

Objective Criteria Review Memo GMT Exploration Company, LLC, Marble-Redstone Pad, Form 2A 402069851

This summary explains how COGCC staff conducted its technical review of the GMT Exploration Company, LLC (GMT), Marble-Redstone Pad, Form 2A, doc no 402069851 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for twenty wells, eight separators, seven oil and condensate tanks, four produced water tanks, and meets the following Objective Criteria:

1. (Criteria #8) The proposed Location has storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels.

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 8: The proposed Location has 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: Based on the technical review, there are eleven tanks on the location with a storage capacity of 500 barrels, each, for a total onsite hydrocarbon or produced liquid storage capacity of 5,500 barrels.

Site Specific Measures to Address Criteria 8: The closest building unit to the location is located approximately 3,530 feet away from the nearest equipment on the location. Revisions to BMPs were requested to clarify stormwater protection, odor mitigation that includes the use of Group II drilling fluids, remote monitoring, daily inspections by the pumper, lined steel-walled secondary containment around the tank battery and steel-walled secondary containment around the separators, remote monitoring and shutdown capabilities, and to acknowledge COGCC's Green Completions standards. GMT is still negotiating a Fire Protection and Safety Agreement with the Rattlesnake Fire Protection District and has committed to entering into the agreement prior to drilling.

Summary: During the technical review process, COGCC staff requested additional information and clarification regarding GMT's proposal and BMPs for odors, stormwater, and daily inspections by the pumper. The information received has been added to the application materials. GMT intends to drill one well on their first occupation at this location to prove the field.

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.