



September 16, 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
Follow-up Report to March 6, 2024, Submittal (ECMC Document No. 403709158)
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/Release Point ID 484182). This supplemental eForm-19 submittal addresses the two (2) conditions of approval from ECMC document number 403709158. As noted in the previous supplemental eForm-19, the spill has been cleaned up, the waste soil has been hauled to an approved off-site disposal facility, and the appropriate follow-up sampling/analysis has been performed showing the site meets Table 915 thresholds.

The previous supplemental eForm-19 did not provide complete notification documentation or sufficient table 915 metals analysis results. This information is being provided in this submittal and PADCO is again 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. See Attachment A.

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 a 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).

The previous supplemental eForm-19 contained the following “conditions of approval” (COA), which is in bold italic type font. PADCO has addressed these conditions, and the associated PADCO response immediately follows the COA in a standard font.

CONDITIONS OF APPROVAL:

- 1. Operator did not report if local government, surface owner, and director were notified as required by Rule 912.b. (2).B. Operator shall submit documentation of notification with the next Supplemental Form 19. Closure request removed.***

The initial eForm-19 (ECMC document 403353422) contained a partially completed "Other Notifications" section which lists the Agencies and Other Parties Notified Pursuant to Rule 912.b.(7)-(11). It is uncertain how the "Other Notifications" table was not completely filled out, but the required documentation is listed below.

Date	Agency/Party	Contact	Phone	Response
3/22/2023	Washington Cty	Hali Thompson	970-345-6662	Thank You
3/22/2023	Surface Owner	Mick Venrick	303-748-1368	I know you'll take care of it
3/22/2023	COGCC	Susan Sherman	719-775-1111	Thanks for letting me know

2. ***ECMC has not approved a reduced analyte suite for this spill, and not all analytes from Table 915-1 were sampled for. 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)).***

Closure Samples (confirmation samples) and Background Samples were collected from the locations shown in Attachments B and B2. The analytical results of these samples were compared against Table 915-1 Cleanup Concentrations, see Attachment C.

Analytical results for Table 915-1 metals do indicate values higher than Table 915-1 thresholds (using Groundwater SSL) for Arsenic and Barium. Following ECMC protocols, background samples were obtained and analyzed. The background sample Arsenic and Barium values indicate these compounds appear to be naturally high in this area.

PADCO is requesting the ability to use the 1.25 multiplier (ECMC Table 915-1 note 11) of the background concentration for Barium, at the sample depth of approximately 60 inches. There were three (3) Table 915-1 Metals confirmation samples with the Barium results being over 200 mg/kg. The background sample, taken at approximately 60 below ground surface, had a Barium value of 190 mg/kg. However, if you use the 1.25 multiplier, the background sample concentration would be 237.5 mg/kg, which indicates the sample results are within an acceptable background concentration.

The analysis results in Attachment C indicate that all impacted soil has been removed and the site meets Table 915-1 standards. After your review of these facts 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.

