

## **Objective Criteria Review Summary – *Grand Mesa Operating Company, DADO 2-21, Form 2A 401925776***

This summary explains how COGCC staff conducted its technical review of the DADO 2-21, Form 2A 401925776 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 proximity to a surface water feature and in an area of potential shallow groundwater).

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 is in a sensitive area due to potential shallow groundwater and proximity to surface water. The estimated depth to groundwater entered on the Form 2A is 18 feet below ground surface (bgs). Well logs from nearby monitoring wells also indicate that groundwater may be less than 20 feet bgs. In addition, the Location lies approximately 86 feet from a surface water feature.

**Site Specific Measures to Address Criteria 5.c:** The DADO 2-21 is a well location proposing one vertical well that will produce to a remote production facility and therefore, will have minimal production facilities at the Location, the drilling pit. Hydrocarbon storage is not proposed for this Location. Staff reviewed the proposed Form 2A. To protect shallow groundwater resources, staff required the operator to use an aboveground tank in lieu of a drilling pit in the event groundwater is encountered during construction. In addition, Staff implemented a Condition of Approval requiring the submittal of sample analysis prior to closure of the pit. Based on the fact that this Location will not have hydrocarbon storage, staff reviewed the Related Remote Production Facility Form 2A for shallow groundwater requirements and required the operator to construct the production facilities within lined secondary containment. To protect surface water resources, staff required the operator to place stormwater controls along the cross- and down-gradient perimeters of the Location to prevent offsite migration of sediment/contaminant migration into the nearby surface water feature.

**Determination:** The Director determined that Criteria 5.c was sufficiently analyzed and that the implementation of BMPs that address the protection of groundwater resources met the standard for protection of the sensitive environment and water resources.