

Objective Criteria Review Memo ADDENDUM - Bison Oil & Gas II LLC
Freeman 8-62 13-24-1 -- Form 2 Application for Permit to Drill (APD) Doc# 401748302

Approved Form 2A Oil & Gas Location Assessment (Freeman 8-62 13 Doc# 401748156, approved 12/12/2019)

Location ID# 469713

The Form 2A for this Oil & Gas Location was reviewed concurrently with all 16 APDs proposed for this Location. COGCC's technical review of the 2A and all 16 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347732, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 16 APDs permitted at this Location.

Delayed Approval of APDs:

The APDs for this location were not ready for approval at the time the Form 2A was ready for Final Approval on 12/12/2019. COGCC staff have since received all remaining information needed for these APDs to be considered for Final Approval, including updated local government disposition information and Location ID number from the approved Form 2A.

The Objective Criteria Review Memo for this location (Doc# 1347732) identified that this location met Criteria #5c for sensitive water resources & #8 for total tank count/volume. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #5c & #8, including: stormwater controls, lined containment, and remote shut-in capabilities. Additionally, this location has an approved WOGLA (WOGLA 19-0190) which requires coordination with local emergency responders regarding an Emergency Action Plan. Based on the existing BMPs, there is no further action needed beyond what was identified in the on-file Objective Criteria Review Memo.

Based on this analysis, the Operator is complying with the existing BMP's and COA's on the approved Form 2A to address the Objective Criteria that were met during the original review of the Form 2A and no further Sundry or Memo is necessary at this time. The APD's IN PROCESS should be passed and sent to Final Approval with the following comment:

COGCC conducted the technical review for the related Oil and Gas Location Assessment permit, Form 2A document #401748156 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 12/12/2019, establishing Location ID #469713 subject to conditions included in the permit. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A. The Objective Criteria Review Memo (Doc# 1347732) can be found in the document file for this Location.