

**Objective Criteria Review Memo – Verdad Resources Boydston 3535, Form 2A
#401586681**

This summary explains how COGCC conducted its technical review of the proposed Verdad Resources' Boydston 3535 location within the context of SB 19-181 and for the required Objective Criteria. This Form 2A meets the following Objective Criteria -

1. (Criteria 8) Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels (20 oil tanks and 10 water tanks)

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether this Form 2A could be approved with the Best Management Practices (BMPs). The following section provides details regarding the evaluation of each criterion.

Criteria 8: Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels.

Site Specific Description of Applicability of Criteria 8: The Form 2A for this Oil & Gas Location proposes a total of 14 oil tanks and 7 water tanks.

Site Specific Measures to Address Criteria 8: Verdad Resources has indicated that as part of the WOGLA, a Site Safety, Emergency Action Plan, and Tactical Response Plan will be coordinated and prepared with local emergency responders. Additionally, the nearest Building Unit is over one-half mile from this proposed Oil and Gas Location. Groundwater is approximately 36 feet below ground surface, is not considered shallow in the area of the Oil and Gas Location, and there are no nearby surface water features. Verdad Resources has also included a Berm Construction BMP indicating they will use impervious lined steel berms and that tertiary containment will be constructed.

Determination: The Director determined that Criteria 8 was sufficiently analyzed based on the requirements of the submitted WOGLA, the lack of proximate surface water and shallow groundwater, and the operator's proposed BMPs.

Staff met with the Director to discuss the updated BMPs that were applied to the Form 2A. The Director determined that following the application of the additional analysis from the Objective Criteria, the permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.