

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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(1)		KF			X	X

304.c.(2). Noise 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?	403196730	403198831
COMPLETENESS REVIEW LIA Exemption request was approved. Attachment not required.		304.c.(2)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW LIA Exemption request was approved. Attachment not required.		304.c.(3)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(4)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(5)		KF			X	X

304.c.(6). Transportation Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(6)		KF			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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(7)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW								
Plans do not include a detailed layout of each Oil and Gas Location	Update to include Layout Figures	304.c.(8)	Yes, Plan Elements, Section 10	KF	Layout drawings have been added.	Yes	X	X
Plans do not include a detailed description of the equipment, typical quantities of hydrocarbon liquids and other hazardous, reactive and flammable materials stored	Include a detailed description of the equipment, typical quantities of hydrocarbon liquids and other hazardous, reactive and flammable materials stored		Yes, Plan Elements, Section 11	KF	Equipment has been revised.	Yes	X	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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(9)		KF			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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(10)		KF			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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(11)		KF			X	X

304.c.(12). Gas Capture 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?	403196730	403198831
COMPLETENESS REVIEW								
GCP mentions that any gas found will be used to power equipment on location. What equipment will be powered? If gas is not found how will equipment be powered?	Include within the GCP a discussion of how equipment on location will be powered.	304.c.(12)		KF	GCP has been revised to describe production equipment usage at the Marquis #1; the Marquis #2-23 will not have any production equipment on location.	Yes	X	X
This site does not meet any of the conditions of Rule 903.d. to allow for flaring of natural gas during production. You have stated that no natural gas production is expected, however there is no description of what will be done if natural gas is encountered other than flaring.	Update Gas Capture Plan to describe how you would handle unforeseen natural gas if it is encountered during production activities. Flaring is not allowed outside of the conditions described in Rule 903.d. or by approved variance request.	903.d.		KF	Statement has been removed and a BMP added to clarify that if gas is encountered beyond what is can be utilized onsite to power equipment, a revised GCP will be submitted via Form 4.	Yes	X	X
The Gas Capture Plan mentions "Regardless, a combustor is proposed for this location...", however no combustor is listed under the equipment list on the Form 2A.	Update the Form 2A to include the combustor or update this plan to remove the use of a combustor.			KF	Plan has been revised to reflect accurate equipment as listed on Form 2A.	Yes	X	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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(13)		KF			X	X

304.c.(14). Topsoil Protection Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW								
The "Topsoil Salvage" section states that 6 inches of topsoil will be stockpiled for use during reclamation, however the volumes listed in the "Soil Types and Cubic Yardage" section does not have a large enough volume of soil listed to allow for 6 inches of topsoil to cover the described area of the oil and gas location during reclamation.	Update the proposed cubic yardage of topsoil that will be stored for the oil and gas location in order to allow for at least 6 inches of topsoil to be available for use in site reclamation.	304.c.(14)	Yes	KF	Topsoil quantity has been revised	Yes	X	X

304.c.(15). Stormwater Management Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW								
Section 3: Stormwater Management Control Measures should include a description of all potential pollution sources as listed in Rule 1002.f.(3).A.	Update to include all pollution sources including "Transportation of chemicals and materials, including loading and unloading operations", "Waste disposal practices", and "Leaks and spills".	304.c.(15) 1002.f.(3).A.		KF	Plan has been updated to include all potential pollution sources	Yes	X	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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(16)		KF			X	X

304.c.(17). Wildlife Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(17)		KF			X	X

304.c.(18). Water 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?	403196730	403198831
COMPLETENESS REVIEW								
Rule states "If fresh water is anticipated to be used, a description of why the Operator does not intend to use recycled or reused water.". No description of why the Operator does not intend to use recycled or reused water is included in this plan.	Add a description of why the Operator does not intend to use recycled or reused water is included in this plan.	304.c.(18)D.		KF	Explanation has been added to plan regarding availability of recycled water.	Yes	X	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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.c.(19)		KF			X	X

304.c.(20). Community Outreach Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(20)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.c.(21)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.b.(7).F		KF			X	X

ALA DATASHEET

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(2)		KF			X	X

ALA NARRATIVE SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(2)		KF			X	X

CONSULTATION SUMMARY

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.				KF			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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.				KF			X	X

CULTURAL FEATURES MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.b.(3)		KF			X	X

DIRECTIONAL WELL PLAT

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(7).H		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(7).J		KF			X	X

