) EXPLANATION -
APPARENT EVIDENCE OF A RELEASE OBSERVED AND/OR OCCURRED: YES / (NO) EXPLANATION:
EQUIPMENT SET OVER RECLAIMED AREA: (YES) / NO EXPLANATION - Plan to install AST (300 BBLs) over reclaimed area.
OTHER:

EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): NA
DEPTH TO GROUNDWATER: 750' NEAREST WATER SOURCE: 7300' NEAREST SURFACE WATER: 7300' NMOCD TPH CLOSURE STD: ppm

SITE SKETCH

BGT Located: off / (on) site

PLOT PLAN circle: attached



OVM CALIB. READ. = 100 ppm RF = 1.00
OVM CALIB. GAS = 100 ppm
TIME: 0930 am/pm DATE: 12/2/21

MISCELL. NOTES

Permit date(s): 6/2/2010
OCD Appr. date(s): 3/7/2017

Tank ID	OVM = Organic Vapor Meter ppm = parts per million
A	BGT Sidewalls Visible: Y / (N)
	BGT Sidewalls Visible: Y / N
	BGT Sidewalls Visible: Y / N

Magnetic declination:

NOTES: BGT = BELOW-GRADE TANK; ED. = EXCAVATION DEPRESSION; BG = 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: ONSITE: 12/2/21

Analytical Report
Lab Order **2112234**
Date Reported: **12/10/2021**

Hall Environmental Analysis Laboratory, Inc.

CLIENT: SIMCOE
Client Sample ID: 5PC-TB@5'(.95)
Project: Gallegos Canyon Unit 021
Collection Date: 12/2/2021 10:20:00 AM
Lab ID: 2112234-001 **Matrix:** SOIL **Received Date:** 12/3/2021 8:00:00 AM

Analyses	Result	RL	Qual	Units	DF	Date Analyzed
EPA METHOD 8015M/D: DIESEL RANGE ORGANICS						Analyst: **JME**
Diesel Range Organics (DRO)	ND	9.8		mg/Kg	1	12/8/2021 9:30:08 PM
Motor Oil Range Organics (MRO)	ND	49		mg/Kg	1	12/8/2021 9:30:08 PM
Surr: DNOP	87.8	70-130		%Rec	1	12/8/2021 9:30:08 PM
EPA METHOD 8015D: GASOLINE RANGE						Analyst: **mb**
Gasoline Range Organics (GRO)	ND	4.9		mg/Kg	1	12/7/2021 4:40:00 PM
Surr: BFB	90.8	70-130		%Rec	1	12/7/2021 4:40:00 PM
EPA METHOD 8021B: VOLATILES						Analyst: **mb**
Benzene	ND	0.025		mg/Kg	1	12/7/2021 4:40:00 PM
Toluene	ND	0.049		mg/Kg	1	12/7/2021 4:40:00 PM
Ethylbenzene	ND	0.049		mg/Kg	1	12/7/2021 4:40:00 PM
Xylenes, Total	ND	0.099		mg/Kg	1	12/7/2021 4:40:00 PM
Surr: 4-Bromofluorobenzene	80.2	70-130		%Rec	1	12/7/2021 4:40:00 PM
EPA METHOD 300.0: ANIONS						Analyst: **LRN**
Chloride	390	60		mg/Kg	20	12/9/2021 6:20:04 PM

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 interference

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

December 10, 2021

Julie Best
SIMCOE
1100 Main St.
Durango, CO 81301
TEL: (505) 330-9179
FAX:

RE: Gallegos Canyon Unit 021 OrderNo.: 2112234

Dear Julie Best:

Hall Environmental Analysis Laboratory received 1 sample(s) on 12/3/2021 for the analyses presented in the following report.

