

**Objective Criteria Review Memo, St. Croix Operating Inc., High Plains 1, Form 2A
402007793**

This summary explains how COGCC staff conducted its technical review of the St. Croix Operating, Inc. (St. Croix), High Plains 1, Form 2A, doc no 402007793 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for one well and meets the following Objective Criteria:

1. (Criteria #5.c) The proposed Location lies within a Sensitive Area for water resources (Location lies within the Northern High Plains Basin).

COGCC staff met with the Director to discuss the Objective Criteria for the Form 2A 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 proposed Location lies within a sensitive area due to lying within the Northern High Plains Basin. Estimated depth to groundwater is at 46 feet based on the static water levels reported for water wells within the vicinity of the proposed Location.

Site Specific Measures to Address Criteria 5.c: St. Croix has placed BMPs on the Form 2A for protection of the shallow groundwater at the Location. BMPs include the construction of all production facilities within secondary containment consisting of steel ring berms tied into a synthetic liner. The proposed Location will be inspected daily for leaks or spills.

Summary: St. Croix provided BMPs that address ground water resource and the environmental protections. The BMPs include engineering controls (construction and containment) and administrative controls (inspections and a leak detection plan).

Director Determination: Based on the Objective Criteria review. The Director has determined that this permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.