

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?	403211377	403211514
<b>COMPLETENESS REVIEW</b> Not submitted, not required.		304.c.(1)		EMW			x	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?	403211377	403211514
Noise levels for production operations are not addressed in the plan for the Janet location.	Include expected noise levels for the production phase of operations.	423.a.(2).		BC	Complete; included on pages 32-33.	x		
BMP for noise levels within 2 miles of a lek.	Either have this BMP be active (lek within 2 miles) or remove. Remove the conditional second sentence. Include the teal line in the legend. Why wasn't the CPW Mapped Greater Sage Grouse Lek east of the Janet location addressed as a receptor?			BC	removed	x	x	
Figure 6-1 does not indicate on the legend what the teal line shows, it also shows the RBU as the only receptor.				EMW	Complete: teal line shows 2000' from the pad edge. Lek is within 2 miles but not within map extent.	x		

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(3)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
There are two occupations for drilling and no notes about what the lighting will be between the occupations.	State how lighting will be conducted in the period between the two drilling operations. Will this be regarded as production operations with no lighting, with lights being brought back onto the location for the second drilling operation?			BC	Complete: Timeline revised to only have one occupation to drill all ten horizontal wells.	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?	483211377	403211514
<p><b>COMPLETENESS REVIEW</b></p> <p>An Odor Plan is not required by Rule 426.a. as both proposed locations are over 2,000 feet from any RBUs.</p>	<p>Remove the included Odor Plan(s). OR Revise the current Odor Plans to include BMPs for drilling fluids, drilling mud, odor neutralizers, closed top tanks, wiping of drill pipe. The current plan discuss air monitoring rather than odor. The current plan states that odors will be monitored without detailing how the monitoring will be performed, revise the plan to address the odor monitoring in more detail.</p>	<p>304.c.(4)</p>	<p><a href="#">Yes</a></p>	<p>EMW</p>	<p>Removed plan and will not resubmit.</p>			

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(5)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
The Dust Plan for each location is the same. The only difference is the soil type and disturbance area listed in Article II of each plan. The attachments/diagrams for the Janet include Ray Ranch attachments.	Submit a site specific Dust Plan for each individual location within the OGD that reflects the following location specific information: soil type, proposed speed limit(s), total area of disturbance, whether the access road(s) will be paved, the number of anticipated truck trips for each phase of operations (construction, drilling, completions, production), a fugitive dust control plan, a list of site specific BMPs that address speed restrictions, road maintenance, high wind days.							
The Janet Dust Plan doesn't include anticipated vehicle trips for the construction and production phases of operations.	The introduction is the only thing that should appear similar between the two location plans. Include the estimated vehicle trips for the construction and production phases of operation for the Janet location.			EMW	Not the same. There are two separate plans.	x	x	
The Ray Ranch Dust Plan doesn't include anticipated vehicle trips for the production (injection) phase of operations.	Include the estimated number of vehicle trips for the production (injection) phase of the Ray Ranch location.			EMW	Revised truck trips to include missing phases.	x		
The Ray Ranch Dust Plan doesn't include a tally of anticipated vehicle trips that includes the pass through traffic to the Janet location.	Update the Dust Plan for the Ray Ranch to show the anticipated vehicle trips for the Ray Ranch AND in a separate tally, the sum of the anticipated trips for both the Ray Ranch and the Janet locations since the Janet access passes through the Ray Ranch location.			EMW	Revised truck trips to include missing phases.		x	
Page 2 of the Janet Dust Plan states that "potential" production equipment located on the Janet pad includes treaters, pump jacks, and gas lift equipment however, none of these types of equipment are listed on the Equipment & Flowlines tab of the Form 2A.	Either update the Dust Plan to match the information on the Form 2A OR update the Form 2A so that the equipment listed matches the equipment discussed in the Dust Plan.			EMW	Total is anticipated to be equal with the number of trips to the Ray Ranch.		x	
Page 2 of the Ray Ranch Dust Plan states that "potential" production equipment located on the Ray Ranch pad includes VRTs and VRUs, however, neither of these are listed on the Equipment & Flowlines tab of the Form 2A.	Either update the Dust Plan to match the information on the Form 2A OR update the Form 2A so that the equipment listed matches the equipment discussed in the Dust Plan.			EMW	Complete; equipment updated	x		
No BMP for silica sand in plan.	Include sand BMP.			EMW EMW	Complete; equipment updated Complete; BMP added		x	

304.c.(6). Transportation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Plan meets requirements of Rule 304.c.(6).		304.c.(6)		EMW	Plan was revised to update phases of operations.	x	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?	403211377	403211514
<b>COMPLETENESS REVIEW</b> Plan meets requirements of Rule 304.c.(7). and COGCC guidance document.		304.c.(7)		EMW			x	x

304.c.(8), Emergency Response Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(8)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<p>Page 5 of the Janet ERP states there will be 5 compressors, 2 water pressure vessels, and 2 oil pressure vessels on location, the Form 2A Equipment &amp; Flowline tab states 6 compressors, 1 water pressure vessel, and 1 oil pressure vessel.</p>	<p>Ensure consistency throughout the application by either</p>			EMW	Revised equipment counts; matches 2A.	x		
<p>Page 5 of the Ray Ranch ERP states there will be 4 loadouts, 4 ECDs and 8 emergency upset combustors, 1 LACT, 6 generators, and 2 glycol and lube oil totes while the Form 2A Equipment &amp; Flowline tab states 2 loadouts, 2 VOC Combustors and 8 ECDs, 3 LACT, 5 generators, and 4 glycol and lube oil totes.</p>	<p>Ensure consistency throughout the application by either</p>			EMW	Revised equipment list			x
<p>Will the materials for spill response and cleanup mentioned on page 7 section 3 of both the Janet and Ray Ranch ERPs be located on site?</p>			Yes	EMW	Yes - language added to both ERPs.	x		x
<p>Location Drawing included in Janet ERP has the access road coming in on the northwest quadrant of the pad but also has a "18' wide temporary pad access" road coming in on the west side of the northwest corner. The west entrance road is not included in the Access Road Map Attachment.</p>				EMW	All maps throughout the plans and submittals have been updated to show both the temporary and permanent access roads for the Janet 0780 S5 Pad.	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?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		304.c.(9)		EMW			x	x

