



September 12, 2024

Mr. Dylan Edwardson
East Reclamation Specialist
Colorado Energy & Carbon Management Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: ECMC Document No. 403919102
Colorado Federal 2A (Location ID 317035) Inspection Corrective Action Response
ECMC Operator ID 24500; PADCO, LLC

Mr. Edwardson,

PADCO (ECMC Operator ID 24500) is responding to the ECMC inspection dated May 15, 2023. A variance (Docket No. 230800267) has been requested from reclamation rules 1004.a, 1004.c(2) 1004.d, and 1004.e associated with the access road mentioned in the inspection report. The surface owner has retained responsibility for the roads for their own use in accessing their agricultural lands.

PADCO has not attempted to reclaim the access road or recontour due to the surface owner's request. As stated in the Staff's recommendation for approval, this inspection will be moot if the variance is approved by the Commission.

BACKGROUND:

The United States Colorado 2-A (aka Colorado Federal 2A) (API No. 121-06867) was in the SWNW Section 33, T62N, T53W of Washington County Colorado. The well was plugged and abandoned on December 10, 2014. The associated remediation project (for the well location, tank battery area, and produced water pits) was approved and received No Further Action (NFA) on July 30, 2020.

An inspection was performed on May 15, 2023 (Document No. 708200247) indicating that the access roads did not appear to have been reclaimed and the vegetative growth did not appear to be progressing towards Rule 1004 standards. There was one corrective action (CA) which is being addressed. The corrective action is listed below with the PADCO response.

CORRECTIVE ACTION (dated 05/15/2023):

Comply with Rule 1004. Reclaim access roads, contour/grade entire location, and reseed disturbance areas using a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Ensure erosion controls are implemented to stabilize the seeded soil. Operator shall continue to monitor and manage this site until the location meets Rule 1004 standards, including stormwater and weed management. Corrective action date is the date the location was observed out of compliance.

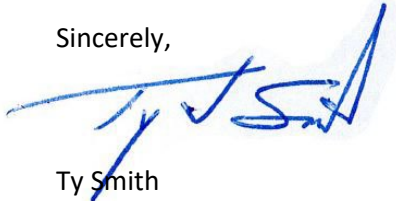
CORRECTIVE ACTION RESPONSE:

The well site location, tank battery site, and historic produced water pits have been reclaimed, contoured, and seeded in the original remediation closure (COGCC Document No. 402456032). The condition of the reclamation at the well location can be seen in photos included in Attachment A, and the photos of the tank battery and reclaimed produced water pits in Attachment B. These photos were taken during a site inspection dated August 28, 2024. The vegetative growth appears to be progressing well and is believed to have reached the uniform plant cover of at least 80% of the background areas shown (referenced areas).

PADCO has scheduled the reclaimed areas associated with the Colorado 2A (well location, tank battery, and reclaimed pit areas) to be sprayed with a pre-emergent herbicide to address the noxious weed issue (cheatgrass) mentioned in the inspection report. The weed spraying is planned sometime in October 2024 after the first soft freeze but before the seasons hard freeze. The surface owner has agreed to steward the maintenance of the weeds once the variance is granted.

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.