



June 2, 2023

Ms. Krystal Heibel
Environmental Protection Specialist
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

**RE: Document ID 403356248; Request for No Further Action
COGCC Operator ID 24500; PADCO, LLC**

Ms. Heibel,

PADCO (COGCC operator ID 24500) is requesting a finding of No Further Action (NFA) required associated with the Gulley #1-D off-location flowline removal. PADCO has removed the off-location flowline (Flowline ID 317112) and performed appropriate sampling and analysis. PADCO is now seeking a finding of NFA allowing PADCO to backfill the flowline trench.

BACKGROUND:

The Gulley #1-D well was in the SENE of Section 21, Township 2 South, Range 53 West in Washington County, Colorado. PADCO plugged the Gulley #1-D (API 05-121-08922) in November 2020 and received a “no further action” approval associated with the remediation/reclamation of the Gulley Production Facility and historic produced water pits on September 15, 2021. The land use associated with the Gulley #1-D off-location flowline is a “dry farmed” agricultural field.

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. Form 44 was filed on September 7, 2022 (Form 44 doc# 403126347) indicating the flowline would be removed per COGCC Rule 1105. Form 27 (doc# 403356248) was filed on March 25 and approved on April 19, 2023.

PROJECT:

On May 9, 2023, the Gulley #1-D off-location flowline was uncovered. The flowline was a fiberglass flowline about 475 feet in length. The 475 feet was comprised of about 415 feet of fiberglass flowline, with a 30-foot joint of steel flowline at each end (see Attachment A).

Soil samples were taken at the required points (per conditions of approval) along the flowline (see Attachment A). During excavation the flowline trench was visually inspected for potential signs of contamination. Per Rule 913.h, soil samples were taken from areas most likely impacted during the operation of the flowline, at the wellhead riser (G1-WHR), the riser to connect to the heater treater (G1-TRTR), at unions and/or connections or line type transitions found during excavation (G1a, G1b) and any points that are considered suspect due to visual observations (G1c). The COA also called for a determination of the presence or absence of contamination at least every 250' of the flowline length (G1f). These results are shown in Attachment B.

There were some sample points that had indications of contaminations (G1b, G1c). The contaminated soil was removed (~25 cubic yards) and has been stockpiled prior to being hauled off

to Pawnee Waste. The areal extent of the contamination was verified as removed by the final samples taken associated with these two (2) sample points (see analysis results associated with sample points G1b2, G1c2).

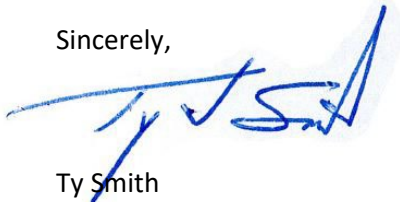
There was an anomalous reading for boron at sample point G1a (5.84 mg/L). There were no other boron samples that indicated a boron issue. PADCO is requesting a NFA finding for this boron reading.

There was also one pH value (8.43) at sample point G1c2. This reading is only slightly above the Table 915-1 range of 6-8.3 and no other samples indicated a pH issue. PADCO is requesting a NFA finding for this sample.

After your review, PADCO is requesting the Commission make a determination of "No Further Action" and allow the flowline trench to be buried and the area be returned to the farmer for agricultural use.

Please contact either Ty Smith at 303.903.4443 (tysmith@lesair.com) or Mr. Dan Richmond at 918.630.9912 (dan@dsrinc.net) if you have any questions.

Sincerely,



Ty Smith
Senior Project Manager
Lesair Environmental, Inc.