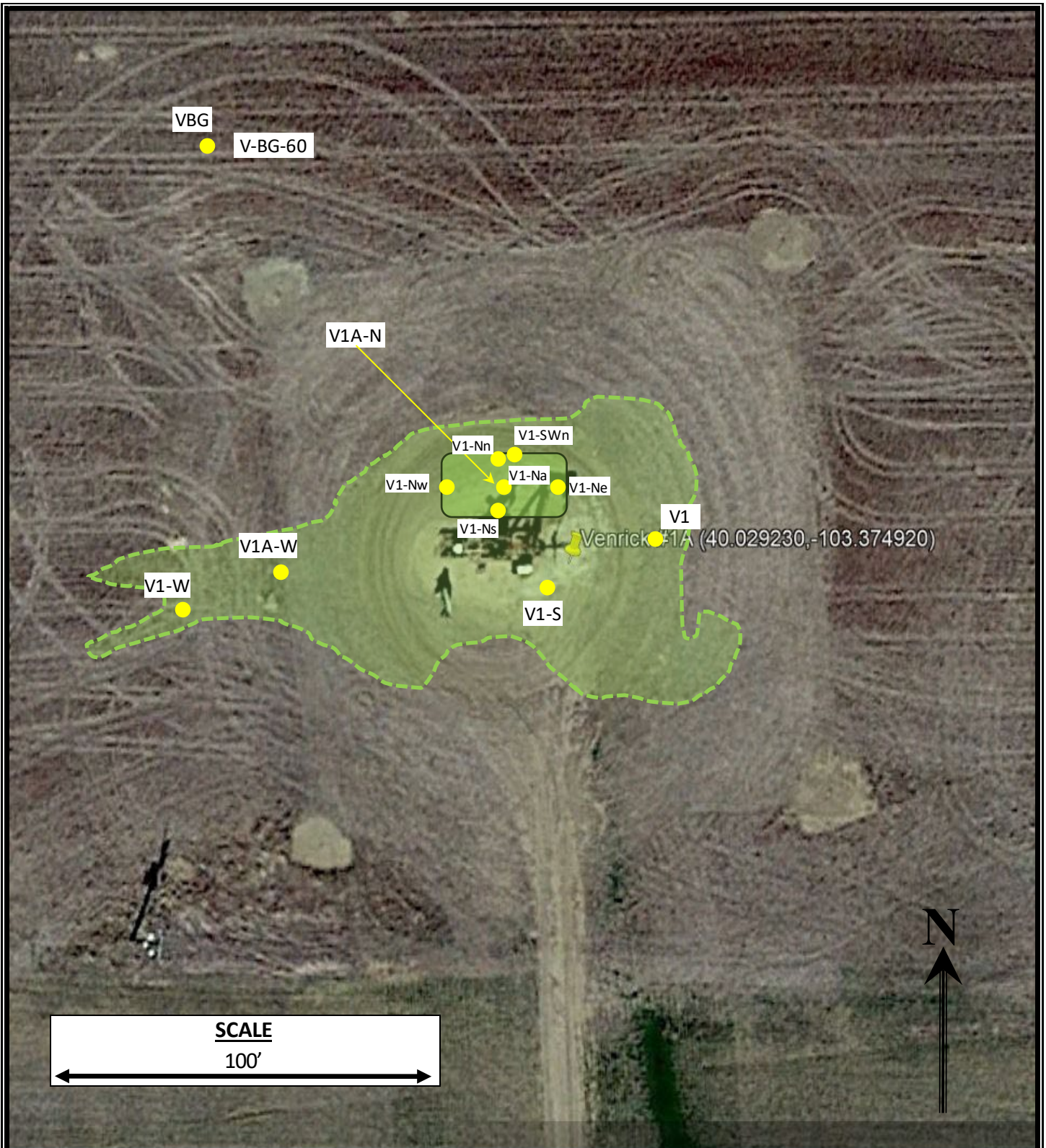


PADCO, LLC

Facility: Venrick #1A
Form: Supplemental Form 19
Location: 40.029230,-130.374920

Date: April 1, 2023



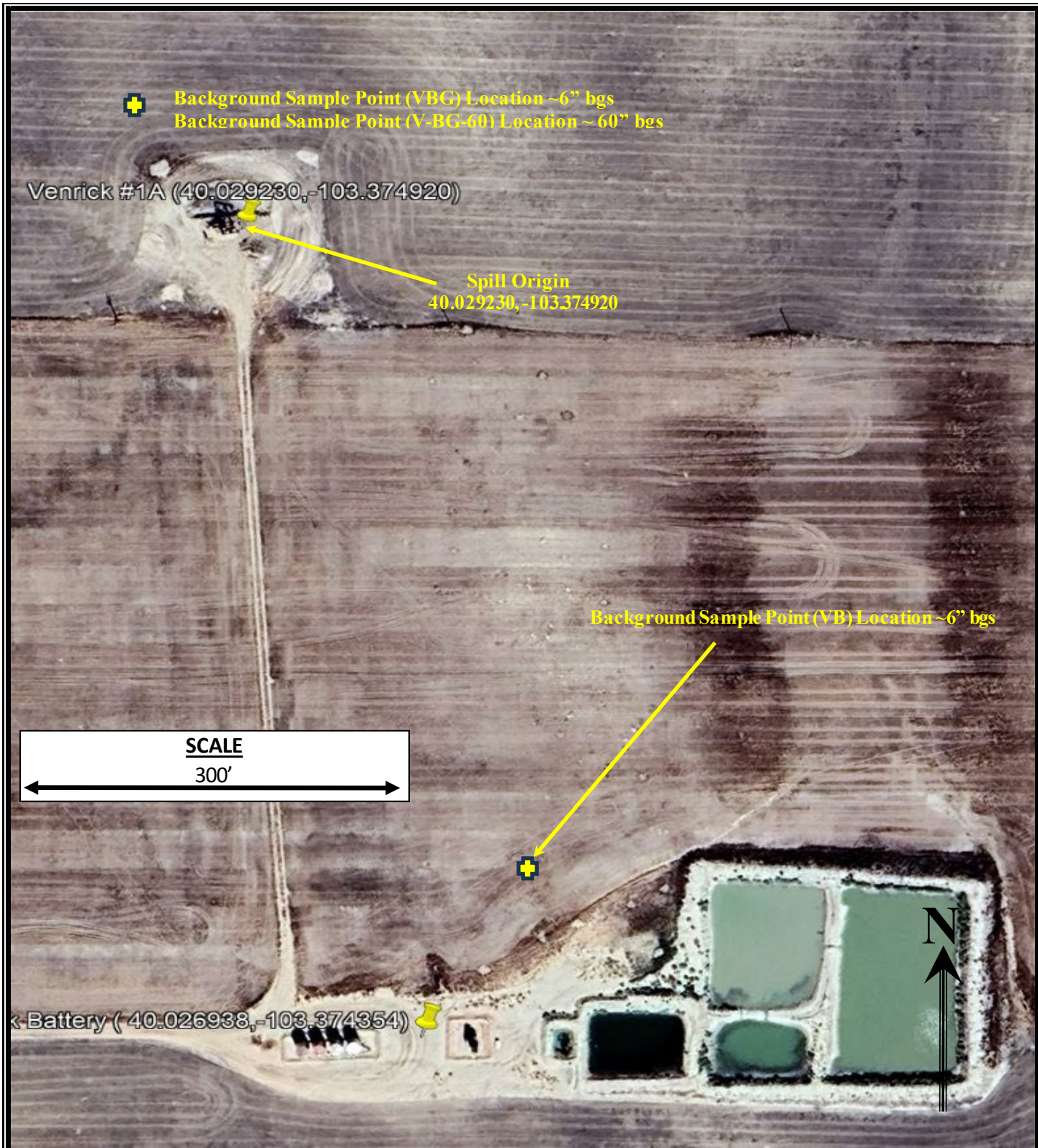


PADCO, LLC

Facility: Venrick #1A
Form: Supplemental Form 19
Location: 40.029230,-130.374920

Date: April 1, 2023





PADCO, LLC

Facility: Venrick #1A
Form: Supplemental Form 19
Location: 40.029230,-130.374920

Date: August 6, 2024

LESAIR
ENVIRONMENTAL, INC.

11786 Shaffer Place, Unit 210
Littleton, CO 80127
Office: (303) 904-2525

**Venrick #1A Well Site - March 2023 Spill
Analytical Results Summary
PADCO LLC**

Hydrocarbon and Organic Compounds in Soils (using Groundwater Soil Screening Level Concentrations)

