

304.c.(14). Topsoil Protection Plan								
	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
Issue identified by staff:		304.c.(14)				Alfalfa	Clover	Rademacher
COMPLETENESS REVIEW						x	x	x
meets requirements, no comments								

304.c.(2). Noise Mitigation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(2)				x	x	x
Includes dbA and dbC. No other comments								

304.c.(3). Light Mitigation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(3)						
Meets requirements, no comments						x	x	x

304.c.(4). Odor Mitigation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(4)						
						Alfalfa	Clover	Rademacher
The layout drawings have open top tanks during completions and flow back.	The odor plan should include how odor during completions and flowback operations will be mitigated.			During completions operations the open top tanks are generally empty unless a screen out occurs and flowback is required. In this rare occurrence the contents of the open top tank are fresh water and minimal hydrocarbons. During flow back we use the open top tank to remove sand from the separators. There is no odor associated with this operation. Additionally, there are sensitive air monitors positioned around the location that alert the team to any emissions. Odors are solely associated with	yes	x	x	x

304.c.(5). Dust Mitigation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(5)				Alfalfa	Clover	Rademacher
						x	x	x
Meets requirements, no comments								

304.c.(6). Transportation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(6)				Alfalfa	Clover	Rademacher
						x	x	x

Meets requirements, no comments

304.c.(7). Operations Safety Management Program								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(7)				Alfalfa	Clover	Rademacher
						x	x	
Meets requirements, no comments								

304.c.(8). Emergency Response Plan								
	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
Issue identified by staff:		304.c.(8)				Alfalfa	Clover	Rademacher
COMPLETENESS REVIEW								
Need signed plan				All signed plans have been uploaded	yes	x	x	x

304.c.(11). Waste Management Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(11)				Alfalfa	Clover	Rademacher
BMPs are not waste stream or operation specific.	Provide BMPs related to each waste stream per operation that describes containers for drilling cuttings and fluid management, completions and flowback, and production			The Waste Management Plans have been updated. Table 1 is the main source of stream and operation specific BMPs		x		x
Produced water is listed to be stored in tanks but no produced water tanks are listed on the equipment list	Clarify how produced water will be stored or if it will be piped off location. BMPs and equipment should correspond with management of waste. Add temporary tanks or permanent tanks as applicable to the waste stream.			Produced water will not be stored on the Alfalfa and Clover Locations. The Waste Management plan has been modified to state produced water will be removed from location continuously via pipeline.		x	x	
Inspections and general site conditions related to waste and trash are not listed under the BMP section	Provide a BMP related to general site conditions and inspections for waste and trash handling during all operations.			The WMPs for all pads have been updated to indicate ".During drilling, completions, and facility constructions, inspection of trash receptacles, sewage tanks, temporary restrooms, waste and material storage areas are performed by a third party and documented during regular stormwater inspections."		x	x	x
Table 1, under Flowback and Produced Water, KMOG indicates that produced water will be stored in tanks, however the Equipment & Flowlines tab of the Form 2A indicates that produced water will be piped away.	1. Split "Flowback and Produced Water" into two separate categories for better clarification on the storage and disposal of each. 2. Correct where needed so that the Waste Management Plan, PRELIMINARY PROCESS FLOW DIAGRAM, and Form 2A equipment & flowline tab are all accurate.			1. KMOG does not distinguish between flowback and produced water. The following sentence has been added to section 3 of both Alfalfa and Clover Plans. "Flowback water and produced water are considered one and the same by KMOG, both will be piped to the nearest available SWD at the Alfalfa 8-20HZ (or Clover 2-29HZ) location and will not be stored on location." 2. Table 1 has been updated to indicate there will not be any storage of flowback or produced water on location and is now consistent with the PFD.		x	x	
Construction, Drilling & Waste tab of the Form 2A indicates that this application includes a beneficial reuse or land application, with the Centralized E&P Waste Management Facility ID of 149021, however the Waste Management Plan does not mention this Facility ID.	Please confirm Facility ID on the Form 2A, and update the Waste Management Plan to include additional information regarding the waste management facility.			The Centralized E&P Facility ID is 456644. KMOG uses multiple E&P Waste Management Facilities and their numbers are included in the Plan		x		
BMPs such as Good Housekeeping measures is not specific to detail what wastes fall under good housekeeping or how it will be achieved	Provide more information regarding how waste will be stored and handled.			The WMPs for all pads have been updated to indicate that the site will be inspected daily and during stormwater inspections		x	x	x
There are two E&P wastes listed on the table but only one on the Form 2A	List both E&P numbers on the 2A or remove one from the table			The Centralized E&P Facility ID is 456644. KMOG uses multiple E&P Waste Management Facilities and their numbers are included in the Plan				x

