

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
[ ] Closure of a pit, below-grade tank, or proposed alternative method
BGT A [ ] 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: Hughes C 009
API Number: 30-045-21178 OCD Permit Number:
U/L or Qtr/Qtr F Section 33 Township 29N Range 08W County: San Juan County
Center of Proposed Design: Latitude 36.68544 Longitude -107.6833 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. [x] Below-grade tank: Subsection I of 19.15.17.11 NMAC Tank ID: A
Volume: 45 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 [x] Visible sidewalls only [ ] Other Single Walled Double Bottomed
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. [x] 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
[x] 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.  
**Variations and Exceptions:**  
 Justifications and/or demonstrations of equivalency are required. Please refer to 19.15.17 NMAC for guidance.  
**Please check a box if one or more of the following is requested, if not leave blank:**  
 Variance(s): Requests must be submitted to the appropriate division district for consideration of approval.  
 Exception(s): Requests must be submitted to the Santa Fe Environmental Bureau office for consideration of approval.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

13. **Proposed Closure:** 19.15.17.13 NMAC

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

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

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

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

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

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

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

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

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

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

17. **Operator Application Certification:**

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

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

Signature: Sabre Beebe Date: 02/03/2022

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: CR Whitehead 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: 12/30/2021

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 36.685427 Longitude -107.683314 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: 02/03/2022

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

**SIMCOE LLC**  
SAN JUAN BASIN, NORTHWEST NEW MEXICO

**Well Name: Hughes C 009**  
**Well API# 30-045-21178**  
**Unit Letter F, Section 33, T29N, R8W**

**BELOW-GRADE TANK CLOSURE PLAN**

This plan will address the standard protocols and procedures for closure of below-grade tanks (BGT's) on SIMCOE, LLC (SIMCOE) well sites. As stipulated in Paragraph A of 19.15.17.13 NMAC, SIMCOE 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 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's NMOCD approved BGT design attached to the SIMCOE Design and Construction Plan. SIMCOE 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's NMOCD approved BGT design attached to the SIMCOE Design and Construction Plan, prior to any sale or change in operator pursuant to 19.15.9.9 NMAC. SIMCOE shall close the permitted BGT within 60 days of cessation of the BGT's 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 shall notify the surface owner by certified mail; return receipt requested that it plans to close a BGT. Notice given will be at least 72 hours in advanced, but not more than one week prior to any closure operation. The notice shall include the well name, API number, and legal description of the location. Evidence of mailing of the notice to the address of the surface owner shown in the county tax records demonstrates compliance with this requirement.  
**Notice was provided and is attached.**
2. SIMCOE shall notify the Division District III office verbally and in writing at least 72 hours, but not more than one week, prior to any closure operation. The notice shall include the Operator's name, and the location of the BGT to be closed by unit letter, section, township and range. If the BGT closure is associated with a particular well, then the notice shall also include the well's name, number and API number.  
**Notice was provided and is attached.**
3. Within 60 days of cessation of operations, SIMCOE shall remove liquids and sludge from the BGT prior to implementing a closure method and dispose of the liquids and sludge in a NMOCD approved facility. The facilities to be used are:
  - a. JFJ Landfarm, 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 E.E. Elliott SWD #1, API 30-045-27799 (Liquids)
  - e. SIMCOE LLC Operated 13 GCU SWD #1, API 30-045-28601 (Liquids)
  - f. SIMCOE LLC Operated GCU 259 SWD, API 30-045-20006 (Liquids)
  - g. SIMCOE LLC Operated GCU 306 SWD, API 30-045-24286 (Liquids)
  - h. SIMCOE LLC Operated GCU 307 SWD, API 30-045-24248 (Liquids)
  - i. SIMCOE LLC Operated GCU 328 SWD, API 30-045-24735 (Liquids)
  - j. SIMCOE LLC 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. SIMCOE shall remove the BGT and dispose of it in a NMOCD approved facility or recycle, reuse, or reclaim it in a manner that the Division District III office approves. Documentation as to the final disposition of the removed BGT will be provided in the final closure report.  
**The BGT was transported for recycling.**
5. Within six months of cessation of operations, SIMCOE shall remove any on-site equipment associated with a BGT unless the equipment is required for some other purpose.  
**All equipment associated with the BGT has been removed.**
6. SIMCOE shall test the soils beneath the BGT to determine whether a release has occurred. SIMCOE shall collect at a minimum: a five (5) point composite sample to include any obvious stained or wet soils, or other evidence of a release under the BGT. The composite sample shall be collected and analyzed for BTEX, TPH, and chlorides. The testing methods for those constituents are as follows:

Constituents	Testing Method	Release Verification (mg/kg)	5PC-TB@5'(45) Results (mg/kg)
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	<0.050
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	<0.300
TPH	US EPA Method SW-846 418.1	100	<30.0
Chlorides	US EPA Method 300.0 or 4500B	250 or background	<11.5

Notes: mg/Kg = milligram per kilogram, 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 whichever concentration level is greatest.

**Soils beneath the BGT were sampled for TPH, BTEX, and chloride per the above requirements. TPH, BTEX, and chloride were all non-detect based on laboratory analytical results.**

7. SIMCOE 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 SIMCOE will comply with 19.15.30 NMAC and 19.15.29 NMAC, as appropriate.  
**Sampling results and field observations 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 SIMCOE shall backfill the excavation, with compacted, non-waste containing, earthen material; construct a division-prescribed soil cover, re-contour and revegetate the location. The location will be reclaimed if it is not within the active process area.  
**No evidence of a release. Area backfilled / regraded.**
10. SIMCOE shall reclaim the BGT location, and all areas associated with the BGT including associated roads to a safe and stable condition that blends with the surrounding undisturbed area. SIMCOE shall substantially restore the impacted surface area to the condition that existed prior to oil and gas operations by placement of the soil cover as provided in 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.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
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.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**

12. SIMCOE 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 the 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 backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
13. SIMCOE 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.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
14. Pursuant to Paragraph (5) of Subsection I of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when it has been seeded or planted and when it successfully achieves re-vegetation.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
15. Reclamation of all disturbed areas no longer in use shall be considered complete when all ground surface disturbing activities at the site have been completed, and a uniform vegetative cover has been established that reflects a life-form ratio of plus or minus fifty percent (50%) of pre-disturbance levels and a total percent plant cover of at least seventy percent (70%) of pre-disturbance levels, excluding noxious weeds.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
16. The re-vegetation and reclamation obligations imposed by other applicable federal or tribal agencies on lands managed by those agencies shall supersede these provisions and govern the obligations of SIMCOE subject to those provisions, provided that the other requirements provide equal or better protection of fresh water, human health and the environment.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
17. Pursuant to Subparagraph (e) of Paragraph (5) of Subsection H of 19.15.17.13 NMAC, SIMCOE shall notify the NMOCD when reclamation and re-vegetation has been successfully achieved.  
**Area backfilled / regraded. No reclamation to be done at this time as former BGT location is located on well pad within area needed for production operations or subsequent drilling.**
18. Within 60 days of closure completion, SIMCOE shall submit a closure report on NMOCD's form C- 144, and will include the following:
  - a. necessary attachments to document all closure activities
  - b. sampling results
  - c. information required by 19.15.17 NMAC
  - d. details on back-filling, capping and covering, where applicable.**Closure report on Form C-144 is included and contains a photo of the location.**
19. SIMCOE shall certify that all information in the report and attachments is accurate, truthful, and compliant with all applicable closure requirements and conditions specified in the approved closure plan.  
**Certification section of Form C-144 has been completed.**