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?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		304.c.(10)		EMW			x	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?	403211377	403211514
<b>COMPLETENESS REVIEW</b>		304.c.(11)						
Waste Handling Table on page 10 of the Janet Waste Management Plan (WMP) plan states that there is 0-500 cubic yards of oil and produced fluid impacted soil anticipated each year. It appears from wording of the table that operator is anticipating spills and impacted soils will occur.	Elaborate on implied anticipation of spills. Ensure that table accurately depicts the volumes of drilling fluids and cuttings anticipated from drilling and completions operations.			EMW	Table has been revised.	x		
On the Waste Handling Table on page 10 of the Janet WMP Date for Routt County Bi-Annual Hazardous Waste Drop Off has already passed.	Update with current/upcoming dates			EMW	Updated to each calendar year.	x		
Location Drawing included in Janet WMP has the access road coming in on the northwest quadrant of the pad but also has a "18' wide temporary pad access" road coming in on the west side of the northwest corner. The west entrance road is not included in the Access Road Map Attachment.				EMW	Drawings have been updated.	x		
	[Ensure consistency between data in plans/attachments and Form 2A.] <i>Either update the WMP Location Drawing to match the information in the 2A OR update the 2A to match the Location Drawing in the WMP.</i>							
Location Drawing included in Janet WMP shows 2 water pumps, 2 oil pumps, 2 water pressure vessels, 2 oil pressure vessels while the Equipment & Flowline Tab of 2A shows just 1 of each of those. Location Drawing in WMP shows 5 gas compressors, the 2A lists 6.	Edit the plan to site the correct rule.			EMW	Exhibits have been updated.	x		
Page 6 section 5.2 of both locations' WMP states that drilling fluid will be disposed of "in accordance with Rule 325". There is no COGCC Rule 325.	COGCC Rule 905.d.(2). addresses disposal of drilling fluids.			EMW	Typo - removed and corrected language in both plans.	x		x

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?	403211377	403211514
<p>Page 3 states that "potential" production equipment located on the Janet pad includes treaters, pump jacks, and gas lift equipment however, none of these types of equipment are listed on the Equipment &amp; Flowlines tab of the Form 2A.</p>	<p>Ensure consistency by either updating the plan or the 2A.</p>			EMW	<p>Equipment list has been updated.</p>	x		
<p>Page 5 states that the Long-Term Xcel Option feasibility study would be completed 12/2022. Has the study been completed? What were the conclusions?</p>				EMW	<p>Gas Capture Plan has been revised. Please see "Overview" section - the Xcel long-term option is not feasible based on the completed study and has been removed from the long-term options.</p>	x	x	
<p>Both the Ray Ranch and Janet location GCPs state that gas will be sent via pipeline to the Gregory location. Why is there data mining equipment listed on the 2A if the gas is being piped off location?</p>				EMW	<p>GCP has been revised - gas may be sent to the Gregory pad if all of the gas cannot be used onsite to run gas-fired equipment on the Janet pad or at the data processing/cloud computing units on Ray Ranch.</p>	x	x	

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(13)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
Page 7 of the Janet FLDP states there will be 5 compressors, 2 water pressure vessels, and 2 oil pressure vessels on location, the Form 2A Equipment & Flowline tab states 6 compressors, 1 water pressure vessel, and 1 oil pressure vessel.	Ensure consistency throughout the application by either updating the FLDP to match the 2A or updating the 2A to match the FLDP.			EMW	Equipment updated - see revised FLDP	x		
Page 7 of the Ray Ranch FLDP states there will be 4 loadouts, 4 ECDs and 8 emergency upset combustors, 1 LACT, 6 generators, and 2 glycol and lube oil totes while the Form 2A Equipment & Flowline tab states 2 loadouts, 2 VOC Combustors and 8 ECDs, 3 LACT, 5 generators, and 4 glycol and lube oil totes.	Ensure consistency throughout the application by either updating the FLDP to match the 2A or updating the 2A to match the FLDP.			EMW	Equipment updated - see revised FLDP		x	
Location Drawing included in Janet FLDP has the access road coming in on the northwest quadrant of the pad but also has a "18' wide temporary pad access" road coming in on the west side of the northwest corner. The west entrance road is not included in the Access Road Map Attachment.				EMW	All maps throughout the plans and submittals have been updated to show both the temporary and permanent access roads for the Janet 0780 S5 Pad.	x		
Page 1 of the Janet FLDP lists the disturbance as 5.51 acres while the Form 2A lists 6.61 acres.	Ensure consistency by updating either the plan or 2A.			EMW	FLDP has been updated - shows 6.61 acres of total disturbance.	x		
Janet FLDP states that secondary containment will be 110% of the largest tank. Rule 603.o.(1) requires 150% of the largest tank.	Update plan to be in compliance with the rule, OR delete the section about containment as no tanks appear to be planned for this location.			EMW	FLDPs have been updated to indicate 150% secondary containment.	x	x	
There are not site specific BMPs included with the FLDP.	Include site specific BMPs.			EMW	Received for Janet and Ray Ranch	x	x	