GEOLOGIC HAZARD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
<p>COMPLETENESS REVIEW</p> <p>This Geologist Hazard Map does not include a certification from a Professional Geologist as described in the referenced guidance.</p>	<p>Add the certification from a Professional Geologist as described in the referenced guidance document.</p>	<p>304.b.(7).I Yes, see "Geologic Hazard Map" section under "Requirements", section 5, on Page 3.</p>	<p>KF</p>		<p>Geologist Certification has been included.</p>	<p>Yes</p>	<p>X</p>	<p>X</p>

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		304.b.(8)						
No GIS file is attached for Form 2A Doc # 403196730.	Attach GIS file for Form 2A Doc # 403196730.			KF	The GIS file has been attached.	Yes	X	

HYDROLOGY MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW								
Downgradient arrow points to the southwest, however based on the USGS topographic map at this location the downgradient direction is to the east/southeast.	Update arrow to accurately represent the downgradient direction.	304.b.(7).E		KF	Downgradient arrow has been corrected.	Yes	X	
Downgradient arrow points to the northeast, however based on the USGS topographic map at this location the downgradient direction is to the north/northeast.	Update arrow to accurately represent the downgradient direction.			KF	Downgradient arrow has been corrected.	Yes		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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		604.b.(1)		KF			X	X

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?	403196730	403198831
COMPLETENESS REVIEW								
No Layout Drawings were attached to Form 2A Doc # 403198831	Attach Layout Drawings.	304.b.(7).B	KF		Facility Layout Drawings have been attached.	Yes		X
The total disturbance acreage for the entire Oil and Gas Location is not included on the Construction Layout Drawings.	Update the Construction Layout Drawings to include the total disturbance acreage.	Yes. Page 3, Section 6.	KF		Total Disturbance Acreage has been revised.	Yes	X	
"Temporary Freshwater Tanks" is listed on the Form 2A under "Other Temporary Equipment". Only one "Tank" is listed on the "Preliminary Rig Layout Drawing".	Tanks used as part of drilling operations do not need to be included on the Form 2A under "Other Temporary Equipment", if these are the tanks being referred to remove this from the Form 2A. If multiple tanks will be used update to include the location in the "Preliminary Rig Layout Drawings".		KF		Temporary freshwater tank has been removed from Form 2A as Temporary Equipment	Yes	X	
"Tank" is shown on the "Preliminary Rig Layout Drawings" but does not describe what will be stored in it.	Update "Tank" to include the type of fluid that will be stored in the tank e.g. "Freshwater Tank".		KF		Tank label has been revised to Freshwater Tank	Yes	X	

LESSER IMPACT AREA EXEMPTION REQUEST

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW								
Operator requested a Rule 304.d Lesser Impact Area exemption from Rule 304.c.(2) Noise Mitigation Plan. The request is based on the potentially impacted resource not present or impacts will be so minimal as to cause no concern. The proposed location is over 2,000 feet from an RBU and there are no mapped HPHs within 2,000 feet.	staff recommends approval of the request	304.d		JN		X	X	
Operator requested a Rule 304.d Lesser Impact Area exemption from Rule 304.c.(3) Light Mitigation Plan. The request is based on the potentially impacted resource not present or impacts will be so minimal as to cause no concern. The proposed location is over 2,000 feet from an RBU and there are no mapped HPHs within 2,000 feet.	staff recommends approval of the request	304.d		JN		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?	403196730	403198831
<p>COMPLETENESS REVIEW</p> <p>The Form 2A states that a permit from the Relevant Location Government (Lincoln County) was approved, however no permit was attached.</p>	<p>Attach approved Lincoln County Permit.</p>	<p>303.a.(6).B</p>		<p>KF</p>	<p>Lincoln County permits are attached.</p>	<p>Yes</p>	<p>X</p>	<p>X</p>

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?		
COMPLETENESS REVIEW No issues identified.		304.b.(7).A		KF			403196730 X	403198831 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?		
COMPLETENESS REVIEW No issues identified.		304.b.(4)		KF			403196730 X	403198831 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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.b.(10)		KF			X	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?	403196730	403198831
COMPLETENESS REVIEW				KF			X	X
Attachment not required.								