<b>Well Name:</b> HUGHES C	<b>Well Location:</b> T29N / R8W / SEC 33 / SENW / 36.685257 / -107.682693	<b>County or Parish/State:</b> SAN JUAN / NM
<b>Well Number:</b> 9	<b>Type of Well:</b> CONVENTIONAL GAS WELL	<b>Allottee or Tribe Name:</b>
<b>Lease Number:</b> NMSF078049	<b>Unit or CA Name:</b>	<b>Unit or CA Number:</b>
<b>US Well Number:</b> 3004521178	<b>Well Status:</b> Producing Gas Well	<b>Operator:</b> SIMCOE LLC

**Notice of Intent**

**Sundry ID:** 2650162

**Type of Submission:** Notice of Intent

**Type of Action:** Other

**Date Sundry Submitted:**

**Time Sundry Submitted:**

**Date proposed operation will begin:** 12/30/2021

**Procedure Description:** Closure of below grade tank on location scheduled to begin at 10 am on 12/30/2021

**Surface Disturbance**

**Is any additional surface disturbance proposed?:** No

**Well Name:** HUGHES C

**Well Location:** T29N / R8W / SEC 33 /  
SENW / 36.685257 / -107.682693

**County or Parish/State:** SAN  
JUAN / NM

**Well Number:** 9

**Type of Well:** CONVENTIONAL GAS  
WELL

**Allottee or Tribe Name:**

**Lease Number:** NMSF078049

**Unit or CA Name:**

**Unit or CA Number:**

**US Well Number:** 3004521178

**Well Status:** Producing Gas Well

**Operator:** SIMCOE LLC

**Operator Certification**

*I certify that the foregoing is true and correct. Title 18 U.S.C. Section 1001 and Title 43 U.S.C. Section 1212, make it a crime for any person knowingly and willfully to make to any department or agency of the United States any false, fictitious or fraudulent statements or representations as to any matter within its jurisdiction. Electronic submission of Sundry Notices through this system satisfies regulations requiring a submission of Form 3160-5 or a Sundry Notice.*

**Operator Electronic Signature:** SABRE BEEBE

**Signed on:** DEC 23, 2021 09:31 AM

**Name:** SIMCOE LLC

**Title:** Compliance Specialist

**Street Address:** 1199 MAIN AVENUE SUITE 101

**City:** DURANGO **State:** CO

**Phone:** (970) 769-9523

**Email address:** SABRE.BEEBE@IKAVENERGY.COM

**Field Representative**

**Representative Name:**

**Street Address:**

**City:** **State:** **Zip:**

**Phone:**

**Email address:**

**From:** [Sabre Beebe](#)  
**To:** [Christopher Whitehead \(chris.whitehead@state.nm.us\)](#); [ocd.enviro@state.nm.us](#)  
**Cc:** [Gina Doerner](#); [Don Buller](#); [Julie Best](#)  
**Subject:** SIMCOE LLC - Hughes C 009 Below Grade Tank (BGT) Closure  
**Attachments:** [image001.jpg](#)

---

SENT VIA E-MAIL

December 23, 2021

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

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

Hughes C 009  
API 30-045-21178  
F-33-29N-8W  
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 45 bbl BGT that will no longer be operational at the above well site. We anticipate this work to start on or around December 30, 2021 at 10:00 AM.

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

Sincerely,

**IKAV\_Logo\_Holding**



**IKAV Energy Inc.**  
**Sabre Beebe**  
**Field Environmental Coordinator**  
**Office: (970) 852-5172**  
**Mobile: (970)-769-9523**  
**E-Mail: [sabre.beebe@ikavenergy.com](mailto:sabre.beebe@ikavenergy.com)**

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

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

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

Incident ID	
District RP	
Facility ID	
Application ID	

## Release Notification

### Responsible Party

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

### Location of Release Source

Latitude 36.685427 Longitude -107.683314  
(NAD 83 in decimal degrees to 5 decimal places)

Site Name <b>Hughes C 009</b>	Site Type <b>Natural Gas Well</b>
Date Release Discovered <b>NA</b>	API# (if applicable) <b>3004521178</b>

Unit Letter	Section	Township	Range	County
<b>F</b>	<b>33</b>	<b>29N</b>	<b>08W</b>	<b>San Juan</b>