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?	403211377	403211514
Why are the topsoil piles on the Janet being stored on the east side of the location where they are closest to the wetlands/surface water? Page 4 Article III and Page 5's Site Specific BMPs both state "All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations." This statement (which reads verbatim from Rule 1002.c) is not a BMP. (The BMPs listed are quite generic. The Rule asks operators to protect the soil from degradation, COGCC staff ask operators to explain how that protection will occur by detailing what/when/how site specific BMPs will be utilized. To make BMPs included in the plan site specific please identify where the berms will be installed, where check dams will be utilized, the location of diversion dikes, the timeline of seeding operations, etc.) COA will need to be added to 2A that operator will submit soil pit data via sundry after pits are dug.	Include specific BMPs will be utilized to prevent soil degradation.		Yes	EMW	The Janet topsoil stockpile being on the east side provides visual and noise screening for wildlife east of the location. Fulcrum will submit topsoil evaluation locations via sundry once conducted prior to construction.	x		
				EMW	removed statement from both plans.	x		
				EMW	OK. Thank you for the heads up.	x		
A map with the soil pit locations is needed. How was salvage quantity of 4,630 cubic yards determined without test pit data when the above line on page 4 states that "soil thickness and evaluation data will be determined at time of site preparation and construction"?	Provide intended location of soil pits either on one of the figures already included or in a new map/figure.			EMW	Fulcrum will submit topsoil evaluation locations via sundry once conducted prior to construction.	x		
				EMW	From the layout drawings, which were done by a certified engineer and surveyor. The Ray Ranch topsoil stockpile being on the south side provides visual and noise screening for building unit owners south of the location. Fulcrum will submit topsoil evaluations via sundry once conducted prior to construction.	x		
Why are the topsoil piles on the Ray Ranch being stored on the south side of the location where they are immediately adjacent to the wetlands/surface water?				EMW				x
The TPP should be written specific to each location, not to the OGD as a whole.	Remove information about the Ray Ranch CTB location from the Janet plan and remove Janet information from the Ray Ranch CTB plan. Either remove the language or cite the rule and provide original accompanying language. Remove the NRCS Map Unit Description Sheets from the TPP.			EMW	It is site specific. Only the Location information mentions both locations for the purposes of knowing the relationship between them. This was requested by ECOM staff to make each plan stand-alone.	x	x	
Several times throughout the plan the rule is quoted verbatim but not cited. NRCS Map Unit Description Sheets should not be attached to the TPP as they are included as a separate attachment on the 2A. Location Drawing included in Janet TPP has the access road coming in on the northwest quadrant of the pad but also has a "18' wide temporary pad access" road coming in on the west side of the northwest corner. The west entrance road is not included in the Access Road Map Attachment.				EMW	Added more detail where appropriate.	x		x
				EMW	Removed attachment.	x		x
				EMW	Access Road Map is revised.	x		
More detail on the timing and type of seeding to be used on topsoil piles is needed. The statement at the top of page 4 on the Janet TPP and top of page 5 in the Ray Ranch TPP does not address when the piles will be seeded. More detail on the long term stabilization is needed. Seeding is not only for stabilizing the topsoil pile, it also maintains microbial health in the soil.				EMW	Plan updated. Seeding will occur as soon as possible after construction has occurred and likely at the same time as interim reclamation, which will likely be around September of whatever year the location is constructed. Standard North Park Mountain Seed mix will be used.	x		x
The site specific BMPs need to be more detailed and not just quotes from the rules.				EMW	Revised BMP	x		x
On Page 1 of the Janet TPP it states that the WPS is 4.89 acres and the interim reclamation is 3.11. These do not match the numbers provided on the Construction, Drilling, & Waste Tab of the Form 2A.	Ensure consistency throughout the application by either updating the TPP to match the 2A or updating the 2A to match the TPP.			EMW	Revised acreages.	x		
On Page 1 of the Janet TPP it states that pump jacks will be used but no pump jacks are listed on the Equipment & Flowlines Tab of the Form 2A.	Ensure consistency throughout the application by either updating the TPP to match the 2A or updating the 2A to match the TPP.			EMW	Equipment revised.	x		

