

**Objective Criteria Review Memo ADDENDUM - Mallard Exploration LLC
Pintail Fed 3-15-9HN -- Form 2 Application for Permit to Drill (APD) Doc# 402449279
Form 4 Sundry to update Location BMPs Doc# 402477815**

**Approved Form 2A Oil & Gas Location Assessment (Pintail Pad Doc# 401386705, approved 3/16/2018)
Location ID# 454414**

The Form 2A for this Oil & Gas Location was reviewed for all 16 wells proposed for this Location. COGCC's original technical review of the 2A and all 16 APDs occurred in 2018. In 2019, after the passage of SB19-181, the 16 APDs were refiled, prompting a review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479091, is in the Location's file in COGCC's database.

Delayed Approval of APDS:

This refile APD is being submitted to changed the wellbore trajectory of the previously approved well API# 05-123-46553.

The Objective Criteria Review Memo for this location (Doc# 2479091) identified that this location met Criteria #5c for proximity to surface water features & Criteria #8 for being planned for more than 18 tanks. 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 management controls and an emergency response plan coordinated with the local government.

To ensure this location's BMPs are consistent with similar locations from this Operator, a Sundry for additional BMPs was requested. These additional BMPs included: remote monitoring/shut-in capabilities, lined containment for tank battery and separator areas, and daily site inspections.

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:

The Form 2A #401386705 for the location, ID #454414, was approved prior to implementation of SB 19-181. The Director approved a refile Form 2 for the location on 6/27/2019 under the statutory authority provided through SB 19-181, including the Objective Criteria. The well proposed by this related Form 2 was contemplated during COGCC's review of the Form 2A and the mitigation measures that were applied during the subsequent Objective Criteria Review for the location. The Objective Criteria Review Memo (Doc# 2479091) and the follow-up addendum (Doc# 1347963) can be found in the document file for this Location.