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)

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

Cause of Release **TPH, BTEX, & chloride all non-detect based on laboratory analytical results.  
No evidence of a release had occurred.**

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?  <input type="checkbox"/> Yes <input checked="" type="checkbox"/> 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*

<input type="checkbox"/> The source of the release has been stopped. <input type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> 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: Julie Best Title: HSE and Measurement Manager  
 Signature: *Julie Best* Date: 1/13/22  
 email: julie.best@ikavenergy.com Telephone: (970) 828-4060

**OCD Only**

Received by: \_\_\_\_\_ Date: \_\_\_\_\_

CLIENT: Simcoe LLC

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

API #: 3004521178  
TANK ID (if applicable): A

# FIELD REPORT:

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

PAGE #: 1 of 1

**SITE INFORMATION:** SITE NAME: Hughes C 009  
QUAD/UNIT: F SEC: 33 TWP: 29N RNG: 8W PM: NM CNTY: San Juan ST: NM  
1/4-1/4/FOOTAGE: 1580 FNL 2207 FWL LEASE TYPE: FEDERAL / STATE / FEE / INDIAN  
LEASE #: NMSF078049 PROD. FORMATION: PC CONTACT: HALO CONTRACTOR: HALO

DATE STARTED: 12/30/21  
DATE FINISHED: 12/30/21  
ENVIRONMENTAL SPECIALIST(S): KS

**REFERENCE POINT:** WELL HEAD (W.H.) GPS COORD.: 36.685372, -107.683383 GL ELEV.: 6322  
1) 45 BBLs Steel Tank A GPS COORD.: 36.685427, -107.683314 DISTANCE/BEARING FROM P&A: NA  
2) \_\_\_\_\_ GPS COORD.: \_\_\_\_\_ DISTANCE/BEARING FROM P&A: \_\_\_\_\_  
3) \_\_\_\_\_ GPS COORD.: \_\_\_\_\_ DISTANCE/BEARING FROM P&A: \_\_\_\_\_  
4) \_\_\_\_\_ GPS COORD.: \_\_\_\_\_ DISTANCE/BEARING FROM P&A: \_\_\_\_\_

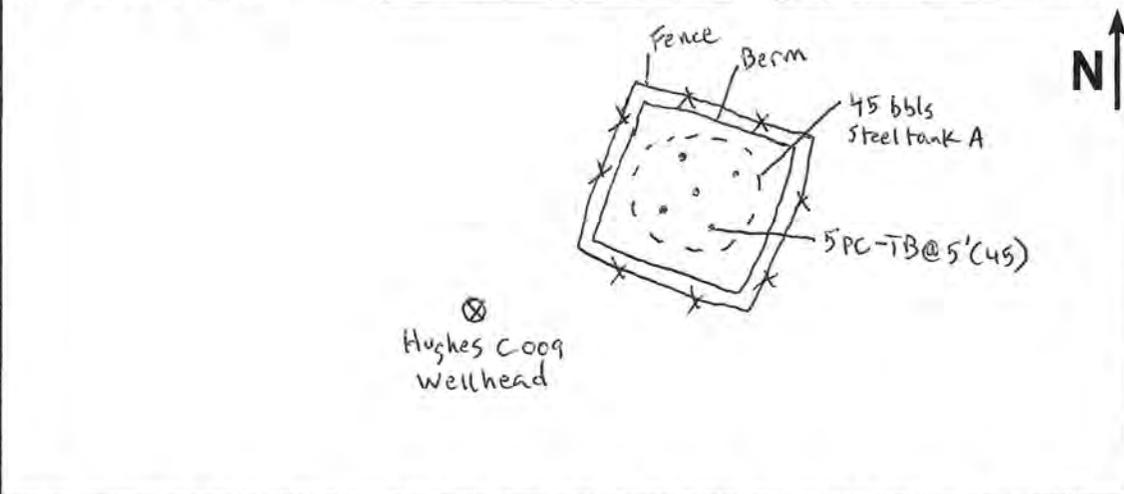
**SAMPLING DATA:** CHAIN OF CUSTODY RECORD(S) # OR LAB USED: Hall  
1) SAMPLE ID: 5PC-TB@5'(45) SAMPLE DATE: 12/30/21 SAMPLE TIME: 1010 LAB ANALYSIS: 8015 M/D, 8021B, 300.0(C1) OVM READING (ppm): 0.0  
2) SAMPLE ID: \_\_\_\_\_ SAMPLE DATE: \_\_\_\_\_ SAMPLE TIME: \_\_\_\_\_ LAB ANALYSIS: \_\_\_\_\_ OVM READING (ppm): \_\_\_\_\_  
3) SAMPLE ID: \_\_\_\_\_ SAMPLE DATE: \_\_\_\_\_ SAMPLE TIME: \_\_\_\_\_ LAB ANALYSIS: \_\_\_\_\_ OVM READING (ppm): \_\_\_\_\_  
4) SAMPLE ID: \_\_\_\_\_ SAMPLE DATE: \_\_\_\_\_ SAMPLE TIME: \_\_\_\_\_ LAB ANALYSIS: \_\_\_\_\_ OVM READING (ppm): \_\_\_\_\_  
5) SAMPLE ID: \_\_\_\_\_ SAMPLE DATE: \_\_\_\_\_ SAMPLE TIME: \_\_\_\_\_ LAB ANALYSIS: \_\_\_\_\_ OVM READING (ppm): \_\_\_\_\_

