

Objective Criteria Review Memo, *St. Croix Operating Inc., Hoss 1, Form 2A 402044323*

This summary explains how COGCC staff conducted its technical review of the St. Croix Operating, Inc. (St. Croix), Hoss 1, Form 2A, doc no 402044323 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for one well, one electric motor, one electric generator, one cavity pump and meets the following Objective Criteria:

1. (Criteria #5.c) The proposed Location lies within a Sensitive Area for water resources (Location lies within a Designated Groundwater Management Area and 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 a Designated Groundwater Management Area and the Northern High Plains Basin. Estimated depth to groundwater is at 170 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 including conducting daily inspections for leaks or spills.

Summary: St. Croix provided BMPs that address ground water resource and the environmental protections. The BMPs include administrative controls (daily inspections).

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.