

## **Objective Criteria Review Memo – Verdad Resources’ Bringelson Fed 2021 & 2029, Form 2A #402066312**

This summary explains how COGCC conducted its technical review of the proposed Verdad Resources’ Bringelson Fed 2021 & 2029 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 20 oil tanks and 10 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 more than a mile from this proposed Oil and Gas Location. Groundwater is approximately 74 feet below ground surface, which is not considered shallow in the area of the Oil and Gas Location, and there are no nearby surface water features. A Condition of Approval (COA) has been applied to this Form 2A requiring the operator to line the secondary containment area and separators to minimize potential impacts to soil from a spill or release.

**Determination:** The Director determined that Criteria 8 was sufficiently analyzed based on the requirements of the submitted WOGLA, the lack of proximate Building Units, surface water, and shallow groundwater, and the addition of a COA to protect soil from impacts.

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.