

Objective Criteria Review Memo *Kerr McGee Oil & Gas Onshore, Gaddis 3-36HZ, Doc no. 402443658*

This summary explains how COGCC staff conducted its technical review of the Kerr McGee Oil & Gas Onshore (Kerr McGee), Gaddis 3-36HZ, Doc no 402443658, within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for six wells, seven separators, one condensate tank, three produced water tanks, and meets the following Objective Criteria:

1. (Criteria #3) Oil and Gas Locations within 1,500 feet of a municipal boundary, platted subdivision or county boundary (the Towns of Berthoud and Mead); and
2. (Criteria #5.c.) Sensitive Environment for Shallow Groundwater and proximity surface water.

COGCC staff met with the Director to discuss the Objective Criteria for the Form 2A with the proposed Best Management Practices (BMPs) and applied Conditions of Approval (COAs). The following sections provide details regarding the evaluation of each criterion.

Criteria 3: Oil and Gas Locations is within 1,500 feet of a municipal boundary, platted subdivision, or county boundary.

Site Specific Description of Applicability of Criteria 3: The Town of Berthoud is approximately 100 feet to the north of the Location. The Town of Mead is approximately 1,600 feet to the west of the Location.

Site Specific Measures to Address Criteria 3: Kerr McGee has started the WOGLA process by notifying proximate local governments prior to submitting the WOGLA permit. Kerr McGee sent information packets to both the Towns of Berthoud and Mead. Neither town responded or had comments regarding the proposed Location. Kerr McGee as an emergency plan through the WOGLA process. There are no other 2As In Process in the COGCC system within a mile of this proposed location.

There are not any Building Units within 2,000 feet of the proposed Location.

Kerr McGee has a 24-hour hotline service and signs posted for public outreach as well as sending notifications to all residents within 2,000 feet of the Location.

Summary: Kerr McGee has provided outreach to bordering municipal governments. A 24-hour hotline number has been provided via mailings and will be posted on all signs for the Location. Kerr McGee is working with the jurisdiction governments for access and haul routes and has an emergency plan in place with the local responders.

Criteria 5.c: Oil and Gas Locations within a Sensitive Area for water resources.

Site Specific Description of Applicability of Criteria 5.c: The proposed Location is in a sensitive water resource area for proximity to surface water and shallow groundwater. An irrigation ditch is located approximately 10 feet to the east of the proposed Location. Groundwater is estimated to be approximately 20 feet below ground surface based on water wells in the area.

Site Specific Measures to Address Criteria 5.c: Kerr McGee has placed BMPs on the Form 2A for protection of proximate surface water and potential shallow groundwater at the proposed Location. BMPs include secondary containment with above-ground tanks in steel-walled containment with a liner and the separators in a steel-walled containment. The location will use automation technology to monitor the tanks on the location. Kerr McGee also provided a stormwater BMP that includes pad grading, and a ditch and berm to divert runoff to sediment traps on location.

Summary: KMG provided BMPs that address ground water resources and environmental protections. The BMPs include engineering controls (construction and containment) and administrative controls (inspections and a leak detection plan). They will also restore the irrigation ditch that will be removed during construction and drilling.

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.