

Objective Criteria Review Memo *Koda Exploration LLC., Roaring Fork 14-28 Pad, Form 2A 402149030*

This summary explains how COGCC staff conducted its technical review of the Koda Exploration LLC (Koda), Roaring Fork 14-28 Pad, Form 2A, Doc no 402149030 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for one well, two drilling pits (one reserve pit and one fresh water pit), one separator, four oil tanks, two produced water tanks, and meets the following Objective Criteria:

1. (Criteria #5.c) The proposed Location lies within a Sensitive Area for water resources (within an area of potential shallow groundwater and proximity to surface water).

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 Location is in a sensitive area due to the potential for shallow groundwater and the proximity to surface water. Estimated depth to groundwater is at 23 feet based on a nearby water well and a nearby spring. The nearest surface water is Adobe Creek approximately 160 feet east of the Location, with a drainage to Adobe Creek located approximately 200 feet north of the location.

Site Specific Measures to Address Criteria 5.c: Koda provided BMPs on the Form 2A for protection of the shallow groundwater and surface water at the Location. BMPs include lined secondary containment for temporary and permanent tanks, stormwater BMPs to prevent runoff to Adobe Creek. Groundwater protection is maintained through secondary containment BMPs for liquids storage. Staff added COAs to this location to strengthen surface runoff protections and groundwater protection.

Summary: Koda provided BMPs that address ground water resource and environmental protections. The BMPs include engineering controls (construction and containment). COAs were used to strengthen the provided BMPs.

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.