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(15)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
Page 4 Article I of the Janet misnames the location in the first paragraph, referring to it as the Janet 0780 S5 CTB (Janet) Pad while the location is named on the 2A and throughout the application materials as Janet 0780 S5 Pad	Ensure consistency throughout the application by editing the SWMP to match the name on the rest of the application.			EMW	Corrected	x		
The equipment listed on pages 4-5 on the Janet SWMP does not match the equipment list on the 2A.	Ensure consistency throughout the application by either updating the SWMP to match the 2A or updating the 2A to match the SWMP.				Updated	x		
The NRCS descriptions are not needed as they are included as a separate attachment to the 2A.	Remove the NRCS descriptions from the SWMP.			EMW	Removed from both plans.	x	x	
Page 7 of the Janet SWMP states "the current stockpile is located on the south side of the pad" while the attached and referenced layout drawings (and the Topsoil Plan) show it on the north half of the east side of the location.	Correct the SWMP to be consistent with itself and the rest of the application. While addressing these inconsistencies provide or include in the TPP and SWMP a written explanation of why the topsoil is planned to be stored closest to the wetlands east of the location and why there is only 1 structural control (straw wattles) to prevent sediment from entering the wetland.			EMW	Plan has been revised.	x		
In the Janet SWMP on page 7 the first bullet under Non-Structural Practices is a goal not a practice.	Either remove the statement or edit it to be an actual practice, e.g. protect sensitive environments in nearby waterways by utilizing natural flow pathways around the site			EMW	Revised	x		
In the Janet SWMP on page 7 under Potential Pollution Sources it mentions potential tracking onto CR 24. Why would there be traffic from this proposed location on CR 24?	Edit plan to accurately match haul route and access road information in application.			EMW	Removed	x		
In the Janet SWMP on page 7 under Potential Pollution Sources it also mentions erosion from the topsoil stockpile into adjacent wetlands and lists the ditch and culverts on the north and east sides of the pad as potential pollution sources.	Clarify why there is anticipated sediment pollution from the topsoil stockpile and ditch and culverts.			EMW	Erosion from the topsoil stockpile into adjacent wetlands is not anticipated, but the potential for it to happen exists, and the plan seeks to identify proper avoidance measures to keep it from happening.	x		

Page 7 of the plan states that "additional erosion control devices (ECDs) will be used..."	The acronym ECD is generally used when referring to Enclosed Combustion Devices or Emission Control Devices and should not be used in relation to erosion control devices. Delete all references to ECDs in relation to erosion control.	EMW	Removed	x	x
Attachments A and B can be removed from these plans and replaced with diagrams that detail where the structural stormwater BMPs will be during each phase of operations.	Remove the attachments and replace with attachments that detail the location of structural BMPs during all phases of operations.	EMW	Removed attachments. Structural stormwater BMPs shown on Figure 3.	x	x
Why are there 4 ECDs planned for the Ray Ranch location when the GCP states that gas will be piped to the processing center at the Gregory location? Why are there data centers shown as equipment on the Ray Ranch when the GCP states that gas will be piped to the Gregory location?		EMW	GCP was revised.		x
The equipment listed on page 4-5 of the Ray Ranch plan does not match the equipment/quantities listed on the 2A Equipment and Flowline tab.	Ensure consistency throughout the application by either updating the SWMP to match the 2A or updating the 2A to match the SWMP.	EMW	Equipment list has been updated.		x
On Page 4 of the Janet SWMP it lists the surface owner as TRK Properties which doesn't match the information provided in the Surface Use Agreement or Form 2A.	Ensure consistency throughout the application by either updating the SWMP to match the 2A or updating the 2A to match the SWMP.	EMW	Revised	x	

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(16)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<p>All drawings excluding the Facilities Layout Drawing and Interim Reclamation Drawing that are attached to the Janet Interim Reclamation Plan show a "18' wide temporary pad access" road entering the pad from the west side of the northwest corner. This additional spur access road is not shown on the Access Road Map attachment and is not mentioned in the discussion on page 6, where it is stated "no portion of the access road will be reclaimed during interim reclamation", yet, the fact that this 18' wide spur is not included in the Facility and Interim Reclamation Drawings makes it appear that the road will in fact be reclaimed.</p>	<p>Please ensure consistency within plan and application. <i>Either add the spur road to the access road map and update the plan to include its time for reclamation OR remove the spur road from this plan and all other plans and drawings where it is shown.</i></p>			EMW	<p>Access Road Map updated.</p>	x		
<p>There is no interim reclamation discussed in the Ray Ranch plan, it is primarily made up of quotes from COGCC Rules. Why are there data centers shown as equipment on the Ray Ranch when the GCP states that gas will be piped to the Gregory location?</p>	<p>Remove all rule quotes and submit a site specific plan for Interim Reclamation activities. The SWMP states that no interim rec will be performed on the Ray Ranch pad but the drawings indicate a shrinking of the disturbance area after drilling and completions.</p>			EMW	<p>The Ray Ranch will not have interim reclamation. Please see the revised plan for further information. Rule quotes have been removed. ECMC review comments in previous OGDG have requested that all required topics were addressed. Format of plans with rule citations are intended to confirm the focus of BMP and statements included in plan.</p>		x	
<p>The quoting of Rule 1003 is not necessary.</p>	<p>Remove the rule quotes and replace with site specific plans/practices/BMPs.</p>			EMW	<p>GCP has been updated - please refer to the revised plan.</p>		x	x
<p>The following list of figures/drawings/attachments are not needed in the IRP as they are already present as attachments within the OGDG application: Location Drawing, Location Photos, Reference Area Map, Reference Area Photos, NRCS Map and Descriptions, Construction Wellhead Location Layout Drawing and Cross Section, Prelim Drill Rig Layout Drawing, Prelim Flowback Equipment Layout Drawing, Prelim Well Completion and Stimulation Layout Drawing, and Facilities Layout Drawing</p>	<p>Remove the listed figures/drawings/attachments from each location's IRP.</p>			EMW	<p>Removed all attachments except seed mix.</p>	x	x	x
<p>There is a 5 year gap between drilling phases on the Janet location yet there is no discussion of whether interim reclamation will be performed after the first phase and then re-disturbed 5 years later. There is no mention of a variance from Rule 1003 to leave the disturbance without performing interim reclamation between the 2 drilling phases.</p>	<p>Address the 5 year gap between phases and explain what Fulcrum intends to do.</p>			EMW	<p>Please see revised operational timing. There is no longer a 5 year gas - Fulcrum plans to drill all 10 wells at the same time.</p>	x		

