

304.c.(1). Emergency Spill Response Program

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
COMPLETENESS REVIEW Attachment not required.		304.c.(1)		KF		X

304.c.(2). Noise Mitigation Plan

Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW			304.c.(2)				403581540
No issues identified.					KF		X

304.c.(3). Light Mitigation Plan						
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
COMPLETENESS REVIEW		304.c.(3)		KF		
No issues identified.						X

304.c.(4). Odor Mitigation Plan

			Referenced in guidance document?	SME reviewer	Applicant Response:
Issue identified by staff: COMPLETENESS REVIEW No issues identified.	Suggested correction:	Specific Rule (optional) 304.c.(4)		KF	

403581540

X

304.c.(5). Dust Mitigation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.c.(5)		KF		403581540 X

304.c.(6). Transportation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.c.(6)		KF		403581540 X

304.c.(7). Operations Safety Management Program

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.c.(7)		KF		403581540 X

304.c.(8). Emergency Response Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(8)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
The Plan includes a section to be signed by the Weld Country Office of Emergency Management but this is not filled out.	Attach a copy of this plan that has been approved by the Local Emergency Response Agency. If the Local Response Agency has not responded add a comment describing what attempts have been made to get their approval for this Emergency Response Plan.			KF	Plan that has been approved by Local Emergency response agency has been uploaded.	YesX

304.c.(9). Flood Shut-In Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW Attachment not required.		304.c.(9)		KF		403581540 X

304.c.(10). Hydrogen Sulfide Drilling Operations Plan

Issue identified by staff:	Suggested	Specific Rule	Referenced	SME	
COMPLETENESS REVIEW	correction:	(optional)	in guidance	reviewer	Applicant Response:
Attachment not required.		304.c.(10)	document?	KF	

403581540

X

304.c.(11). Waste Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW		304.c.(11)			
No issues identified.				KF	

403581540

X

304.c.(12). Gas Capture Plan

Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW			304.c.(12)		KF		403581540
Attachment not required.							X

304.c.(13). Fluid Leak Detection Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW No issues identified.		304.c.(13)		KF	

403581540

X

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(14)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
<p>The "Estimated Topsoil Salvaged" (8,190 Cubic Yards) is not enough soil to properly reclaim the interim reclamation area to a depth of at least 6 inches of topsoil and allow for the remaining 3,012 Cubic Yards of stockpiled soil to remain for final reclamation.</p>	<p>Update the amount of topsoil that will be salvaged from the disturbed area to account for at least 6 inches of topsoil to be available for both interim and final reclamation.</p> <p>Based on my calculations the interim reclamation area should be 11.36 acres (15.36 acres of total disturbance - 3.73 acres after interim reclamation) which would require at least 9,382 Cubic Yards of topsoil to reclaim the 11.36 interim reclaimed acres to a depth of 6 inches of topsoil. The 3,012 Cubic Yards of "Estimated Topsoil Stored for Final Rec" meets this requirement already, however I believe the "Estimated Topsoil Salvaged" should represent the total needed for interim reclamation (9,382 CY) and the "Estimated Topsoil Stores for Final Rec" (3,012 CY) combined.</p> <p>Note that the soil test pit data included in this plan shows greater than 6 inches of depth for the first soil horizon and that per Rule 1002.b.(2). "As to all excavation operations undertaken after July 1, 1997 on non-crop land, the operator shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper".</p>			KF	<p>Had call with Kevin Fletcher from ECOM on 6/12/24 to discuss. Chad Brebis (KMOG Construction Manager) was able to explain where the discrepancy was. Kevin was satisfied with Chad's explanation. It is understood that the numbers are accurate.</p>	X
<p>The plan does not include a description of the areas disturbed by the access road or what volume of soil will be stockpiled to be used upon final reclamation. Per Rule 1002.b.(2). "As to all excavation operations undertaken after July 1, 1997 on non-crop land, the operator shall separate and store the topsoil horizon or the top six (6) inches, whichever is deeper, and mark or document stockpile locations to facilitate subsequent reclamation". Since there would be new disturbance from the creation of new access road installation and new disturbance would be included as part of "all excavation operations" it should be included in the calculations and storage of the disturbed topsoil area in order to facilitate subsequent reclamation upon final closure and decommissioning of the location.</p>	<p>Update plan to include the access road disturbance and the planned stockpiled topsoil associated with this disturbance to allow for at least 6 inches of topsoil to be used during decommissioning and final reclamation of these locations.</p>	1002.b.(2).		KF	Updated plan has been uploaded.	X

304.c.(15). Stormwater Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.c.(15)				403581540
The attached CDPHE CDPS General Permit lists an expiration date of 3/31/24, this permit expired 2 days after you submitted this OGD.	Update to include valid CDPHE CDPS General Permit.			KF	Updated permit has been added.	YesX

304.c.(16). Interim Reclamation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.c.(16)		KF		403581540 X