304.c.(13). Fluid Leak Detection Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(13)				Alfalfa	Clover	Rademacher
Production BMPs reference permanent tanks and there are not any permanent tanks on the Form 2A	BMPs should be location specific, remove if this is not actually on the location			This has been removed from the plans		x	x	

304.c.(15). Stormwater Management Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(15)				Alfalfa	Clover	Rademacher
meets requirements, no comments						x	x	x

304.c.(16). Interim Reclamation Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(16)				Alfalfa	Clover	Rademacher
						x	x	x
Meets requirements, no comments								

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(17)					Alfalfa	Clover	Rademacher
The Wildlife plan section 4.0 identifies five raptor nests and a nest survey will be performed, but does not provide information regarding what will happen if active raptor nests are in the area prior to construction	Provide information regarding KMG's plan for active raptor nests, will CPW be informed? Will timing of operations be changed? More information regarding raptors and migratory birds is necessary to evaluate this section.				According to rule 1202.a.8, CPW will be informed if a consultation is required, that would occur if an active raptor nest is encountered prior to construction and in a CPW buffer and construction can't be delayed. The Clover & Alfalfa WPPs have been modified to indicate "Pre-construction CPW protocol raptor nest surveys will be conducted prior to vegetation removal if planned during the nesting season. If an active nest(s) is identified and operations fall within a CPW recommended species buffer, KMOG will consult with CPW." In Section 4.0		x	x	
Section 5.0 for 1205.a.(5) has trenches, but there are not any trenches on the drawings or other plans.	If there are trenches, please describe them otherwise please provide more information regarding this requirement.				This has been change to N/A for the plan for Clover, Alfalfa & Rademacher Plans		x	x	x
Section 5.0 for 1202.a.(9) discusses pits for mosquitoes, The 2A does not describe any pits on the clostion	Provide information specific to the location.				This has been change to N/A for the plan for Clover.			x	
BMPs are not site specific and how they are protective of wildlife is not clear	Provide site specific BMPs related to protecting and minimizing impacts to Wildlife in the area.				Neither Alfalfa nor Clover are within HPH, therefore avoidance is the main mechanism that allows KMOG to be protective of wildlife. All plans have been updated to include all of the changes requested that are more site specific. In the Rademacher Wildlife Mitigation Plan, the BMPs described are specific to this location. Timing Stipulations are described in sections 4, 6 and 7. Noise and light BMPs are described in section 7 in minimization and mitigation. The remainder of the BMPs described are applied to many of our locations, but will also be applied at these locations. All three Wildlife plans have been updated		x	x	x

304.c.(18). Water Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(18)				Alfalfa	Clover	Rademacher
Water sampling results are not provided	Laboratory results of the recycled water should be included in the Water Plan or a COA/BMP stating the results will be provided to ECMC via a Form 4 Sundry.			The recycled water mentioned in the plans is processed at a Centralized E&P Waste Management Facility (ECMC Facility ID 456644) and is trucked for reuse in completions. Applicable Table 437-1 results are provided in the facility's annual report to staff. The water plan submitted is identical to all the plans previously submitted. ECMC staff has not previously requested this item.		x	x	x
If recycled water will be provided to the location with layflat lines, inspections for leaks should be included	Provide information on how recycled water will be delivered to the location and if inspections will be conducted.			The water from the central processing facility is trucked to location, therefore an inspection for leaks is not required.		x	x	x

