

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

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  
 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

BGT99

**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: Stewart LS #005  
API Number: 30-045-13210 OCD Permit Number: \_\_\_\_\_  
U/L or Qtr/Qtr L Section 20 Township 30N Range 10W County: San Juan  
Center of Proposed Design: Latitude 36.794476 Longitude -107.912493 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  
Volume: 95 bbl Type of fluid: Produced Water  
Tank Construction material: Steel  
 Secondary containment with leak detection  Visible sidewalls, liner, 6-inch lift and automatic overflow shut-off  
 Visible sidewalls and liner  Visible sidewalls only  Other Double wall, double bottom.  
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

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 type="checkbox"/> No <input type="checkbox"/> NA
<b><u>Ground water is less than 50 feet below the bottom of a Temporary pit, permanent pit, or Multi-Well Fluid Management pit.</u></b> NM Office of the State Engineer - iWATERS database search; USGS; Data obtained from nearby wells	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> NA
Within incorporated municipal boundaries or within a defined municipal fresh water well field covered under a municipal ordinance adopted pursuant to NMSA 1978, Section 3-27-3, as amended. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification from the municipality; Written approval obtained from the municipality	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within the area overlying a subsurface mine. <b>(Does not apply to below grade tanks)</b> - Written confirmation or verification or map from the NM EMNRD-Mining and Mineral Division	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within an unstable area. <b>(Does not apply to below grade tanks)</b> - Engineering measures incorporated into the design; NM Bureau of Geology & Mineral Resources; USGS; NM Geological Society; Topographic map	<input type="checkbox"/> Yes <input type="checkbox"/> No
Within a 100-year floodplain. <b>(Does not apply to below grade tanks)</b> - FEMA map	<input type="checkbox"/> Yes <input type="checkbox"/> No
<b><u>Below Grade Tanks</u></b>	
Within 100 feet of a continuously flowing watercourse, significant watercourse, lake bed, sinkhole, wetland or playa lake (measured from the ordinary high-water mark). - Topographic map; Visual inspection (certification) of the proposed site	<input type="checkbox"/> Yes <input 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 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): \_\_\_\_\_ Title: \_\_\_\_\_

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

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

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

OCD Representative Signature: Joel Stone Approval Date: 05/21/2024

Title: Environmental Scientist & Specialist-A OCD Permit Number: BGT99

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: 4/15/2024

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)

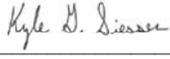
On-site Closure Location: Latitude 36.794476 Longitude -107.912459 NAD:  1927  1983

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): Kyle Siesser Title: Consultant

Signature:  Date: 5/16/2024

e-mail address: ksiesser@cottonwoodconsulting.com Telephone: 970-764-7356

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

**Well Name: Stewart LS #005**  
**Well API# 30-045-13210**  
**Unit L, Section 20, T30N, R10W**

**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 approved 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 was provided and 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 was provided and 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 an NMOCD 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, API 30-045-24286 (Liquids)
- g. Simcoe, LLC Operated GCU 307 SWD, API 30-045-24248 (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)

**All liquids and/or sludge within the BGT were removed and sent to one of the above NMOCD approved 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 BGT will be reused.**

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

**The BGT was removed and area regraded.**

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 analyze for BTEX, TPH, and chlorides. The testing methods for those constituents are as follows.

Constituents	Testing Method	Closure Criteria (mg/kg)	5PC-TB@6'(95) Results (mg/kg)
Chlorides	US EPA Method 300.0 or 4500B	250 or background	10.6
TPH	US EPA Method SW-846 418.1	100	ND
Total BTEX	US EPA Method SW-846 8021B or 8260B	50	ND
Benzene	US EPA Method SW-846 8021B or 8260B	0.2	ND

**Notes:** mg/kg- milligram per kilogram; TPH- total petroleum hydrocarbons; BTEX- benzene, toluene, ethylbenzene, and total xylenes; ND- analyte not detected; BG - background. 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, and BTEX were non-detect based on laboratory analytical results. Chloride was detected below NMOCD standards.**

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.

**Sampling results and field observations reveal no evidence that 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, LLC 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. The BGT was removed and area regraded.**

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.

**The BGT was removed and area 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, 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.

**The BGT was removed and area 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, 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.

**The BGT was removed and area 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, LLC shall notify the NMOCD when it has seeded or planted and when it successfully achieves revegetation.

**The BGT was removed and area 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. 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 and contains a photo of the location.**

16. 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.**

**From:** Kholeton Sanchez  
**Sent:** Tuesday, April 9, 2024 10:40 AM  
**To:** [victoria.venegas@emnrd.nm.gov](mailto:victoria.venegas@emnrd.nm.gov) <[victoria.venegas@emnrd.nm.gov](mailto:victoria.venegas@emnrd.nm.gov)>  
**Subject:** SIMCOE Stewart LS 005 BGT 72 Hour Closure Notice

The subject well has a below-grade tank that will begin the closure process between 72 hours and one week from this notification. I have attached the permit for reference.

