

Objective Criteria Review Memo ADDENDUM - Mallard Exploration LLC
Koloa 15-22-1HC -- Form 2 Application for Permit to Drill (APD) Doc# 402230073

Approved Form 2A Oil & Gas Location Assessment (Koloa Pad Doc# 402230071, approved 1/22/2020)
Location ID# 470933

The Form 2A for this Oil & Gas Location was reviewed for all 10 wells proposed for this Location. COGCC's technical review of the 2A and all eight APDs submitted included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479344, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of these eight APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 1/22/2020. These eight APD's did not pass Completeness until 3/05/2020.

The Objective Criteria Review Memo for this location (Doc# 2479344) identified that this location met Criteria #5c for having the nearest downgradient water feature 344 feet away and is within the Upper Crow Creek Designated Groundwater Basin & Criteria #8 for being planned for 20 oil wells and 10 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 #5c & #8, including: lined containment for tank area and separators placed on compacted road base with metal berm walls, SCADA system for remote monitoring/shut-in capabilities, AVO inspections, stormwater/sediment trap controls, liners under drilling & completions equipment, Green Completions, and coordination with local emergency responders. 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 #402230071 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 1/22/2020, establishing Location ID #470933 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# 2479344) can be found in the document file for this Location.