304.c.(17). Wildlife Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW No issues identified.		304.c.(17)		KF	

403581540

X

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(18)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
The plan has the water sources redacted for privacy.	Provide a separate list of water sources for review when this OGD is resubmitted. These sources will remain confidential and will only be reviewed internally.			KF	The non-redacted version was sent to John Noto and Ben Frissell on 3/29/24	Yes X

304.c.(19). Cumulative Impacts Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW No issues identified.		304.c.(19)		KF	

403581540

X

304.c.(20). Community Outreach Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.c.(20)		KF		403581540 X

304.c.(21). Geologic Hazard Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW Attachment not required.		304.c.(21)		KF		403581540 X

ACCESS ROAD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(7).F		KF		403581540
No issues identified.						X

ALA DATASHEET

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(2)				403581540
Wetland identified along the nearest Surface Waters of the State 190 ft W of WPS mapped as Riverine Wetland by the National Wetlands Inventory.	An ALA is required per Rule 304.2.(2).B.vii. if the proposed Oil and Gas Location is immediately upgradient from a mapped wetland. Remove the figures and attach a completed ALA Datasheet using the Template that can be found on our website .	304.b.(2).B.vii.		KF	ALA Data sheet uploaded.	Yes X
The ALA Datasheet only includes figures showing the alternate locations described in the ALA Narrative Summary.		304.b.(2).C.iii.	Yes	KF	ALA Data sheet uploaded.	Yes X

ALA NARRATIVE SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(2)				403581540
Wetland identified along the nearest Surface Waters of the State 190 ft W of WPS mapped as Riverine Wetland by the National Wetlands Inventory.	An ALA is required per Rule 304.2.(2).B.vii. if the proposed Oil and Gas Location is immediately upgradient from a mapped wetland.	304.b.(2).B.vii.		KF	ALA narrative uploaded.	Yes X

CONSULTATION SUMMARY

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
No issues identified.				KF		X

CPW CONSULTATION

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW						403581540
The Form 2A states that a CPW pre-application consultation occurred on 10/4/23, but no CPW Consultation Summary is attached.	Attach a summary of the CPW Consultation.			KF	The consultation box was inadvertently checked. It now is unchecked.	X
Attachment not required.				KF	Yes	X

CULTURAL FEATURES MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(3)		KF		403581540
No issues identified.						X

DIRECTIONAL WELL PLAT

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).H	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
No issues identified.				KF		X

DISPROPORTIONATELY IMPACTED
COMMUNITY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW Attachment not required.		304.b.(7).J		KF	

403581540

X

GEOLOGIC HAZARD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.b.(7).I		KF		403581540 X

GIS data

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(8)		KF		403581540
No issues identified.						X

HYDROLOGY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(7).E		KF		403581540
No issues identified.						X

INFORMED CONSENT LETTER

Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW			604.b.(1)		KF		403581540
Attachment not required.							X

LAYOUT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(7).B		KF		403581540
No issues identified.						X

LESSER IMPACT AREA EXEMPTION
REQUEST

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW Attachment not required.		304.d		KF		403581540 X

LOCAL/FED FINAL PERMIT DECISION

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 303.a.(6).B	Referenced in guidance document?	SME reviewer	Applicant Response:	403581540
The Form 2A states "1041WOGLA application will be submitted to Weld County ~4/8/24", so the WOGLA permit should be submitted now.	Update to include Approved WOGLA Permit if the permit has been approved.			KF	Application has been corrected to show that 1041WOGLA application was submitted 4/4/2024 WOGLA Final order is uploaded to Webforms	Yes X

LOCATION DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.b.(7).A		KF		403581540 X

LOCATION PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW		304.b.(4)		KF	
No issues identified.					

403581540

X

NRCS MAP UNIT DESC

Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW			304.b.(10)				403581540
No issues identified.					KF		X

OTHER

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW					
Attachment not required.				KF	

403581540

X

PRELIMINARY PROCESS FLOW
DIAGRAMS

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.b.(7).D		KF		403581540 X

REFERENCE AREA MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(9).B.i		KF		403581540
No issues identified.						X

REFERENCE AREA PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW		304.b.(9).B.ii				403581540
Only 4 images are supplied as part of this attachment, the 5th is satellite imagery that does not provide a sufficient resolution to provide specific vegetation information as required by Rule 304.b.(9).B.ii.	Provide a 5th photograph from above the reference of a sufficient resolution to provide specific vegetation information.	304.b.(9).B.ii		KF	<p>A larger picture with better resolution was added to this document and uploaded.</p> <p>We have had a number of Reference Area photos provided with Maxar or Google imagery and has been acceptable. There is no published guidance on this matter and some consultants do not have access to this technology (and in some instances, the surface owners will not allow drones). I respectfully ask that you accept this application (and deem complete) with this minor issue, so it can continue forward and in the meantime I will work with our consultant to get some solution in place. I also ask that discuss this with John and Doug about the lack of published guidance. Yes</p>	X

