

**Objective Criteria Review Memo ADDENDUM - Confluence DJ LLC  
Willow 22-4-4L -- Form 2 Application for Permit to Drill (APD) Doc# 402294263**

**Approved Form 2A Oil & Gas Location Assessment (Willow 22 West Doc# 401959539, approved 8/24/2019)**

**Location ID# 466977**

The Form 2A for this Oil & Gas Location was reviewed for all 13 wells proposed for this Location. COGCC's technical review of the 2A and all 11 APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2316568, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the 11 APDs permitted at this Location.

**Delayed Approval of APDS:**

These 11 APD's were not able to be approved concurrently with the Form 2A for this location on 08/24/2019 because the technical review (Permitting and/or Engineering) was not complete at that time. The technical review has since been completed and the forms are now ready to be considered for approval.

The Objective Criteria Review Memo for this location (Doc# 2316568) identified that this location met Criteria #1 for having two building units within 1500' of the location, Criteria #5c for proximity of surface water feature and shallow groundwater, & Criteria #8 for having 26 oil tanks and 13 water tanks onsite. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1, #5c, & #8, including: sound walls on the south and west sides of the location, odor neutralizer for oil-based mud, propant dust control, enhanced stormwater controls, lined containment for tank areas, daily inspections and an Emergency Response Plan as part of the WOGLA process. 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 #401959539 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 8/24/2019, establishing Location ID #466977 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# 2316568) can be found in the document file for this Location.