304.c.(17), Wildlife Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<b>COMPLETENESS REVIEW</b> Staff discussed area wide Wildlife Mitigation Plan with CPW on 5/24/2023. CPW will be reaching out to Fulcrum to discuss mitigation numbers and updates to plan.		304.c.(17)		EMW	Please see attached Onsite Consultation Notes for dates and attendees of previous onsites. The most recent onsite also includes a summary of discussion points and conclusions/concurrence.	x	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?	483211377	4.03E+08
Plans need to be separate and specific to each location. Each location specific plan needs to include the estimated volume of water that will be used in that location's drilling and completion operations. The plans submitted for each location are identical.	Separate the Janet and Ray Ranch locations and attach each location's plan separately to its respective 2A. The plan should accurately depict the volumes of water anticipated to be used on each location.			EMW	They are separate plans with different volumes of water.	x		x
The Ray Ranch plan map shows the Janet location.	Separate the Janet and Ray Ranch locations and attach each location's plan separately to its respective 2A.			EMW	They are separate plans with different volumes of water. That water line for both comes from the same source, so yes, the water source map is the same for both.			x
Why is the water take out spot on Grizzly Creek so far from the location(s)? What is the total amount of lay flat line that will be in place? What are the BMPs for the lay flat line?	Address these questions in the revised plan.			EMW	Revised plans to add water extraction details.	x		x
Plan states "Prior to drilling Fulcrum will obtain an allocation of Consumptive Water Depletion from Jackson County Water Conservancy District for the estimated amount of water to be used in Fulcrum's operations (~795 acre-feet)." Will water be purchased from the district? How are the water rights being obtained?				EMW	Revised plans to add water acquisition details.			

304.c.(19). Cumulative Impacts Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional) 304.c.(19)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<b>COMPLETENESS REVIEW</b>								
CI Plan for the Janet states that there may be pump jacks located at the Location; however, the Form 2A does not list treaters in the equipment list.	Verify the equipment.			MMH	Equipment revised.		x	
CI Plan for the Ray Ranch states that there may be VRTs and VRUs located at the Location; however, the Form 2A does not list treaters in the equipment list.	Verify the equipment.			MMH	Equipment revised.			x
Air Resources - • Measures taken to mitigate or offset cumulative adverse impacts:								
As stated in the submitted Form 2B and per CDPHE Regulation 7, Part D, Fulcrum will perform a baseline air quality monitoring survey prior to the commencement of drilling operations and the site will have continuous air monitoring during the drilling, completion, and production operations.	This is not a mitigation method. This should be included under "Additional Information" as it is good information.			MMH	Moved to additional information.		x	x
Public Health - • Measures taken to mitigate or offset cumulative adverse impacts:								
The impacts to Public Health are mitigated by location selection that prioritized avoiding residential building units, ability to connect to existing infrastructure including shorter access roads and proximity to electrical tie-ins. BMP developed in coordination with CPW for the protection of wildlife will also protect public health.	"by location selection that prioritized avoiding residential building units" is an avoidance measure and should be included under the "Specific measures taken to avoid or minimize the extent to which cumulative adverse impacts are increased:" section.			MMH	moved to correct section.		x	x
Soil Resources - Topsoil stockpiles are reported to be located along the north side of the Oil and Gas Location. The topsoil protection plans report the topsoil stockpiles located along the east side of the Janet Location and the south side of the Ray Ranch Location.	Verify the location of the topsoil stockpiles for each Location.			MMH	revised location of stockpiles to match Topsoil Plans.		x	x
Page 5 of the plan states that "Fulcrum will have electrical power at this proposed site that will provide power to some portion of the production facility." The Gas Capture Plan states that gas will be used on site to generate electricity.	Explain this contradiction.			EMW	Revised - Ray Ranch will have power, Janet will not.		x	x
Page 6 of the plan states "Mapped freshwater emergent wetland visible on COGCC GIS does not show up on National Wetland Inventory and is not present in field."	The wetlands shown in the east boundary of the proposed location and directly to the east of the proposed location is mapped on both the COGCC GIS and the National Wetland Inventory as a Riverine R4SBCx. Include field verification documents to support statement that the mapped wetland isn't present in the field.			EMW	Revised to: <i>Mapped freshwater emergent wetland visible on ECMC GIS does not show up on National Wetland Inventory and is not present in field. Fulcrum has hired a third party to conduct a wetland delineation of the area surrounding the Ray Ranch North 0880 S32 CTB. This wetland delineation report will be submitted via Form 4 (or whatever method is preferable to ECMC) as soon as it is received if not completed prior to the completeness response period.</i>			x
Page 9 states that Fulcrum will be employing crypto mining on location but the Gas Capture Plan states that excess gas will be piped to the Gregory location's crypto units.	Ensure consistency and revise the appropriate plan.			EMW	Gas will be used on site at the Janet 0780 S5 Pad for any gas fired equipment, and excess gas will be transported to the Ray Ranch CTB via pipeline where there will be third party data processing/cloud computing units installed to utilize the gas. If all of the produced gas cannot be utilized with these methods, Fulcrum would like to keep the option open to put gas into existing pipelines and send it to the Gregory 0780 S9 Pad. The Gregory 0780 S9 Pad has existing data processing units onsite, and Fulcrum is exploring the option of a gas processing plant as well. The ultimate goal is to be able to produce oil with the associated gas and not have routine flaring, therefore, optionality is		x	x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		304.c.(20)		EMW			x	x