Sample Date	Sampled By	Soil Sample	Lab ID	Location	Sample Depth (inches)	GRO (mg/kg)	DRO (mg/kg)	ORO (mg/kg)	TPH (mg/kg)	Benzene (mg/kg)	Toluene (mg/kg)	Ethyl-Benzene (mg/kg)	Xylene (mg/kg)	1,2,4-Tri methyl benzene (mg/kg)	1,3,5-Tri methyl benzene (mg/kg)	Naphthalene (mg/kg)	pH
---	---	Table 915	---	---	---	---	---	---	500	0.0026	0.69	0.78	9.9	0.0081	0.0087	0.0038	6-8.3
3/22/2023	Lesair	V1	2303552-01	Initial Spill Sample	~3"	1,000	19,000	3,700	23,700	ND	ND	ND	1.2	6.7	4.0	1.3	7.58
4/17/2023	Lesair	V1-6"	2304363-01	East of PU (2nd sample at pt. V1)	~6"	ND	180	ND	180	ND	ND	ND	ND	ND	ND	ND	8.21
4/21/2023	Lesair	V1A-E	2304486-01	East of PU	~4"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.03
4/17/2023	Lesair	V1-W	2304363-03	West of PU	~4"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	8.45
4/21/2023	Lesair	V1A-W	2304486-02	West of PU	~6"	ND	260	68	328	ND	ND	ND	ND	ND	ND	ND	7.45
4/17/2023	Lesair	V1-S	2304363-02	South of PU	~4"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	7.47
4/21/2023	Lesair	V1A-N	2304486-03	North of PU	~6"	ND	1,300	350	1,650	ND	ND	ND	ND	ND	ND	ND	7.70
5/3/2023	Lesair	V1A-Na	2305068-05	N side of PU	~66"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-Nn	2305068-01	N side of PU	~61"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-Ns	2305068-02	N side of PU	~66"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-Ne	2305068-03	N side of PU	~43"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-Nw	2305068-04	N side of PU	~64"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-SWnn	2305067-01	North Sidewall	~18"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
5/3/2023	Lesair	V1A-SWn	2305066-01	North Sidewall	~40"	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND	---
4/21/2023	Lesair	Pile V1	2304487-01	Waste Soil Pile #2	~12"	24	1,100	190	1,314	ND	ND	ND	ND	ND	0.0260	ND	---

NOTES: Sample V1-6" and V1A-E, V1-W, V1A-W, V1-S provide confirmation that soil impacted by the spill has been cleaned up to meet Table 915-1 thresholds.
 Samples V1A-Na, Nn, Ns, Ne, Nw, SWn, SWnn are confirmation samples for sample V1A-N, indicating that soils on the North side of the pumping unit were delineated and meet Table 915-1 thresholds.
 Sample V1A-W provides confirmation that soils on the West side of the pumping unit meet the Table 915-1 threshold for pH.
 Waste soil pile #2, based on analysis results of sample "Pile V1", will be hauled to an offsite disposal facility (Pawnee Waste)
 PU = Pumping Unit

**Venrick #1A Well Site - March 2023 Spill
Analytical Results Summary
PADCO LLC**

Soil Suitability for Reclamation Results

Sample Date	Sampled By	Soil Sample	Lab ID	Location	Sample Depth (inches)	Sodium Adsorption Ratio (SAR)	Specific Conductance (EC) (mmhos/cm)	% Solids	Boron (mg/l)	pH
---	---	Table 915	---	---	---	<6	<4	---	2	6-8.3
3/22/2023	Lesair	V1	2303552-01	Initial Spill Sample	~3"	4.30	1.04	73.8	0.91	7.58
4/17/2023	Lesair	V1-6"	2304363-01	2nd Sample (V1)	~6"	1.87	0.84	86.0	0.66	8.21
4/21/2023	Lesair	V1A-E	2304486-01	East of PU	~4"	0.95	0.38	86.3	0.42	8.03
4/17/2023	Lesair	V1-W	2304363-03	West of PU	~4"	0.54	0.68	86.0	0.31	8.45
4/21/2023	Lesair	V1A-W	2304486-02	West of PU	~6"	1.23	0.50	85.2	0.40	7.45
4/17/2023	Lesair	V1-S	2304363-02	South of PU	~4"	1.27	0.55	86.5	0.22	7.47
4/21/2023	Lesair	V1A-N	2304486-03	North of PU	~6"	1.01	0.58	85.0	0.80	7.70
4/8/2024	Lesair	V1A-Na	2404130-06	N side of PU	~66"	0.05	0.10	84.0	ND	---
4/8/2024	Lesair	V1A-Nn	2404130-07	N side of PU	~61"	0.06	0.10	87.6	ND	---
4/8/2024	Lesair	V1A-Ns	2404130-08	N side of PU	~66"	0.07	0.12	84.1	ND	---
4/8/2024	Lesair	V1A-Ne	2404130-09	N side of PU	~43"	0.09	0.13	84.3	ND	---
4/8/2024	Lesair	V1A-Nw	2404130-10	N side of PU	~64"	0.08	0.13	90.1	ND	---
4/21/2023	Lesair	Pile V1	2304487-01	Waste Soil Pile #2	~12"	1.98	0.67	79.4	1.84	7.59

