

Criteria Review Summary – Conoco Phillips Company, LLC, State Bierstadt 4-65 35-34 2AH, Form 2A 401963396

This summary explains how COGCC staff conducted its technical review of the State Bierstadt 4-65 35-34 2AH, Form 2A 401963396 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 3) The proposed Location lies within 1500 feet a municipal boundary (Aurora).
2. (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 within 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). The following sections provide details regarding the evaluation of each criterion.

Criteria 3: Oil and Gas Locations within 1500 feet a municipal boundary (Aurora).

Site Specific Description of Applicability of Criteria 3: The proposed Location is part of a planned series of Locations to fully develop the minerals in sections 34, 35 and 36, Township 4S, Range 65W and section 31, Township 4S, Range 64W. Although this proposed Location lies approximately 1570 feet from the Aurora city limits, it will abutt the northern existing Location which is located approximately 1050 feet from the Aurora city limits. Furthermore, based on the review of the Access Road Map submitted with the Form 2A, access to the Location will involve the use of the roads maintained by the City of Aurora.

Site Specific Measures to Address Criteria 3: Because the proposed location is proximate to the City of Aurora (City), it was referred to the City for comment during the Arapahoe County permitting process. Based on correspondence with the operator, Attachment Document #1010716, the City did not provide any comments to Arapahoe County regarding the proposed Location. In addition, the access road proposed for the State Bierstadt will utilize Yale Avenue, which is maintained by the City. Staff contacted the City to verify the communication with the operator. The operator is working with the City to revise the Master Road Maintenance Agreement with the City for the use of Yale Avenue. The operator has an approved AEUSR with Arapahoe County, approved in May of 2018.

Determination: The Director determined that Criteria 3 was sufficiently analyzed because there was sufficient communication and coordination between the operator and the relevant local government and local jurisdictions within 1,500 feet of the proposed Oil and Gas Location and

all concerns raised by the proximate local governments were addressed during the permit process.

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 proximity to an ephemeral stream as mapped on the USGS Topographic Map and potential shallow groundwater. The estimated depth to groundwater entered on the Form 2A is 25 feet below ground surface (bgs). Well logs from nearby monitoring wells also indicate that groundwater may be less than 30 feet bgs. The ephemeral stream is located 152 feet from the edge of the Location.

Site Specific Measures to Address Criteria 5.c: The State Bierstadt 4-65 35-34 2AH is a proposed location accommodating 4 wells, 5 oil tanks, 5 separators, 7 electric motors, 2 vapor recovery units, 1 electric generator, 1 VOC combustor, 2 modular large volume tanks, 1 gas compressor, 1 LACT unit and 1 pigging station. To protect groundwater and the nearby ephemeral drainage, the operator submitted the following BMPs; use of cathodic protection on buried steel lines to mitigate corrosion, and steel walled lined secondary containment for the tank batteries.

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.