

Objective Criteria Review Memo - Bison Oil & Gas II LLC

Hunt 8-60 6C-5-1 -- Form 2 Application for Permit to Drill (APD) Doc# 402344296

Hunt 8-60 6C -- Form 4 Sundry to update Location BMPs Doc# 402400119

Approved Form 2A Oil & Gas Location Assessment (Doc# 401506372, approved 3/2/2018)

Location ID# 454166

This memo summarizes COGCC's technical review of the subject well within the context of SB 19-181 and the required Objective Criteria. The Form 2A and 10 APDs for this location were approved in March 2018. The location was built and two wells were drilled in 2018. Bison O&G II has since submitted this subject refile APD (one of eight total refile APDs) on this approved, built Oil & Gas Location.

For Oil & Gas Locations approved prior to SB 19-181, the Objective Criteria apply to any wells proposed on those approved or existing Oil & Gas Locations. This APD meets the following Objective Criteria:

1. (Criteria 1) Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area ("UMA") and Large UMA Facility ("LUMAF") locations. The location is approximately 1200' from the nearest building unit.
2. (Criteria 8) Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels. The location is planned for 20 oil tanks and 10 water tanks.

The following sections provide details regarding the evaluation of each criterion:

Criteria 1: Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area ("UMA") and Large UMA Facility ("LUMAF") locations.

Site Specific Description of Applicability of Criteria 1: The location is approximately 1200' from the nearest building unit.

Site Specific Measures to Address Criteria 1: The Operator provided the following information regarding communication with the nearby building unit:

- Notice was provided via certified mail and email about the refiling of APDs on the oil & gas location (email 4/28/2020). During a phone call about emailing the notice the Operator asked if the building unit owner had any concerns or requests regarding the location. The building unit owner expressed no concerns or requests at that time.

The Operator provided the following BMPs to mitigate having a building unit within 1500':

- Remote Monitoring: Operator shall use a Supervisory Control and Data Acquisition (SCADA) system in conjunction with tank level indicators which have the ability to automatically shut in wells during an upset condition.

- Dust Controls: Practices for control of fugitive dust caused by operations may include but are not limited to treating roads and location with water, the use of speed restrictions, regular road maintenance, and silica dust controls when handling sand used in hydraulic fracturing operations.
- In order to prevent truck traffic from becoming a nuisance to the building unit, the Operator has instructed all vendors, pumpers, & misc. employees to approach the location via CR 96 from the East, in order to minimize impact on CR 95 & CR 96 (west of location) which building unit owners use to access their home.
- Light Mitigation: All temporary and permanent lighting installed on location shall be directed downward to illuminate key areas within the facility, while minimizing the amount of light projected outside the facility.
- Green Completions BMP to control and reduce emissions.
- MLVT to reduce water trucking during completions operations.

Additionally, COGCC has received no complaints related to this location and the most recent inspection (doc# 696300842; 11/13/2019) by a COGCC Field Inspector found no items requiring corrective actions.

Summary: Bison O&G II provided BMPs that address possible impacts to a single building unit 1200' from the location. The BMPs include: remote monitoring/shut-in, dust controls, modified trucking routes, light mitigation, Green Completions, and the use of MLVT to reduce water trucking.

Criteria 8: Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels.

Site Specific Description of Applicability of Criteria 8: The location is planned for 20 oil tanks and 10 water tanks.

Site Specific Measures to Address Criteria 8: The Operator provided the following BMPs to mitigate having more than 18 tanks on location:

- Storm water controls constructed around the perimeter of the site prior to construction (typically a ditch and berm system).
- Operator shall install a 30mil reinforced polyethylene liner, or liner of comparable material, under the drilling rig and associated equipment for use during drilling operations.
- Lined containment for tank area and weekly berm inspections. Annual spill prevention inspections, and formal site-specific audits by third-party consultants to inspect for general site conditions as well as visible inspections for the condition of tanks, pipelines, and containment structures.
- The approved Emergency Response Plan is in place with both Weld County Office of Emergency Management & Briggsdale Fire Protection District.

Summary: Bison O&G II provided BMPs that address possible impacts to having more than 18 tanks on location. The BMPs include stormwater controls, remote monitoring/shut-in capabilities, liners under equipment, lined containment around the tank area with 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.