RELATED LOCATION AND FLOWLINE MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW No issues identified.		304.b.(7).G		KF	

403581540
X

SURFACE AGRMT/SURETY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW No issues identified.		304.b.(12).B		KF	

403581540

X

WAIVERS

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:
COMPLETENESS REVIEW Attachment not required.		604.a.(4)		KF	

403581540

WILDLIFE HABITAT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	
COMPLETENESS REVIEW No issues identified.		304.b.(7).C		KF		403581540 X

Form 2A

COMPLETENESS REVIEW (Form 2A topic) (topic/subtopic)

Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403581540
The Form 2A states "1041WOGLA application will be submitted to Weld County ~4/8/24", so the WOGLA permit should be submitted now.	Update Relevant Local Government Siting Information section to show current status of Weld County permitting.	KF	2A application has been updated to show that 1041WOGLA application was submitted 4/4/2024	Yes	X
Wetland identified along the nearest Surface Waters of the State 190 ft W of WPS mapped as Riverine Wetland by the National Wetlands Inventory. The "Operator Comments" section states that "This proposed location is not within 500 feet of OHWM and no wetlands are present.", however this location is also listed as 190 feet from Surface Water of the State which are NWI mapped wetlands.	An ALA is required per Rule 304.2.(2).B.vii. if the proposed Oil and Gas Location is immediately upgradient from a mapped wetland. Provide a wetland delineation showing the absence of wetlands or update submission to include an ALA.	KF	ALA provided	Yes	X
	Update to describe the discrepancy.	KF	That comment was removed.	Yes	X

COMPLETENESS REVIEW (Form 2B topic) (topic/subtopic)				Staff second review: Was the issue addressed?	
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:		
The Form 2B lists the distance to the nearest Wetland as 3006 feet to the NE as a "Potential Wetland Pond", however the Platteville Ditch is a NWI mapped wetland.	Update to accurately show closest wetland.	KF	Corrected to show Platteville Ditch at 190'	Yes	X

403581540

COMPLETENESS REVIEW (Form 2C topic) (topic/subtopic)				Staff second review: Was the issue addressed?	
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:		
Missing OGDG Map	Attach OGDG map	SS	Map has been attached.	Yes	403581540 X

Hearing Application

COMPLETENESS REVIEW		Docket# 240300074
Attorney Name: JAMIE JOST; KELSEY WASYLENKY	Attorney Email Address: JJOST@JOSTENERGYLAW.COM; KWASYLENKY@JOSTENERGYLAW.COM	
Permitter Name: Sam Champlin	Permitter Email: sam.champlin@state.co.us	
Engineer Name: Diane McCoy	Engineer Email: diane.mccoy@state.co.us	
Hearing Officer Name: Stephen Smeltz	Hearing Officer Email: stephen.smeltz@state.co.us	

Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
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LAS Review Notes

OGDP Hearing Application & Exhibit C Paragraph 2; and Exhibit A: states that the surface location will be in the "SW/4NW/4 of Section 5", but the Form 2A materials state the location will be in the "SE/4NW/4 of Section 5"

Correct the Paragraph 2 of the Hearing Application and Paragraph 2 of the Spacing Exhibit C, as well as the Exhibit A map to reflect the correct QuarterQuarter the surface location is proposed.

corrected 6/25

Permitting Review Notes

TOPIC

Concern: Rule 305.a.(2).D requires all existing Wells that are developing the same formation in the application lands must be listed [regardless of TA/SI status]. This includes all wells that have spacing which overlaps the application lands. The following well(s) are missing from the application:

- 1) Kunzman Federal 13C-8HZ (05-123-37033)
- 2) Kunzman Federal 30N-5HZR (05-123-37032)
- 3) Olin Federal 21-31 (05-123-31631) (Directional)
- 4) Olin Federal 25-31 (05-123-31633) (Directional)
- 5) Olin L Federal 31-28D (05-123-30715) (Directional)

corrected 6/18

Concern: Rule 305.a.(2).D requires that all existing locations that are developing the same formation in the applicationlands must be listed. The following locations are producing the applications lands and are not included in the application:

- 1) KUNZMAN FEDERAL/35N-8HZ (Loc ID:432232)
- 2) OLIN/30-31 (Loc ID: 319447)
- 3) OLIN L/31-29D (Loc ID: 329069)

corrected 6/18

Geologic Testimony

None.

None.

There were no Review issues identified in the Geologic Testimony at this time.

Engineering Testimony

1296.52 acre Larkspur OGD for 10 HZ wells on one location
1281.16 DSU
Niobrara and Sharon Springs setbacks: 235' from E & W and 75' from N & S
FH, Codell, Carlile setbacks: 435' from E&W and 140' from N&S

ACCEPTABLE OVERALL

Engineering

Applicant Response: