

Objective Criteria Review Memo ADDENDUM - Verdad Resources LLC
Safi 1224-01H -- Form 2 Application for Permit to Drill (APD) Doc# 402009277

Approved Form 2A Oil & Gas Location Assessment (Safi 1224 Doc# 402010466, approved 12/6/2019)
Location ID# 469568

The Form 2A for this Oil & Gas Location was reviewed concurrently with all 14 APDs proposed for this Location. COGCC's technical review of the 2A and all 14 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479172, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 14 APDs permitted at this Location.

Delayed Approval of APDS:

The APDs for this location were not ready for approval at the time the Form 2A was ready for Final Approval on 12/6/2019. COGCC staff have since received all remaining information needed for these APDs to be considered for Final Approval, including updated local government disposition information and Location ID number from the approved Form 2A.

The Objective Criteria Review Memo for this location (Doc# 2479172) identified that this location met Criteria #5c for sensitive water resources & #8 for total tank count/volume. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #5c & #8, including: lined containment for the tank and separator equipment areas, stormwater management, a reduced tank count, remote shut-in capability, and an approved Emergency Action Plan in place with local emergency responders. Based on the existing BMPs, there is no further action needed beyond what was identified in the on-file Objective Criteria Review Memo.

Also approved with the Form 2A was a PUBLIC COMMENT CONSIDERATION MEMO (doc# 2479173). This memo addressed site specific concerns raised by the public that included: a request to halt Permitting until SB19-181 rulemaking was complete, concerns about regional air quality, concerns about impacts to freshwater resources, and other concerns about various COGCC rules. The Public Comments that were received on the APDs were considered in the writing of the PUBLIC COMMENT CONSIDERATION MEMO for the Form 2A, and therefore an additional PUBLIC COMMENT CONSIDERATION MEMO is not needed at this time.

Based on this analysis, the Operator is complying with the existing BMP's and COA's on the approved Form 2A to address the Objective Criteria that were met during the original review of the Form 2A and no further Sundry or Memo is necessary at this time. The APD's IN PROCESS should be passed and sent to Final Approval with the following comments:

- 1) COGCC conducted the technical review for the related Oil and Gas Location Assessment permit, Form 2A document #402010466 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 12/6/2019, establishing

Location ID #469568 subject to conditions included in the permit. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A. The Objective Criteria Review Memo (Doc# 2479172) can be found in the document file for this Location.

- 2) Public Comments received for this Form 2 are summarized and addressed in the Public Comment Consideration Memo (Doc# 2479173) saved in the file for Oil and Gas Location ID# 2479172.