Well Name: STEWART LS #005

API#: 30-045-13210

Location: L, Section 2, T30N, R10W

Footages: 1650 FSL & 990 FWL

Operator: SIMCOE, LLC

Surface Owner: BLM

Scheduled Date and Time of Start: 4/15/2024, 07:00



**IKAV Energy Inc.**

**Kholeton Sanchez**

**Environmental Coordinator**

**Office: (970)-822-8930**

**Mobile: (505)-801-4707**

**E-Mail: [kholeton.sanchez@ikavenergy.com](mailto:kholeton.sanchez@ikavenergy.com)**

U.S. Department of the Interior  
BUREAU OF LAND MANAGEMENT

<b>Well Name:</b> STEWART LS	<b>Well Location:</b> T30N / R10W / SEC 20 / NWSW / 36.794662 / -107.912537	<b>County or Parish/State:</b> SAN JUAN / NM
<b>Well Number:</b> 5	<b>Type of Well:</b> CONVENTIONAL GAS WELL	<b>Allottee or Tribe Name:</b>
<b>Lease Number:</b> NMNM03566	<b>Unit or CA Name:</b>	<b>Unit or CA Number:</b> NMNM73399
<b>US Well Number:</b> 3004513210	<b>Operator:</b> SIMCOE LLC	

### Notice of Intent

**Sundry ID:** 2784037

**Type of Submission:** Notice of Intent

**Type of Action:** Pit Construction or Closure

**Date Sundry Submitted:** 04/10/2024

**Time Sundry Submitted:** 01:06

**Date proposed operation will begin:** 04/15/2024

**Procedure Description:**

### Surface Disturbance

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

### NOI Attachments

**Procedure Description**

STEWART\_LS005\_PIT\_PERMIT\_C144\_3004513210\_03\_07\_2016\_12\_10\_46\_20240410130603.pdf

STEWART\_LS\_005\_pitclosure\_20240408\_20240410130548.pdf

STEWART\_LS\_005\_20240408\_20240410130540.pdf

Well Name: STEWART LS

Well Location: T30N / R10W / SEC 20 / NWSW / 36.794662 / -107.912537

County or Parish/State: SAN JUAN / NM

Well Number: 5

Type of Well: CONVENTIONAL GAS WELL

Allottee or Tribe Name:

Lease Number: NMNM03566

Unit or CA Name:

Unit or CA Number: NMNM73399

US Well Number: 3004513210

Operator: SIMCOE LLC

**Operator**

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

Operator Electronic Signature: CHRISTY KOST

Signed on: APR 10, 2024 01:06 PM

Name: SIMCOE LLC

Title: Permitting Agent

Street Address: 1199 MAIN AVE STE 101

City: DURANGO State: CO

Phone: (719) 251-7733

Email address: CHRISTY.KOST@IKAVENERGY.COM

**Field**

Representative Name:

Street Address:

City: State: Zip:

Phone:

Email address:

**BLM Point of Contact**

BLM POC Name: JEFFREY J TAFOYA

BLM POC Title: Assistant Field Manager

BLM POC Phone: 5055647672

BLM POC Email Address: JTAFOYA@BLM.GOV

Disposition: Approved

Disposition Date: 04/25/2024

Signature: s/ Jeff Tafoya

Form 3160-5  
(June 2019)

UNITED STATES  
DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT

FORM APPROVED  
OMB No. 1004-0137  
Expires: October 31, 2021

**SUNDRY NOTICES AND REPORTS ON WELLS**  
**Do not use this form for proposals to drill or to re-enter an abandoned well. Use Form 3160-3 (APD) for such proposals.**

5. Lease Serial No.

6. If Indian, Allottee or Tribe Name

**SUBMIT IN TRIPLICATE - Other instructions on page 2**

7. If Unit of CA/Agreement, Name and/or No.

1. Type of Well

Oil Well     Gas Well     Other

8. Well Name and No.

2. Name of Operator

9. API Well No.

3a. Address

3b. Phone No. (include area code)

10. Field and Pool or Exploratory Area

4. Location of Well (Footage, Sec., T.,R.,M., or Survey Description)

11. Country or Parish, State

**12. CHECK THE APPROPRIATE BOX(ES) TO INDICATE NATURE OF NOTICE, REPORT OR OTHER DATA**

TYPE OF SUBMISSION	TYPE OF ACTION				
<input type="checkbox"/> Notice of Intent	<input type="checkbox"/> Acidize	<input type="checkbox"/> Deepen	<input type="checkbox"/> Production (Start/Resume)	<input type="checkbox"/> Water Shut-Off	
<input type="checkbox"/> Subsequent Report	<input type="checkbox"/> Alter Casing	<input type="checkbox"/> Hydraulic Fracturing	<input type="checkbox"/> Reclamation	<input type="checkbox"/> Well Integrity	
<input type="checkbox"/> Final Abandonment Notice	<input type="checkbox"/> Casing Repair	<input type="checkbox"/> New Construction	<input type="checkbox"/> Recomplete	<input type="checkbox"/> Other	
	<input type="checkbox"/> Change Plans	<input type="checkbox"/> Plug and Abandon	<input type="checkbox"/> Temporarily Abandon		
	<input type="checkbox"/> Convert to Injection	<input type="checkbox"/> Plug Back	<input type="checkbox"/> Water Disposal		

