

Objective Criteria Review Memo *Burlington Resources Oil and Gas, LP, Grande 4-65 20-19, Form 2A 402156151*

This summary explains how COGCC staff conducted its technical review of the Burlington Resources Oil and Gas, LP (Burlington), Grande 4-65 20-19, Form 2A, doc no 402156151 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for eight wells, four separators, five oil tanks, two water tanks, one gas compressor, one LACT Unit and meets the following Objective Criteria:

1. (Criteria #2) Locations within a municipality (Location lies within the City of Aurora).
2. (Criteria #5.c) The proposed Location lies within a Sensitive Area for water resources (within an area of potential shallow groundwater and within proximity to a surface water body).

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 section provides details regarding the evaluation of this criterion.

Criteria 2: Oil and Gas Locations within a municipality.

Site Specific Description of Applicability of Criteria 2: The proposed Location lies within the municipal boundaries of the City of Aurora.

Site Specific Measures to Address Criteria 2: Burlington provided a description of the outreach and coordination with the City of Aurora LGD which included communications with the City of Aurora and application for an Oil and Gas Permit. In addition, Burlington hosted an open house in the City of Aurora on August 6, 2019 to provide site specific information to all community members within a 1 mile radius of this well site. The City of Aurora granted Burlington an approved Oil and Gas Permit on December 26, 2019.

Summary: During the technical review, COGCC staff requested additional information regarding Burlington's communication and outreach with the City of Aurora. Burlington provided a description of the outreach and coordination along with a copy of the approved Oil and Gas permit.

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 proximity to surface water. Estimated depth to groundwater is at 18 feet based on the static water levels reported in water wells within the vicinity of the proposed Location. An ephemeral stream transects the Location.

Site Specific Measures to Address Criteria 5.c: Burlington has placed BMPs on the Form 2A for protection of the shallow groundwater at the Location. BMPs include the use of a portable containment

liner under the drilling rig during drilling activities, and secondary containment for tanks consisting of a steel-rim berm lined with a synthetic or engineered liner. Burlington will also program the Location with remote shut-in capabilities to remotely monitor well production onsite and activate specific valves, which can shut-in production wells and stop a release at the production facility. Furthermore, this proposed Location will utilize a pitless closed-loop system to prevent migration of contaminants into the underlying soil and groundwater. To protect surface water, Burlington will install stormwater controls, which include an 18" diversion ditch to divert stormwater, seeding and mulching, culvert inlet protection, erosion control blankets, sediment control logs, sediment basins, and silt fence to protect proximal surface waters from contaminant/sediment migration. Burlington will also conduct routine inspections of the Location and facilities.

Summary: Burlington provided BMPs that address ground water resources and environmental protections. The BMPs include engineering controls (construction, containment and remote shut-in capabilities) and administrative controls (inspections).

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.