

**Objective Criteria Review Memo ADDENDUM - PDC Energy Inc**  
**Lawrence 1N -- Form 2 Application for Permit to Drill (APD) Doc# 402104361**

**Approved Form 2A Oil & Gas Location Assessment (Lawrence 7N66W33 1-8 Doc# 402170112, approved 2/27/2020)**

**Location ID# 472461**

The Form 2A for this Oil & Gas Location was reviewed concurrently with 7 APDs proposed for this Location. COGCC's technical review of the 2A and all 8 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479366, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of this single APD permitted at this Location.

**Delayed Approval of APDS:**

7 of the APDs were approved on 2/27/2020 with the Form 2A. The remaining APD did not pass Completeness until 3/3/2020.

The Objective Criteria Review Memo for this location (Doc# 2479366) identified that this location met Criteria #1 for having eight building units within 1500' of the location, Criteria #5c for shallow groundwater and nearby surface water features, & Criteria #8 for total oil storage onsite in excess of 5200 bbls in volume. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1, #5c, & #8, including:

Criteria 1

PDC will use closed, upright tanks to store the OBM, will remove drill cuttings continuously using trucks to haul cuttings during daylight hours, and will not stockpile cuttings onsite. PDC will use Group II oil-based mud. PDC communicated to all eight building unit owners by mail and phone prior to location approval. PDC plans to transport oil via pipeline from this location. PDC will install sound walls, straw bales, or customized semi-trailers on the north, south, east, and west of the Location. PDC will also be implementing dust controls on county and access roads.

Criteria 5c & 8

PDC will install lined containment around storage containers onsite. Liners will be used under equipment and containment will be installed around wellheads. Stormwater controls will be installed around the location, such as diversion dikes and site grading.

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 #402170112 under the statutory authority provided through SB 19-181, including the

Objective Criteria. The Director approved the Form 2A on 2/27/2020, establishing Location ID #472461 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# 2479366) can be found in the document file for this Location.