304.c.(19). Cumulative Impacts Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(19)				Alfalfa	Clover	Rademacher
						x	x	x
Meets requirements, no comments								

304.c.(21). Geologic Hazard Plan								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.c.(21)				Alfalfa	Clover	Rademacher
The plan references the coal mine risk, but does not mention collapsible soils or other geologic hazards.	Include information regarding collapsible soils			Collapsible soils are defined as any unsaturated soil that goes through a radical rearrangement of particles and greatly decreases in volume upon wetting, additional loading, or both. KMOG does not consider collapsible soils to be a geologic hazard. They are not defined as such in CRS 24-65.1-103. KMOG uses proper construction techniques that prevent collapsible soils becoming an issue. The geologic hazards defined in CRS have been addressed in the evaluation if there are other hazards that need to be addressed, please specify.		x	x	x

ACCESS ROAD MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).F				Alfalfa	Clover	Rademacher
Meets requirements, no comments						x	x	x

ALA DATASHEET								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(2)				Alfalfa	Clover	Rademacher
Last ALA location is on the second page with the list of criteria is difficult to read	Please add the criteria to the second page or have the last ALA on a separate sheet to be able to read and review efficiently.			This has been corrected				x

ALA NARRATIVE SUMMARY								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(2)				Alfalfa	Clover	Rademacher
The Form 2A has Rademacher Home Farm LLC as the surface owner and the ALA has Boedle as the land owner	Ensure the Form 2A matches the ALA Narrative and the SUA			The 2A has been updated to reflect the correct surface owner - Boedle Creek LLC				x

CONSULTATION SUMMARY								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW						Alfalfa	Clover	Rademacher
Provided LGD consultation						x	x	x

CPW CONSULTATION								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW								
						Alfalfa	Clover	Rademacher
Location is within 500 feet of a mapped wetland.	Operator will need a waiver from CPW regarding the staging and fueling of chemicals at the location			The wetlands that are mapped in the NWI database have been inspected by qualified personnel and determined to not be present. This is reflected in an updated Wildlife Protection Plan that has been uploaded to the Clover 2A. In Appendix III Wetland Delineation Report			x	

CULTURAL FEATURES MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(3)				Alfalfa	Clover	Rademacher
complete, no comments						x	x	x

DIRECTIONAL WELL PLAT								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).H				Alfalfa	Clover	Rademacher
complete, no comments						x	x	x

GEOLOGIC HAZARD MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).I				Alfalfa	Clover	Rademacher
Does not have collapsible soils	Provide review of collapsible soils and information regarding the potential hazards or how collapsible soils will be managed if present at the location.			Collapsible soils are defined as any unsaturated soil that goes through a radical rearrangement of particles and greatly decreases in volume upon wetting, additional loading, or both. KMOG does not consider collapsible soils to be a geologic hazard. They are not defined as such in CRS 24-65.1-103. KMOG uses proper construction techniques that prevent collapsible soils becoming an issue.		x	x	x

GIS data								
	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
Issue identified by staff:		304.b.(8)				Alfalfa	Clover	Rademacher
COMPLETENESS REVIEW								
Meets requirements.						x	x	x

HYDROLOGY MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).E				Alfalfa	Clover	Rademacher
Meets requirements, no comment						x	x	x

LAYOUT DRAWING								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).B				Alfalfa	Clover	Rademacher
For the flowback diagram, any tanks that will be on location for an extended period of time or during high flowback periods should be listed on the Form 2A under temporary equipment.	Make sure temporary equipment on the Form 2A matches any equipment on the flowback or production drawings			The layout drawings and the 2A have been updated to ensure the equipment counts match for the final production phase. At both Alfalfa and Clover as a result of produced water being piped there are not any tanks that will be on location temporarily that will be present for more than 6 months.		x	x	
The final facility layout equipment does not match the Form 2A, such as there are 2 electrical boxes on the drawing and only 1 listed on the 2A or 2 VRUs on the drawing and none on the Form 2A.	Cross check the Form 2A with the layout drawings to ensure all equipment is represented.			The layout drawings and the 2A have been updated to ensure the equipment counts match		x	x	
Temporary equipment on the final facility layout does not match the form 2A, such as sand traps, water pump, etc.	Add missing temporary equipment depicted on the drawings to the Form 2A			The layout drawings and the 2A have been updated to ensure the equipment counts match		x	x	
The final production drawing equipment does not match the Form 2A equipment list. The form 2A has 3 water tanks and the drawing has 4 plus the maintenance tank.	Ensure the equipment list on the Form 2A matches the drawings			The layout drawings and the 2A have been updated to ensure the equipment counts match				x
The drawing shows 7 temporary ECD and the Form 2A has 6	Ensure the equipment list on the Form 2A matches the drawings			The layout drawings and the 2A have been updated to ensure the equipment counts match				x

