

Director Criteria Review Summary - GWOC Rio LC, Form 2A #401749741

This summary explains how COGCC staff conducted its technical review of the Great Western Operating Company (GWOC) Rio LC Pad, Form 2A #401749741 within the context of SB 19-181 and for the required Director's Objective Criteria. This Form 2A permit application met the following Director's Objective Criteria -

1. (Criteria 1) The proposed Location lies within 1,500 feet of a Building Unit (the closest Building Unit is 452 feet from the planned production facilities).
2. (Criteria 3) The proposed Location lies within 1500 feet a municipal boundary (both Thornton and Northglenn) and within 1500 feet of a county boundary (Weld County).
3. (Criteria 5.c) The proposed Location lies within a Sensitive Area for water resources (adjacent to a floodplain and within an area of potential shallow groundwater).
4. (Criteria 10) The Relevant Local Government provided comment on this Form 2A regarding additional requirements.

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 1: Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area ("UMA") and Large UMA Facility ("LUMAF") locations.

Site Specific Description of Applicability of Criteria 1: Based on the technical review and desktop evaluation, staff identified one building unit located approximately 275 feet to the east of the Oil and Gas Location, a second building unit approximately 425 feet to the east. Staff also identified building units approximately 775, 800 and 1,000 feet to the west and west-northwest. In total there are five building units within 1,500 feet of the proposed Location. There are no high density residential neighborhoods within 1,500 feet of the proposed location.

Site Specific Measures to Address Criteria 1: Because 1 proximate building unit is located within 500' of the proposed wells and production facilities, this location is an exception zone location and is subject to all BMPs and mitigation measures specified in Rule 604.c.(2) and (3). These protections for nuisance impacts will also serve to protect residents in the other proximate buildings, despite their location outside the exception zone setback. In addition to those measures, the nearest building unit owner is the surface owner on which the oil and gas location will be constructed and has signed a surface use agreement with the operator and has been made aware of the potential impacts resulting from the proximity to the operations.

Because the proposed location is in Adams County, the operator was required to notice residents within ½ mile and hold a public meeting to disseminate information; 23 residents of Adams County and two residents of Weld County were noticed. In addition, the Brighton Fire Rescue District and Weld County Local Government Designee were invited to attend the meeting. Three members of the public attended the public meeting. Adams County granted an Administrative Use by Special Review (AUSR) in early May.

Though not required by COGCC rule, GWOC also provided a detailed rationale for siting the multi-well production facilities and included a discussion of 5 potential alternative locations and why they were not chosen.

Determination: During the technical review process, COGCC staff requested additional information and clarification regarding the applicant's proposal and BMPs and the information received has been added to the application materials. The applicant provided enhancements and clarifications to the proposed BMPs. Given the foregoing, the Director determined Criteria 1 was sufficiently analyzed.

Criteria 3: Oil and Gas Locations within 1,500' feet a municipal boundary, platted subdivision, or county boundary

Site Specific Description of Applicability of Criteria 3: The proposed Location lies within 1500 feet a municipal boundary (both Thornton and Northglenn) and within 1500 feet of a county boundary (Weld County).

Site Specific Measures to Address Criteria 3: GWOC provided a description of the outreach and coordination with the Adams County LGD as well as Thornton for the Form 2A. In addition, the Weld County LGD was noticed regarding the Form 2A proposal and Neighborhood Meeting as the proposed Location lies within proximity to Weld County. Staff contacted Thornton to confirm that GWOC worked with Thornton regarding use of roads and that any other concerns were addressed. Staff also contacted Northglenn, which had no concerns regarding the proposed location.

Determination: The Director determined that Criteria 3 was sufficiently analyzed because there was sufficient communication and coordination between the operator and the relevant local government and local jurisdictions within 1,500 feet of the proposed Oil and Gas Location and all concerns raised by the proximate local governments were addressed during the permit process.

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 area due to its proximity to the surface water and shallow groundwater.

Site Specific Measures to Address Criteria 5.c: Staff worked with the GWOC to place BMPs on the form that address protection of the sensitive environment including; lining production facilities, equipping the location with remote shut-in capabilities, an inspection program for leak detection, and pressure testing of pipelines. GWOC will also review production records including volume and pressure irregularities that will detect a potential leak associated with a tank or pipeline.

Determination: The Director determined that Criteria 5.c was sufficiently analyzed based on the application of additional BMPs that address the protection of ground and surface water resources were sufficient to meet the standard for protection of the sensitive environment and water resources.

Criteria 10: Oil and Gas Locations where the Relevant Local Government, or state or federal agency requests additional consultation

Site Specific Description of Applicability of Criteria 10: The Adams County Local Government Oil and Gas Liaison (LGD) provided comments on this Form 2A regarding additional requirements.

Site Specific Measures to Address Criteria 10: COGCC staff reviewed the comments placed on the Form 2A by the local jurisdictional authority, Adams County, and requested written responses to address each comment, from the operator. In addition, COGCC staff requested a copy of the Local Permit upon receipt from the county. The permit has been included on this Form 2A.

Staff requested additional BMPs to address the comments placed on the form by the Adams County LGD. Staff worked with GWOC to place the following BMPs on the Form 2A;

- a) Baseline testing of all residential water wells located within 1/2 mile of the proposed location will be required upon the owner's request.
- b) Operator shall line the production facilities, equip the location for remote shut in capabilities and leak detection system that will include the review of production records, including volume and pressure irregularities that will detect a potential leak associated with a tank or pipeline.
- b) Emissions monitoring.

The above-referenced BMPs addressed all issues raised by the Adams County LGD. Pursuant to Adams County requirements, the operator held a neighborhood meeting to discuss the proposal with local residents within 2500 feet of the proposed Oil and Gas Location. GWOC provided a summary of the public meeting and description of the outreach and coordination with the Adams County.

Determination: The Director determined that Criteria 10 was sufficiently analyzed based on the additional BMPs provided by the Operator and applied to this Form 2A were sufficient and all concerns raised by the proximate local governments were addressed during the permit process.

Staff met with the Director to discuss the updated BMPs and the COAs that were applied to the Form 2A by COGCC staff. 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.