



August 26, 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 (Remediation Project #15981)  
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 the final closure documentation as per the three (3) conditions of approval (COA) associated with approved COGCC e-form 27 document #402593298. This pit reclamation project is referenced in initial e-Form 27 Doc # 402498609 as remediation project 15981.

This remediation project #15981 includes the Gulley 1-D skim pit (~20 ft x ~20 ft pit) and produced water pit (~60 ft x ~55 ft) which was started in October 2020 and concluded in February 2021. Based on sampling analysis results submitted, approval was obtained to close the pit excavations on February 10, 2021. The pit excavations were subsequently filled with clean fill soil and then clean topsoil (See Photos 1 and 2). The soil was then plowed to make ready for planting (see Photos 3 and 4).

The information below should resolve the requested three (3) conditions of approval (COA) found in the approved COGCC e-form 27 document #402593298.

**Condition of Approval No. 1**

COA#1 (e-form 27 #402593298) requested samples be taken between 0 – 2 feet and analyzed for sodium absorption ratio (SAR) and electrical conductivity (EC). Soil samples were taken across the pit remediation area (at various depths 6” - 24” in depth) and combined into a composite sample (GTS1). See Photo 5 for the location of the sample points.

The result of the composite sample is as follows:

Sample	Date	SAR	EC	Boron	pH
Table 915	----	<6.0	<4.0 mmhos/cm	2 mg/l	6 – 8.3
GTS1	03/25/2021	4.1	1.5	0.22	8.1

**Condition of Approval No. 2**

COA#2 required the oil-stained soil to be removed from the West side of the Gulley 1-D Tank Battery and confirmation samples to be obtained.

A trench was dug along the West side of the Gulley 1-D Tank Battery (see Photo 6) to determine the extent of the staining. All of the stained soil was removed and placed in the disposal soil piles from the pit excavation and hauled to the Republic Tower landfill facility (Republic manifests for all remediation disposal uploaded to COGCC site).

The results of this confirmation sampling are as follows:

Sample	Date	TPH	Benzene	Toluene	E-Benzene	Xylene
Table 915	---	500 mg/kg	1.2 mg/kg	490 mg/kg	5.8 mg/kg	58 mg/kg
WTB	02/11/2021	ND	ND	ND	ND	ND

Sample	Date	SAR	EC	Boron	pH
Table 915	----	<6.0	<4.0 mmhos/cm	2 mg/l	6 – 8.3
GTS2	02/11/2021	1.4	0.59	0.93	8.26

**Condition of Approval No. 3**

COA#3 requires Spil ID #469938 to be resolved. This potentially contaminated soils associated with this spill were removed and included in the other soils that were hauled to Republic Tower Road landfill facility (manifests not specifically identified but included in main submittal).

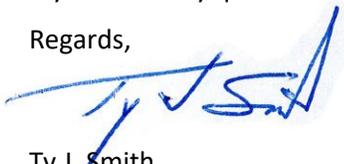
A Supplement e-form 19 is being included (identified) with this e-form 27 final closer document (COGCC ID# 402794356).

**Summary**

All of the conditions of approval (COA) have been completed for the Gulley 1-D (remediation project # 15981). The laboratory analyses are found in attached.

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