September 28, 2023

Ms. Krystal Heibel
Environmental Protection Specialist
Colorado Energy & Carbon Management Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Spill/Release Point ID: 484841; Request for No Further Action
Initial Form-19 Document ID: 403463899
ECMC Operator ID 24500; PADCO, LLC

Ms.Heibel,

PADCO (ECMC operator ID 24500) is requesting a finding of No Further Action (NFA) associated with the Wright Tank Battery July 2023 Spill (Spill ID 484841). The spill has been cleaned up, waste soil has been hauled to an approved off-site disposal facility, and appropriate sampling/analysis has been performed showing the site meets Table 915 thresholds. PADCO is now requesting a finding of No Further Action (NFA).

BACKGROUND:
The Wright Tank Battery (WTB) is located in the SWNW of Section 22, Township 2 South, Range 53 West in Washington County, Colorado. The Wright Tank Battery receives production from a single existing producing well, the Wright #1 (API 05-121-08867).

A release was discovered at approximately 18:00 hours on July 12, 2023, at the Wright Tank Battery. The release was approximately 15 barrels of oil from a pressure safety valve that failed on the heater treater. The initial Form-19 was filed on July 13, 2023 (ECMC document no. 403463899).

A Supplemental Form-19 (ECMC document number 403466214) was filed on July 21, 2023, and approved with two (2) "conditions of approval" (see below). In the Supplemental Form-19 there was an initial estimate that 40 cubic yards of soil was impacted by the release, about 63 cubic yards of waste soil was hauled to disposal.

CONDITIONS OF APPROVAL:

1. *Operator shall submit a "Soil Sampling Location Map" that includes: a scale, an aerial photograph that shows the location of sample(s) and background sample(s), per Rule 913.h.(4).A..*

   "Soil sample location maps" have been submitted as Attachment A and Attachment B of this Supplemental Form-19. Attachment A indicates the background sample point locations (A and WTB-BG). Attachment B indicates the sample point locations of soil samples with laboratory analysis (WTB-1,2,3,B, and 31) and soil samples that were qualitatively analyzed using a photo-ionic detector (to give an indication of hydrocarbon impact in the soil)_.

2. *Operator shall collect confirmation soil samples as described in the Rule 915.e.(2) Guidance Document. Operator will analyze soil samples for TPH (C6-C36), Table 915-1 Organic*

Compounds in Soil, Table 915-1 metals, and Table 915-1 Soil Suitability for Reclamation (Electrical conductivity, Sodium adsorption ratio, and pH by saturated paste method, boron (hot water soluble)).

An approximate "worst case" soil sample associated with the soil impacted by the spill was collected (WTB-WS) and analyzed. The analysis results (TPH, SAR, EC, pH, metals) are listed in the top row of each of the three (3) summary tables of Attachment C. There were no negative impacts associated with "Soil Suitability for Reclamation".

Closure Samples (confirmation samples) were collected and compared against "Protection of Groundwater" Soil Screening Level (SSL) concentrations. The soil sample (WTB-1) analysis, from sample point 1, was analyzed for hydrocarbon, soil suitability for reclamation, and metals (See Attachment C, Metals analysis is attached to this report). At a depth of ~8" bgl (below ground level) the TPH was 3,609 mg/kg but at a depth of ~16" it was 1.2 mg/kg. Soil was removed through this area to a depth of ~16" bgl. It was also noted that arsenic and barium concentrations were higher than the Table 915-1 thresholds, however background samples (Sample Point A and WTB-BG) indicate that native soil concentrations are also high for arsenic and barium. (See Attachment C, Background sample analysis is attached to this report.) PADCO requests a finding of NFA associated with arsenic and barium based on these background concentrations.

Additional confirmation samples were taken at sample points 2, 3, B, and 31. Some samples had concentrations above the TPH threshold at ~8" bgl but at ~16" the TPH concentration was below Table 915-1 thresholds for TPH. Confirmation samples are highlighted in blue in Attachment C.

PADCO is requesting a NFA determination based on this information.

PROJECT:
After the submittal of the Supplemental Form-19 was submitted on July 21, 2023, Lesair Environmental went to location on July 28, 2023, to obtain soil samples and gather other pertinent data.

Soil samples were taken at the three (3) points on the three (3) sides of the heater treater that were impacted by the spill (North, East, South). At a depth of ~8: below ground level (bgl) there were hydrocarbon (TPH) impacts exceeding the Table 915-1 threshold of 500 mg/kg. At a depth of ~16" bgl, any hydrocarbon levels were below Table 915-1 thresholds.

To better delineate the potentially impacted soils, a sampling grid was established on August 15, 2023, and site samples were evaluated using a PID (photoionization detector). The PID samples were collected, heated, and sampled using a PID, with the vapor space concentration used as an indication of impacted soil. The vapor space readings were compared to samples taken from known impacted sample points and depths. Sample points and readings are shown on Attachment B. The field sample drawing is included as Attachment B2.

Results from the PID readings were used to determine what areas had impacted soil. Confirmation samples were then taken from these areas at ~8" and ~16". Impacted soils were removed down to ~16" bgl and hauled to an approved disposal (Pawnee Waste). Waste Manifests are attached.

After your review, PADCO is requesting the ECMC return a finding of “No Further Action”.

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.