NOTES: Sample V1A-W confirms the soils on the West side of the pumping unit meet the Table 915 threshold for pH

**Venrick #1A Well Site - March 2023 Spill
Analytical Results Summary
PADCO LLC**

Metals in Soils (using Groundwater Soil Screening Level Concentrations)

Sample Date	Sampled By	Soil Sample	Lab ID	Location	Sample Depth (inches)	Arsenic (mg/kg)	Barium (mg/kg)	Cadmium (mg/kg)	Chromium (mg/kg)	Copper (kg/mg)	Lead (kg/mg)	Nickel (mg/kg)	Selenium (mg/kg)	Silver (mg/kg)	Zinc (mg/kg)	pH
---	---	Table 915	---	---	---	0.29	82	0.38	0.00067	46	14	26	0.26	0.8	370	6-8.3
3/22/2023	Lesair	V1	2303552-01	Initial Spill Sample	~3"	2.87	117	0.24	ND	8.9	10.9	8.5	0.570	0.060	34.3	7.58
4/8/2024	Lesair	V1-6"	2404130-01	2nd Sample (V1)	~6"	2.07	137	0.32	ND	9.0	10.0	9.5	ND	0.037	36.8	---
4/8/2024	Lesair	V1-E	2404130-02	East of PU	~4"	1.70	120	0.28	ND	6.8	8.2	8.9	ND	0.030	31.7	---
4/8/2024	Lesair	V1-S	2404130-03	South of PU	~4"	1.95	119	0.28	ND	8.2	9.3	8.8	ND	0.040	33.0	---
4/8/2024	Lesair	V1-W	2404130-04	West of PU	~4"	2.22	128	0.21	ND	6.5	6.7	7.5	ND	0.035	24.2	---
4/8/2024	Lesair	V1A-W	2404130-05	West of PU	~6"	1.99	130	0.29	ND	9.6	9.7	11.7	ND	0.111	34.0	---
4/8/2024	Lesair	V1A-Na	2404130-06	N side of PU	~66"	2.40	203	0.29	ND	7.6	8.1	9.0	ND	0.048	32.2	---
4/8/2024	Lesair	V1A-Nn	2404130-07	N side of PU	~61"	2.16	131	0.24	ND	5.8	6.5	7.3	ND	0.032	25.1	---
4/8/2024	Lesair	V1A-Ns	2404130-08	N side of PU	~66"	2.58	211	0.32	ND	7.7	8.1	9.1	ND	0.046	31.1	---
4/8/2024	Lesair	V1A-Ne	2404130-09	N side of PU	~43"	2.72	213	0.32	ND	8.0	8.4	9.5	ND	0.051	32.1	---
4/8/2024	Lesair	V1A-Nw	2404130-10	N side of PU	~64"	2.06	95	0.21	ND	5.0	5.7	6.1	ND	0.026	22.3	---
3/3/2021	Lesair	VB	2103099-01	SE of Venrick #1A	~6"	4.74	150	---	---	---	---	---	0.836	---	---	8.27
7/28/2023	Lesair	VBG	2307585-01	N of Venrick #1A	~6"	1.42	183	0.29	---	2.6	8.5	ND	ND	0.107	7.9	---
7/20/2024	Lesair	V-BG-60	2407291-01	N of Venrick #1A	~60"	2.84	190	0.35	ND	5.5	8.5	6.2	ND	0.056	21.0	---

NOTES: Sample VB is a background sample taken 03/03/2021 Southeast of the Venrick #1A well site.
 Sample VBG is a background sample taken 07/28/2023 North of the Venrick #1A well site.
 Arsenic, Barium, and Selenium levels greater than Table 915 Groundwater SSL thresholds are attributed to high background levels of these compounds, as shown in background samples VB, VBG, and V-BG-60
 Sample V-BG-60 has a Barium level of 1901 mg/kg, using the ECMC protocol of a 1.25 multiplier a Barium value of 237.5 mg/kg could be used. This indicates the Barium values are associated with natural background levels.