

**Objective Criteria Review Memo ADDENDUM - Bison Oil & Gas II LLC**

**Grotheer 5-61 11B-14-23-1 -- Form 2 Application for Permit to Drill (APD) Doc# 401950082**

**Approved Form 2A Oil & Gas Location Assessment (Grotheer 5-61 11B Doc# 401949727, approved 5/27/2020)**

**Location ID# 476593**

The Form 2A for this Oil & Gas Location was reviewed concurrently with all 10 APDs proposed for this Location. COGCC's technical review of the 2A and all 10 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347899, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 10 APDs permitted at this Location.

**Delayed Approval of APDS:**

The Form 2A for this location was approved on 5/27/2020. The APDs passed Completeness on 3/8/2019, but the technical review was not complete until recently. These APDs are now ready to be considered for Approval.

The Objective Criteria Review Memo for this location (Doc# 1347899) identified that this location met Criteria #5c for estimated shallow groundwater & Criteria #8 for being planned for more than 18 tanks (20 oil tanks and 10 water tanks). 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 stormwater controls, liner under the drilling rig, daily tank inspections, lined containment for tank and separator areas, remote monitoring, and an Emergency Response Plan with the 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 #401949727 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 5/27/2020, establishing Location ID #476593 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# 1347899) can be found in the document file for this Location.