These were analyzed according to EPA procedures or equivalent. To access our accredited tests please go to www.hallenvironmental.com or the state specific web sites. In order to properly interpret your results, it is imperative that you review this report in its entirety. See the sample checklist and/or the Chain of Custody for information regarding the sample receipt temperature and preservation. Data qualifiers or a narrative will be provided if the sample analysis or analytical quality control parameters require a flag. When necessary, data qualifiers are provided on both the sample analysis report and the QC summary report, both sections should be reviewed. All samples are reported, as received, unless otherwise indicated. Lab measurement of analytes considered field parameters that require analysis within 15 minutes of sampling such as pH and residual chlorine are qualified as being analyzed outside of the recommended holding time.

Please don't hesitate to contact HEAL for any additional information or clarifications.

ADHS Cert #AZ0682 -- NMED-DWB Cert #NM9425 -- NMED-Micro Cert #NM0901

Sincerely,

Andy Freeman
Laboratory Manager
4901 Hawkins NE
Albuquerque, NM 87109

QC SUMMARY REPORT

Hall Environmental Analysis Laboratory, Inc.

WO#: **2112234**

10-Dec-21

Client: SIMCOE

Project: Gallegos Canyon Unit 021

Sample ID: **MB-64406**	SampType: **mblk**	TestCode: **EPA Method 300.0: Anions**
Client ID: **PBS**	Batch ID: **64406**	RunNo: **84430**
Prep Date: **12/9/2021**	Analysis Date: **12/9/2021**	SeqNo: **2965973** Units: **mg/Kg**

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

Sample ID: **LCS-64406**	SampType: **lcs**	TestCode: **EPA Method 300.0: Anions**
Client ID: **LCSS**	Batch ID: **64406**	RunNo: **84430**
Prep Date: **12/9/2021**	Analysis Date: **12/9/2021**	SeqNo: **2965974** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Chloride	14	1.5	15.00	0	92.8	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 interference
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#: **2112234**

10-Dec-21

Client: SIMCOE

Project: Gallegos Canyon Unit 021

Sample ID: **LCS-64326** SampType: **LCS** TestCode: **EPA Method 8015M/D: Diesel Range Organics**

Client ID: **LCSS** Batch ID: **64326** RunNo: **84333**

Prep Date: **12/6/2021** Analysis Date: **12/7/2021** SeqNo: **2963081** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Diesel Range Organics (DRO)	42	10	50.00	0	84.4	68.9	135			
Surr: DNOP	4.6		5.000		92.2	70	130			

Sample ID: **MB-64326** SampType: **MBLK** TestCode: **EPA Method 8015M/D: Diesel Range Organics**

Client ID: **PBS** Batch ID: **64326** RunNo: **84333**

Prep Date: **12/6/2021** Analysis Date: **12/7/2021** SeqNo: **2963083** 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	13		10.00		126	70	130			

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 interference
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#: **2112234**

10-Dec-21

Client: SIMCOE

Project: Gallegos Canyon Unit 021

Sample ID: **mb-64317** SampType: **MBLK** TestCode: **EPA Method 8015D: Gasoline Range**

Client ID: **PBS** Batch ID: **64317** RunNo: **84336**

Prep Date: **12/6/2021** Analysis Date: **12/7/2021** SeqNo: **2962413** 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	1000		1000		101	70	130			

Sample ID: **lcs-64317** SampType: **LCS** TestCode: **EPA Method 8015D: Gasoline Range**

Client ID: **LCSS** Batch ID: **64317** RunNo: **84336**

Prep Date: **12/6/2021** Analysis Date: **12/7/2021** SeqNo: **2962414** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Gasoline Range Organics (GRO)	29	5.0	25.00	0	115	78.6	131			
Surr: BFB	1100		1000		111	70	130			

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 interference
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#: **2112234**

10-Dec-21

Client: SIMCOE

Project: Gallegos Canyon Unit 021

Sample ID: **mb-64317**	SampType: **MBLK**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **PBS**	Batch ID: **64317**	RunNo: **84336**
Prep Date: **12/6/2021**	Analysis Date: **12/7/2021**	SeqNo: **2962421** 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	0.92		1.000		92.3	70	130			

