

**Objective Criteria Review Memo ADDENDUM - Bayswater Exploration & Production LLC
West Eaton M-35-36HN -- Form 2 Application for Permit to Drill (APD) Doc# 402187410
Form 4 Sundry to update Location BMPs Doc# 402424753**

**Approved Form 2A Oil & Gas Location Assessment (West Eaton 2-A Pad Doc# 402179770, approved
3/27/2020)
Location ID# 474389**

The Form 2A for this Oil & Gas Location was reviewed for all 12 wells proposed for this Location. COGCC's technical review of the 2A and all 12 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479243, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 12 APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 3/27/2020. The 12 APDs did not pass Completeness until 5/15/2020.

The Objective Criteria Review Memo for this location (Doc# 2479243) identified that this location met Criteria #1 for being located within 1500' of five building units & Criteria #5c for being located in an area for shallow groundwater and proximity to surface water features. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1 & #5c, including: health study fact sheets provided to building units, access road maintained for emergency vehicles, dust control measures, 32' sound walls on three sides, odor neutralizer with oil-based mud, oil takeaway via pipeline (BMP added via Sundry Doc# 402424753), stormwater controls, Leak Detection Plan, remote monitoring/shut-in capabilities, and lined containment for tank area. 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 #402179770 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 3/27/2020, establishing Location ID #474389 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# 2479243) can be found in the document file for this Location.