



May 1, 2024

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

**RE: Remediation Project: 25696; Status Report on Harpham Tank Battery Remediation Project
ECMC Operator ID: 24500; PADCO, LLC**

Ms. Heibel,

PADCO (ECMC operator ID 24500) is providing a status update concerning the Harpham Tank Battery (TB) remediation project (ECMC Remediation Project No. 25696). This project has experienced significant delays due to the extremely wet (high precipitation levels) that occurred throughout 2023.

PADCO is proposing a revised remediation and reclamation schedule (included in this letter) and some of the information requested in the conditions of approval (COA) within ECMC document 403329652.

BACKGROUND:

The Harpham Tank Battery (COGCC facility ID 317064) is in the NESE of Section 3, Township 2 North, Range 52 West of Washington County, Colorado. PADCO plugged the last well, the Harpham #3 (API #05-121-08090) associated with the Harpham Tank Battery in August 2022.

An initial eForm 27 (ECMC Document No. 403124740) was submitted on September 28, 2022, and approved on November 2, 2022. There were no conditions of approval stipulated.

A Supplemental eForm 27 (ECMC Document No. 403329652) was submitted on February 28, 2023, and approved (with COA) on May 17, 2023. That Supplemental eForm 27 indicated an "Implementation Schedule" where the site investigation was estimated to be completed by April 1, 2023 and the estimated completion of remediation was June 1, 2023. PADCO received conditional approval of the Supplemental Form 27 in May 2023.

PROJECT PERIODIC REPORT:

After the removal of the production equipment and off-location flowline, no additional site work has occurred since the conditional ECMC approval dated May 17, 2023. The lack of progress was due to inclement weather through all of 2023. In the six months (May – September) following the conditional approval, the site received over 20 inches of precipitation¹ (a typical calendar year of precipitation is 16.5"²). As shown in the included Harpham TB Photo Log, when PADCO started the initial site investigation, produced water pits #1 and #2 were dry (photos dated 09.09.2022). PADCO began monitoring the produced water pits from April to September 2023 and as shown in the photos, the freshwater levels in the pits kept any project work from being able to occur.

¹ National Weather Service; NOWData – NOAA Online Weather Data; Akron Washington County AP, CO; Calendar Year 2023

² www.usclimatedata.com; Colorado and Weather averages; Akron, CO

PADCO expects the pits to dry this summer and is tentatively planning to restart work on the Harpham Tank Battery remediation project (ECMC Remediation Project No. 25696) later this year. See revised "Remedial Action Dates" and "Site Reclamation Dates" below and in the Supplemental eForm 27 (ECMC document #403768758).

SITE RECLAMATION DATES

Proposed date of commencement of Reclamation: 08/01/2024

Proposed date of completion of Reclamation: 12/31/2024

SITE INVESTIGATION DATES

Proposed completion of site investigation: 10/01/2024

REMEDIAL ACTION DATES

Proposed start date of Remediation: 06/01/2024

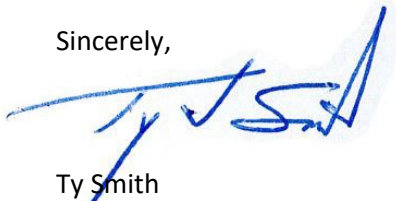
Proposed date of completion of Remediation: 12/31/2024

An initial FORM 44 was prepared and submitted (ECMC 403331153 on 02/27/2023) for the 30-day Notice of the off-location flowline (location ID 317064) removal. The Form 44 indicated that the off-location flowline would be "removed" per Rule 1105.d.(2).

Work began on the off-location flowline removal began on April 7, 2023 (38 days after the 30-day Notice was submitted). All of the off-location flowline has now been removed and initial closure samples taken. PADCO still needs to obtain Table 915-1 metals analysis associated with the closure samples and expects to obtain those samples in May 2024. A final Form 44 is being prepared.

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.