



February 5, 2021

Mr. Rob Young  
Northeast Environmental Protection Specialist  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

**RE: Facility ID 104590; Gulley 1-D Pit Closure Request  
PADCO, LLC  
SENE Section 21 T2S R53W Washington County, Colorado**

Mr. Young;

Lesair Environmental, Inc. (Lesair), on behalf of our client PADCO, LLC, is submitting a request to backfill and close the historic skim pit and produced water pit (Form 15 Doc #707852) associated with the Gulley 1-D well. This pit reclamation project is referenced in initial Form 27 Doc # 402498609 and remediation project 15981.

These pits tested positive for hydrocarbon contaminated soils and required remediation to meet applicable Table 910 standards based on analysis dated October 2, 2020. As described in the remedial action plan (Supplemental Form 27 document number 402529448), PADCO has excavated the contaminated soil and is in the process of hauling this soil to the Republic Services Tower Landfill as non-hazardous oilfield waste.

#### **Skim Pit**

Closure sampling for the skim pit (~20 ft x ~20 ft pit) occurred on January 22, 2021 (following the removal of contaminated soil). Four (4) samples were pulled, one (1) from the skim pit bottom and three (3) from the skim pit sidewalls. See Attachment A for the sampling location diagram and Table 1 for the skim pit analytical results.

The highest total petroleum hydrocarbon (TPH) reading was determined to be 87 mg/kg from sample SP3 (East sidewall at ~12 ft depth). The skim pit was excavated to a depth of ~15 ft, with approximately 150 cubic yards of soil being removed and hauled to the Republic Services Tower Landfill. See attached Skim Pit Photo Log for photographs of the excavated skim pit.

#### **Produced Water Pit**

Closure sampling of the produced water pit (~60 ft x ~55 ft) occurred on February 2, 2021. Seven (7) samples were pulled, three (3) from the pit bottom and four (4) from the pit sidewalls. See attachment A for the sample location diagram and Table 2 for the produced water pit analytical results.

All seven (7) samples came back non-detect (ND) for TPH and BTEX. Analytical results for sodium adsorption ratio (SAR) and specific conductance (EC) also were within table 910 standards. The produced water pit was excavated to a depth of ~20 ft, with approximately 380 cubic yards of hydrocarbon impacted soil hauled to the Republic Services Tower Landfill. See attached Produced Water Pit Photo Log for photographs of the excavated pit.

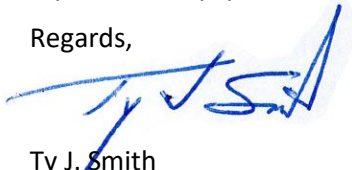
**Summary**

The analytical results of the soil sampling indicate both the skim pit and produced water pit now meet closure requirements of COGCC Table 910-1 acceptance levels. All hydrocarbons (TPH) register below the 500 mg/kg limit, BTEX levels are non-detectable, and SAR/EC levels are below the threshold. It was noted that the pH values are slightly high, however, Lesair believes this should be considered acceptable. The laboratory analyses are found in Attachment D.

As the historical skim pit and produced water pit now meet COGCC closure limits, PADCO is requesting approval to backfill and apply topsoil to the surface of the pits. Returning this portion back to the landowner for agricultural use.

If you have any questions regarding this project, please contact Ty Smith (Lesair) at (303) 904-2525.

Regards,



Ty J. Smith  
Sr. Environmental Engineer

enclosures:

cc: Dan Richmond; PADCO, LLC

**PADCO LLC**

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**Remediation Project 15981**