13. Describe Proposed or Completed Operation: Clearly state all pertinent details, including estimated starting date of any proposed work and approximate duration thereof. If the proposal is to deepen directionally or recomplete horizontally, give subsurface locations and measured and true vertical depths of all pertinent markers and zones. Attach the Bond under which the work will be performed or provide the Bond No. on file with BLM/BIA. Required subsequent reports must be filed within 30 days following completion of the involved operations. If the operation results in a multiple completion or recompletion in a new interval, a Form 3160-4 must be filed once testing has been completed. Final Abandonment Notices must be filed only after all requirements, including reclamation, have been completed and the operator has determined that the site is ready for final inspection.)

14. I hereby certify that the foregoing is true and correct. Name (Printed/Typed)

Title

Signature

Date

**THE SPACE FOR FEDERAL OR STATE OFFICE USE**

Approved by

Title

Date

Conditions of approval, if any, are attached. Approval of this notice does not warrant or certify that the applicant holds legal or equitable title to those rights in the subject lease which would entitle the applicant to conduct operations thereon.

Office

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.

(Instructions on page 2)

## GENERAL INSTRUCTIONS

This form is designed for submitting proposals to perform certain well operations and reports of such operations when completed as indicated on Federal and Indian lands pursuant to applicable Federal law and regulations. Any necessary special instructions concerning the use of this form and the number of copies to be submitted, particularly with regard to local area or regional procedures and practices, are either shown below, will be issued by or may be obtained from the local Federal office.

## SPECIFIC INSTRUCTIONS

*Item 4* - Locations on Federal or Indian land should be described in accordance with Federal requirements. Consult the local Federal office for specific instructions.

*Item 13*: Proposals to abandon a well and subsequent reports of abandonment should include such special information as is required by the local Federal office. In addition, such proposals and reports should include reasons for the abandonment; data on any former or present productive zones or other zones with present significant fluid contents not sealed off by cement or otherwise; depths (top and bottom) and method of placement of cement plugs; mud or other material placed below, between and above plugs; amount, size, method of parting of any casing, liner or tubing pulled and the depth to the top of any tubing left in the hole; method of closing top of well and date well site conditioned for final inspection looking for approval of the abandonment. If the proposal will involve **hydraulic fracturing operations**, you must comply with 43 CFR 3162.3-3, including providing information about the protection of usable water. Operators should provide the best available information about all formations containing water and their depths. This information could include data and interpretation of resistivity logs run on nearby wells. Information may also be obtained from state or tribal regulatory agencies and from local BLM offices.

## NOTICES

The privacy Act of 1974 and the regulation in 43 CFR 2.48(d) provide that you be furnished the following information in connection with information required by this application.

AUTHORITY: 30 U.S.C. 181 et seq., 351 et seq., 25 U.S.C. 396; 43 CFR 3160.

PRINCIPAL PURPOSE: The information is used to: (1) Evaluate, when appropriate, approve applications, and report completion of subsequent well operations, on a Federal or Indian lease; and (2) document for administrative use, information for the management, disposal and use of National Resource lands and resources, such as: (a) evaluating the equipment and procedures to be used during a proposed subsequent well operation and reviewing the completed well operations for compliance with the approved plan; (b) requesting and granting approval to perform those actions covered by 43 CFR 3162.3-2, 3162.3-3, and 3162.3-4; (c) reporting the beginning or resumption of production, as required by 43 CFR 3162.4-1(c) and (d) analyzing future applications to drill or modify operations in light of data obtained and methods used.

ROUTINE USES: Information from the record and/or the record will be transferred to appropriate Federal, State, local or foreign agencies, when relevant to civil, criminal or regulatory investigations or prosecutions in connection with congressional inquiries or to consumer reporting agencies to facilitate collection of debts owed the Government.

EFFECT OF NOT PROVIDING THE INFORMATION: Filing of this notice and report and disclosure of the information is mandatory for those subsequent well operations specified in 43 CFR 3162.3-2, 3162.3-3, 3162.3-4.

The Paperwork Reduction Act of 1995 requires us to inform you that:

The BLM collects this information to evaluate proposed and/or completed subsequent well operations on Federal or Indian oil and gas leases.

Response to this request is mandatory.

The BLM would like you to know that you do not have to respond to this or any other Federal agency-sponsored information collection unless it displays a currently valid OMB control number.

