

**Objective Criteria Review Memo St. Croix Operating, Inc., Armstrong #3, Form 2A, Document #402093719**

This summary explains how COGCC staff conducted its technical review of the St. Croix Operating, Inc. (St. Croix), Armstrong #3, Form 2A, document # 402093719 within the context of SB 19-181 and for the required Objective Criteria. This is a new Location with one proposed well, a pump jack, an electric generator, one cavity pump and meets the following Objective Criteria:

- (Criteria #5 c) The proposed Location lies within a Sensitive Area for water resources (within the Northern High Plains 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:** Objective Criteria 5.c was met since the Location is in a Sensitive Area for water resources which includes ground water basins designated by the Colorado Ground Water Commission. The proposed Armstrong #3 lies within the Northern High Plains Designated Basin. This Location is in a recharge area for the High Plains aquifer.

**Site Specific Measures to Address Criteria 5.c:** St. Croix has placed BMPs on the Form 2A for protection of the sensitive water resources at the Location. BMPs include the installation of stormwater controls prior to construction activities and daily visual inspections of the Location for leaks or spills along the well head. In addition, the Location will produce to a centralized remote Location and will not have hydrocarbon storage at the Location. Dedicated production facilities at the remote Location will be constructed in lined secondary containment. In addition, St. Croix has agreed to submit the laboratory analytical results to the COGCC via Form 4 Sundry within 30 days of receipt to verify compliance with Table 910-1, which has been added as an additional BMP.

**Summary:** St. Croix provided BMPs that address the sensitive water resource and the environmental protections. The BMPs include engineering controls (construction and containment) and administrative controls (offsite consolidated production facilities and daily inspections for leak detection).

**Director Determination:** Based on the Objective Criteria review. The Director has determined that this permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.