

**Objective Criteria Review Memo ADDENDUM - Verdad Resources LLC**  
**Timbro 0101-01H -- Form 2 Application for Permit to Drill (APD) Doc# 402050821**

**Approved Form 2A Oil & Gas Location Assessment (Timbro 0101 Doc# 402060001, approved 10/22/2019)**

**Location ID# 468727**

The Form 2A for this Oil & Gas Location was reviewed for all 15 wells proposed for this Location. COGCC's technical review of the 2A and all submitted APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479148, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of these eight APDs permitted at this Location.

**Delayed Approval of APDS:**

The Form 2A was approved on 10/22/2019. While the APDs were IN PROCESS then, the DSU for the wells had not yet been approved (Docket Number 191000563). The DSU has since been approved (Spacing Order: 535-1270) and the APDs are ready to be considered for approval.

The Objective Criteria Review Memo for this location (Doc# 2479148) identified that this location met Criteria #8 for being planned for 30 oil tanks and 15 water tanks. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #8, including: an Emergency Action Plan, a stormwater control plan, and a COA for lined secondary containment within the tank and separator containment areas. 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 #402060001 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 10/22/2019, establishing Location ID #468727 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# 2479148) can be found in the document file for this Location.