

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

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.c.(1)		DT		X	

304.c.(2). Noise Mitigation Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(2)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
The BMP regarding sound walls doesn't specify the length and height of the sound walls, nor does it mention when it will be placed at the location, and how long it will be there for.	Add the necessary detail regarding usage of the sound walls. Please provide additional information regarding the Halliburton Zeus Electric Fleet. Is it fully battery powered? Are generators a part of it?			DT	Added a statement related to material, height, length and timing of placement on the sound wall.	Yes	x
More information could be provided regarding the Halliburton Zeus Electric Fleet.				DT	Added statement related to frac fleet, Info also found in cumulative impacts plan.	Yes	x

304.c.(3). Light Mitigation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues		304.c.(3)		DT		x	

304.c.(4). Odor Mitigation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.c.(4)		DT		x	

304.c.(5). Dust Mitigation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
<p>COMPLETENESS REVIEW</p> <p>The existing access road is mentioned in the plan, and it is not clear to me if the existing road is to remain or not (as didn't appear on access road map).</p>	<p>Please specify if the existing access road is going to remain.</p>	<p>304.c.(5)</p>		<p>DT</p>	<p>Existing access will be reclaimed. It is inside the ROW for HWY 52 and needed to be shifted. Added a statement about existing road to clarify.</p>	<p>Yes</p>	<p>x</p>

304.c.(6). Transportation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues		304.c.(6)		DT		x	

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

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues		304.c.(7)		DT		x	

304.c.(8). Emergency Response Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No issues identified		304.c.(8)		DT		x	

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

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW		304.c.(9)		DT		x	403562037

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

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.c.(10)		DT		x	

304.c.(11). Waste Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No issues identified		304.c.(11)		DT		x	

304.c.(12). Gas Capture Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(12)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
Plan meets requirements of Rule 304.c.(12) and 903.c.(3).A and 903.e	No requested corrections.			EMW		x	

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

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues		304.c.(13)		DT		x	

304.c.(14). Topsoil Protection Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(14)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
The soil probe photos in the shadow are hard to see clearly.	Keep in mind for the future, no photo change needed with this plan.	Detail at what point the stockpile is expected to be seeded.		DT	Noted. Thanks	yes	x
The timeline for seeding the stockpile is unclear.				DT	Added comment related to timing of seeding to plan.	yes	x

304.c.(15). Stormwater Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No issues identified		304.c.(15)		DT		x	

304.c.(16). Interim Reclamation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
<p>COMPLETENESS REVIEW</p> <p>A new access road is proposed to the existing pad (which is to be expanded), but no mention of plans for the existing access road.</p>	<p>Please describe reclamation for the access road, or plans to incorporate it into the new access road.</p>	<p>304.c.(16)</p>		<p>DT</p>	<p>Added statements related to reclaiming existing road</p>	<p>Yes</p>	<p>x</p>

304.c.(17). Wildlife Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues		304.c.(17)		DT		x	

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(18)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
Part C is not consistent with Part D	Part C says recycled and reused water is planned to be used, and Part D says recycled or reused water is not feasible. Make consistent. If recycled water actually is to be used, provide the information regarding source, and background concentration of chemicals found in Table 437-1.			DT	Made consistent. We can recycle some water here, but clarified when we are able to recycle water in general	Yes	x
The plan says produced or recycled water would be brought in by truck.	Explain why produced or recycled water couldn't be brought in by a temporary line like the freshwater that is planned to be brought in with.			DT	Added a statement, without centralized water storage facility, we do not have the ability to transport via temporary produced water lines.	Yes	x

304.c.(19). Cumulative Impacts Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No issues identified		304.c.(19)		DT		x	

304.c.(20). Community Outreach Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.c.(20)		DT		x	

304.c.(21). Geologic Hazard Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW		304.c.(21)		DT			403562037 x

ACCESS ROAD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW The existing access road is not labeled on the map, and no mention of it in the Interim Reclamation Plan.	If the existing access road is not being reclaimed, then add to the map.	304.b.(7).F		DT	We noted the existing access road on the Access Road Map to be reclaimed. This is not quite your directive, but it seemed the more information the better.	Yes	x

ALA DATASHEET

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.b.(2)		DT		x	

ALA NARRATIVE SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW		304.b.(2)		DT		x	403562037

CONSULTATION SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No issues identifies				DT		x	403562037

CPW CONSULTATION

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW				DT		x	

CULTURAL FEATURES MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW The table says the nearest property line is 143' N, while the 2A says the nearest property line is 108' N.	Determine the correct value and make consistent.	304.b.(3)		DT	Corrected 2A, cultural features map was correct.	Yes	x 403562037

DIRECTIONAL WELL PLAT

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
The Entry Point of the three existing wells aren't labeled.	Add the label of the Entry Point for the three existing wells.	304.b.(7).H		DT	Entry points added (Brnak 01-64-10-1H in the larger drawing and Brnak 01-64-10-2H and 3H in the detail) Yes	x	

**DISPROPORTIONATELY IMPACTED
COMMUNITY MAP**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.b.(7).J		DT			x

GEOLOGIC HAZARD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No identified issues		304.b.(7).l		DT		x	403562037

GIS data

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW No identified issues.		304.b.(8)		DT		x	403562037

HYDROLOGY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No identified issues		304.b.(7).E		DT		x	403562037

INFORMED CONSENT LETTER

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW		604.b.(1)		DT		x	403562037

LAYOUT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW The existing production area for the three existing producing wells are not shown as to be reclaimed	If the existing production area for the three existing wells is to be reclaimed, please show that.	304.b.(7).B		DT	Added reclaim of existing pads to construction layout	Yes	x 403562037