**BURDEN HOURS STATEMENT:** Public reporting burden for this form is estimated to average 8 hours per response, including the time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding the burden estimate or any other aspect of this form to U.S. Department of the Interior, Bureau of Land Management (1004-0137), Bureau Information Collection Clearance Officer (WO-630), 1849 C St., N.W., Mail Stop 401 LS, Washington, D.C. 20240

## Additional Information

### Location of Well

0. SHL: NWSW / 1650 FSL / 990 FWL / TWSP: 30N / RANGE: 10W / SECTION: 20 / LAT: 36.794662 / LONG: -107.912537 ( TVD: 0 feet, MD: 0 feet )

BHL: NWSW / 1650 FSL / 990 FWL / TWSP: 30N / SECTION: / LAT: 36.794662 / LONG: 107.912537 ( TVD: 0 feet, MD: 0 feet )

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 Kholeton Sanchez	Contact Telephone (970) 852-5172
Contact email kholeton.sanchez@ikavenergy.com	Incident # (assigned by OCD)
Contact mailing address 1199 Main Ave., Suite 101 Durango, CO 81301	

### Location of Release Source

Latitude 36.794476 Longitude -107.912493  
*(NAD 83 in decimal degrees to 5 decimal places)*

Site Name Stewart LS #005	Site Type Natural Gas Well
Date Release Discovered NA	API# (if applicable) 30-045-13210

Unit Letter	Section	Township	Range	County
L	20	30N	10W	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)

<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  
Soils beneath the BGT were sampled for TPH, BTEX, and chloride. TPH and BTEX were non-detect in all samples based on laboratory analytical results. Chloride was detected below the NMOCD standard. No evidence that a release has 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)? <b>Not required.</b>	

### 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 <u>not</u> 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: <u>Kholeton Sanchez</u> Title: <u>Environmental Coordinator</u> Signature: <u><i>Kholeton Sanchez</i></u> Date: <u>4/27/2024</u> email: <u>kholeton.sanchez@ikavenergy.com</u> Telephone: <u>(970) 822-8930</u>
<b><u>OCD Only</u></b> Received by: _____ Date: _____



Date: 4/15/24

Client: Simcoe

Environmental Specialist(s): KO

Contractor: Kelly Oilfield

Page: 1 of 1

BGT Closure Field Form

Site Information

Well Name: Stewart LS #005 Well API#: 30-045-13210 Lease: Federal / State / Fee / Indian  
Well Location: Unit: \_\_\_\_\_ Sec: 20 T: 30 R: 10 Cty: San Juan St: NM

BGT Information

Prev. Tank ID: 20147-88 95 serial # \_\_\_\_\_ bbls single / double -wall single / double -bottom sidewalls visible (Y)(N) berm (Y)(N) fenced (Y)(N) liner (Y)(N)  
Notes: Closure. Tank will be removed 2016 yr

Site Observations Following BGT Removal: evidence of a release (Y)(N) BGT replaced / backfilled and graded / other: Closed  
New Tank ID: \_\_\_\_\_ bbls single / double -wall single / double -bottom sidewalls visible (Y) (N) berm (Y) (N) fenced (Y) (N) liner (Y) (N)  
Notes: No staining, no odor. Some minor white sand at base of excavation. Bottom of tank appears intact.

NMOCD Closure Standards: TPH \_\_\_\_\_ mg/kg Chloride \_\_\_\_\_ mg/kg

Soil Sampling

Sample ID: SPC-TB @ 6' (95) Time: 1045 Sample Type: Grab / Composite - 5 pts PID: 0.0 ppm Lab: GAL  
Notes: Soil is tan sand. No stain no odor. Slightly moist

Soil Sampling

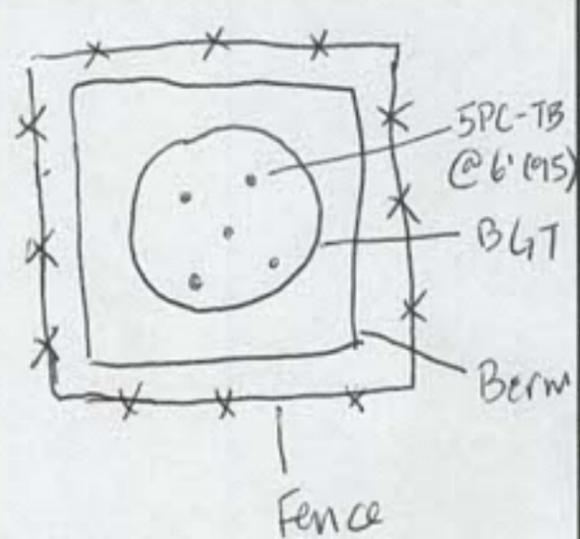
Sample ID: \_\_\_\_\_ Time: \_\_\_\_\_ Sample Type: Grab / Composite - pts PID: \_\_\_\_\_ ppm Lab: \_\_\_\_\_  
Notes: \_\_\_\_\_