**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: \_\_\_\_\_  
OTHER: \_\_\_\_\_

EXCAVATION DIMENSION ESTIMATION: NA ft. X NA ft. X NA ft. EXCAVATION ESTIMATION (Cubic Yards): NA  
DEPTH TO GROUNDWATER: > 50 ft NEAREST WATER SOURCE: 7200 ft NEAREST SURFACE WATER: 7200 ft NMOCD TPH CLOSURE STD: \_\_\_\_\_ ppm

**SITE SKETCH** BGT Located: off / on site PLOT PLAN circle: attached

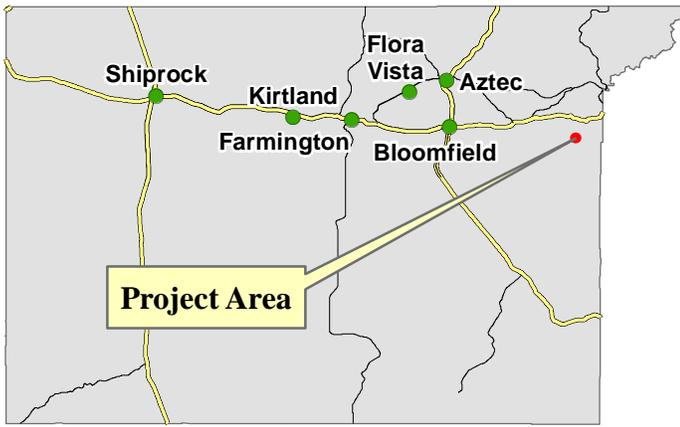


OVM CALIB. READ. = 100 ppm RF=1.00  
OVM CALIB. GAS = 100 ppm  
TIME: 0945 am/pm DATE: 12/30/21

**MISCELL. NOTES**  
Permit date(s): 6/14/10  
OCD Appr. date(s): 3/7/17  
Tank ID: A OVM = Organic Vapor Meter ppm = parts per million  
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: 12/30/21



San Juan County, New Mexico



Notes: Sample collected 12/30/2021. Sample 5PC-TB@5'(45) is a five-point composite sample.

