

# Remediation Action Plan Gulley Off-Location Flowline PADCO, LLC

## **SUMMARY:**

PADCO (COGCC operator ID 24500) plugged the Gulley #1-D (API 05-121-08922) in November 2020. PADCO received a “no further action” approval on September 15, 2021, associated with the remediation/reclamation of the Gulley Production Facility and historic produced water pits. PADCO is now removing the off-location flowline (Flowline ID 317112) associated with the Gulley #1-D.

The land use associated with the Gulley #1-D off-location flowline is a “dry farmed” agricultural field.

Below is the “remediation action plan” proposed for the closure of the Gulley Off-Location Flowline.

### **Gulley #1-D Off-Location Flowline:**

The Gulley #1-D off-location flowline follows a straight line from the Gulley #1-D well head (API 05-121-08922) approximately 475 feet to where it connected to the heater treater at the Gulley Production Facility (see Attachment A). The flowline crosses an agricultural field. A Form 44 was filed on September 7, 2022 (Form 44 doc# 403126347) indicating the flowline would be removed per COGCC Rule 1105.

Flowline integrity was known to be good during the operation of the well and there were no spills or releases associated with the flowline. During flowline abandonment any liquids evacuated from the flowline will be properly contained and disposed in compliance with Rule 905.

During excavation the flowline trench will be visually inspected for potential signs of contamination and photo documentation will be taken. Per Rule 913.h, soil samples will be taken from areas most likely impacted during the operation of the flowline. Soil samples will be taken at the wellhead riser, the riser to connect to the heater treater, at unions and/or connections or line type transitions found during excavation, and any points that are considered suspect due to visual observations.

Laboratory analysis results will be obtained and reviewed prior to any continued work associated with the flowline trench. If all analysis results meet Table 915-1 thresholds, the flowline excavation will be backfilled. If there are exceedances found, the extent of the contamination will be determined, the contaminated soil will be removed and hauled to disposal.

Based on flowline depth, encountering groundwater during the flowline excavation is not anticipated but if encountered, PADCO will notify COGCC EPS, collect and analyze a groundwater sample for Table 915-1, and soil investigation will proceed using the Table 915-1 “Protection of Groundwater Soil Screening Level Concentrations”.