

## Objective Criteria Review Memo - Mallard Exploration LLC

**Wigeon Fed 33-28-1HN -- Form 2 Application for Permit to Drill (APD) Doc# 402235600**

**Wigeon Fed Pad -- Form 4 Sundry to update Location BMPs Doc# 402277264**

**Approved Form 2A Oil & Gas Location Assessment (Doc# 401423294, approved 12/27/2017)**

**Location ID# 453567**

This memo summarizes COGCC's technical review of the subject well within the context of SB 19-181 and the required Objective Criteria. The Form 2A and 16 APDs were approved in 12/2017 and the Operator is now refiling the APDs due to their imminent expiration.

For Oil & Gas Locations approved prior to SB 19-181, the Objective Criteria apply to any wells proposed on those approved or existing Oil & Gas Locations. This APD 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. The approved Form 2A states there will be 32 oil tanks and 16 water tanks.

The following sections provide 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 approved Form 2A states there will be 32 oil tanks and 16 water tanks.

**Site Specific Measures to Address Criteria 8:** The Operator provided the following BMP updates via form 4 Sundry to mitigate against possible risks by having a large number of tanks onsite:

- Engineered, lined containment for the tank and separator areas.
- The location will utilize a SCADA (remote monitoring) system to monitor facility pressures and flows.
- Leak detection and AVO (Audible, Visual, and Olfactory) inspections on the location.

The Operator also provided the following information regarding coordination with local emergency responders:

- Mallard Exploration consulted with the Briggsdale Fire Protection District and the Weld County Office of Emergency Management (OEM) regarding the proposed facility and emergency response for this location. The site-specific Emergency Action Plan was approved by Briggsdale Fire on May 20, 2019 and the OEM on September 23, 2019.

**Summary:** Mallard provided BMPs that address possible impacts by having a large number of tanks onsite. The BMPs include lined containment, remote monitoring, and leak detection inspections. Mallard also provided information regarding their coordination with the Briggsdale Fire Protection District and the Weld County Office of Emergency Management (OEM).

**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.