**LESSER IMPACT AREA EXEMPTION
REQUEST**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.d		DT		x	

LOCAL/FED FINAL PERMIT DECISION

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW Add WOGLA permit when available.		303.a.(6).B		DT	Not yet approved. Hearing is set for 2/29/2024. WOGLA hearing order not available as of 3/13/24.	x	403562037

LOCATION DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No identified issues		304.b.(7).A		DT		x	403562037

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?	
No identified issues		304.b.(4)		DT		x	403562037

NRCS MAP UNIT DESC

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No issues identified		304.b.(10)		DT		x	

OTHER

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW No identified issues				DT		x	

**PRELIMINARY PROCESS FLOW
DIAGRAMS**

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).D	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
The preliminary flowback diagram says DRAFT. The production diagram only lists 1 x LACT unit, but the 2A says 3.	Please submit what you consider the final version of this, so we know what Verdad Resources is committing to. Make consistent. Add the meaning of the dashed orange line.			DT	Removed Draft from title. This is our Preliminary Process Flow Diagram for flowback	Yes	x
				DT	We added the 2 additional LACTs	Yes	x
Dashed orange line not described in legend.				DT	Added dashed orange to legend	Yes	x

REFERENCE AREA MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		304.b.(9).B.i		DT		x	

REFERENCE AREA PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
COMPLETENESS REVIEW		304.b.(9).B.ii		DT		x	403562037

RELATED LOCATION AND FLOWLINE MAP

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).G	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
The planned gas flowline from the Nighthawk facility is not on the map. Possibly other facilities missing pipelines as well.	Add the route of the planned gas pipeline from the point of origin to their end point (main gathering line, transfer station, or offsite production facility).		Yes. Requirement 2.d)	DT	Added proposed and existing lines and attached.	Yes	x

SURFACE AGRMT/SURETY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No issues identified		304.b.(12).B		DT		x	403562037

WAIVERS

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
COMPLETENESS REVIEW		604.a.(4)		DT		x	

WILDLIFE HABITAT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
<p>COMPLETENESS REVIEW</p> <p>There are no pipeline or utility corridors on the map.</p>	<p>Include on the map all pipeline and utility corridors associated with the Oil and Gas Location and operations.</p>	<p>304.b.(7).C</p>		<p>DT</p>	<p>Added proposed and existing lines to the document and revised plan</p>	<p>Yes</p> <p>x</p>	

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

		SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
Issue identified by staff: The 2A says the nearest property line is 108' N, while the table in the Cultural Features Map says it is 143' N.	Suggested correction: Determine the correct value and make consistent.	DT	updated to 143'.	Yes	x
No operator comments on the submit tab explaining how they are amending this location.	Add Operator comment to the Submit tab explaining how they are amending this location	DT	added a statement. It also addresses the road.	Yes	x

Form 2B

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

Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	
No identified issues		DT		x	403562037

Form 2C

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

		SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403562037
Issue identified by staff: No identified issues	Suggested correction:	DT		x	

COMPLETENESS REVIEW		Docket# 231100343	
Attorney Name: JOSEPH PIERZCHALA; ANTHONY ROEBER	Attorney Email Address: JPIERZCHALA@WSMTLAW.COM; AROEBER@WSMTLAW.COM		
Permitter Name: Sam Champlin	Permitter Email: sam.champlin@state.co.us		
Engineer Name: Diana Burn	Engineer Email: diana.Burn@state.co.us		
Hearing Officer Name: Elias Thomas	Hearing Officer Email: elias.thomas@state.co.us		
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>OGLA Review Notes</u>			
OGDP Application Lands and Exhibit C Spacing Lands conflict with another OGDP application (Docket# 231000313).	Options: 1) DN 231100343 has its lands adjusted; 2) DN 231000313 has its lands adjusted; 3) DN 231100343 demonstrates that both OGDPs can occupy the same lands without conflict.	Both OGDP applications seek to develop the following lands: <u>Township 1 North, Range 64 West, 6th P.M.</u> Section 2: All	
<u>Permitting Review Notes</u>			
Concern: Order No. 535-87 is not in the applications lands. (535-87 is in T8N R63W) Should be 407-87. If 407-87 is the correct referenced order, since there are not active wells in section 2 & 3 using these orders, the order should be amended/modified to remove Sec 2 & 3 T1N R64W from the order.		Topic: Citation of Applicable Prior Orders & Units	corrected 3/13
Concern: The OGDP relief should state that Order No. 407-3467 & Order No. 407-2084 is being brought into this OGDP.			corrected 3/13
Concern: The # of wells spaced by Order No. 407-3467, Order No. 407-2048 and the pending spacing application is 33. The OGDP is planned for 27 total (24 new). The # of requested wells in the OGDP should be equal to the # of the combined wells in the DSU's. If the number requested (27) is correct, then one or more DSU's should be amended to reduce the well count.		Topic: Number & Type of Proposed Wells	corrected 3/13
This Nighthawk Pad OGDP (Docket #231100343) overlaps on section 2 with KMG Cyprus OGDP (Docket # 231000313)		Topic: Conflicts with other pending application	
<u>Geologic Testimony</u>			
Concern: Paragraph 2 of Geology Testimony states the pending DSU will have 12 horizontal wells, while the Spacing Application states 9 horizontal wells.		Topic: Geology Testimony Narrative	corrected 3/13
<u>Engineering Testimony</u>		ACCEPTABLE OVERALL	Engineering
Testimony provided supports requested development.			

Applicant Response:

