

Objective Criteria Review Memo – Highpoint Operating , Fox Creek 25 SE Location, Form 2A 401905333

This summary explains how COGCC staff conducted its technical review of the Fox Creek 25 SE Location, Form 2A Document # 40190533 within the context of SB 19-181 and for the required Criteria. This Form 2A permit application met the following Objective Criteria:

1. (Criteria 5.c) The proposed Location lies within a Sensitive Area for water resources (proposed Location lies within the Upper Crow Creek Designated Basin).

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A could be approved 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 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 because the location falls within the Upper Crow Creek Designated Basin. The estimated depth to groundwater reported on the Form 2A is 60 feet beneath the proposed location.

Site Specific Measures to Address Criteria 5.c: The Fox Creek 25 SE Location is planned to have sixteen wells and associated production facilities when completed. Per the operator's information on the submitted Form 2A the location will have the following production equipment:

Sixteen Pump jacks,
Sixteen separators,
Eight oil tanks,
Four water Tanks,
Two LACT Units,
12 VOC Combustors,
Four Pigging Stations, and
One vapor recovery unit.

Staff reviewed the operator provided BMPS on Form 2A Doc # 40190533 and placed the following COA on the Form 2A:

The location is in a sensitive area because it falls within the boundary of the Upper Crow Creek Designated Basin, therefore, the operator shall line the secondary containment

areas for the tanks and separators with an impervious material to prevent the downward migration of produced liquids.

Determination: The Director determined that Criteria 5.c was sufficiently analyzed and that the inclusion of the additional COA for the protection of groundwater resources met the standard for protection of the sensitive environment and water resources.