Gulley 1-D

**Attachment A**

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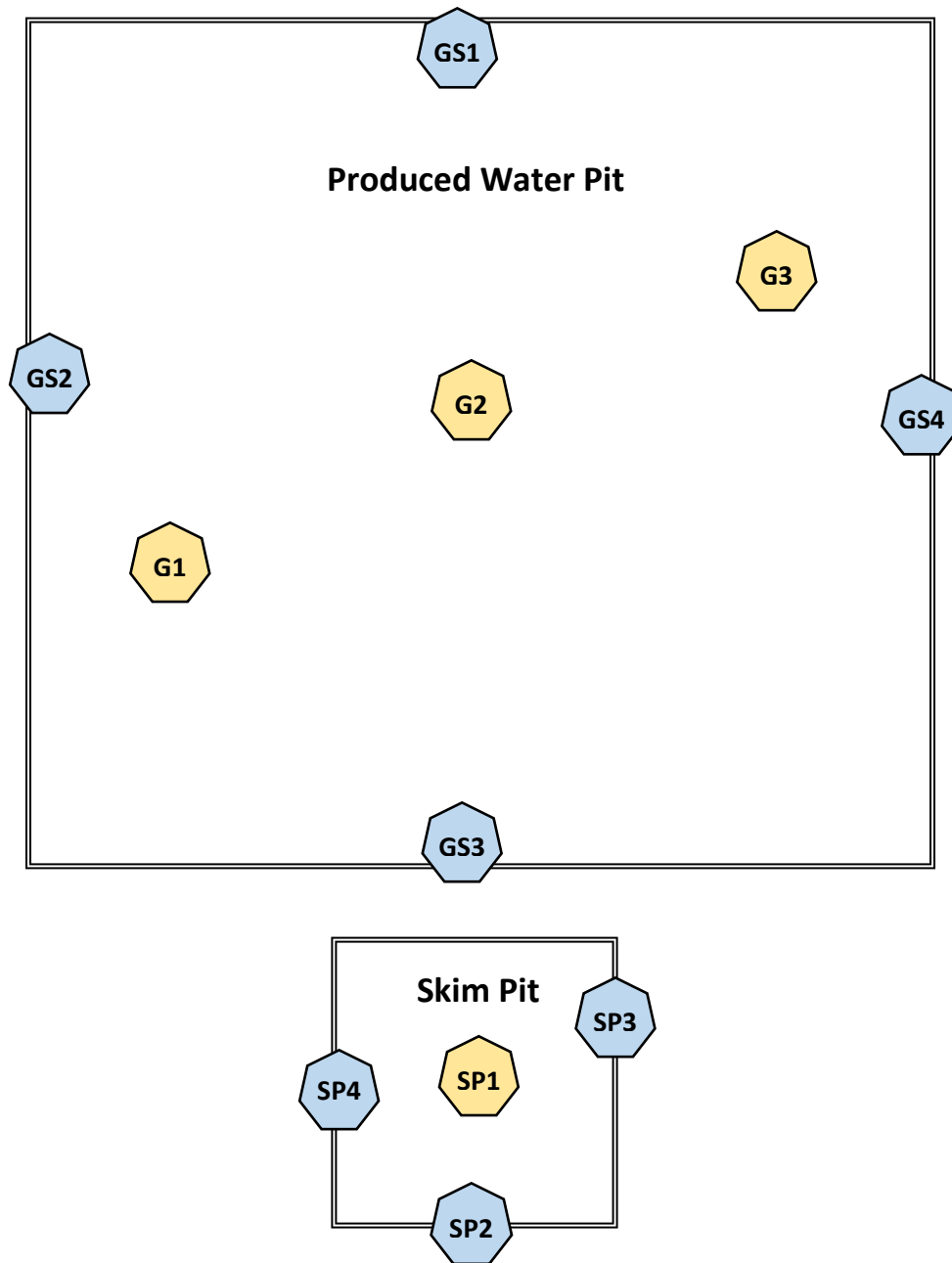
**Sample Location Diagram**

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**Prepared for:**  
PADCO LLC

**Prepared by:**  
Lesair Environmental, Inc.  
[www.Lesair.com](http://www.Lesair.com)



11786 Shaffer Place, Unit 210  
Littleton, CO 80127  
Office: (303) 904-2525

Drawn By: Erick Magana Date: 02/05/2021

Approved By: Ty Smith

**ATTACHMENT A**  
**Gulley 1-D**

Latitude: 39.865019° N

Longitude: -103.311837° W

Section: 21

Township: 2S

Range: 53W

**PADCO LLC**

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**Remediation Project 15981**