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		304.c.(21)		EMW			x	x

**ACCESS ROAD MAP**

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).F	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
The Access Road Map for the Janet doesn't show the spur road shown on the layout drawings.		Add the additional spur road into the access road drawings or remove it from the layout drawings.		EMW	corrected	x		
The Acces Road Map shows Planned OGDG Pipelines in the legend but there do not appear to be any on the map.		Either remove from the legend or add to the map.		EMW	corrected	x		
The Access Road Map for the Ray Ranch meets the requirements of Rule 304.b.(7).F		No corrections requested.		EMW	acknowledged		x	

ALA DATASHEET

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(2)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
The bearings for the nearest above ground utility and childcare center for the proposed location does not match the bearing listed in the Cultural and Safety Setbacks tab of the Form 2A.	Ensure consistency and correct either the datasheet to match the 2A or the 2A to match the datasheet.			EMW	Complete: Updated ALA DataTemplate to match revised cultural features map and Form 2A.	x		

**ALA NARRATIVE SUMMARY**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional) 304.b.(2)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
CPW waived ALA requirement for Janet location, yet the Janet is included both in the introductory section of the ALA and is then stated as not triggering ALA criteria. <i>CPW waived ALA requirement for Ray Ranch location. ALA still required due to proximity to wetland.</i>	Remove references to Janet location in Ray Ranch ALA Narrative. Edit sentence that states "location does not trigger any ALA criteria" to state that it does trigger vii but that CPW waived the requirement for an ALA.			EMW	Revised Janet statement. Janet is only mentioned here and within Location Information section.	x		
ALA tab of Form 2A states that a federal consult was conducted on 10/20/2022. The final "bullet" point on page 4 of the narrative states that there are existing pipeline risers on the location, while elsewhere in the application it states that the location was permitted but never built. The previously approved 2A expired in 2017.	Include a copy of that consultation/conclusions of the consultation as an attachment to the 2A.			EMW	Noted. Consultation Summary attached to Form 2A.		x	
Was a field verification wetland delineation study performed to justify the use of "ostensibly" in the Note on page 4?	Clarify how the risers came to exist on a not built location by providing install timing information. Include wetland delineation study if one was performed.			EMW	Clarified.		x	
Since the Ray Ranch will be 1 SIWD well plus the production equipment for the Janet, and since the Janet is planned to pipe fluids off location, why wasn't one of Fulcrum's existing locations such as the Grizzly or Oxbow considered as an Alternate Location during the ALA analysis? Similarly, since gas from the Janet is planned to be piped to equipment on the Gregory location, why weren't the Gregory, Mutual, or Bighorn locations considered as an alternate?	Explain why "ostensible" features were not field verified as part of the ALA/prior to submitting application.  Address why no existing locations were considered as alternates.			EMW	TBD; wetland delineation is in process  Added consideration of existing locations to ALA Narrative.	x		x

**CONSULTATION SUMMARY**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
Not submitted, not required.				EMW	Consultation Summary was attached to resolve CPW Consultation Completeness Review Comment.	x	x	x

CPW CONSULTATION

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<p><b>COMPLETENESS REVIEW</b>                      Operator has a field wide Wildlife Mitigation Plan with CPW but did not consult with CPW prior to submitting this application. Staff contacted CPW who expressed surprise at the lack of consultation. CPW will reach out to Fulcrum to discuss possible revisions to field wide mitigation plan.</p>	<p>Work with CPW to ensure wildlife mitigation measures are current and appropriate for the proposed locations.</p>			EMW	<p>Fulcrum is continuing to work with CPW to ensure wildlife mitigation measures are current and appropriate for the proposed locations.</p>	x	x	

**CULTURAL FEATURES MAP**

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(3)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
No Cultural Features Table included with the Cultural Features attachment for the Janet location.	Include Cultural Features Table with Janet Cultural Features attachment			EMW	Table included as page 2 on revised drawing.	x		
Cultural Features Table lists nearest building as 5424' SW while the Form 2A lists it as 5280 SW.	Ensure consistency by either	correcting the Table or the 2A.		EMW	Changed table to 4974; SW		x	
Cultural Features Table lists nearest Child Care Center as 5280' W while the 2A shows it at 5280' NE.	Ensure consistency by either	correcting the Table or the 2A.		EMW	Changed table to >5280' NE		x	

**DIRECTIONAL WELL PLAT**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<b>COMPLETENESS REVIEW</b> Not required for Ray Ranch location. Plat submitted for Janet location meets requirements of Rule 304.b.(7).H		304.b.(7).H		EMW				x
				EMW		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?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		304.b.(7).J		EMW			x	x

**GEOLOGIC HAZARD MAP**

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).l	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
The attachment should be specific to each location. The Janet location rectangle appears to be oriented portrait instead of landscape on the soil survey aerial imagery on page 2 of the attachment.	Separate the Janet and Ray Ranch locations and attach each location separately to its respective 2A.			EMW	Both locations have their own Geologic Hazard Map	x	x	
The Janet location rectangle appears to be oriented portrait instead of landscape on the soil survey aerial imagery on page 2 of the attachment.	Correctly orient the location.			EMW	Had surveyor complete map with appropriate shapefiles	x		
It is unclear why the maps on pages 11 and 12 are included in this attachment, the red arrows are not included in the legend.	Add description as to why map is being included with the attachment. Unless necessary to show geologic hazards more than one map is not necessary.			EMW	removed supplement pages	x	x	

GIS data

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?	403211377	403211514
Location and WPS GIS received. No access road GIS.		304.b.(8)		EMW	Complete; revised GIS Data	x	x	

Access road is not required by Rule but is requested as it aids in review of the application.

