

Objective Criteria Review Memo – Bison Oil & Gas II LLC Miller 7-61 13A, Form 2A #401722041

This summary explains how COGCC staff conducted its technical review of the Bison Oil & Gas II LLC Miller 7-61 13A, Form 2A #401722041 within the context of SB 19-181 and for the required Objective Criteria. This proposed Location is for 10 wells, 20 oil tanks, 10 separators, 10 water tanks, and 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. The Form 2A indicates there will be 20 oil tanks and 10 water tanks.

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 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 indicates there will be 20 oil tanks and 10 water tanks.

Site Specific Measures to Address Criteria 8: The Operator has the following BMP's for the location to address lined containment, auto shutoffs, and leak detection:

- Operator shall use a Supervisory Control and Data Acquisition (SCADA) system in conjunction with tank level indicators which have the ability to automatically shut in wells during an upset condition.
- AVO inspections will occur weekly, and LDAR inspections are performed quarterly. All records will be kept readily available.
- Steel tank berms with an engineered synthetic liner and designed to contain 100% of the capacity of the largest tank (or manifolded tanks) with the addition of rain water. The engineered secondary containment system will be constructed of a perimeter of walls that are post driven into the ground around a flexible geotextile base. All components will then be sprayed with a polyurea liner technology.

Additionally, the Operator provided the following communication regarding emergency response plans:

- An Emergency Response Plan must be submitted and approved from both the local emergency responders and Weld County's Director of Emergency Management prior to receiving the approved WOGLA (WOGLA was approved on 10/30/2019-WOGLA19-0200). The Emergency Response Plan includes general field wide, and site specific safety protocol, and a tactical response plan.

Summary: Bison Oil & Gas II LLC provided BMPs that address possible impacts to from having a large number of tanks on site. The BMPs include lined containment, remote monitoring through a SCADA system, leak detection, as well as an Emergency Response Plan and coordination with local emergency responders.

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.