

Objective Criteria Review Memo – Mallard Exploration’s Rouen Pad, Form 2A #401629954

This summary explains how COGCC conducted its technical review of the proposed Mallard Exploration Rouen Pad location within the context of SB 19-181 and for the required Objective Criteria. This Form 2A meets the following Objective Criteria -

1. (Criteria 8) Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels (28 oil tanks and 14 water tanks)

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether this Form 2A could be approved with the Best Management Practices (BMPs). The following section provides details regarding the evaluation of each criterion.

Criteria 8: Oil and Gas Locations with 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: The Form 2A for this Oil & Gas Location proposes a total of 28 oil tanks and 14 water tanks.

Site Specific Measures to Address Criteria 8: A WOGLA from Weld County is required for this proposed Oil & Gas Location. WOGLAs require operators coordinate with local emergency responders in case of a fire or explosion at the location. There are no Building Units, School Facilities, or Child Care Centers within a mile of the proposed Oil & Gas Location. Groundwater is estimated to be 60 feet below ground surface and the soil is predominantly a clay loam; therefore, impacts to groundwater from a release from the tanks is assessed to be a low probability. Mallard Exploration will have emission control facilities on the location to control tank vapor emissions. An Emissions Mitigation/Green Completions Condition of Approval requiring Mallard Exploration to connect to a gas sales line or shut in the wells has also been applied to the Form 2A.

Determination: The Director determined that Criteria 8 was sufficiently analyzed based on the requirements of the WOGLA, deep groundwater, predominantly clay loam soils, and the Emissions Mitigation/Green Completions COA.

Staff met with the Director to discuss the BMPs applied to the Form 2A. The Director determined that following the application of the additional analysis from the Objective Criteria, the permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.