Soil Sampling

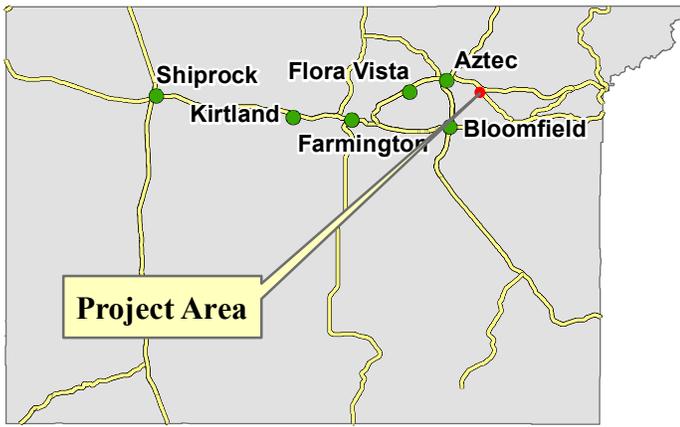
Sample ID: \_\_\_\_\_ Time: \_\_\_\_\_ Sample Type: Grab / Composite - pts PID: \_\_\_\_\_ ppm Lab: \_\_\_\_\_  
Notes: \_\_\_\_\_

Site Sketch

Notes



Mini Rae  
PID Calibration Date: 4/15/24



San Juan County, New Mexico



Notes: All samples collected 4/15/2024. 5PC-TB@6'(95) is a 5-point composite sample.

<p><b>Legend</b></p> <ul style="list-style-type: none"> <li> Oil &amp; Gas Wells</li> <li> Soil Sample</li> <li> BGT Location</li> </ul>	<p><b>Cottonwood</b> CONSULTING </p> <p>Mapping by: K. O'Brien, 4/15/2024 Coordinate System: NAD 1983 UTM Zone 13 N</p> <p>Location: Sec 20 T30N R10W NMPM</p>	<p><b>Stewart LS #005</b> <b>Project Map</b> <b>Simcoe LLC</b></p>
---	--	--



**Stewart LS #005  
Photographic Log  
Simcoe, LLC**

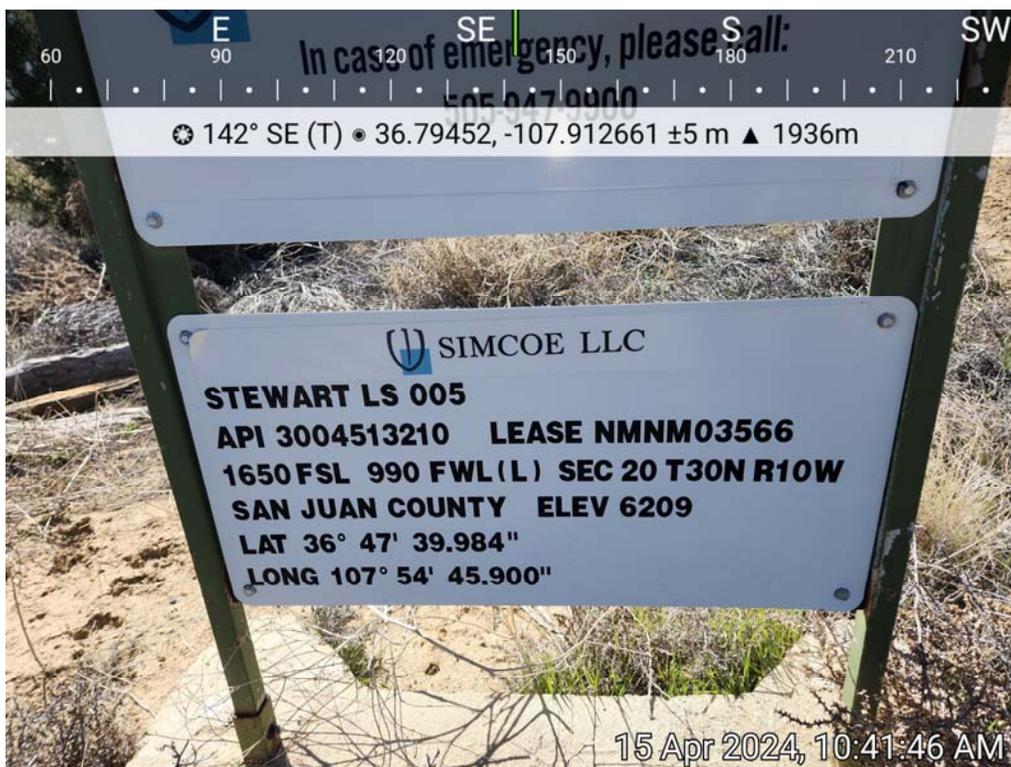


Photo 1: Stewart LS #005 well sign, 4/15/2024.



Photo 2: BGT prior to removal, 4/15/2024.



