

Objective Criteria Review Memo – McCoy Petroleum Corporation, ALC 1545 1-27, Form 2A 401933056

This summary 401933056 within the context of SB 19-181 and for the required Objective Criteria. This Form 2A permit application met the following Objective Criteria -

1. (Criteria 5.c) The proposed Location lies within a Sensitive Area for water resources (proposed Location lies within a Designated Groundwater Management Area and a Designated Basin and within proximity to a surface water feature).

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A could be approved with the proposed Best Management Practices (BMPs) and applied Conditions of Approval (COAs). The following sections provide details regarding the evaluation of each criterion.

Criteria 5.c: Oil and Gas Locations within a Sensitive Area for water resources.

Site Specific Description of Applicability of Criteria 5.c: The proposed location lies within an area of potential shallow groundwater and within the East Cheyenne Designated Groundwater Management Area and the Northern High Plains Designated Basin and therefore, is considered a Rule-Based Sensitive Area for water resources. In addition, the Location lies within proximity to a mapped drainage and an unmapped surface water feature. The estimated depth to groundwater entered on the Form 2A is 105 feet below ground surface (bgs).

Site Specific Measures to Address Criteria 5.c: The ALC 1545 1-27, Form 2A is a proposed Location consisting of 1 vertical well, 1 drilling pit, 1 gas or diesel motor, 1 electric motor, 1 separator, 1 VRU, 1 VOC Combustor, 3 oil tanks, 2 water tanks, 1 fuel tank, 1 Emissions Control Device, 1 heater treater and 1 fresh water pit. Staff required additional BMPs to protect groundwater: the operator proposed to construct all production facilities within lined secondary containment and will use perimeter stormwater controls along the cross- and down-gradient perimeters to prevent offsite sediment/contaminant migration into the nearby drainage. In addition, Staff Condition of Approval requiring the submittal of the drilling pit sampling results to the COGCC prior to closure of the drilling pit and an additional Condition of Approval requiring Reference Area Pictures to be submitted within 12 months of approval of the Form 2A.

Determination: The Director determined that Criteria 5.c was sufficiently analyzed and that the implementation of previously imposed permit conditions and inclusion of additional BMPs that address the protection of ground and surface water resources met the standard for protection of the sensitive environment and water resources.