

**Objective Criteria Review Memo ADDENDUM - Highpoint Operating Corporation
Randall Creek 31-0164B -- Form 2 Application for Permit to Drill (APD) Doc# 402412474**

Approved Form 2A Oil & Gas Location Assessment (Randall Creek 30 SW Doc# 401976837, approved 4/30/2020)

Location ID# 476065

The Form 2A for this Oil & Gas Location was reviewed for all 16 wells proposed for this Location. COGCC's technical review of the 2A and all 16 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347785, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 16 APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 4/30/2020. The APDs did not pass Completeness until 7/10/2020.

The Objective Criteria Review Memo for this location (Doc# 1347785) identified that this location met Criteria #5c for the location being located within the Crow Creek Designated Groundwater Basin & Criteria #8 for being a location planned for more than 18 tanks on location. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #5c & #8, including: stormwater controls, drip pans/liners during refueling, daily inspections, oil-based drilling fluid will not be used, remote monitoring and shut down capabilities, drilling mats on location, containment for tanks and separators. 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 #401976837 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 4/30/2020, establishing Location ID #476065 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# 1347785) can be found in the document file for this Location.