

## **Objective Criteria Review Memo - Bison Oil & Gas II LLC**

**Wade 8-59 20A-29-32-6 -- Form 2 Application for Permit to Drill (APD) Doc# 402356482**

**Wade 8-59 20A -- Form 4 Sundry to update Location BMPs Doc# 402355725**

**Approved Form 2A Oil & Gas Location Assessment (Doc# 401485605, approved 7/8/2018)**

**Location ID# 455825**

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 20 APDs were approved on 7/8/2018. Bison O&G II has since submitted this subject refile APD (one of 12 total refile APDs) on this approved, unbuilt 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 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 approved Form 2A states the location is planned for 20 oil tanks and 8 water tanks.

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

**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 approved Form 2A states the location is planned for 20 oil tanks and 8 water tanks.

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

- **Stormwater Management:** constructed around the perimeter of the site prior to construction. Typically a ditch and berm system. Storm water controls will remain in place until the pad is stabilized or reaches final reclamation.
- **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.
- **Lined Containment:** Tank berms shall be constructed of steel walls with an engineered synthetic liner and designed to contain 100% of the capacity of the largest tank (or manifolded tanks) with the addition of rain water and additional freeboard to account for any small piping or equipment that may be in containment. Operator will place separators within secondary containment composed of steel berms with a minimum containment capacity of 100% of the single largest storage vessel inside the containment.

- Rig Liner: 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.
- Site Inspections: AVO inspections will occur weekly, and LDAR inspections are performed quarterly, or at the required frequency of County or State regulations. All records will be kept readily available.
- Emergency Response Plan: An Emergency Response Plan was submitted to and approved by both the local emergency responders and Weld County Director of Emergency Management prior to receiving the approved WOGLA19-0084 on 6/21/2019. The Emergency Response Plan includes general field wide, site specific safety protocol, and a tactical response plan.

**Summary:** Bison Oil & Gas II provided BMPs that address possible impacts to having more than 18 tanks on location. The BMPs include stormwater management controls, lined containment for tanks and separators, remote monitoring/shut-in capabilities, rig liners, weekly site inspections, and an Emergency Response Plan.

**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.