**Stewart LS #005  
Photographic Log  
Simcoe, LLC**

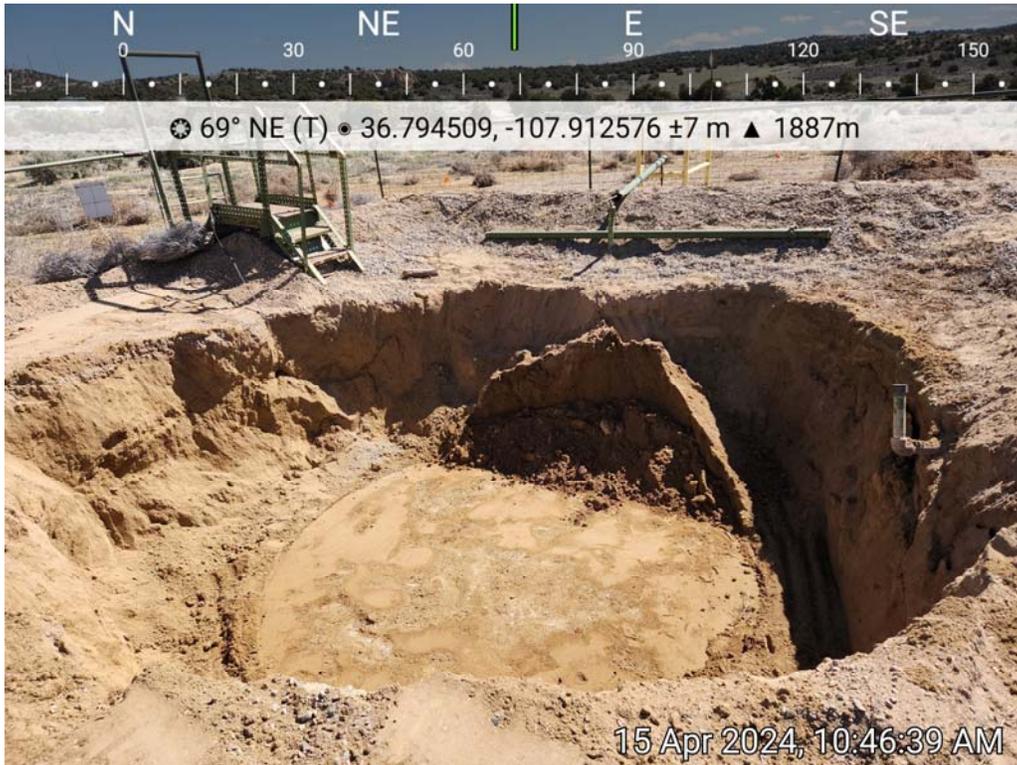


Photo 3: Location of BGT following removal, 4/15/2024.



Photo 4: Bottom of BGT following removal, 4/15/2024.



**Stewart LS #005  
Photographic Log  
Simcoe, LLC**



Photo 5: Location of BGT following backfilling and grading, 5/16/2024.



75 Suttle Street  
Durango, CO 81303  
970.247.4220 Phone  
jeremy.allen@greenanalytical.com

23 April 2024

Kyle Siesser  
Cottonwood Consulting  
PO Box 1653  
Durango, CO 81302  
RE: Stewart LS #005

Enclosed are the results of analyses for samples received by the laboratory on 04/15/24 12:15. The data to follow was performed, in whole or in part, by Green Analytical Laboratories. Any data that was performed by a subcontract laboratory is included within the GAL report, or with an additional report attached.

If you need any further assistance, please feel free to contact me.

Sincerely,

A handwritten signature in blue ink that reads 'Veronica J. Wells'.

Veronica Wells  
Project 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: TX-C24-00019

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: T104704398-23-16

## Table of Contents

Samples in Report	3
Sample Results	4
2404146-01: 5PC-TB@6'(95)	4
Quality Assurance Results	5
Notes and Definitions	7
Chain of Custody & Attachments	8



Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, Cl  
Project Name / Number: Stewart LS #005  
Project Manager: Kyle Siesser

**Reported:**  
04/23/24 09:37

**ANALYTICAL REPORT FOR SAMPLES**

Sample ID	Laboratory ID	Matrix	Date Sampled	Date Received	Notes
5PC-TB@6(95)	2404146-01	Solid	04/15/24 10:45	04/15/24 12:15	

Green Analytical Laboratories

Veronica Wells, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.



Cottonwood Consulting  
 PO Box 1653  
 Durango CO, 81302

Project: BTEX/TPH, CI  
 Project Name / Number: Stewart LS #005  
 Project Manager: Kyle Siesser

Reported:  
 04/23/24 09:37

**5PC-TB@6'(95)**

**2404146-01 (Soil)**

**Sampled Date: 04/15/24 10:45**

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

**General Chemistry**

% Dry Solids	93.9			%	1	04/15/24 17:10	EPA160.3/1684		CAI
--------------	------	--	--	---	---	----------------	---------------	--	-----

**Soluble (DI Water Extraction)**

Chloride	10.6	10.6	0.591	mg/kg dry	10	04/17/24 22:59	EPA300.0		AWG
----------	------	------	-------	-----------	----	----------------	----------	--	-----

