

Objective Criteria Review Memo ADDENDUM - Verdad Resources LLC
Georgene 2828-01H -- Form 2 Application for Permit to Drill (APD) Doc# 402146027

Approved Form 2A Oil & Gas Location Assessment (Georgene 2828-2833 Doc# 402216196, approved 3/16/2020)

Location ID# 473534

The Form 2A for this Oil & Gas Location was reviewed for all eight wells proposed for this Location. COGCC's technical review of the 2A and all eight APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479240, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the eight APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A for this location was approved on 3/16/2020. These APDs passed Completeness originally on 8/18/2020, were Rejected on 9/11/2020, and passed Completeness on 9/24/2020.

The Objective Criteria Review Memo for this location (Doc# 2479240) identified that this location met Criteria #5c for proximity to surface water features (335' from intermittent pond) and estimated shallow groundwater (9' bgs). The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #5c, including: {stormwater control measures, berm and cement liner for rig, berms and compressed road base for separator area, tank containment and liner, remote monitoring, daily inspections, and secondary containment of drilling mud}. 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 #402216196 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 3/16/2020, establishing Location ID #473534 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# 2479240) can be found in the document file for this Location.