

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.c.(1)					
Not near relevant surface water				BC			

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.c.(2)					
The request for increased allowable noise levels will need to be moved from the LIA to the Noise Mitigation Plan.	Note, the request may take the form of a cover letter or another form.			BC	Updated Noise Plan attached. Section 8 of the plan now includes the request with the appropriate attachments. Also, a note has been added to the Comments Section of the "Submit" Tab.	Yes	x
Plan and modeling for both locations are combined in the plan. Review complete.				BC			x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF !
COMPLETENESS REVIEW		304.c.(3)					
There is a discrepancy between the production phase lighting description (no lighting) and the BMPs for the production phase (describing controls for lights).	If there will be no production phase lighting, simplify the production phase BMPs and remove references to lighting from that phase of the BMPs.			BC	This was an oversight. The consultant used a DJ Basin BMP, and we did not catch it. Apologies! Caerus will not utilize any lighting during the production phase of this project.	Yes No, plan says that no permanent production phase lighting will occur but BMPs are on the plan to have lighting.	x
Section 6.3 Production Phase and the Production Phase BMPs contradict eachother.	If there will be no lighting during the production phase, then reconsider the BMPs describing the production phase lighting.			BC	This was an oversight. The consultant used a DJ Basin BMP, and we did not catch it. Apologies! Caerus will not utilize any lighting during the production phase of this project.	Updated. Yes	x

304.c.(4). Odor Mitigation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF !
COMPLETENESS REVIEW		304.c.(4)		BC			X
Not required							X

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(5)						
BMP for the treatment of access roads. Per Rule 427.c.(2), dust suppression activities within 300 ft of ordinary high-water marks of any water body will only be treated with fresh water.	Chemical treatment is discussed in the Road Maintenance and Federal Requirements BMP. Tighten Road Maintenance BMP for the stretches of road within 300 ft of the ordinary high-water marks of water bodies.	427.c.(2).		BC	Agreed, apologies for the oversight. Updated Dust Plan is uploaded.	Yes	x	x

304.c.(6). Transportation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW Operator noted in submit box that Rio Blanco County does not require plan.		304.c.(6)		BC		x	x

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

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(7)					
Completeness review complete				BC			x

x

304.c.(8). Emergency Response Plan

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(8)					
Completeness review complete				BC			x

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

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(9)					
Completeness review complete				BC			x

x

x

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

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(10)					
Not required.				BC			x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF !
COMPLETENESS REVIEW		304.c.(11)					
4.5.1 Drill cuttings will be stored in steel bins placed in the compacted cuttings management area on the southeast side of the well pad.	Environmental Group requested COA: Operator shall implement BMPs to ensure that the cuttings are properly stored and contained within the steel bins, and do not impact the working pad surface; spills/releases onto the working pad surface shall require immediate removal. Transportation of the cuttings shall be performed in a manner in which the cuttings are completely contained and do not impact the working pad surface. Operator shall comply with Rule 912 for all spill/release reporting requirements.			BC	<p>Caerus has reviewed the proposed COA, which Caerus has determined is infeasible due to the lack of a closed loop system and the inevitability of some drill cuttings coming into contact with the Working Pad Surface. Caerus maintains that such inevitable and incidental contact with the Working Pad Surface will not pose a risk to public health, safety, welfare or the environment or wildlife resources. Caerus proposes the following COA to address Staff's concern regarding drill cuttings coming into contact with the Working Pad Surface:</p> <p>The Operator shall implement BMPs to ensure that the cuttings are properly managed. Cuttings will be transported free of fluid from the cuttings bins to transport trucks. Daily inspection and maintenance of the Cuttings Management Area will be completed. The Operator shall comply with Rule 912 for all spill/release reporting requirements. Caerus will sample the Cuttings Management Area of the Working Pad Surface once the area is no longer in use for drilling, completions, and flowback operations to comply with Table 915-1.</p>	Yes	x
4.5.1 Drill cuttings may only be disposed of in the cuttings trench or per Rule 905.g.(2) and may not be used for recontouring during reclamation.	Remove recontouring as a potential onsite disposal for drill cuttings.	905.g.(2).		BC	Updated Waste Management Plan is uploaded	Yes	x
7.1 Per the 100 series definition of a Cuttings Trench, only dried cuttings generated from drilling a Well may be stored and disposed of in a cuttings trench. Contaminated soils are not allowed in the cuttings trench.	Remove contaminated soils from what may be disposed of in the cuttings trench.	905		BC	Updated Waste Management Plan is uploaded	Cuttings trench removed from plan, COA no longer necessary.	x
Offsite disposal record keeping is identified as 5 years on the plan.	Environmental Group is requesting as a COA: The operator shall maintain records for the life of the facility and be kept up to date. Records shall be transferred with change of operator.			BC	Rule 905.b.(3) provides the time period for which an operator is required to maintain records related to off-site transportation of E&P Waste. Caerus will comply with Rule 905.b.(3) and therefore the proposed COA is unnecessary.	No	x
7.1. "Currently, there are no plans for onsite disposal of drill cuttings in a cuttings trench and/or beneficial reuse of drill cuttings on this location"	Sentence is unclear and contradicts what is stated in 4.5.1.			BC	Updated Waste Management Plan is uploaded	Cuttings trench removed from plan, COA no longer necessary.	x
Likely COA	COA: Drill cuttings shall be managed in such a manner as to not preclude compliance with 1003 Interim Reclamation requirements. If Operator is unable to complete remediation of the drill cuttings within timeframe for 1003.b interim reclamation to be completed, Operator shall comply with 905 Rules and dispose of drill cuttings that exceed Table 915-1 at an approved Waste Disposal facility. Operator shall ensure the cuttings trench is maintained properly and that all drill cuttings stay within the parameters of the cuttings trench.			BC	The Operator will comply with Rule 1003. This COA is not necessary.	Cuttings trench removed from plan, COA no longer necessary.	x
Likely COA	COA: Pursuant to the January 5, 2017 "NTO: Interim Reclamation Procedures for Delayed Operations", remediation of drill cuttings is not interpreted as part of "drilling or subsequent operations".			BC	Cuttings will be hauled off location as they are generated. The Operator will comply with Rule 1003. This COA is not necessary.	Cuttings trench removed from plan, COA no longer necessary.	