**Subcontracted -- Cardinal Laboratories 101 East Marland Hobbs, NM 88240**

**Volatile Organic Compounds by EPA Method 8021**

Benzene*	<0.050	0.050	0.011	mg/kg	50	04/18/24 13:10	8021B		JH
Ethylbenzene*	<0.050	0.050	0.013	mg/kg	50	04/18/24 13:10	8021B		JH
Toluene*	<0.050	0.050	0.013	mg/kg	50	04/18/24 13:10	8021B		JH
Total BTEX	<0.300	0.300	0.030	mg/kg	50	04/18/24 13:10	8021B		JH
Total Xylenes*	<0.150	0.150	0.025	mg/kg	50	04/18/24 13:10	8021B		JH

Surrogate: 4-Bromofluorobenzene (PID) 104 % 71.5-134 04/18/24 13:10 8021B JH

**Petroleum Hydrocarbons by GC FID**

DRO >C10-C28*	<10.0	10.0	4.26	mg/kg	1	04/17/24 21:55	8015B		MS
EXT DRO >C28-C36	<10.0	10.0	4.26	mg/kg	1	04/17/24 21:55	8015B		MS
GRO C6-C10*	<10.0	10.0	6.25	mg/kg	1	04/17/24 21:55	8015B		MS

Surrogate: 1-Chlorooctadecane 68.6 % 49.1-148 04/17/24 21:55 8015B MS

Surrogate: 1-Chlorooctane 74.9 % 48.2-134 04/17/24 21:55 8015B MS

Green Analytical Laboratories

Veronica Wells, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.



Cottonwood Consulting  
 PO Box 1653  
 Durango CO, 81302

Project: BTEX/TPH, CI  
 Project Name / Number: Stewart LS #005  
 Project Manager: Kyle Siesser

Reported:  
 04/23/24 09:37

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

Analyte	Result	Reporting Limit	Units	Spike Level	Source Result	%REC	%REC Limits	RPD	RPD Limit	Notes
<b>Batch B240903 - IC- Ion Chromatograph</b>										
<b>Blank (B240903-BLK1)</b> Prepared: 04/16/24 Analyzed: 04/17/24										
Chloride	ND	10.0	mg/kg wet							
<b>LCS (B240903-BS1)</b> Prepared: 04/16/24 Analyzed: 04/17/24										
Chloride	253	10.0	mg/kg wet	250		101	85-115			
<b>LCS Dup (B240903-BSD1)</b> Prepared: 04/16/24 Analyzed: 04/17/24										
Chloride	252	10.0	mg/kg wet	250		101	85-115	0.340	20	

**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
<b>Batch 4041749 - Volatiles</b>										
<b>Blank (4041749-BLK1)</b> Prepared: 04/17/24 Analyzed: 04/18/24										
Surrogate: 4-Bromofluorobenzene (PID)	0.0550		mg/kg	0.0500		110	71.5-134			
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							
<b>LCS (4041749-BS1)</b> Prepared: 04/17/24 Analyzed: 04/18/24										
Surrogate: 4-Bromofluorobenzene (PID)	0.0487		mg/kg	0.0500		97.5	71.5-134			
Benzene	2.06	0.050	mg/kg	2.00		103	82.8-130			
Ethylbenzene	2.05	0.050	mg/kg	2.00		102	85.9-128			
m,p-Xylene	4.08	0.100	mg/kg	4.00		102	89-129			
o-Xylene	2.06	0.050	mg/kg	2.00		103	86.1-125			
Toluene	2.01	0.050	mg/kg	2.00		101	86-128			
Total Xylenes	6.14	0.150	mg/kg	6.00		102	88.2-128			
<b>LCS Dup (4041749-BSD1)</b> Prepared: 04/17/24 Analyzed: 04/18/24										
Surrogate: 4-Bromofluorobenzene (PID)	0.0493		mg/kg	0.0500		98.6	71.5-134			
Benzene	2.07	0.050	mg/kg	2.00		104	82.8-130	0.499	15.8	
Ethylbenzene	2.06	0.050	mg/kg	2.00		103	85.9-128	0.667	16	
m,p-Xylene	4.10	0.100	mg/kg	4.00		102	89-129	0.309	16.2	

Green Analytical Laboratories

Veronica Wells, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.



Cottonwood Consulting  
 PO Box 1653  
 Durango CO, 81302

Project: BTEX/TPH, CI  
 Project Name / Number: Stewart LS #005  
 Project Manager: Kyle Siesser

Reported:  
 04/23/24 09:37

**Volatile Organic Compounds by EPA Method 8021 - Quality Control  
 (Continued)**

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

**Batch 4041749 - Volatiles (Continued)**

**LCS Dup (4041749-BSD1) (Continued)**

Prepared: 04/17/24 Analyzed: 04/18/24

o-Xylene	2.07	0.050	mg/kg	2.00		104	86.1-125	0.620	16.7	
Toluene	2.03	0.050	mg/kg	2.00		101	86-128	0.608	15.9	
Total Xylenes	6.17	0.150	mg/kg	6.00		103	88.2-128	0.414	16.3	

