

Objective Criteria Review Summary - Catamount Energy Partners LLC (Catamount), Federal-M34N6W Pad; Form 2A #401988357; Location ID #320848; Federal 26-1 Pilot, Form 2 #401985236; Federal 26-1 Lateral 1, Form 2 #401993353; Federal 26-1 Lateral 1 ST 1, Form 2 #401995749; Federal 26-1, Lateral 2 Form 2 #401995948; and Federal 26-1 Lateral 2 ST 1, Form 2 #401995983.

This summary explains how COGCC staff conducted its technical review of the existing Catamount Federal-M34N6W Pad (Location ID #320848), Form 2A #401988357 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) This existing location (built in 1984 by Amoco Production Company prior to the requirement for a Form 2A) Fed Surface and Fed Minerals oil and gas location is in a sensitive area for water resources due to its proximity to one (1) USGS identified named ephemeral drainage, Salt Canyon, located approximately 60 feet to the north of the pad. The estimated depth to groundwater, if present, would be approximately 40 feet below ground surface (bgs) as averaged from several existing water wells located to the west in the Spring Creek drainage area.*

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A and Form 2s 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 this criteria.

Criteria 5.c: Oil and Gas Locations within: c) a Sensitive Area for water resources.

Site Specific Description of Applicability of Criteria 5.c: Based on the technical review and desktop evaluation, staff determined that the existing Fed Surface and Fed Minerals gas well pad's edge of disturbance is in close proximity to one (1) USGS identified named ephemeral drainage, Salt Canyon, located approximately 60 feet to the north of the location.

Site Specific Measures to Address Criteria 5.c: COGCC staff's review of this existing oil and gas location indicates that the well pad was constructed in June 1984 and has one (1) vertical gas well that was drilled in June 1984, completed in July 1986, and shut-in the same month. This existing vertical well is currently shut-in, there is no production equipment on site, and the well pad has been reclaimed. Catamount is planning to deepen the existing vertical well and drill four (4) horizontal laterals from that deepened pilot borehole this season (October to November 2019). Four (4) new wells are scheduled to be drilled in 2020.

Construction is planned for October 2019. Best management practices (BMPs) in the form of a compacted earthen berm will be constructed around the entire working surface along the fill slope portion of the well pad (northwest side). The access road's pad entrance will be raised. The location will be graded to the southeast towards the interior diversion ditches that surround the entire working surface along the cut portion of the well pad. Exterior diversion ditches are planned along the cut portions of the well pad (the northeastern, southeastern, and southwesternt sides) to control surface water run-on. There will be a sediment catchment basin in the northeast corner of the location that both interior and exterior diversion ditches feed into through rock armored drain

systems. Discharge will be controlled through another rock armored drain system. Sediment control logs (consisting of silt fences and/or straw wattles) are proposed along the fill portions (eastern and southern sides) of the pad, outside of the disturbed area of this location, to control any potential site storm water or sediment run-off. Any existing or newly installed BMPs will be monitored and maintained to ensure site containment.

Based on the information collected during this desktop review, the closest downgradient surface water feature that could be impacted would be the ephemeral/intermittent stream, Salt Canyon (approximately 60 feet to the north of the pad). Based on the storm water and erosion control measures detailed in the supplemental drawing, and the surface water protection BMPs submitted by the Catamount, it is anticipated that Salt Canyon would not be impacted by a potential release.

Determination: During the technical review process for the amended Form 2A and Form 2s, COGCC staff received additional information and clarification regarding the operator's planned activities, fluid containment, and storm water/erosion control measures. Given that the additional technical information (that address the protection of surface water resources) have met the standard for protection of the sensitive environment and water resources; the Director determined Criteria 5.c. was sufficiently analyzed.

Staff met with the Director to discuss Objective Criteria that are met by this Oil and Gas Location. 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.