

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

Big Mountain Viper Fed 8-59 16-17-18-1 -- Form 2 Application for Permit to Drill (APD) Doc# 402500858

Approved Form 2A Oil & Gas Location Assessment (Big Mountain Viper 8-59 16 Doc# 402026015, approved 2/28/2020)

Location ID# 472549

The Form 2A for this Oil & Gas Location was reviewed concurrently with all APDs proposed for this Location. COGCC's technical review of the 2A and all APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479369, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 7 APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A for this location was approved on 2/28/2020 with 11 APDs. These seven APDs have been submitted to adjust the wellbore spacing and the refile APDs passed Completeness on 11/3/2020.

The Objective Criteria Review Memo for this location (Doc# 2479369) identified that this location met Criteria #8 for the location being planned for 33 storage tanks (22 oil tanks and 11 water tanks). The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #8, including: secondary containment for the tank area, site inspections, and an emergency management 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 #402026015 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 2/28/2020, establishing Location ID #472549 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# 2479369) can be found in the document file for this Location.