

STATE OF
COLORADO

Waldron - DNR, Emily <emily.waldron@state.co.us>

Wavetech Harker-Victor-Roberts OGDG Returned to Draft

5 messages

Waldron - DNR, Emily <emily.waldron@state.co.us>

Thu, Oct 5, 2023 at 2:11 PM

To: Andrea Gross <agross@upstreampm.com>, igendelman@wavetechenergy.com

Good Afternoon Andrea,

The Form 2As (Document #s 403312900, 403312918, and 403312965) for Wavetech Helium's Harker-Victor-Roberts OGDG Application are being returned to DRAFT in Webforms. There were no requested corrections to the Form 2B (Document # 403312975) and it will remain in UPLOAD while the requested corrections to the Form 2As are performed. The Hearing Application (Docket # 230300082) was returned to Applicant Issue Resolution in eFilings on September 20, 2023. In accordance with Rule 303.b.(4), Wavetech has 90 days from the date of this email to correct and/or provide the requested information, otherwise the Director may deny the Form 2C, and all components of the application will be considered withdrawn.

The attached spreadsheet addresses issues identified by staff during this Completeness Review. There is a tab for each plan and attachment required by Rule 304, a tab for the Form 2A, 2B, 2C, and Hearing Application. Tabs that are colored black are plans and attachments not required for this application. Tabs colored green are plans and attachments that are considered complete. These tabs may contain notes about COA's or follow up information being requested, but they have been found to meet the rule requirement for completeness. Tabs colored red require corrections/revisions to the plans or attachments in order to be in compliance with Rule 304. Staff have included notes and referenced relevant guidance documents and rules for these tabs.

Please let me know if you have any questions. While there are numerous tabs colored red, many of the revisions are minor. If you want to set up a call to discuss anything in this email let me know and we will find a time to do so.

Cheers,

Emily

Emily M Waldron

Oil and Gas Location Assessment Specialist

**COLORADO**
Energy & Carbon Management
Commission
Department of Natural Resources

C 970-819-9609

emily.waldron@state.co.us | www.colorado.gov/ecmc

**Wavetech Helium Harker-Victor-Roberts Helium OGDG - Completeness 10052023.xlsx**

76K

Andrea Gross <agross@upstreampm.com>

Thu, Oct 5, 2023 at 2:12 PM

To: "Waldron - DNR, Emily" <emily.waldron@state.co.us>, "igendelman@wavetechenergy.com" <igendelman@wavetechenergy.com>

Thank you Emily! We will let you know when the 2As have been resubmitted.

Andrea Gross

President

6494 S. Quebec St.

Englewood, CO 80111

Phone: 303-942-0506

Cell: 720-339-4277

agross@upstreampm.com

www.upstreampm.com



[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Thu, Oct 19, 2023 at 2:24 PM

To: "Waldron - DNR, Emily" <emily.waldron@state.co.us>, "igendelman@wavetechenergy.com" <igendelman@wavetechenergy.com>

Hi Emily,

Regarding your request for a Completions/Stimulation Layout, these wells will not be stimulated. Wavetech will use a natural completion. They will only be perforated a single interval. We have not been asked for the layout due to this fact. The three prior OGDGs have been approved/passed into completeness without requesting this drawing.

Are you free to discuss or let us know if we can continue to submit without this layout drawing per our previous OGDGs?

Thank you!

Andrea Gross

President

6494 S. Quebec St.

Englewood, CO 80111

Phone: 303-942-0506

Cell: 720-339-4277

agross@upstreampm.com

www.upstreampm.com



From: Waldron - DNR, Emily <emily.waldron@state.co.us>

Sent: Thursday, October 5, 2023 2:11 PM

To: Andrea Gross <agross@upstreampm.com>; igendelman@wavetechenergy.com

Subject: Wavetech Harker-Victor-Roberts OGDG Returned to Draft

Good Afternoon Andrea,

[Quoted text hidden]

Waldron - DNR, Emily <emily.waldron@state.co.us>

To: Andrea Gross <agross@upstreampm.com>

Cc: "igendelman@wavetechenergy.com" <igendelman@wavetechenergy.com>

Thu, Oct 19, 2023 at 3:56 PM

I suspect the difference is that this application references completions activities occurring while perhaps other locations did not. Of course if the well will not be completed there is no completions drawing required by Rule, but if there are references to completions operations elsewhere in the permit application then there does need to be a drawing or those references should be removed.

Let me know if this answers your question, if not we can find a time next week to talk about it.

Cheers,

Emily M Waldron
Oil and Gas Location Assessment Specialist



C 970-819-9609
emily.waldron@state.co.us | www.colorado.gov/ecmc

[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Tue, Oct 24, 2023 at 8:40 AM

To: "Waldron - DNR, Emily" <emily.waldron@state.co.us>, "igendelman@wavetechenergy.com" <igendelman@wavetechenergy.com>

Hi Emily,

Please see the attached spreadsheet with our notes/responses. The forms were resubmitted last Friday.

Thank you,

Andrea Gross

President

6494 S. Quebec St.

Englewood, CO 80111

Phone: 303-942-0506

Cell: 720-339-4277

agross@upstreampm.com

www.upstreampm.com



From: Waldron - DNR, Emily <emily.waldron@state.co.us>
Sent: Thursday, October 5, 2023 2:11 PM
To: Andrea Gross <agross@upstreampm.com>; igendelman@wavetechenergy.com
Subject: Wavetech Harker-Victor-Roberts OGDG Returned to Draft

Good Afternoon Andrea,
[Quoted text hidden]



Wavetech Helium Harker-Victor-Roberts Helium OGDG - Completeness 10052023.xlsx
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|---|-----------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| 304.c.(1). Emergency Spill Response Program | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(1) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

| 304.c.(2). Noise Mitigation Plan | | | | | | | | | | | |
|--|---|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | | | | | | | | | | |
| LIAE letter submitted. | | | | | | | | | | | |
| | Why wasn't an LIAE letter submitted for this location like the other 2? | | | | | | | x | x | | |
| Noise Plan Submitted for Roberts 42-3. | | | | EMW | | | An LIAE was not submitted for the Roberts as that location had the most suitable LPC habitat and therefore, we submitted Noise and Light Plans. | Yes | | | x |
| Cover page for attached Noise Plan is for Waste Management Plan. | Ensure all information contained in plans are for the correct plan. | | | EMW | | | Revised. | Yes | | | x |
| There are no site specific BMPs included with the plan. | Include site specific BMPs. | | | EMW | | | Timing BMP added. | Yes | | | x |
| Page 2 of the Plan states that continuous monitoring will be performed and refers to the terminal location on the map. The terminal is not on the map. Continuous monitoring isn't required for this location. | Either add terminal location to map or remove reference to continuous monitoring. | | | | | | Terminal and continuous noise monitoring have been removed. | Yes | | | x |

| 304.c.(3). Light Mitigation Plan | | | | | | | | | | | |
|---|---|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(3) | | | | | | | | 403312918 | 403312965 |
| LIAE letter submitted. | | | | | | | | | x | x | |
| Light Plan submitted for Roberts 42-3. | Why wasn't an LIAE letter submitted for this location like the other 2? | | | EMW | | | An LIAE was not submitted for the Roberts as that location had the most suitable LPC habitat and therefore, we submitted Noise and Light Plans. | Yes, requested revisions to plan below. | | | x |
| Cover page for attached Light Plan is for Waste Management Plan. | Ensure all information contained in plans are for the correct plan. | | | EMW | | | Revised. | Yes | | | x |
| Light Plan is not signed by a person with relevant expertise in light mitigation techniques and design as required by rule. | | 424.a.(1). | | EMW | | | Signed. | Yes | | | |
| The modeled drawings in the plan do not say what the unit of light is. | Include the unit. | | | EMW | | | Revised to include all light levels were measured in foot candles. | Yes | | | |
| There are no site specific BMPs included with the plan. | Include site specific BMPs. | | | EMW | | | Timing BMP added. | Yes | | | |

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| 304.c.(4). Odor Mitigation Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(4) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | x | | | |

| 304.c.(5). Dust Mitigation Plan | | | | | | | | | | | |
|---|--|--------------------------|----------------------------------|--------------|---|---|-------------------------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(5) | | | | | | | | | |
| Plan meets requirements of Rule 304.c.(5) | | | | EMW | | | | x | x | | |
| | Remove the NRCS Unit Descriptions from the Dust Plan (and all other Plans). It is included as a separate attachment to the Form 2A and is not needed anywhere else in the application. | | | | | | | | | | |
| NRCS Unit Descriptions included with Dust Plan. | | | | EMW | | | NRCS data sheets have been removed. | Yes | x | x | x |
| Wellpad soil types listed on page 3 of the Roberts 42-3 Plan appear to be incorrect. ECMC maps show only 2 soil types for wellpad and the plan lists 3. | Double check/update plan to correct soil types. | | | EMW | | | Removed 1 soil type. | Yes | | | x |

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| 304.c.(6). Transportation Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(6) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

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| 304.c.(7). Operations Safety Management Program | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(7) | | | | | | | | 403312918 | 403312965 |
| Plan meets requirements of Rule 304.c.(7) | No requested corrections. | | | EMW | | | | | x | x | x |

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| 304.c.(8). Emergency Response Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(8) | | | | | | | | 403312918 | 403312965 |
| Plan meets requirements of Rule 304.c.(8). | No requested corrections. | | | EMW | | | | | x | x | x |

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| 304.c.(9). Flood Shut-In Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(9) | | | | | | | | 403312918 | 403312965 |
| Not submitted not required. | | | | EMW | | | | | | | |

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| 304.c.(10). Hydrogen Sulfide Drilling Operations Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(10) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

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| 304.c.(11). Waste Management Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(11) | | | | | | | | | |
| Plan meets requirements of Rule 304.c.(11). | No requested corrections. | | | EMW | | | | x | x | x | |

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| 304.c.(12). Gas Capture Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(12) | | | | | | | | 403312918 | 403312965 |
| Not submitted not required. | | | | EMW | | | | | | | |

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| 304.c.(13). Fluid Leak Detection Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(13) | | | | | | | | | |
| Plan meets requirements of Rule 304.c.(13). | No requested corrections. | | | EMW | | | | x | x | x | |

| 304.c.(14). Topsoil Protection Plan | | | | | | | | | | | |
|--|---|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(14) | | | | | | | | | |
| Plans for the Harker and Victor-Weed locations meet requirements of Rule 304.c.(14). | No requested corrections. | | | EMW | | | | | x | x | |
| BMP on page 3 of the Roberts 42-3 Plan states that topsoil will be stored on the northwestern and southwestern sides of the location while the attached diagram shows it stored along the entire western side of the location. | Ensure consistency throughout the application by updating either the statement in the plan(s) or the attached diagram(s). | | | EMW | | | The plan has been updated and uploaded. | Yes | | | x |

| 304.c.(15). Stormwater Management Plan | | | | | | | | | | | |
|---|---|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(15) | | | | | | | | | |
| The SWMP for the Harker 14-26 location states on page 3 that topsoil will be stockpiled on the "southern boundary" of the location while page 7 of the SWMP and the TPP states that topsoil will be stockpiled on the "northwestern corner and west side" of the location. The drawings included with both the TPP and SWMP both show the topsoil on the west and northwest corner of the location. | Ensure consistency throughout the application by updating the correct plan(s) and/or attachment(s). | | | EMW | | | Revised | Yes | x | | |
| Page 4 of the Harker 14-26 SWMP states that there will be one combustor on location, combustor not shown on Equipment tab of Form 2A and seems to be unnecessary as WaveTech has stated they will be connecting to a gas line. | Ensure consistency by updating either the SWMP or Form 2A or both. | | | EMW | | | Combustor removed | Yes | x | | |
| The SWMP for the Roberts 42-3 location states on page 3 that topsoil will be stockpiled on the "southern boundary" of the location while page 7 of the SWMP and the TPP states that topsoil will be stockpiled on the "northwestern and southwestern sides" of the location. The drawings included with both the TPP and SWMP both show the topsoil on the northwestern and southwestern sides of the location. | Ensure consistency throughout the application by updating the correct plan(s) and/or attachment(s). | | | EMW | | | Revised. The topsoil is actually on the western side. | Yes | | | x |
| Page 6 of the Roberts 42-3 SWMP states that there will be one combustor on location, combustor not shown on Equipment tab of Form 2A and seems to be unnecessary as WaveTech has stated they will be connecting to a gas line. | Ensure consistency by updating either the SWMP or Form 2A or both. | | | EMW | | | Combustor removed | Yes | | | x |
| The SWMP for the Victor-Weed 42-27 Location meets the requirements of Rule 304.c.(15). | No requested corrections on that SWMP. | | | EMW | | | | | x | | |

| 304.c.(16). Interim Reclamation Plan | | | | | | | | | | | |
|--|---|--------------------------|----------------------------------|--------------|---|---|----------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(16) | | | | | | | | 403312918 | 403312965 |
| Plans for the Harker and Victor-Weed locations meet requirements of Rule 304.c.(16). | No requested corrections. | | | EMW | | | | | x | x | |
| BMP on page 6 of the Roberts 42-3 Plan states that topsoil will be stored on the northwestern and southwestern sides of the location while the attached diagram shows it stored along the entire western side of the location. | Ensure consistency throughout the application by updating either the statement in the plan(s) or the attached diagram(s). | | | EMW | | | Updated and uploaded | Yes | | | x |

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| 304.c.(17). Wildlife Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(17) | | | | | | | | | |
| Plan meets requirements of Rule 304.c.(17). | No requested corrections. | | | EMW | | | | x | x | x | |

| 304.c.(18). Water Plan | | | | | | | | | | | |
|--|--|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(18) | | | | | | | | 403312918 | 403312965 |
| Water plan states that "2,000 barrels of water will be needed for the re-entry" are these wells re-entries? It appears the Harker is but the 2A has not been filed as an amended location. | Revise the plan (s) to accurately state whether well is a re-entry or not. Plans need to be site specific. | | | EMW | | | Uploaded | Yes | x | x | x |

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| 304.c.(19). Cumulative Impacts Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(19) | | | | | | | | 403312918 | 403312965 |
| Plan meets requirements of Rule 304.c.(19). | No requested corrections. | | | EMW | | | | | x | x | x |

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| 304.c.(20). Community Outreach Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.c.(20) | | | | | | | | 403312918 | 403312965 |
| Not submitted not required. | | | | EMW | | | | | | | |

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| 304.c.(21). Geologic Hazard Plan | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.c.(21) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

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|--|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| ACCESS ROAD MAP | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).F | | | | | | | | | |
| Attachments meet requirements of Rule 304.b.(7).F. | No requested corrections. | | | EMW | | | | x | x | x | |

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| ALA DATASHEET | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.b.(2) | | | | | | | | 403312918 | 403312965 |
| Attachment for the Harker location meets requirements of Rule 304.b.(2). | No requested corrections for the Harker location. | | | EMW | | | | | x | | |
| No ALA submitted for the Victor location. It triggers the same criteria as the other 2 locations in this OGD application. | Include an ALA datasheet for the Victor location. | 304.b.(2).B.x | | EMW | | | Uploaded | Yes | | x | |

| ALA NARRATIVE SUMMARY | | | | | | | | | | | |
|---|---|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(2) | | | | | | | | | |
| The ALA Narrative for the Harker and Victor locations shows on page 2 that criteria viii and x are being met but the location is not within 2,000 feet of a RBU, HOBUE, or School located within a DIC. | Update the narrative to accurately reflect the location criteria met. | 304.b.(2).B.x. | | EMW | | | Roberts and Harker have been revised and uploaded | Yes | x | | x |
| No ALA submitted for the Victor location. It triggers the same criteria as the other 2 locations in this OGD application. | Include an ALA Narrative for the Victor location. | 304.b.(2).B.x | | EMW | | | Uploaded | Yes | | x | |

[illegible]

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|---|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| CPW CONSULTATION | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | | | | | | | | | | |
| CPW Pre application summary attached for each location. | No requested corrections. | | | EMW | | | | | x | x | x |

| | | | | | | | | | | | |
|--|---|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| CULTURAL FEATURES MAP | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(3) | | | | | | | | | |
| No bearings listed on Cultural Features Table. | Include bearings with distance in Table. Bearings should match those listed on the Cultural & Safety Setbacks Tab of the Form 2A. | 304.b.(3).A | | EMW | | | Uploaded | Yes | x | x | x |

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|-----------------------------|-----------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| DIRECTIONAL WELL PLAT | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | | |
| COMPLETENESS REVIEW | | 304.b.(7).H | | | | | | | | 403312918 | 403312965 |
| Not submitted not required. | | | | EMW | | | | | | | |

| | | | | | | | | | | | |
|--|--------------------------|-----------------------------|--|--------------|--|--|---------------------|--|-----------|-----------|-----------|
| DISPROPORTIONATELY IMPACTED COMMUNITY MAP | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).J | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

| GEOLOGIC HAZARD MAP | | | | | | | | | | | |
|---|--|--------------------------|----------------------------------|--------------|---|---|---|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).I | | | | | | | | | |
| The attached maps for the Harker and Roberts locations meets the requirements of Rule 304.b.(7). I. | No requested corrections for the Harker and Roberts locations. | | | EMW | | | | x | | x | |
| The attachment for the Victor-Weed location has been submitted on and aerial, not on a map. | Per the rule submit a map similar to the maps submitted with the other 2 locations in this OGDP. | 304.b.(7).I | | EMW | | | The guidance documents states that the geo hazard map will include a topographic map or current aerial photo. | Yes, but no Geo Haz Map included with attachments on resubmittal. | x | | |

| | | | | | | | | | | | |
|--|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| GIS data | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(8) | | | | | | | | | |
| Attachments meet requirements of Rule 304.b.(8). | No requested corrections. | | | EMW | | | | x | x | x | |

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|---|--|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| HYDROLOGY MAP | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).E | | | | | | | | | |
| Map contains symbols for oil and gas wells and water wells that are not listed on the legend. | Ensure legend is comprehensive and reflects all features shown on map. | | | EMW | | | Uploaded. | Yes | x | x | x |

| | | | | | | | | | | | |
|----------------------------|-----------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| INFORMED CONSENT LETTER | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 604.b.(1) | | | | | | | | | |
| not submitted not required | | | | EMW | | | | | | | |

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|--|---|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| LAYOUT DRAWING | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).B | | | | | | | | | |
| In various other portions of application it is stated that wells will be stimulated yet no stimulation/completions layout drawings are included. | Included layout drawings for all phases of operations that will occur on locations. | 304.b.(7).B.iii. | | EMW | | | Uploaded | Yes | x | x | x |

| LESSER IMPACT AREA EXEMPTION REQUEST | | | | | | | | | | | |
|--|-----------------------|---|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.d | | | | | | | | | |
| LAE submitted for Noise and Light Plans for Harker and Victor locations. | | | | EMW | | | | | x | x | |
| | | Operator requested a Rule 304.d Lesser Impact Exemption from the Rule 304.c.(2) Noise Mitigation Plan. The request is based on the impacted resource not present in the area or impacts will be so minimal as to cause no concern. The proposed location is over one mile to the nearest RBU. Although in a Rule 309.e.(1) lesser prairie chicken consultation habitat, the operator indicated that surrounding land use and vegetation, the area around the proposed location is not suitable lesser prairie chicken habitat. CPW reportedly indicated that the the permitted noise levels are acceptable in the area. Staff recommends approval of the exemption request. | | JN | | | | | x | x | |
| | | Operator requested a Rule 304.d Lesser Impact Exemption from the Rule 304.c.(3) Light Mitigation Plan. The request is based on the impacted resource not present in the area or impacts will be so minimal as to cause no concern. The proposed location is over one mile to the nearest RBU. Although in a Rule 309.e.(1) lesser prairie chicken consultation habitat, the operator indicated that surrounding land use and vegetation, the area around the proposed location is not suitable lesser prairie chicken habitat. Staff recommends approval of the exemption request. | | JN | | | | | x | | |

| | | | | | | | | | | | |
|---------------------------------|-----------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| LOCAL/FED FINAL PERMIT DECISION | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 303.a.(6).B | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

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|--|---|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| LOCATION DRAWING | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).A | | | | | | | | | |
| Not all distances provided contain bearings. | Add bearings to all distances listed on table. Ensure that bearings match those provided on the 2A. | 304.b.(7).A. | | EMW | | | Uploaded. | Yes | x | x | x |

| | | | | | | | | | | | |
|---|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| LOCATION PICTURES | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(4) | | | | | | | | | |
| Attachment meets requirements of Rule 304.b.(4). A. | No requested corrections. | | | EMW | | | | | x | x | x |

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|---|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| NRCS MAP UNIT DESC | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(10) | | | | | | | | | |
| Attachments meet requirements of Rule 304.b.(10). | No requested corrections. | | | EMW | | | | | x | x | x |

[illegible]

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|---|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| PRELIMINARY PROCESS FLOW DIAGRAMS | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).D | | | | | | | | | |
| Attachment meets requirements of Rule 304.b.(7). D. | No requested corrections. | | | EMW | | | | | x | x | x |

| REFERENCE AREA MAP | | | | | | | | | | | |
|---|---|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(9).B.i | | | | | | | | | |
| Map for Harker and Victor locations meets requirements of Rule 304.b.(9).B.i. | No requested corrections for the Harker and Victor locations. | | | EMW | | | | x | x | | |
| No Reference Area Map included with Roberts location. | Include Reference Area Map as required by Rule 304.b.(9).B.i. | | | EMW | | | Roberts uploaded | Yes | | | x |

| REFERENCE AREA PICTURES | | | | | | | | | | | |
|---|--|--------------------------|----------------------------------|--------------|---|---|----------------------------|---|-----------|-----------|-----------|
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(9).B.ii | | | | | | | | | |
| Attachment for Victor location meets requirements of Rule 304.b.(9).B.ii. | No requested corrections for Victor location. | | | EMW | | | | | | x | |
| No aerial or above view provided with pictures for Harker location. | Include aerial or overhead perspective with Harker location attachment as required by Rule 304.b.(9).B.ii. | 304.b.(9).B.ii. | | EMW | | | Uploaded with aerial photo | Yes | x | | |
| No Reference Area Pictures included with Roberts attachments. | Include Reference Area Pictures as required by Rule 304.b.(9).B.ii. | 304.b.(9).B.ii. | | EMW | | | Roberts uploaded | Yes | | | x |

| | | | | | | | | | | | |
|--|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| RELATED LOCATION AND FLOWLINE MAP | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).G | | | | | | | | | |
| Attachments meets requirements of Rule 304.b.(7). G. | No requested corrections. | | | EMW | | | | | x | x | x |

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| SURFACE AGRMT/SURETY | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(12).B | | | | | | | | | |
| Attachments meet requirements of Rule 304.b.(12). B. | No requested corrections. | | | EMW | | | | | x | x | x |

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| WAIVERS | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 604.a.(4) | | | | | | | | | |
| Not submitted not required. | | | | EMW | | | | | | | |

| | | | | | | | | | | | |
|--|---------------------------|--------------------------|----------------------------------|--------------|---|---|---------------------|---|-----------|-----------|-----------|
| WILDLIFE HABITAT DRAWING | | | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | Specific Rule (optional) | Referenced in guidance document? | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| COMPLETENESS REVIEW | | 304.b.(7).C | | | | | | | | | |
| Attachments meets requirements of Rule 304.b.(7). C. | No requested corrections. | | | EMW | | | | | x | x | x |

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| Form 2A | | | | | | | | | |
| COMPLETENESS REVIEW (Form 2A topic) | (topic/subtopic) | | | | | | | | |
| | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| | No corrections requested. | EMW | | | | x | x | x | |

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| Form 2B | | | | | | | | | |
| COMPLETENESS REVIEW (Form 2B topic) | (topic/subtopic) | | | | | | | | |
| | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| | No requested corrections. | EMW | | | | x | x | x | |

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| Form 2C | | | | | | | | | |
| COMPLETENESS REVIEW (Form 2C topic) | (topic/subtopic) | | | | | | | | |
| | | | | | | | | | |
| Issue identified by staff: | Suggested correction: | SME reviewer | Senior reviewer comment (internal only) | Lead OGLA response to senior review (internal only) | Applicant Response: | Staff second review: Was the issue addressed? | 403312900 | 403312918 | 403312965 |
| | No requested corrections. | EMW | | | | x | x | x | |

| | | | | | | | | |
|---|---|--|---------------------|--|----------------------------|-----------|-----------|-----------|
| Hearing Application | | | | | | | | |
| COMPLETENESS REVIEW | | Docket# 230300082 | | | | 403312900 | 403312918 | 403312965 |
| Attorney Name: KELSEY WASYLENKY; JAMIE JOST | Attorney Email Address: KWASYLENKY@JOSTENERGYLAW.COM; JJOST@JOSTENERGYLAW.COM | | | | | | | |
| Permitter Name: Alex Acks | Permitter Email: alex.acks@state.co.us | | | | | | | |
| Engineer Name: Craig Burger | Engineer Email: craig.burger@state.co.us | | | | | | | |
| Hearing Officer Name: Jon Peskin | Hearing Officer Email: jon.peskin@state.co.us | | | | | | | |
| Issue identified by staff: | Suggested correction: | Explanation: | SME reviewer | | Applicant Response: | | | |
| <u>OGLA Review Notes</u> | | | | | | | | |
| OGDP Application & Exhibit A: the webforms materials indicate that the mineral development area for the 1 Wavetech Roberts 42-3 is "E/2 Sec. 3 13S43W", but the Hearing Application states it is "N/2 Sec. 3 13S43W". Which is correct? | Either the Hearing Application materials or the webform materials need to be corrected. | | | | | | | |
| 1 Wavetech Victor Weed 42-27 acreage listed as 3.5, but Form 2A lists 3.9. | Acreages should be consistent. | Either the Hearing Application materials or the webform materials need to be corrected. | | | | | | |
| | | | | | | | | |
| <u>Permitting Review Notes</u> | | | | | | | | |
| None. | None. | There were no Permitting Review issues identified in the hearing application at this time. | | | | | | |
| | | | | | | | | |
| <u>Geologic Testimony</u> | | | | | | | | |
| None. | None. | There were no issues identified in the Geologic Testimony at this time. | | | | | | |
| | | | | | | | | |
| <u>Engineering Testimony</u> | | ACCEPTABLE OVERALL | Engineering | | | | | |
| Comment: Exception location requests are required for the #1 Wavetech Harker-Family 14-26 and the #1 Wavetech Roberts 42-3 wells. | None. | Topic: Engineering Testimony Narrative | | | | | | |
| | | | | | | | | |



STATE OF
COLORADO

Waldron - DNR, Emily <emily.waldron@state.co.us>

Wavetech Harker-Victor-Roberts Helium OGDG: lands issue

11 messages

Schwarz - DNR, Stephen <stephen.schwarz@state.co.us>

Mon, Oct 23, 2023 at 11:02 AM

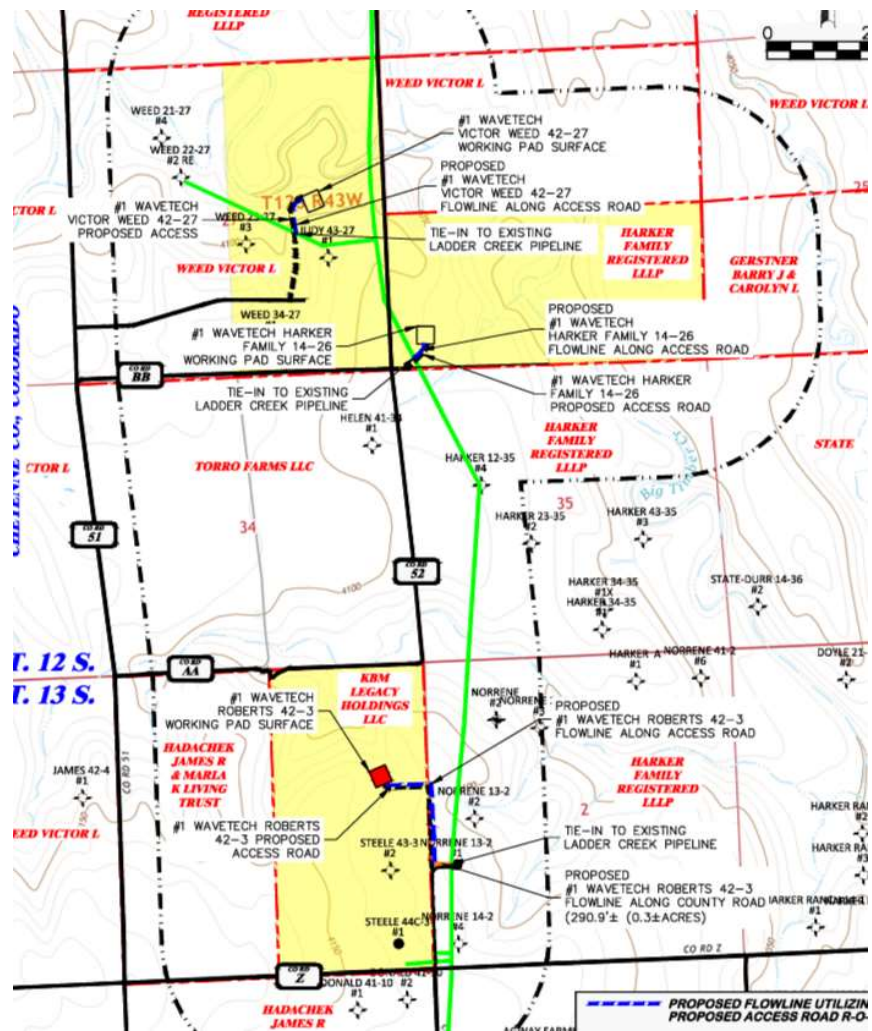
To: "Agross@upstreampm.com" <agross@upstreampm.com>, Kelsey Wasylenky <kwasylenky@jostenergylaw.com>

Cc: Emily Waldron - DNR <emily.waldron@state.co.us>

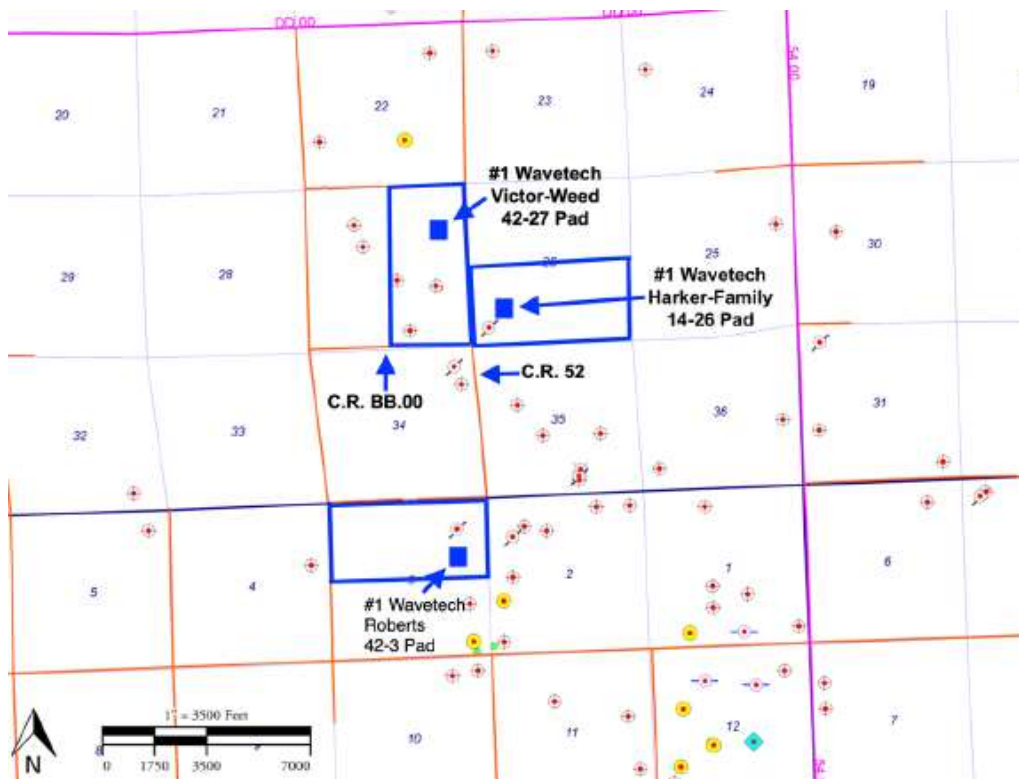
Hi Andrea and Kelsey,

In comparing the resubmitted webforms and Hearing Application materials, there is a lingering discontinuity between the lands that I don't think I identified clearly enough with my initial review comments. Please see below:

Form 2C and Form 2A RELATED LOCATION AND FLOWLINE MAPs:



Hearing Application Map:



As you can see, the webforms materials indicate that the mineral development area for the 1 Wavetech Roberts 42-3 is "E/2 Sec. 3 13S43W", but the Hearing Application states it is "N/2 Sec. 3 13S43W". Which is correct?

Thank you,
Stephen

--

Stephen Schwarz

Hearing Liaison

My pronouns: he/him/his



COLORADO

**Energy & Carbon Management
Commission**

Department of Natural Resources

P 303.894.2100 x5130 | F 303.894.2109

1120 Lincoln Street, Suite 801, Denver, CO 80203

stephen.schwarz@state.co.us | www.colorado.gov/ecmc

Kelsey Wasylenky <kwasylenky@jostenergyllaw.com>

Mon, Oct 23, 2023 at 3:05 PM

To: "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>, "Agross@upstreampm.com" <agross@upstreampm.com>
Cc: Emily Waldron - DNR <emily.waldron@state.co.us>

Hi Stephen,

The mineral development area for the Roberts Location is the N/2 of Section 3. The Hearing Application is correct. Andrea, would you please update the Related Location and Flowline Map? Thank you!

Kelsey

Kelsey H. Wasylenky

Shareholder

Jost Energy Law, P.C.

(720) 446-5620

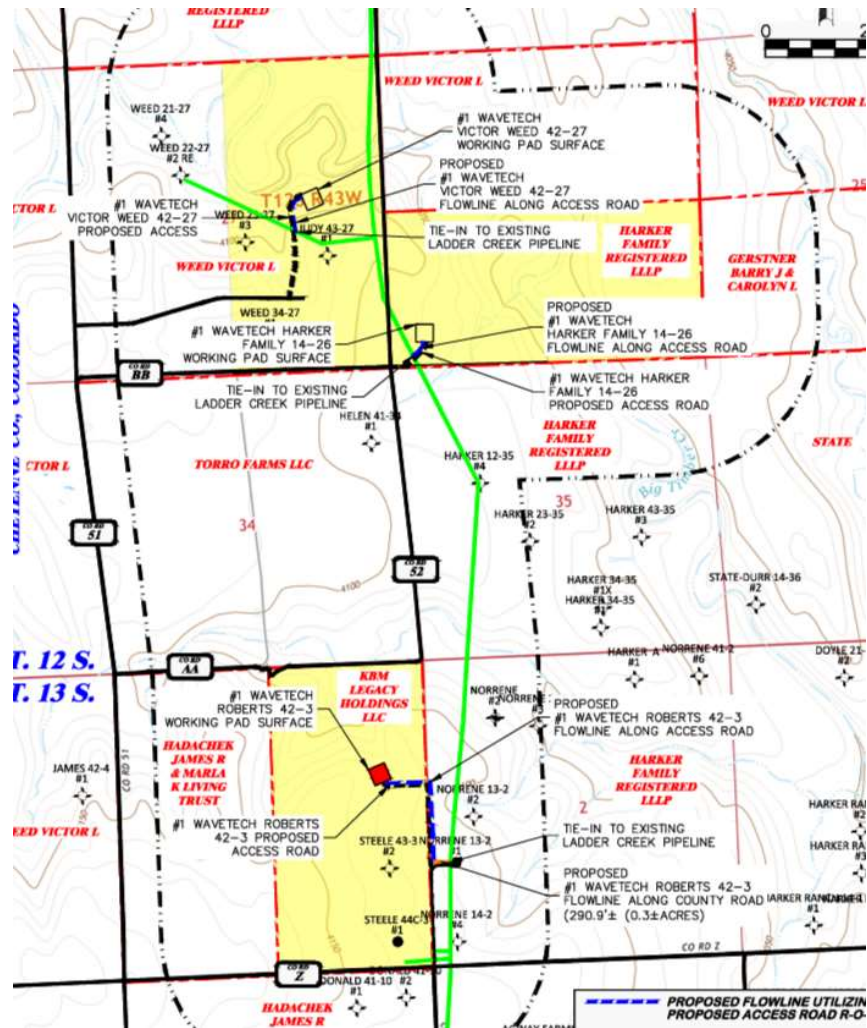
kwasylenky@jostenergylaw.com

From: "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>
Date: Monday, October 23, 2023 at 11:03 AM
To: Andrea Gross <agross@upstreampm.com>, Kelsey Wasylenky <kwasylenky@jostenergylaw.com>
Cc: Emily Waldron - DNR <emily.waldron@state.co.us>
Subject: Wavetech Harker-Victor-Roberts Helium OGD: lands issue

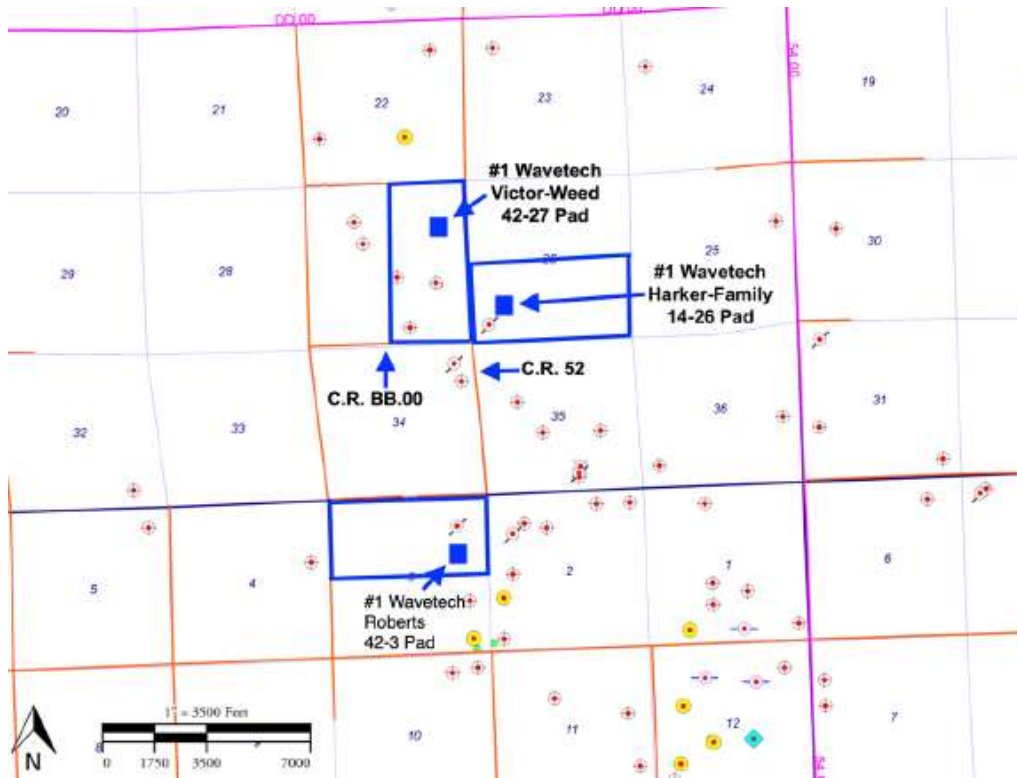
Hi Andrea and Kelsey,

In comparing the resubmitted webforms and Hearing Application materials, there is a lingering discontinuity between the lands that I don't think I identified clearly enough with my initial review comments. Please see below:

Form 2C and Form 2A RELATED LOCATION AND FLOWLINE MAPS:



Hearing Application Map:



[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Tue, Oct 24, 2023 at 8:22 AM

To: Kelsey Wasylenky <kwasylenky@jostenergyllaw.com>, "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>

Cc: Emily Waldron - DNR <emily.waldron@state.co.us>

Good morning!

I'll get this revised ASAP!

Thanks,

Andrea Gross

President

6494 S. Quebec St.

Englewood, CO 80111

Phone: 303-942-0506

Cell: 720-339-4277

agross@upstreampm.com

www.upstreampm.com



[Quoted text hidden]

Schwarz - DNR, Stephen <stephen.schwarz@state.co.us>

Tue, Oct 24, 2023 at 9:10 AM

To: Andrea Gross <agross@upstreampm.com>

Cc: Kelsey Wasylenky <kwasylenky@jostenergylaw.com>, Emily Waldron - DNR <emily.waldron@state.co.us>

Hi Andrea,

Since this issue is on the Form 2C map and the Related Location & Flowline Map attached to every Form 2A, would you like us to return those four Forms to draft right now? Please let us know what you/Wavetech would prefer.

Thank you,
Stephen

[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Wed, Oct 25, 2023 at 9:08 AM

To: "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>

Cc: Kelsey Wasylenky <kwasylenky@jostenergylaw.com>, Emily Waldron - DNR <emily.waldron@state.co.us>

Hi Stephen,

I have the revised plats. Please return them to draft and I will update.

[Quoted text hidden]

Schwarz - DNR, Stephen <stephen.schwarz@state.co.us>

Wed, Oct 25, 2023 at 9:20 AM

To: Andrea Gross <agross@upstreampm.com>

Cc: Kelsey Wasylenky <kwasylenky@jostenergylaw.com>, Emily Waldron - DNR <emily.waldron@state.co.us>

Hi Andrea,

The Form 2C and the three Form 2A's should be back in DRAFT now.

Thank you,
Stephen

[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Wed, Oct 25, 2023 at 9:23 AM

To: "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>

Cc: Kelsey Wasylenky <kwasylenky@jostenergyllaw.com>, Emily Waldron - DNR <emily.waldron@state.co.us>

Thanks Stephen. I'll let you know when I resubmit.

[Quoted text hidden]

Andrea Gross <agross@upstreampm.com>

Wed, Oct 25, 2023 at 10:22 AM

To: "Schwarz - DNR, Stephen" <stephen.schwarz@state.co.us>

Cc: Kelsey Wasylenky <kwasylenky@jostenergyllaw.com>, Emily Waldron - DNR <emily.waldron@state.co.us>

The forms have been resubmitted.

Thank you,

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Waldron - DNR, Emily <emily.waldron@state.co.us>

Wed, Nov 1, 2023 at 12:36 PM

To: Andrea Gross <agross@upstreampm.com>

Hi Andrea,

Thanks for the responses to the Completeness Review. There are a few remaining revisions on the Roberts and Victor Form 2As and I have returned them to DRAFT status for you to correct. Please address the following and resubmit the Form 2As by the end of the week:

Victor (Form 2A # 403312918)

1. No Geologic Hazard Map attached. **Attach a Geologic Hazard Map**, submitting the map on an aerial is acceptable.

Roberts (Form 2A# 403312965)

1. Noise Plan - Cover sheet of Noise Plan is for the Waste Management Plan; **Ensure all information contained in the plan applies to that plan**
2. Noise Plan - Page 2 of the plan states that continuous monitoring will be performed and refers to the terminal location on the map. The terminal is not on the map. Continuous monitoring isn't required for this location; **Either add terminal location to the map OR remove the reference to continuous monitoring**
3. Noise Plan - No site specific BMPs included in Plan; **Include site specific BMPs**

4. Light Plan - Cover sheet of Light Plan is for the Waste Management Plan; **Ensure all information contained in the plan applies to that plan**
5. Light Plan - Plan is not signed by a person with relevant expertise in light mitigation techniques and design as required by Rule 424.a.(1).; **Ensure plan is signed by person of expertise**
6. Light Plan - The modeled drawings in the plan do not say what the unit of light is; **Include the unit of light on the drawings**
7. Light Plan - there are no site specific BMPs included in the Plan; **Include site specific BMPs**

Let me know if you have any questions.

Thanks,

Emily

Emily M Waldron
Oil and Gas Location Assessment Specialist

1.



C 970-819-9609

emily.waldron@state.co.us | www.colorado.gov/ecmc

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Andrea Gross <agross@upstreampm.com>
To: "Waldron - DNR, Emily" <emily.waldron@state.co.us>

Thu, Nov 2, 2023 at 10:44 AM

Thank you Emily. I have requested the changes from the vendors.

I will let you know when it has been resubmitted.

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Andrea Gross <agross@upstreampm.com>
To: "Waldron - DNR, Emily" <emily.waldron@state.co.us>

Fri, Nov 3, 2023 at 11:02 AM

Hi Emily,

The 2As have been resubmitted. Please see my notes in red below.

Thank you,

Andrea Gross

President

6494 S. Quebec St.

Englewood, CO 80111

Phone: 303-942-0506

Cell: 720-339-4277

agross@upstreampm.com

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From: Waldron - DNR, Emily <emily.waldron@state.co.us>

Sent: Wednesday, November 1, 2023 12:36 PM

To: Andrea Gross <agross@upstreampm.com>

Subject: Re: Wavetech Harker-Victor-Roberts Helium OGDG: lands issue

Hi Andrea,

Thanks for the responses to the Completeness Review. There are a few remaining revisions on the Roberts and Victor Form 2As and I have returned them to DRAFT status for you to correct. Please address the following and resubmit the Form 2As by the end of the week:

Victor (Form 2A # 403312918)

1. No Geologic Hazard Map attached. **Attach a Geologic Hazard Map**, submitting the map on an aerial is acceptable. **Reattached and resubmitted.**

Roberts (Form 2A# 403312965)

1. Noise Plan - Cover sheet of Noise Plan is for the Waste Management Plan; **Ensure all information contained in the plan applies to that plan Revised**
2. Noise Plan - Page 2 of the plan states that continuous monitoring will be performed and refers to the terminal location on the map. The terminal is not on the map. Continuous monitoring isn't required for this location; **Either add terminal location to the map OR remove the reference to continuous monitoring. Terminal and continuous noise monitoring have been removed.**
3. Noise Plan - No site specific BMPs included in Plan; **Include site specific BMPs Timing BMP added**
4. Light Plan - Cover sheet of Light Plan is for the Waste Management Plan; **Ensure all information contained in the plan applies to that plan Revised**
5. Light Plan - Plan is not signed by a person with relevant expertise in light mitigation techniques and design as required by Rule 424.a.(1).; **Ensure plan is signed by person of expertise Signed**
6. Light Plan - The modeled drawings in the plan do not say what the unit of light is; **Include the unit of light on the drawings Revised to include all light levels were measured in footcandles**
7. Light Plan - there are no site specific BMPs included in the Plan; **Include site specific BMPs Timing BMP added**

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