Gulley 1-D

**Attachment B**

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**Analytical Results**

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**Prepared for:**  
PADCO LLC

**Prepared by:**  
Lesair Environmental, Inc.  
[www.Lesair.com](http://www.Lesair.com)

TABLE 1

**Gulley 1-D Historic Pit Remediation**

PADCO LLC

**Skim Pit Analytical Results**

Sample Date	Sampled By	Soil Sample	Location	Sample Depth (feet)	DRO (mg/kg)	ORO (mg/kg)	GRO (mg/kg)	TPH (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Xylene (mg/kg)	pH
---	---	<b>Table 910</b>	---	---	---	---	---	<b>500</b>	<b>0.17</b>	<b>85</b>	<b>100</b>	<b>175</b>	<b>6-9</b>
1/22/2021	Lesair	SP1	Skim Pit Bottom	~15	ND	ND	ND	ND	ND	ND	ND	ND	8.88
1/22/2021	Lesair	SP2	S. Side Wall	~12	ND	ND	ND	ND	---	---	---	---	9.16
1/22/2021	Lesair	SP3	W. Side Wall	~12	ND	87	ND	87	---	---	---	---	8.86
1/22/2021	Lesair	SP4	E. Side Wall	~12	ND	57	ND	57	---	---	---	---	9.1

TABLE 2

## Gulley 1-D Historic Pit Remediation

PADCO LLC

## Main Pit Analytical Results

Sample Date	Sampled By	Soil Sample	Location	Sample Depth (feet)	DRO (mg/kg)	ORO (mg/kg)	GRO (mg/kg)	TPH (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Xylene (mg/kg)	pH
---	---	Table 910	---	---	---	---	---	500	0.17	85	100	175	6-9
2/2/2021	Lesair	G1	SW Pit Bottom	~20	ND	ND	ND	ND	ND	ND	ND	ND	9.54
2/2/2021	Lesair	G2	Center Pit Bottom	~20	ND	ND	ND	ND	ND	ND	ND	ND	9.62
2/2/2021	Lesair	G3	NE Pit Bottom	~20	ND	ND	ND	ND	ND	ND	ND	ND	9.46
2/2/2021	Lesair	GS1	N Side wall	~14-16	ND	ND	ND	ND	ND	ND	ND	ND	9.35
2/2/2021	Lesair	GS2	W Side Wall	~14-16	ND	ND	ND	ND	ND	ND	ND	ND	9.38
2/2/2021	Lesair	GS3	S Side Wall	~14-16	ND	ND	ND	ND	ND	ND	ND	ND	9.11
2/2/2021	Lesair	GS4	E Side Wall	~14-16	ND	ND	ND	ND	ND	ND	ND	ND	9.4

Sample Date	Sampled By	Soil Sample	Location	Sample Depth (feet)	Sodium Adsorption Ratio	Specific Conductance (EC) (mmhos/cm)	% Solids	Calcium (mg/kg)	Magnesium (mg/kg)	Sodium (mg/kg)
---	---	Table 910	---	---	<12	<4	---	---	---	---
2/2/2021	Lesair	G1	SW Pit Bottom	~20	---	---	---	---	---	---
2/2/2021	Lesair	G2	Center Pit Bottom	~20	---	---	---	---	---	---
2/2/2021	Lesair	G3	NE Pit Bottom	~20	---	---	---	---	---	---
2/2/2021	Lesair	GS1	N Side wall	~14-16	---	---	---	---	---	---
2/2/2021	Lesair	GS2	W Side Wall	~14-16	---	---	---	---	---	---
2/2/2021	Lesair	GS3	S Side Wall	~14-16	4.9	1.51	84.4	13700	2200	2360
2/2/2021	Lesair	GS4	E Side Wall	~14-16	---	---	---	---	---	---