

**Objective Criteria Review Memo ADDENDUM - Mallard Exploration LLC
GC Fed 1 -- Form 2 Application for Permit to Drill (APD) Doc# 402171354**

Approved Form 2A Oil & Gas Location Assessment (Goldeneye Center Pad Doc# 402165402, approved 11/11/2019)

Location ID# 469100

The Form 2A for this Oil & Gas Location was reviewed for all 10 wells proposed for this Location. COGCC's technical review of the 2A and all 9 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479298, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 9 APDs permitted at this Location.

Delayed Approval of APDs:

The Form 2A was approved on 11/11/2019, prior to the submittal of the 9 APDs. The 9 APDs were submitted on 12/19/2019 & 12/20/2019.

The Objective Criteria Review Memo for this location (Doc# 2479298) identified that this location met Criteria #5c for the distance to the nearest downgradient surface water feature is 19 feet and the estimated depth to groundwater is 19 feet. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #5c, including: StormWater/Erosion Controls, Leak Detection Inspections, automatic well shut-in, remote tank level monitoring, berm construction, and lined containment areas (during drilling and production). Based on the existing BMPs, there is no further action needed beyond what was identified in the on-file Objective Criteria Review Memo.

Based on this analysis, the Operator is complying with the existing BMP's and COA's on the approved Form 2A to address the Objective Criteria that were met during the original review of the Form 2A and no further Sundry or Memo is necessary at this time. The APD's IN PROCESS should be passed and sent to Final Approval with the following comment:

COGCC conducted the technical review for the related Oil and Gas Location Assessment permit, Form 2A document #402165402 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 11/11/2019, establishing Location ID #469100 subject to conditions included in the permit. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A. The Objective Criteria Review Memo (Doc# 2479298) can be found in the document file for this Location.