LOCAL/FED FINAL PERMIT DECISION								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		303.a.(6).B				Alfalfa	Clover	Rademacher
Not approved have consultation notes.	will need local permit when approved.			The Rademacher 14-30HZ 1041 WOGLA was approved 11/2/23. The approved Weld County permit has been uploaded to the 2A in two files - 01_RADEMACHER14-30HZ_WOGLA_9_26_23_1-27_EQP_COUNTS & WOGLA_Part2_ECMC_UPLOAD_12_5_23 Both are labeled "LOCAL/FED FINAL PERMIT DECISION" The Alfalfa & Clover WEld County hearing is on january 11, 2024. KMOG will provide the updated local permits after they are approved		x	x	x

LOCATION DRAWING								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).A				Alfalfa	Clover	Rademacher
complete						x	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?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(4)					Alfalfa	Clover	Rademacher
complete no comments					No Changes Needed		x		x
If the location is actually rangeland, reference area map and pictures are required	Provide additional information if necessary based on landuse determination				The location is non-irrigated cropland, the 2A has been updated to indicate this			x	

NRCS MAP UNIT DESC								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(10)				Alfalfa	Clover	Rademacher
Does not have full description of each soil unit	Provide the full NRCS description for each Soil Unit			The Alfalfa report contained soil unit descriptions of 44 & 72, it has been updated to include the access road soils of 70 & 73. The Clover report previously contained a description of soil units 4, 44 and 47. It has been updated to include the access road soils and now also includes 72 and 73.		x	x	
Only the unit descriptions are required, but the soil report is fine	No change necessary			No changes Needed				x

OTHER								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW						Alfalfa	Clover	Rademacher
community outreach for whole OGD				No revisions needed		x	x	x
Topsoil pile drawing	This should be attached to the topsoil plan			This has been removed from the attachments and attached to the topsoil plan.			x	

PRELIMINARY PROCESS FLOW DIAGRAMS								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).D						
						Alfalfa	Clover	Rademacher
There are sand tanks on the first drawing, is this for completions? The title block says production	If completions is separate from production, title the drawings accordingly.			These sand tanks are to remove sand from the production stream, not for frac sand to be pumped downhole. The page is titled correctly.		x	x	x

REFERENCE AREA MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(9).B.i				Alfalfa	Clover	Rademacher
corpland, not required				N/A		x		x
Will be required if determined landuse is rangeland				The landuse is cropland			x	

REFERENCE AREA PICTURES								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(9).B.ii				Alfalfa	Clover	Rademacher
crop land not required.				N/A		x		x
Will be required if landuse is determined to be rangeland				The land use is cropland	yes		x	

RELATED LOCATION AND FLOWLINE MAP								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).G				Alfalfa	Clover	Rademacher
The drawing is difficult to see lines with the aerial photo	Provide a map where the flowlines for the area can be viewed.			The only related flowlines shown on the map are shown on the Alfalfa detailed map that will bring production from the Ruca pad to the new Alfalfa Facility. KMOG does not operate any off location flowlines at Clover or Rademacher and therefore none are shown on the map. The LACT is the point of custody transfer.		x	x	x
The more detail should show the off location flowlines for the DSU of the proposed location.	In addition the the whole OGD, provide a detailed flow line that is site specific.			These maps have been updated to show that there are no related flowlines outside of the location for Clover and Rademacher		x	x	x
the Alfalfa map is attached for the detail and not the Clover	Provide the detailed map of the Clover			These maps have been updated to show that there are no related flowlines outside of the location for Clover and Rademacher			x	x
The first of the location has the correct equipment, but the last drawing has four water tanks	Ensure all drawings have the correct equipment count			Perhaps these comments are for a different exhibit? The related flowline and location map does not show equipment				x
The last drawing has 5 water tanks	Separate out the maintenance tank from the produced water tanks			Perhaps these comments are for a different exhibit? The related flowline and location map does not show equipment				x

