

**Objective Criteria Review Memo ADDENDUM - PDC Energy Inc
Stugart 03N -- Form 2 Application for Permit to Drill (APD) Doc# 402437735**

Approved Form 2A Oil & Gas Location Assessment (Stugart State 6-20 Doc# 402308980, approved 7/30/2020)

Location ID# 332647

The Form 2A for this Oil & Gas Location was reviewed for all 24 wells proposed for this Location. COGCC's technical review of the 2A and all 24 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347925, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 24 APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A for this location was approved on 7/30/2020. The APDs did not pass Completeness until 8/12/2020.

The Objective Criteria Review Memo for this location (Doc# 1347925) identified that this location met Criteria #1 for being within 1500' of four building units, Criteria #2 for being located within Greeley boundaries, Criteria #5c for distance to surface water features and in an areas with estimated shallow groundwater, & Criteria #8 for having a total temporary and permanent tank volume greater than 5200 bbls. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1, #2, #5c, & #8, including:

Criteria 1

PDC provided BMPs to mitigate being located within 1500' of building units, including: light mitigation, 32' sound walls on N&E sides of location, Group 2 OBM, pipeline takeaway for oil, gas, and produced water, and Health Study Fact Sheets provided to all building units within 2000'.

Criteria 2

PDC applied for a USR from the City of Greeley on 10/31/2018 and received approval on 10/8/2019 from the City of Greeley Planning Commission.

Criteria 5c & 8

PDC provided the following BMPs to address sensitive water resources and on location tank volume: stormwater controls, lined containment, remote monitoring/shut-in capabilities, an Emergency Response Plan, a leak detection plan, other containment around the rig and well heads, and removing temporary tanks within 6-9 months so the location does not permanently meet Criteria 8.

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 #402308980 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 7/30/2020, amending Location ID #332647 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# 1347925) can be found in the document file for this Location.