

**Director Criteria Review Summary – Conoco Phillips Company, State Massive #5-65 2-3, Form 2A 401656230**

This summary explains how COGCC staff conducted its technical review of the State Massive #5-65 2-3, Form 2A 401656230 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 5.c) The proposed Location lies within a Sensitive Area for water resources (adjacent to a surface water feature and potential shallow groundwater).

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 area due to its proximity to the surface water. The Hydrology Map and aerial photographs indicate the presence of a shallow drainage transecting the location. Although the drainage transects the location, it is impeded by two, 2-track roads prior to connecting to a tributary of Coal Creek located approximately 75 feet from the location. The estimated depth to groundwater was reported at 25 feet bgs as reported in the nearby water well logs.

**Site Specific Measures to Address Criteria 5.c:** To protect the water resources, staff required the following BMPs: the operator proposed the use of steel secondary containment structures to prevent the discharge of oil from crude oil storage tanks, produced water storage tanks and portable storage containers; pollution control containers (spill boxes) are used on truck loading lines and are placed within the limits of the secondary containment system; remote monitoring and shut down capabilities including automatic shutdown pressure devices installed on process vessels with remote monitoring capabilities and installed on flowlines from well heads to facilities with remote monitoring capabilities. To protect groundwater resources, staff required the following BMPs: operator proposed the use of cathodic protection on buried steel lines to mitigate corrosion and will install engineered liner systems within the secondary steel containment systems for tank batteries.

**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.