**Legend**

- Soil Sample
- Approximate Former BGT Location
- ★ Oil & Gas Well



Mapping by: E. Millar, 1/3/2022  
 Coordinate System:  
 NAD 1983 UTM Zone 13 N

Location: Sec 33 T29N R8W NMPM

**Figure 1**  
**Hughes C #009**  
**Project Map**  
**Simcoe LLC**



dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

www.GreenAnalytical.com

Simcoe LLC  
1199 Main Ave Suite 101  
Durango CO, 81301

Project: BTEX/TPH, Cl  
Project Name / Number: Hughes C 009  
Project Manager: Sabre Beebe

Reported:  
01/11/22 16:31

**5PC-TB@5'(45)**

**2112227-01 (Soil)**

Analyte	Result	RL	MDL	Units	Dilution	Analyzed	Method	Notes	Analyst
---------	--------	----	-----	-------	----------	----------	--------	-------	---------

**General Chemistry**

% Dry Solids	87.3			%	1	01/04/22 11:05	EPA160.3/1684		VJW
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**Soluble (DI Water Extraction)**

Chloride	<11.5	11.5	0.484	mg/kg dry	10	01/10/22 19:40	EPA300.0		AES
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Subcontracted -- **Cardinal Laboratories**

**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	0.025	mg/kg	50	01/06/22 15:01	8021B	QR-03	MS/
Toluene*	<0.050	0.050	0.020	mg/kg	50	01/06/22 15:01	8021B		MS/
Ethylbenzene*	<0.050	0.050	0.026	mg/kg	50	01/06/22 15:01	8021B		MS/
Total Xylenes*	<0.150	0.150	0.079	mg/kg	50	01/06/22 15:01	8021B		MS/
Total BTEX	<0.300	0.300	0.151	mg/kg	50	01/06/22 15:01	8021B		MS/

Surrogate: 4-Bromofluorobenzene (PID)		95.0 %	69.9-140			01/06/22 15:01	8021B		MS/
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**Petroleum Hydrocarbons by GC FID**

GRO C6-C10*	<10.0	10.0	6.25	mg/kg	1	01/06/22 18:23	8015B		MS
DRO >C10-C28*	<10.0	10.0	4.26	mg/kg	1	01/06/22 18:23	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	4.26	mg/kg	1	01/06/22 18:23	8015B		MS

Surrogate: 1-Chlorooctane		91.4 %	66.9-136			01/06/22 18:23	8015B		MS
---------------------------	--	--------	----------	--	--	----------------	-------	--	----

Surrogate: 1-Chlorooctadecane		93.7 %	59.5-142			01/06/22 18:23	8015B		MS
-------------------------------	--	--------	----------	--	--	----------------	-------	--	----

Green Analytical Laboratories

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Debbie Zufelt, Reports Manager

Released to Imaging: 2/3/2022 10:20:52 AM



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

11 January 2022

Sabre Beebe  
Simcoe LLC  
1199 Main Ave Suite 101  
Durango, CO 81301  
RE: BTEX/TPH, CI

Enclosed are the results of analyses for samples received by the laboratory on 12/30/21 12:45.  
If you need any further assistance, please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Debbie Zufelt". The signature is written in a cursive, flowing style.

Debbie Zufelt  
Reports Manager

All accredited analytes contained in this report are denoted by an asterisk (\*). For a complete list of accredited analytes please do not hesitate to contact us via any of the contact information contained in this report. All of our certifications can be viewed at <http://greenanalytical.com/certifications/>

Green Analytical Laboratories is NELAP accredited through the Texas Commission on Environmental Quality. Accreditation applies to drinking water and non-potable water matrices for trace metals and a variety of inorganic parameters. Green Analytical Laboratories is also accredited through the Colorado Department of Public Health and Environment and EPA region 8 for trace metals, Cyanide, Fluoride, Nitrate, and Nitrite in drinking water.  
TNI Certificate Number: T104704514-21-12.