304.c.(12), Gas Capture Plan

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(12)					
Not required.				BC			x

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

Issue identified by staff:	Suggested	Specific Rule	Referenced in	SME reviewer	Applicant Response:	Staff second review: Was the	#REF!
COMPLETENESS REVIEW		304.c.(13)					
Completeness review complete				BC			x

x

304.c.(14). Topsoil Protection Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW Plans may need approval of the interim variance to pass review.		304.c.(14)		BC		x	x

304.c.(15). Stormwater Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(15)						
Completeness review complete				BC			x	x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(16)						
Review complete				BC			x	x
Add note about this plan requiring the variance to be approved.				BC			x	x

304.c.(17). Wildlife Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(17)						
Completeness review complete				BC			x	x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(18)						
Completeness review complete				BC			x	x
Note, water used for completions is delivered to the A27-197 CDP pad to be used for the B27-197 pad.								
It is accounted for in the B27-197 pad Water Plan.				BC				

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(19)						
Review complete				BC			x	x

304.c.(20), Community Outreach Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.c.(20)		BC				
Not within 2,000 ft of RBU in DIC.							x	x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?
COMPLETENESS REVIEW		304.c.(21)		BC		
Review complete						

#REF!

ACCESS ROAD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(7).F						
Completeness reivew complete				BC			x	x

ALA DATASHEET

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(2)					
Completeness review complete				BC			x

x

ALA NARRATIVE SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(2)						
Completeness review complete				BC			x	x

CONSULTATION SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW								
Completeness review complete				BC			x	x

CPW CONSULTATION

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW Included within the variance requests and Wildlife Plans, not as a stand-alone				BC		x	x

CULTURAL FEATURES MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(3)						
Completeness review complete				BC			x	x

DIRECTIONAL WELL PLAT

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(7).H					
Completeness review complete				BC		x	
Not applicable - No wells on the location				BC			x

DISPROPORTIONATELY IMPACTED
COMMUNITY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(7).J		BC			
Not in DIC						x	x

GEOLOGIC HAZARD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW							
Missing	Attach GeoHaz Map	304.b.(7).l		BC	Attached, apologies.	Yes	x

GIS data

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(8)					
Completeness review complete - wellpad				BC			x
Working Pad surface shapefile is missing - A27-197				BC	Uploaded	Updated and now is uploaded.	x

HYDROLOGY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(7).E					
Lee Gulch, a potential intermittent stream with potential wetlands associated with it, is not addressed.	Include information on Lee Gulch and show on map. Can include reference to the Aquatic Wildlife Habitat Assessment attached to the Form 2A.			BC	Updated A27 Hydrology Map is attached.	Yes	x
Review complete				BC			x

INFORMED CONSENT LETTER

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		604.b.(1)					
No RBU within 2,000 feet.				BC			

LAYOUT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(7).B					
Completeness review complete				BC			x
Disagreement between Form 2A and Layout Drawing between oil tanks and condensate tanks.	Ensure consistency between drawing and the Form 2A.			BC	2A amended to match plats.	No	x

LESSER IMPACT AREA EXEMPTION REQUEST

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF !
COMPLETENESS REVIEW LIA for the Noise Mitigation Plan is an incorrect approach. Submit the request as part of the Noise Mitigation Plan. The LIA is for an exemption to creating and attaching a plan.		304.d					
		423.b.(3).B.		BC	Document removed. Request added into Noise Plan (Section 8). Lesser Impacts unchecked on Variances & Exemptions tab.	Yes	x

LOCAL/FED FINAL PERMIT DECISION

Issue identified by staff:			Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW							
Monitor for updates.							

LOCATION DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(7).A						
Completeness review complete				BC			x	x

LOCATION PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(4)					
Completeness review complete				BC	8/30 JM: Attach updated photos with NO SNOW.	x	x

NRCS MAP UNIT DESC

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(10)						
Completeness review complete				BC			x	x

OTHER							#REF !
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW							
Interim Reclamation Variance	We've reviewed the application with Reclamation and due to the size of interim reclamation proposed at the locations and the time period requested, we are seeking an Interim Reclamation bond for each location as part of the OGDPR. Please fill out the attached template based on third party costs and attach it to the respective Form 2A.			BC	Form has been filled out for the CDP (A27) and Well Pad (B27) and they have been attached as "Other" in attachments.	Yes	

PRELIMINARY PROCESS FLOW DIAGRAMS

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(7).D						
Missing	Attach Preliminary Process Flow Diagram			BC	Uploaded in attachments.	Yes	x	x

REFERENCE AREA MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(9).B.i						
Completeness review complete				BC			x	x

REFERENCE AREA PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(9).B.ii						
Completeness review complete				BC			x	x

RELATED LOCATION AND FLOWLINE MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(7).G						
Completeness review complete				BC			x	x

SURFACE AGRMT/SURETY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
COMPLETENESS REVIEW		304.b.(12).B					
Federal Surface - Lease as right to construct				BC		x	x

WAIVERS

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		604.a.(4)						
NA				BC			x	x

WILDLIFE HABITAT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
COMPLETENESS REVIEW		304.b.(7).C						
Completeness review complete				BC			x	x

COMPLETENESS REVIEW (Form 2A topic)		(topic/subtopic)				
			SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF !
Issue identified by staff:	Suggested correction:					
Provide additional information about estimated depth to water. Am unable to locate the water well listed as the source of the estimated depth to water, provide additional information about this well's location.	Unable to locate the water well listed as the source of the estimated depth to water, provide additional information about this well's location.		BC	Clarified. Well referenced has been plugged. Based on historic depth to GW for that well, and using current elevation of the pad it is determined that depth to GW is 463-feet.		x

COMPLETENESS REVIEW (Form 2B topic)		(topic/subtopic)					
			SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!	
Issue identified by staff:		Suggested correction:					
Review complete			BC			x	x

COMPLETENESS REVIEW (Form 2C topic)		(topic/subtopic)				
			SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	#REF!
Issue identified by staff:	Suggested correction:					
Completeness review complete			BC			

Hearing Application

COMPLETENESS REVIEW		Docket# 230400122	
Attorney Name: JOSEPH C. PIERZCHALA; ANTHONY M. ROEBER		Attorney Email Address: JPIERZCHALA@WSMTLAW.COM; AROEBER@WSMTLAW.COM Permitter Email: fenton.buchanan@state.co.us Engineer Email: craig.burger@state.co.us Hearing Officer Email: elias.thomas@state.co.us	
Permitter Name: Fenton Buchanan Engineer Name: Craig Burger Hearing Officer Name: Elias Thomas			
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>OGLA Review Notes</u> Exhibit C: introduction paragraph and Paragraph 2 - incorrectly states the locations are in Garfield County. County should be corrected to "Rio Blanco".			
<u>Permitting Review Notes</u> Comment: This application would be improved by the inclusion of the ILES formation. County should be Rio Blanco not Garfield. Incorrect in 2 areas.			
		Topic: Geologic Formations	
		Topic: Typographic and Other Errors - Exhibit C	
<u>Geologic Testimony</u> None.			
	None.	There were no issues identified at this time.	
<u>Engineering Testimony</u> Order 1-229: This Oil & Gas Development Plan (OGDP) Hearing Application seeks to develop the proposed wells in accordance with the provisions of the established, basin-wide Order 1-229; no further Engineering Review is required at this time for the proposed development.			Engineering

#REF !

Applicant Response:

Corrected with Amended Application

Geologic Testimony includes data related to the ILES. Amended Application now includes ILES.

Corrected with Amended Application