Need to upload A/C.R Related Flow Line Map

Uploaded
12/18/23

Uploaded
12/18/23

Uploaded
12/18/23

SURFACE AGRMT/SURETY								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(12).B				Alfalfa	Clover	Rademacher
applicant is surface owner, not required.						x		
attached, no comments							x	
The surface owner on the 2A does not match the SUA	The 2A surface owner the the SUA should be the same name or an explanation of why they are different			The 2A has been updated to indicate Boedle Creek is the owner of the parcel				x

WAIVERS								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		604.a.(4)				Alfalfa	Clover	Rademacher
CPW for 1202 attached								x
CPW should determine if the nearby wetland meets 1202.c.(3)	Provide an email correspondence or other information that CPW has determined the nearby waterbody to not have wetlands			The Wildlife Protection Plan for Clover has been updated to include a wetland delination. The NWI mapped wetland near the pad was determined to not be present by 2dot environmental contractors.			x	

WILDLIFE HABITAT DRAWING								
Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
COMPLETENESS REVIEW		304.b.(7).C				Alfalfa	Clover	Rademacher
complete						x	x	x

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

Issue identified by staff:	Suggested correction:	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
				Alfalfa	Clover	Rademacher
The temporary equipment list should have the MLVT marked above and not under the temporary list	Remove the MLVT from the temporary list and add it to the list above. ECMC staff is aware that the MLVT is part of completions and not production. The MLVT is on the list above.	It is KMOG's preference to leave the MLVT as a temporary piece of equipment to most accurately reflect the equipment that is planned to be on location.		x	x	x
The hydrology map and the Water resource section do not match for the distance to the nearest downgradient wetland. According to the hydrology map and the topography, the wetland should be closer than indicated on the Form 2A	Correct the water resource section to match the hydrology map or provide an explanation of why they are different.	The wetland distance is listed as 511' west on 2A water resources, 2B and hydrology map.		x		
CDPHE BMPs are on the Form 2A, these should only be added when a pre-consultation has occurred	Provide a pre-consultation summary for the BMPs or remove the BMPs from the 2A.	As a consultation with CDPHE was not required for either location. We would like to highlight our commitment to the BMPs. The CDPHE recommended BMPs have been removed from the Operator BMPs tab and added to a stand alone document titled "Other". The BMPs that are not in plans have been left on the Operator BMP tab and are also included in the BMP/Other document		x	x	
The distance to the nearest water well listed on the form 2A is an expired permit that was not drilled.	A water well that was completed with a depth to water should be provided on the Form 2A. An active drinking water well is preferred, but irrigation and monitoring wells should be considered.	This has been updated to indicate: Monitoring wells were drilled to a depth of 8' within the proposed oil and gas location. Groundwater was encountered at 66 inches and 90 inches. KMOG conservatively estimates depth to groundwater at 5'.			x	
The depth to water is listed at 66 feet below ground surface, but there are several monitoring wells that list the depth to water more shallow.	The depth to water should be the shallowest an operator is able to discern and is not necessarily from the nearest drinking water well. The depth to water can be from a different water well than what is listed for the nearest well. ECMC is looking for potential impacts to groundwater. The calculation for determining depth to water is understandable, but not necessarily the most accurate.	This has been updated to indicate: Monitoring wells were drilled to a depth of 8' within the proposed oil and gas location. Groundwater was encountered at 66 inches and 90 inches. KMOG conservatively estimates depth to groundwater at 5'.			x	
Land use is listed as both non-irrigated cropland and rangeland.	As Cropland and rangeland have different requirements for pictures and interim reclamation, please select one. If it is cropland, based on the pictures, please identify the crop.	Land Use is Non-irrigated Cropland dominated by Tall Wheatgrass. The 2A has been updated to indicate this. The 2A requests species only if it is not crop.			x	
Statement on the submit tab says there is not an RBU within 2,000 feet but there are 2 according the the cultural tab	Revise the Submit tab for the Radamacher location	This statement is specific to RBUs and other buildings in a DIC and intended to highlight that the community consultation plan is submitted as "other" since it is not required				x
The drawings and the equipment list on the Form 2A are not consistent	Drawings, Form 2A equipment list, and Form 2B should all have the same information. Please update drawings and forms for consistency	The Drawings and 2A and 2B have been updated and are now consistent				
The drawings have additional temporary equipment listed that is not on the Form 2A, such as chemical totes that are on the drawings and the Form 2B	Update the equipment lists to be consistent with what is proposed for the location.	The Drawings and 2A and 2B have been updated and are now consistent		x	x	x