Our affiliate laboratory, Cardinal Laboratories, is also NELAP accredited through the Texas Commission on Environmental Quality for a variety of organic constituents in drinking water, non-potable water and solid matrices. Cardinal is also accredited for regulated VOCs, TTHM, and HAA-5 in drinking water through the Colorado Department of Public Health and Environment and EPA region 8. TNI Certificate Number: T104704398-21-14



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www.GreenAnalytical.com

Simcoe LLC	Project: BTEX/TPH, CI	
1199 Main Ave Suite 101	Project Name / Number: Hughes C 009	<b>Reported:</b>
Durango CO, 81301	Project Manager: Sabre Beebe	01/11/22 16:31

ANALYTICAL REPORT FOR SAMPLES

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
5PC-TB@5'(45)	2112227-01	Solid	12/30/21 10:10	12/30/21 12:45	

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

Released to Imaging: 2/3/2022 10:20:52 AM

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www.GreenAnalytical.com

Simcoe LLC 1199 Main Ave Suite 101 Durango CO, 81301	Project: BTEX/TPH, Cl Project Name / Number: Hughes C 009 Project Manager: Sabre Beebe	Reported: 01/11/22 16:31
--	--	-----------------------------

**General Chemistry - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

**Batch B220014 - General Prep - Wet Chem**

<b>Duplicate (B220014-DUP1)</b>	<b>Source: 2112227-01</b>		<b>Prepared &amp; Analyzed: 01/04/22</b>							
% Dry Solids	87.0		%		87.3			0.387	20	

**Soluble (DI Water Extraction) - Quality Control**

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

**Batch B220063 - IC- Ion Chromatograph**

<b>Blank (B220063-BLK1)</b>	<b>Prepared &amp; Analyzed: 01/10/22</b>									
Chloride	ND	10.0	mg/kg wet							
<b>LCS (B220063-BS1)</b>	<b>Prepared &amp; Analyzed: 01/10/22</b>									
Chloride	256	10.0	mg/kg wet	250		102	85-115			
<b>LCS Dup (B220063-BSD1)</b>	<b>Prepared &amp; Analyzed: 01/10/22</b>									
Chloride	255	10.0	mg/kg wet	250		102	85-115	0.560	20	

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

Released to Imaging: 2/3/2022 10:20:52 AM

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dzufelt@greenanalytical.com p: 970.247.4220 f: 970.247.4227 75 Suttle Street Durango, CO 81303

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Simcoe LLC  
1199 Main Ave Suite 101  
Durango CO, 81301

Project: BTEX/TPH, CI  
Project Name / Number: Hughes C 009  
Project Manager: Sabre Beebe

Reported:  
01/11/22 16:31

## Volatile Organic Compounds by EPA Method 8021 - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
---------	--------	-----------------	-------	-------------	---------------	------	-------------	-----	-----------	-------

## Batch 2010601 - Volatiles

## Blank (2010601-BLK1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 4-Bromofluorobenzene (PID)	ND		mg/kg	0.0500		97.3	69.9-140			
Benzene	ND	0.050	mg/kg							
Ethylbenzene	ND	0.050	mg/kg							
Toluene	ND	0.050	mg/kg							
Total BTEX	ND	0.300	mg/kg							
Total Xylenes	ND	0.150	mg/kg							

## LCS (2010601-BS1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 4-Bromofluorobenzene (PID)	0.0468		mg/kg	0.0500		93.5	69.9-140			
Benzene	2.08	0.050	mg/kg	2.00		104	85.1-114			
Ethylbenzene	1.95	0.050	mg/kg	2.00		97.6	84.4-115			
m,p-Xylene	4.02	0.100	mg/kg	4.00		101	85.5-116			
o-Xylene	1.89	0.050	mg/kg	2.00		94.7	85.2-111			
Toluene	2.01	0.050	mg/kg	2.00		101	88.6-116			
Total Xylenes	5.91	0.150	mg/kg	6.00		98.6	86.2-113			

