

Objective Criteria Review Memo – Kuenzler & Flora Reserve Company, UPRR Miller 1-7, Form 2A 401859922

This summary 401859922 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 amended Location lies within a Sensitive Area for water resources (Location lies within a Designated Basin and 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 amended 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 Sensitive Area for water resources. The estimated depth to groundwater entered on the Form 2A is 13 feet below ground surface (bgs).

Site Specific Measures to Address Criteria 5.c: The UPRR Miller is an amended Location consisting of 1 vertical well that is scheduled to be re-entered. The amended well Location will produce to the Baughman Farms Production Facility, Location ID #380146. During the technical review, Staff reviewed the required BMPs for the Related Remote Location. Required BMPs for the Related Remote Location included the construction of all production facilities serving this Location to be constructed within lined containment and a daily inspection schedule to identify spills at the Location within a timely manner. In addition, the operator is proposing the use of a pitless/closed-loop drilling system to prevent impacts from drilling waste resulting from the use of a drilling pit.

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 groundwater resources met the standard for protection of the sensitive environment and water resources.