



July 8, 2025

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 remediation project (ECMC Remediation Project No. 25696).

This project has experienced delays through Winter and Spring months due to extremely wet conditions. It is now July and there is still surface water (not groundwater) that is being held in the excavation (see attached Photo).

PADCO submitted a Supplemental Form 27 on April 8, 2025, indicating the completion of several 'conditions of approval' (COA) from ECMC document number 403768758. In that Supplemental Form 27 there were 9 COA listed, the following is the status of each COA.

COA 1: *Per Doc# 403329652, Operator shall submit a revised "Soil Sampling Location Map" that includes: a scale, an aerial photograph that shows the location of field screenings, sample(s), and background sample(s), including samples taken from flowline analysis and delineation from known Table 915-1 exceedances.*

PADCO submitted a revised "soil sampling location map" which included the requested information as Attachment B in the Supplemental Form-27 (ECMC document# 404156684) dated April 8, 2025.

COA 2: *Per Doc# 403329652, Operator will provide the Form 44 Document number for Abandonment Verification submitted pursuant to Rule 1105.f.(2) that includes the requirements of Rule 1105.e. for abandonment in place.*

The ECMC document number of the Form 44 Off-location Flowline verification is 403778903.

COA 3: *Per Doc# 403329652, Approval of this Form 27 does not imply approval of pre abandonment in place notice required by Rule 1105.d.(2).*

PADCO did not request pre-abandonment in place of the off-location flowline. PADCO removed the off-location flowline following ECMC procedures.

COA 4: Per Doc# 403329652, On the Supplemental Form 27 following off-location flowline abandonment, Operator shall provide the associated Form 44 Flowline Abandonment Verification

PADCO prepared and submitted the Form 44 Off-location Flowline Abandonment “verification” on May 9, 2024. Within the ECMC system, the Form 44 “verification” has ECMC document # 403778903 and is listed as “active” and assigned to Ellice Devine. It is PADCO’s understanding that Ms. Devine no longer has ‘flowline integrity’ responsibilities and so it is unknown when this document will be approved.

COA 5: *Per Doc# 403329652, Operator will submit a Form 44 Pre-abandonment notice pursuant to Rule 1105.d. A Form 44 will be filed prior to starting flowline abandonment, and will be included in the Related Forms in a supplemental Form 27. Abandonment will occur per the requirements of Rule 1105. During flowline abandonment, any liquids evacuated from the flowline will be contained and disposed per the requirements of Rule 905. Note: Approval of this Form 27 does not imply approval of pre-abandonment required by Rule 1105.d.*

PADCO prepared and submitted a 30-day off-location pre-abandonment notice (ECMC document# 403331153) on February 27, 2023. This notice indicated that PADCO would be removing the old flowline per Rule 1105.d(2). The Form 44 pre-abandonment notice was approved on March 15, 2023.

COA 6: *Per Doc# 403329652, If groundwater is encountered, Operator will analyze groundwater samples for Table 915-1 Groundwater Inorganic Parameters (total dissolved solids, sulfate, chloride) and organic compounds in groundwater.*

To date, groundwater has not been encountered. Should groundwater be encountered appropriate sampling and analysis will be performed.

COA 7: *Soil confirmation sample data indicate that SAR at the site exceeds the Table 915-1 soil suitability levels for reclamation. If the Operator proposes to leave material with elevated levels of SAR in situ, the Operator shall define the vertical and lateral extent of impacts and provide a detailed Reclamation plan that includes, but is not limited to, soil analysis from adjacent undisturbed lands, revegetation techniques, site stabilization, and details of seeded species. Operator will submit the Reclamation plan pursuant to Rule 915.b. on a Form 27 Supplemental Report for Director review.*

Information is still in the process of being assembled.

COA 8: *"Summary, PADCO will scrape off any clean surface gravel and removed or bury in the pit (with written landowner approval). "Operator shall not bury any impacted material in the pit.*

Per PADCO’s remediation action plan, PADCO has scraped off the clean surface gravel and it is currently stored onsite at the Harpham Tank Battery. The clean gravel is still onsite and final disposition will be determined near the end of the project, following approved ECMC procedures and approvals.

COA 9: *Operator shall conduct an environmental investigation to confirm the presence or absence of impacts adjacent to the flowline at a minimum of every 250'.*

PADCO provided Attachment C in Supplemental Form 27 (ECMC document# 404156684) indicating PID readings were taken every 250 feet along the off-location flowline. No readings indicate the presence of potential impacts.

PADCO believes that it has provided sufficient information to resolve most of the above conditions of approval and hopes that those items may be cleared from this process.

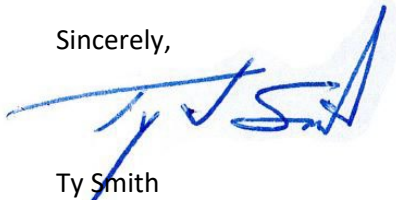
BACKGROUND:

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.

PADCO has been working on the remediation and reclamation aspect of the Harpham Tank Battery since the submittal of the initial Form 27 on September 28, 2022.

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
(ECMC Operator No. 24500)
Harpham Wellsite and Tank Battery Remediation/ Reclamation
Wellsite Remediation Project No.: 25694
Tank Battery Remediation Project No.: 25696