**HYDROLOGY MAP**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional) 304.b.(7).E	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
Map is missing arrows for flow direction.	Include flow direction arrows and resubmit.			EMW	flow direction arrows added	x	x	

**INFORMED CONSENT LETTER**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		604.b.(1)		EMW			x	x

**LAYOUT DRAWING**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional) 304.b.(7).B	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
There is no completions/flowback drawing for the the Ray Ranch.	Include completions and flowback drawings or explain why they were not included/aren't needed.			EMW	No flowback operations are planned for the Ray Ranch location.		x	
The Layout drawings for the Janet show the access road coming in on the northwest quadrant of the pad but also has a "18" wide temporary pad access" road coming in on the west side of the northwest corner. The west entrance road is not included in the Access Road Map Attachment.	Discuss this spur road and adjust plans/attachments as necessary to accurately describe why it is there and when/why it goes away. Include the cuttings management area(s) in the Rig	Layout Drawing for both locations.		EMW	Spur road is shown as present from construction through completions and removed at facility production operations.	x		
Cuttings storage/management area not shown on either location Rig Layout Drawing.	Ensure consistency. Either adjust the 2A or the drawing.			EMW	Cuttings Storage Management Area added to both rig layouts	x	x	
The Janet Facility Layout Drawing shows 5 compressors while the 2A lists 6.	Show how produced water will be handled on the Facility Layout Drawing.			EMW	confirmed 5 compressors on Form 2A	x		
There are no tanks shown on the Janet Facility Layout Drawing but the only pipeline takeaway is labeled as oil. How will produced water be handled?	Either show facilities on drawing or explain when/why/how they are removed during interim reclamation.			EMW	Water pipelines are labeled on Janet Facility Layout Drawing.	x		
Why are the production facilities not shown on the Interim Reclamation Layout Drawing?				EMW	All production will be shifted to the Ray Ranch location at Janet's interim reclamation.	x		

**LESSER IMPACT AREA EXEMPTION  
REQUEST**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional) 304.d	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
Not submitted, not required.				EMW			x	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?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		303.a.(6).B		EMW			x	x

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?	403211377	403211514
<p><b>COMPLETENESS REVIEW</b>                      Lists Janet 0780 S5 and Ray Ranch 0880 CTB as nearest existing facility but the Janet location was never built and the original location was AL in 2019. The nearest existing facility should be one that has been constructed and is active.</p>	<p>Update the distance to the nearest existing facility to be from each location to the nearest active facility, probably the Grizzly 3-32H Location ID 436007.</p>	<p>304.b.(7).A.vii and 304.b.(7).A.ix.</p>		<p>EMW</p>	<p>Active facility refers to the Grizzly 3-32H for both locations. This isn't a requirement of this drawing since the distance is beyond the buffer, so it is just supplemental information.</p>		<p>x</p>	<p>x</p>

LOCATION PICTURES

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(4)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
No field of view on a current aerial image included with photos.	Include field of view on ariel as required by Rule 304.b.(4).			EMW	Rec'd field of view page for both locations.	x	x	x

**NRCS MAP UNIT DESC**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Attachment meets requirements of Rule 304.b.(10)		304.b.(10)		EMW			x	x



**PRELIMINARY PROCESS FLOW  
DIAGRAMS**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<b>COMPLETENESS REVIEW</b>		304.b.(7).D						
On the Janet diagrams page 1 and 2 are inaccurately identified as flowback diagrams. They show the same production flow process as pages 3 and 4.	Provide a flowback diagram that illustrates the flow of fluids during flowback. This should be consistent with the equipment and process depicted in the Flowback Layout Drawing.			EMW	Diagram shows both locations and has 2 pages each for flowback and production.	x		
On the Ray Ranch diagrams page 1 and 2 are inaccurately identified as flowback diagrams. They show the same production flow process as pages 3 and 4.	Either provide a flowback diagram OR remove pages 1 and 2 from the attachment.			EMW	Diagram shows both locations and has 2 pages each for flowback and production.	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?	403211377	403211514
<b>COMPLETENESS REVIEW</b>	Remove the Reference Area Map from the attachments	304.b.(9).B.i						
A Reference Area Map is included with the Ray Ranch CTB but is not needed as the location's final use is non-irrigated crop land.				EMW	Remove map; no map needed		x	
No Reference Area Map included with Janet.	No correction needed, this is correct.			EMW	no map needed		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?	403211377	403211514
<b>COMPLETENESS REVIEW</b>	Remove the Reference Area Pictures from the attachments	304.b.(9).B.ii						
Reference Area Pictures are included with the Ray Ranch CTB but are not needed as the location's final use is non-irrigated crop land.	on the Ray Ranch CTB 2A.			EMW	No pictures needed		x	
No Reference Area Pictures included with Janet.	No correction needed, this is correct.			EMW	No pictures needed		x	

**RELATED LOCATION AND FLOWLINE MAP**

Issue identified by staff: <b>COMPLETENESS REVIEW</b>	Suggested correction:	Specific Rule (optional) 304.b.(7).G	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
What is the unlabeled Non-OGDP WPS in the NENE of section 9? PA locations do not need to be shown on the map.	Identify location on the map like the other non-OGDP WPS or remove from map. Remove the 2 DA wells from the map.		<a href="#">Yes</a>	EMW EMW	Removed Removed	x x	x x	x x

**SURFACE AGRMT/SURETY**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW SUA provided meets requirements of Rule 304.b.(12).B		304.b.(12).B		EMW			x	x

