



March 5, 2024

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

**RE: Spill/Release Point ID: 484182; Request for No Further Action
Initial Form-19 Document ID: 403353422
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 Venrick #1A March 2023 Spill (Spill ID 484182). 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 Venrick #1A well site is in the NWNW of Section 25, Township 1 North, Range 54 West in Washington County, Colorado. The Venrick #1A well (API #05-121-08071) produces to the Venrick Tank Battery located approximately 850 feet South of the well site.

A release was discovered at approximately 12:00 hours on March 22, 2023, at the Venrick #1A well. The release was approximately 3 barrels of oil (2 barrels recovered) and 25 barrels of produced water (18 barrels recovered) from cracked gate valve at the well head. The well was shut-in at the time of the release, the fluids released were from the flowline. The initial Form-19 was filed on March 22, 2023 (ECMC document no. 403353422).

CONDITIONS OF APPROVAL:

- 1. Pursuant to Rule 912.b.(6) Operator is required to submit a Form 19 Supplemental Report for the associated spill within 90 days of the spill date requesting closure pursuant to Rule 913.h and supported by adequate documentation to demonstrate that the Spill or Release has been fully cleaned up and complies with Table 915-1; or A Form 27 if any of the criteria listed in Rules 912.b.(6).B.i–iii apply. If Remediation will continue under an approved Form 27, the Operator will also submit a Form 19 – Supplemental which requests closure of the Spill or Release and includes the Remediation project number assigned by the Director. Form 19 Supplemental is due by June 20, 2023.*

This letter and supporting documentation is a request for “No Further Action” associated with the release. The release was cleaned up in April and May 2023. With all oil/salt water contaminated soils being hauled to an authorized disposal facility (Pawnee Waste).

The release was cleaned up prior to June 20, 2023.

2. *Per Rule 912.b.(4), the Operator shall make a supplemental report on Form 19 not more than 10 calendar days after the spill/release is discovered that includes: A. A topographic map showing the governmental section and location of the spill or an aerial photograph showing the location of the spill B. All pertinent information about the spill/release known to the Operator that has not been reported previously including photo documentation showing the source of the Spill or Release, the impacted area, and initial cleanup activity C. Information relating to the initial mitigation, site investigation, and remediation measures conducted by the Operator D. Global Positioning System data that meets the requirements of Rule 216 if latitude and longitude data provided pursuant to Rule 912.b.(2).A did not meet the requirements of Rule 216.*

Attachment A is an aerial map which indicates the release point. Attachment B indicates the locations of the sample locations (corresponding to the sample analysis in Attachment C) and Attachment B2 shows the background sample point location (VB). Attachment C provides a summary of the sample analysis. Attachment D provides photos of the initial release, sample locations, and site clean-up process.

3. *Operator shall collect confirmation soil samples as described in the Rule 915.e.(2). 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)).Operator shall collect confirmation soil samples as described in the Rule 915.e.(2).*

Closure Samples (confirmation samples) were collected and compared against "Protection of Groundwater" Soil Screening Level (SSL) concentrations. There were no negative impacts associated with "Soil Suitability for Reclamation" or 915 metals. Table 915 metals does show some high results for Arsenic, Barium, and Selenium but these are known to be naturally higher than the Groundwater SSL thresholds as demonstrated by the background soil sample (sample VB).

An approximate "worst case" soil sample associated with the soil impacted by the release was collected (V1) on March 22, 2023 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.

Closure samples were analyzed and found to meet Table 915-1 standards on the South, East, and West sides. An area North of the pumping unit was found to have additional hydrocarbon impacts (believed to be historical but not definitively known when they may have occurred). Excavation of this North area was completed and all impacted soils from the release and excavation were hauled to Pawnee Waste (manifests are attached).

Additional confirmation samples were taken at sample points V1-Na, V1-Ne, V1-Nw, V1-Ns, V1-Nn, V1-SWn and SWnn. These samples indicate that all of the hydrocarbon impacted soils was removed and the remaining soil meets Table 915-1 standards for "Protection of Groundwater" SSL concentrations.

Analysis results are found in Attachment C and indicate that all impacted soil were removed and the site meets Table 915-1 standards. PADCO is requesting a NFA determination based on this information.

PROJECT:

Lesair Environmental went to location on the day the release was discovered (March 22, 2023) to obtain soil samples and gather other pertinent data.

The initial soil sample was taken at location V1 (East side of the pumping unit), ~3" below ground level (bgl), to demonstrate the "worst case" impacts. After initial clean-up, soil samples were taken at the four (4) points, East (V1-6"); North (V1-N); South (V1-S); and West (V1-W) sides of the pumping unit.

Sample V1-W indicated a slightly elevated pH and an additional sample was collected (V1A-W) which indicated the pH was within Table 915-1 standards.

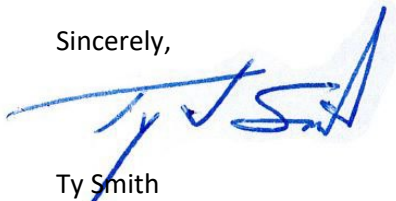
Sample V1A-N indicated elevated hydrocarbon levels and additional excavation was performed. After removing the hydrocarbon impacted soils, confirmation samples were taken (V1A-Na, Nn, Ns, Ne, Nw, and V1A-SWn and SWnn). These samples indicated hydrocarbon levels were below Table 915-1 thresholds.

Impacted soils were hauled to Pawnee Waste from April 20 through May 22, 2023. 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.