Form 2B						
COMPLETENESS REVIEW (Form 2B topic)	(topic/subtopic)					
Issue identified by staff:	Suggested correction:	Applicant Response:	Staff second review: Was the issue addressed?	403278400	403278417	403278425
				Alfalfa	Clover	Rademacher
Alfalfa water resources wetland distance does not match Form 2A	Correct the distance on one of the Forms so there is consistency between the two	511' W on 2A & 511' W on 2B		x		
See water resources under the 2A tab for depth to water	Correct the depth to water as appropriate	Updated to include: "Monitoring wells were drilled to a depth of 8' within the proposed oil and gas location. Groundwater was encountered at 66 inches and 90 inches. KMOG conservatively estimates depth to groundwater at 5'."			x	
The number of produced water/condensate tanks listed is 4, but the Form 2A has 3	Correct the number of tanks and storage capacity for the location with what will be on the location. The Form 2A, drawings, and Form 2B should be constant.	Updated to 4 tanks so the two forms are consistent				x

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

Issue identified by staff:

Suggested correction:

Applicant Response:

Staff second review: Was the issue addressed?

complete

COMPLETENESS REVIEW		Docket# 230900284	
Attorney Name: KELSEY WASYLENKY; JAMIE JOST	Attorney Email Address: KWASYLENKY@JOSTENERGYLAW.COM; JJOST@JOSTENERGYLAW.COM		
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Hearing Officer Name: Jon Peskin	Hearing Officer Email: jon.peskin@state.co.us		
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>OGLA Review Notes</u>			
Paragraph 8: Incorrect Form 2A document number listed for the proposed RADEMACHER 14-30HZ location.	The correct document number is: 403278425.		
Paragraph 12: based on the Form 2A for the RADEMACHER 14-30HZ, the Town of Firestone is also a Proximate Local Government for the proposed RADEMACHER 14-30HZ location.	Recommended Revision: "...and the Town of Firestone as the Proximate Local Government for the Alfalfa 8-20HZ, Rademacher 14-30HZ , and Clover 2-29HZ Oil and Gas Locations..."		
Relief Paragraph B: number of wells for the ALFALFA 8-20HZ and CLOVER 2-29HZ locations are backwards.	Recommended Revision: "...on the Alfalfa 8-20HZ Pad (1342 Wells), the Clover 2-29HZ Pad (1243 Wells) and the..."		
<u>Permitting Review Notes</u>			
Concern: Map does not include the Township/Range required by Rule 503.c.		Topic: Map	
<u>Geologic Testimony</u>			
Concern: A key is absent for the scales on the left and bottom of Structure and Isopach maps. Add a description of what these scales represent.		Topic: All Exhibits	
Concern: Township and Range locations are not properly identified on all Isopach and Structure maps. Either add a textual description of the lands to "Exhibit Descriptions" under the maps or add Township and Range descriptors onto the maps.			
<u>Engineering Testimony</u>		[review conclusion]	Engineering

These have been updated by Jost
Energy Law