**WAIVERS**

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
COMPLETENESS REVIEW Not submitted, not required.		604.a.(4)		EMW			x	x

WILDLIFE HABITAT DRAWING

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
<b>COMPLETENESS REVIEW</b> Wildlife drawings meet requirements of Rule 304.b.(7).C.	No correction requested.	304.b.(7).C		EMW		x	x	

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

Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403211377	403211514
No statement included with application to show that Fulcrum is the operator of assets formerly belong to Gondola and D90.	Include certifying statement on the submit tab detailing when Fulcrum took over the assets, include the Form 9 document number and date.		Added statement to submit tab: Fulcrum is the operator of assets formerly belonging to D90 via approved Form 9 Doc #403192640 approved 5/10/2023. Equipment counts have been updated.	x	x	
The equipment types and quantities listed on the Equipment & Flowlines Tab does not match equipment lists provided in plans and attachments included with this application.	Ensure consistency throughout the application by correcting either the Form 2A or the appropriate plans so they are consistent with each other.	EMW		x	x	
On the Wildlife Resources Tab BMP list, BMP 7 states D90 is the operator.	Update the BMP to state Fulcrum is the operator.	EMW	Changed from D90 to Fulcrum	x	x	
Cultural Features Table listes nearest building as 5424' SW while the Form 2A lists it as 5280 SW.	Ensure consistency by either correcting the Table or the 2A.	EMW	Cultural distances have been revised.			x
Cultural Features Table lists nearest Child Care Center as 5280' W while the 2A shows it at 5280' NE.	Ensure consistency by either correcting the Table or the 2A.	EMW	Cultural distances have been revised.			x
No Form 31 or Form 33 included with the Ray Ranch application.	The Form 31 and Form 33 document numbers should be included on the Ray Ranch Form 2A.	EMW	Added Lupine 0880 1-32D SWD Doc #: Form 2 Doc #403290360 Form 31-I Doc #403290461 Form 33-I Doc #403290471			x

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

		<b>SME reviewer</b>	<b>Applicant Response:</b>	<b>Staff second review: Was the issue addressed?</b>	403211377 403211514
<b>Issue identified by staff:</b>	<b>Suggested correction:</b>				
The Form 2B states that the location will be electrified but the Gas Capture Plan states that electricity will be provided by gas powered generators.	Explain this contradiction. Revise the plan(s) or the 2B to be consistent.	EMW	Revised.	x	x
The surface water usage volume of 1667 doesn't match the water plan for the Ray Ranch.	Ensure consistency in the application. Either revise the Water Plan or the 2B.	EMW	Revised Form 2B to 615500 bbl		x
The 2B states that the Status of the Ray Ranch location is "active, built" when it is described throughout the location as previously permitted but never built.	Change status to "proposed"	EMW	Done. Changed to proposed.		x

Form 2C

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

		<b>SME reviewer</b>	<b>Applicant Response:</b>	<b>Staff second review: Was the issue addressed?</b>	403211377	403211514
<b>Issue identified by staff:</b> No issues identified.	<b>Suggested correction:</b> No corrections requested.	EMW		x	x	

Hearing Application

COMPLETENESS REVIEW		Docket# 221200353	
<b>Attorney Name: JILLIAN FULCHER; RYAN MCKEE</b>	<b>Attorney Email Address: JFULCHER@BWENERGYLAW.COM; RMCKEE@BWENERGYLAW.COM</b>		
<b>Permitter Name: Fenton Buchanan</b>	<b>Permitter Email: fenton.buchanan@state.co.us</b>		
<b>Engineer Name: Diana Burn</b>	<b>Engineer Email: Diana.Burn@state.co.us</b>		
<b>Hearing Officer Name: Matthew Berman</b>	<b>Hearing Officer Email: matthew.berman@state.co.us</b>		
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>OGLA Review Notes</u>			
Application does not speak to the disposition of the wells (and associated location) that are currently producing the same Spacing Unit (Order 531-52) that the application seeks to use.	An additional paragraph (possibly after paragraph 5) should be added stating the following wells on the Gregory 0780/S9 Pad (Loc ID# 439603) are currently producing from the unit created by Order 531-52, and that the wells and location are excluded from this OGDG: Janet 0780 #1-16H21 (API# 05-057-06603) Janet 0780 #2-16H21 (API# 05-057-06604) Janet 0780 #4-16H21 (API# 05-057-06605) Janet 0780 #3-16H21 (API# 05-057-06606)	At a minimum, when Spacing is not being sought in an OGDG, the existing wells and locations producing the Spacing Unit to be used should be identified and excluded in the OGDG Application.	
The Form 2, 31, and 33 identified in paragraph 7 have not yet been submitted.	The identified forms should be submitted via the webforms system.	Rule 803.b.1 requires that a Form 2, 31 and 33 be filed simultaneously with an OGDG if the OGDG includes a new injection well. For further questions, please contact UIC Lead John Morgan (john.morgan@state.co.us).	
<u>Permitting Review Notes</u>			
Concern: Rule 803.b.1 requires that a Form 2, 31 and 33 be filed simultaneously with an OGDG if the OGDG includes an injection well.		Topic: Pending Well Permits - Form 2s	
<u>Geologic Testimony</u>			
None.	None.	No further issues identified at this time.	
<u>Engineering Testimony</u>			
Concern: unable to fully complete the Engineering Review without the Form 2, Form 31, and Form 33 IN PROCESS for the associated UIC well.		CLARIFICATIONS OR ADDITIONAL INFORMATION REQUESTED	Engineering