

Objective Criteria Review Memo, St. Croix Operating Inc., Gunbarrel 1, Form 2A Document # 401831529

This summary explains how COGCC staff conducted its technical review of the St. Croix Operating, Inc. (St. Croix), Gunbarrel 1, Form 2A, doc no 401831529 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 volatile organic compound (VOC) combustor, one cavity pump, one fuel tank, four oil tanks and two water tanks. The Location 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 164 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: Based on the technical review, this Location will have the following BMPs to protect water resources within this Sensitive Area.

- Operator will use a closed loop drilling system and will not use drilling pits.
- Operator will prepare a Leak Detection Plan to monitor Production Facilities on a regular schedule to identify fluid leaks. The pumper will visually inspect all tanks, equipment, piping, valves and fittings for leaks or spills when onsite. Leaks will be repaired immediately or through continuous action.
- For all tanks Operator will construct secondary containment consisting of a steel ring berm and a spray-on liner designed to contain 150 percent capacity of the largest tank.

Summary: St. Croix provided BMPs that address ground water resource and the environmental protections. The BMPs include

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.