Sample ID: **lcs-64317**	SampType: **LCS**	TestCode: **EPA Method 8021B: Volatiles**
Client ID: **LCSS**	Batch ID: **64317**	RunNo: **84336**
Prep Date: **12/6/2021**	Analysis Date: **12/7/2021**	SeqNo: **2962422** Units: **mg/Kg**

Analyte	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	%RPD	RPDLimit	Qual
Benzene	0.91	0.025	1.000	0	90.8	80	120			
Toluene	0.93	0.050	1.000	0	92.6	80	120			
Ethylbenzene	0.95	0.050	1.000	0	95.2	80	120			
Xylenes, Total	2.8	0.10	3.000	0	94.0	80	120			
Surr: 4-Bromofluorobenzene	0.92		1.000		91.5	70	130			

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 interference
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 Work Order Number: 2112234 RcptNo: 1

Received By: **Sean Livingston** 12/3/2021 8:00:00 AM Sean Livingston

Completed By: **Sean Livingston** 12/3/2021 9:31:47 AM Sean Livingston

Reviewed By: JR 12/3/21

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 ☐	
12. Are matrices correctly identified on Chain of Custody?	Yes ☑	No ☐	
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 ☐	

# of preserved bottles checked for pH: _____ (<2 or >12 unless noted)

Adjusted? _____

Checked by: KPA 12/03/21

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	2.6	Good				

Chain-of-Custody Record

Client: Simcoe LLC

Mailing Address: 1199 Main St Ste 101
Durango, CO 81301

Phone #: 970 394 0131

email or Fax#: julie.best@ikavenergy.com

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

Accreditation: ☐ Az Compliance
☐ NELAC ☐ Other

☐ EDD (Type)

Turn-Around Time:
☒ Standard ☐ Rush

Project Name: Gallegos Canyon Unit 021

Project #:

Project Manager:

Sampler: Kyle Siesser

On Ice: ☑ Yes ☐ No

# of Coolers: 1

Cooler Temp(including CF): 2.7-0.1=2.6°C

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

Date	Time	Matrix	Sample Name	Container Type and #	Preservative Type	HEAL No. 2112234	BTEX / MTBE / TMB's (8021)	TPH:8015D(GRO / DRO / MRO)	8081 Pesticides/8082 PCB's	EDB (Method 504.1)	PAHs by 8310 or 8270SIMS	RCRA 8 Metals	Cl, F, Br, NO_3, NO_2, PO_4, SO_4	8260 (VOA)	8270 (Semi-VOA)	Total Coliform (Present/Absent)	BTEX 8021B	TPH 8015B	Chlorides 300.0			
12/2/21	1020	Soil	SPC-TB@5' (95)	(Two) 4 oz jars	—	001											X	X	X			

Analysis Request

Date	Time	Relinquished by:	Received by:	Via:	Date	Time
12/2/21	1220	Kyle Siesser	Chad Ward		12/2/21	1220
12/2/21	811	Chad Ward	See cooler		12/3/21	8:00

Remarks:

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.

Cottonwood CONSULTING

Gallegos Canyon Unit 021
Photographic Log
Simcoe, LLC

Photo 1: Gallegos Canyon Unit 021 well sign, 12/2/2021.

Photo 2: 95 bbls steel tank "A" during removal, 12/2/2021.

Cottonwood CONSULTING

Gallegos Canyon Unit 021
Photographic Log
Simcoe, LLC

Photo 3: Former location of 95 bbls steel tank "A" following removal, 12/2/2021.

Photo 4: Former location of 95 bbls steel tank "A" following removal and re-grading, 12/2/2021.

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

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

CONDITIONS

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 78284
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

CONDITIONS

Created By	Condition	Condition Date
cwhitehead	None	2/3/2022