

Objective Criteria Review Memo – Verdad Resources' Timbro Fed 1931 Form 2A #402254036

This summary explains how COGCC staff conducted its technical review of the Verdad Resources Timbro Fed 1931 location, Form 2A #402254036 within the context of SB 19-181 and for the required Objective Criteria. This Form 2A permit application met the following Objective Criteria -

1. (Criteria 8) The Location will have storage of hydrocarbons or produced liquid in more than 18 tanks or in excess of 5,200 barrels.

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A could be approved 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 8: Oil and Gas Locations with storage of hydrocarbons or produced liquid in more than 18 tanks or in excess of 5,200 barrels

Site Specific Description of Applicability of Criteria 8: The Form 2A indicates there will be 10 oil tanks and 6 water tanks on the location for the storage of produced fluids from 8 wells. The operator has indicated these will be 400 barrel tanks; therefore, the total storage capacity will be 6,400 barrels.

Site Specific Measures to Address Criteria 8: Verdad Resources provided a berm construction BMP for the tank battery, leak detection BMPs consisting of AVO (audio, visual, olfactory) inspections, a BMP indicating the tank battery and separators will be lined, automated tank gauging to reduce tank vapor emissions, and has indicated their WOGLA application will include an emergency action and tactical response plan in case of a fire or explosion. The wells will also have remote shut-in capabilities to allow Verdad to immediately shut off the flow from wells if necessary. There are no Building Units within a mile of the proposed oil and gas location.

Summary: Verdad Resources provided BMPs that address the protection from the presence of a large tank battery. The BMPs are sufficient to meet the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.

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.