

Objective Criteria Review Memo – Verdad Resources’ Timbro 0101, Form 2A #402060001

This summary explains how COGCC conducted its technical review of the proposed Verdad Resources’ Timbro 0101 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 (30 oil tanks and 15 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) and Conditions of Approval (COAs). 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 30 oil tanks and 15 water tanks.

Site Specific Measures to Address Criteria 8: Verdad Resources has submitted a WOGLA application which required a Site Safety, Emergency Action Plan, and Tactical Response Plan 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 60 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. Verdad Resources has provided a Stormwater/Erosion Control BMP. A Condition of Approval (COA) has been applied to this Form 2A requiring the operator to line the secondary containment area 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.