

**Objective Criteria Review Memo ADDENDUM - Nickel Road Operating LLC
BLEHM 1X-HC-10-07-67 -- Form 2 Application for Permit to Drill (APD) Doc# 402502738**

Approved Form 2A Oil & Gas Location Assessment (BLEHM PAD Doc# 402449623, approved 11/5/2020)

Location ID# 478497

The Form 2A for this Oil & Gas Location was reviewed for all 32 wells proposed for this Location. COGCC's technical review of the 2A and all 32 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347977, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 32 APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 11/5/2020. These APDs did not pass Completeness until 11/24/2020.

The Objective Criteria Review Memo for this location (Doc# 1347977) identified that this location met Criteria #5c for estimated shallow groundwater and proximity to surface water features (Larimer County Canal) & Criteria #8 for total onsite storage volume over 5200 bbls. 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: ditch and berm with sediment traps and wattles; containment for tanks, separators, and completions equipment; leak inspections; rig liner; remote monitoring/shut-in capabilities, and an emergency response plan with local emergency responders. 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 #402449623 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 11/5/2020, establishing Location ID #478497 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# 1347977) can be found in the document file for this Location.