## LCS Dup (2010601-BSD1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 4-Bromofluorobenzene (PID)	0.0462		mg/kg	0.0500		92.4	69.9-140			
Benzene	2.17	0.050	mg/kg	2.00		108	85.1-114	4.20	12.6	
Ethylbenzene	2.03	0.050	mg/kg	2.00		102	84.4-115	4.14	13.9	
m,p-Xylene	4.19	0.100	mg/kg	4.00		105	85.5-116	4.08	13.6	
o-Xylene	1.99	0.050	mg/kg	2.00		99.4	85.2-111	4.88	14.1	
Toluene	2.09	0.050	mg/kg	2.00		105	88.6-116	3.94	13.3	
Total Xylenes	6.18	0.150	mg/kg	6.00		103	86.2-113	4.34	13.4	

Green Analytical Laboratories

Debbie Zufelt, Reports Manager

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Simcoe LLC  
1199 Main Ave Suite 101  
Durango CO, 81301

Project: BTEX/TPH, Cl  
Project Name / Number: Hughes C 009  
Project Manager: Sabre Beebe

Reported:  
01/11/22 16:31

### Petroleum Hydrocarbons by GC FID - Quality Control

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
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#### Batch 2010605 - General Prep - Organics

##### Blank (2010605-BLK1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 1-Chlorooctadecane	52.8		mg/kg	50.0		106	59.5-142			
Surrogate: 1-Chlorooctane	49.9		mg/kg	50.0		99.8	66.9-136			
DRO >C10-C28	ND	10.0	mg/kg							
EXT DRO >C28-C36	ND	10.0	mg/kg							
GRO C6-C10	ND	10.0	mg/kg							

##### LCS (2010605-BS1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 1-Chlorooctadecane	56.5		mg/kg	50.0		113	59.5-142			
Surrogate: 1-Chlorooctane	54.4		mg/kg	50.0		109	66.9-136			
DRO >C10-C28	216	10.0	mg/kg	200		108	83-129			
GRO C6-C10	210	10.0	mg/kg	200		105	81.6-129			
Total TPH C6-C28	426	10.0	mg/kg	400		106	84.5-127			

##### LCS Dup (2010605-BS1)

Prepared &amp; Analyzed: 01/06/22

Surrogate: 1-Chlorooctadecane	56.3		mg/kg	50.0		113	59.5-142			
Surrogate: 1-Chlorooctane	54.9		mg/kg	50.0		110	66.9-136			
DRO >C10-C28	213	10.0	mg/kg	200		107	83-129	1.16	17.9	
GRO C6-C10	210	10.0	mg/kg	200		105	81.6-129	0.0128	21.4	
Total TPH C6-C28	423	10.0	mg/kg	400		106	84.5-127	0.577	17.6	

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Simcoe LLC	Project: BTEX/TPH, Cl	
1199 Main Ave Suite 101	Project Name / Number: Hughes C 009	<b>Reported:</b>
Durango CO, 81301	Project Manager: Sabre Beebe	01/11/22 16:31

Notes and Definitions

- QR-03 The RPD value for the sample duplicate or MS/MSD was outside of QC acceptance limits due to matrix interference. QC batch accepted based on LCS and/or LCSD recovery and/or RPD values.
- DET Analyte DETECTED
- ND Analyte NOT DETECTED at or above the reporting limit
- NR Not Reported
- dry Sample results reported on a dry weight basis  
\*Results reported on as received basis unless designated as dry.
- RPD Relative Percent Difference
- LCS Laboratory Control Sample (Blank Spike)
- RL Report Limit
- MDL Method Detection Limit

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Debbie Zufelt, Reports Manager

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**Hughes C 009  
Photographic Log  
Simcoe, LLC**



Photo 1: Hughes C 009 well sign, 12/30/21.



Photo 2: 45 bbls steel tank "A" prior to removal, 12/30/21.



Hughes C 009  
Photographic Log  
Simcoe, LLC



Photo 3: Former location of 45 bbls steel tank “A” following removal, 12/30/21.



Photo 4: Former location of 45 bbls steel tank “A” following removal and re-grading, 12/30/21.

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

CONDITIONS  
 Action 77707

**CONDITIONS**

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 77707
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

**CONDITIONS**

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