**Petroleum Hydrocarbons by GC FID - Quality Control**

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

**Batch 4041728 - General Prep - Organics**

**Blank (4041728-BLK1)**

Prepared & Analyzed: 04/17/24

Surrogate: 1-Chlorooctadecane	44.5		mg/kg	50.0		89.0	49.1-148			
Surrogate: 1-Chlorooctane	48.3		mg/kg	50.0		96.6	48.2-134			
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 (4041728-BS1)**

Prepared & Analyzed: 04/17/24

Surrogate: 1-Chlorooctadecane	48.5		mg/kg	50.0		97.0	49.1-148			
Surrogate: 1-Chlorooctane	49.4		mg/kg	50.0		98.8	48.2-134			
DRO >C10-C28	174	10.0	mg/kg	200		87.2	66.5-118			
GRO C6-C10	185	10.0	mg/kg	200		92.4	66.4-123			
Total TPH C6-C28	359	10.0	mg/kg	400		89.8	77.6-123			

**LCS Dup (4041728-BSD1)**

Prepared & Analyzed: 04/17/24

Surrogate: 1-Chlorooctadecane	50.4		mg/kg	50.0		101	49.1-148			
Surrogate: 1-Chlorooctane	51.8		mg/kg	50.0		104	48.2-134			
DRO >C10-C28	174	10.0	mg/kg	200		87.1	66.5-118	0.0821	21	
GRO C6-C10	188	10.0	mg/kg	200		93.8	66.4-123	1.51	17.7	
Total TPH C6-C28	362	10.0	mg/kg	400		90.4	77.6-123	0.743	18.5	

Green Analytical Laboratories

Veronica Wells, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.



Cottonwood Consulting  
PO Box 1653  
Durango CO, 81302

Project: BTEX/TPH, CI  
Project Name / Number: Stewart LS #005  
Project Manager: Kyle Siesser

**Reported:**  
04/23/24 09:37

**Notes and Definitions**

- 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

Green Analytical Laboratories

Veronica Wells, Project Manager

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety. In no event shall Green Analytical Laboratories be liable for incidental or consequential damages. GALs liability, and clients exclusive remedy for any claim arising, shall be limited to the amount paid by client for analyses. All claims, including those for negligence and any other cause whatsoever, shall be deemed waived unless made in writing and received within thirty days after completion of the applicable service.





SAMPLE CONDITION RECEIPT FORM

Client Name: Cottonwood Consulting

Work Order # 2404-146

Courier:  Fed Ex  UPS  USPS  Client  Kangaroo  Third Party  Other

Custody Seals on Box/Cooler Present:  Yes  No      Seals Intact:  Yes  No

Thermometer Used: #2      Samples on ice, cooling process has begun:  Yes  No

Type of Ice:  Wet  Blue  None

Cooler Temp: Observed Temp: 7.1 °C      Correction Factor: 0 °C      Final Temp: 7.1 °C

\*Temp should be above freezing to 6°C

Date/Initials of person examining contents: 4.15.24  
CDN  
Labeled by initials: \_\_\_\_\_  
(if different than above)

Chain of Custody Present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	1.
Chain of Custody Filled Out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	2.
Chain of Custody Relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	3.
Sampler Name and Signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	4.
Samples arrived within hold time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	5.
Short Hold Time Analysis (<72hr):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	6.
Rush Turn Around Time Requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	7.
Sufficient Volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	8. <u>Aliquot taken</u>
Correct Containers Used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	9.
Containers Intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	10.
Dissolved Testing Needed:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	11.
Field Filtered: <input type="checkbox"/> Yes <input type="checkbox"/> No		
Sample Labels match COC: -Includes Date/Time/ID	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	12.
Matrix:	WT <input checked="" type="checkbox"/> SL <input type="checkbox"/> OT	
Trip Blank Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	13.
Trip Blank Custody Seals Present:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	

Client Notification/Resolution:

Person Contacted: \_\_\_\_\_

Date/Time: \_\_\_\_\_

Comments/Resolution: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

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

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

CONDITIONS  
 Action 345425

**CONDITIONS**

Operator: SIMCOE LLC 1199 Main Ave., Suite 101 Durango, CO 81301	OGRID: 329736
	Action Number: 345425
	Action Type: [C-144] Below Grade Tank Plan (C-144B)

**CONDITIONS**

Created By	Condition	Condition Date
joel.stone	Upon the plugging and abandonment of well API 30-045-13210 (Stewart LS #005) and cessation of all production operations in the area associated with this below-grade tank, Simcoe, LLC shall complete requirements of 19.15.17.13.H NMAC for the area associated with this below-grade tank and notify the OCD when restoration, reclamation and re-vegetation are complete.	5/21/2024
joel.stone	All future C-144 Form submittals related to this below-grade tank must include OCD Permit Number: BGT99 in Section 1 of the C-144 Form.	5/21/2024