

**Objective Criteria Review Memo ADDENDUM - Crestone Peak Resources Operating LLC
Cottonwood Creek 4-65 28-27 1AH -- Form 2 Application for Permit to Drill (APD) Doc# 402440944
Approved Form 2A Oil & Gas Location Assessment (Rush 4-65 29-30 1AH Pad Doc# 401764632,
approved 1/24/2020)
Location ID# 471001**

The Form 2A for this Oil & Gas Location was reviewed concurrently with all eight APDs proposed for this Location. COGCC's technical review of the 2A and all eight APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 1347748, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the four refile APDs at this Location.

Delayed Approval of APDS:

The Form 2A and eight APDs for this location were approved on 1/24/2020. These four refile APDs have been submitted to change wellbore trajectories and passed Completeness on 9/30/2020.

The Objective Criteria Review Memo for this location (Doc# 1347748) identified that this location met Criteria #1 for one building unit within 1500' of the location, Criteria #2 for boeing located within the City of Aurora, Criteria #3 for being located within 1500' of the platted "Trasko Acres" subdivision, & Criteria #5c for proximity to surface water features and in an area of estimated shallow groundwater. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1, #2, #3, & #5c, including:

Criteria 1

Crestone provided the following BMPs to mitigate proximity to building units: dust controls through wetting with fresh water and/or trackifiers, sound walls on N, S, & W sides of the location, lighting directed inward and down, and a closed loop drilling system to reduce odors. There is also a planned oil pipeline and gas pipeline for the location to reduce truck traffic and an air monitoring plan provided to the City of Aurora.

Criteria 2

The City of Aurora approved, via Administrative approval, the oil and gas permit for this location on 11/1/2019. Case no. 2019-6035-00.

Criteria 3

The Platted subdivision proximate to the location has been platted since the 1970's. The Operator confirmed with the developer that the current platted plan is not the intended development plan and that changes are being made to move the proposed development further from the oil and gas location.

Criteria 5c

Crestone provided the following BMPs to mitigate being located in a sensitive area for water resources: stormwater management controls constructed with good engineering practices, remote monitoring/shut-down capabilities, and lined containment for the tank area.

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 #401764632 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 1/24/2020, establishing Location ID #471001 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# 1347748) can be found in the document file for this Location.