**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?	403196730	403198831
<p>COMPLETENESS REVIEW</p> <p>ECD is listed on the diagram however the Gas Caputure Plans mention a combustor and the Form 2A does not list an ECD or Combustor as part of the "Site Equipment List".</p>	<p>Update to accurately represent the equipment that will be present on site.</p>	<p>304.b.(7).D</p>		<p>KF</p>	<p>2A and Gas Capture Plan have been revised to be consistent.</p>	<p>Yes</p>	<p>X</p>	

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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(9).B.i		KF			X	X

REFERENCE AREA PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(9).B.ii		KF			X	X

RELATED LOCATION AND FLOWLINE MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response	Staff second review: Was the issue addressed?	403196730	403198831
COMPLETENESS REVIEW			304.b.(7).G					
Application Lands Inconsistency: the Hearing Application (OGDP and Spacing) indicates that the application lands will be "160 acres, NW/4 Sec 23 7S52W", but the Form 2C OGDP Map and one of the Related Location Flowline Maps (403196730: Marquis 1) indicate that the application lands are instead "320 acres, N/2 Sec 23 7S52W". Which is correct?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct application lands for this OGDP.			SS	The exhibits have been revised to accurately reflect the 160 acre spacing.	Yes - SS 2/20		
Two different figures have been attached, one to each Form 2A. The Related Location and Flowline Map should be representative of the OGDP as a whole and therefore the map should be the same between both Form 2A submissions. The two attachments are not consistent with one another.	Attach a single "Related Location and Flowline Map" to both Form 2A's that is representative of the entire OGDP to ensure consistency. Refer to the referenced guidance to ensure all requirements are met.		Yes	KF	Exhibits have been modified to be consistent.	Yes	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?	403196730	403198831
COMPLETENESS REVIEW Attachment not required.		304.b.(12).B		KF			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?		
COMPLETENESS REVIEW Attachment not required.		604.a.(4)		KF			403196730 X	403198831 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?	403196730	403198831
COMPLETENESS REVIEW No issues identified.		304.b.(7).C		KF			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?	403196730	403198831	
OGDP Application: paragraph 5 conflicts with the Form 2C and Form 2A materials which state both locations are new. Is the Marquis-67S52W23SWNW Oil and Gas Location, (Location ID: 311736) being amended or not?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct status of the location(s) being sought.	SS	The Form 2A has been revised to be Amended to align with the Hearing Application.	Yes - SS 2/20	X		
The "Surface Water and Wetlands" sections lists the distance and direction to the nearest downgradient wetland as 3854 ft to the southwest. This does not match with USGS data review or with what is shown in the attached Hydrology Map.	Update to accurately reflect the nearest downgradient wetland.	KF	Wetland distance has been updated.	Yes		X	
"Temporary Freshwater Tanks" and "Water Tank" are listed under temporary equipment. Only one "Tank" is shown in the Layout Drawings and it is only present in the "Preliminary Rig Layout Drawing". If the listed "Temporary Freshwater Tanks" and "Water Tank" will only be used during drilling activities it should not be included under "Temporary Equipment". The "Other Temporary Equipment" section is for equipment that will be used during production but will not remain to the entirety of this locations production.	If these tanks will only be used during drilling then remove them from the 2A. If Freshwater tanks will be used during production update the Layout Drawings to accurately reflect the prescence and planned location of these tanks.	KF	Temporary equipment has been revised.	Yes		X	X
The Gas Capture Plan states "Regardless, a combustor is proposed for this location...", however no combustor is listed under the equipment list on the Form 2A.	Update the Form 2A to include the combustor or update the Gas Capute Plan to remove the use of a combustor.	KF	Gas Capture Plan and Form 2As have been revised to accurately reflect location of ECD	Yes		X	X
On the "Consultation and Contact Info" tab the email is not correct for Robert Herritt.	Update email to be correct.	KF	Email has been corrected.	Yes			X
Location is in the Northern High Plains Designated Groundwater Basin but "Sensitive Area for Water Resources" is indicated to be NO	All Designated Groundwater Basins are considered a Sensitive Area for Water resources by ECMC Rule. This data field should be marked as YES	DA	Sensitive Water Area has been revised.	Yes		X	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 issues identified.		KF		X	403196730	403198831

COMPLETENESS REVIEW (Form 2C topic) (topic/subtopic)						
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403196730	403198831
Application Lands Inconsistency: the Hearing Application (OGDP and Spacing) indicates that the application lands will be "160 acres, NW/4 Sec 23 7S52W", but the Form 2C OGDP Map and one of the Related Location Flowline Maps (403196730: Marquis 1) indicate that the application lands are instead "320 acres, N/2 Sec 23 7S52W". Which is correct?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct application lands for this OGDP.	SS	The map has been revised to align with the Hearing Application.	Yes - SS 2/20		
OGDP Application: paragraph 5 conflicts with the Form 2C and Form 2A materials which state both locations are new. Is the Marquis-67S52W23SWNW Oil and Gas Location, (Location ID: 311736) being amended or not?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct status of the location(s) being sought.	SS	The existing, closed location is being amended. The 2A has been revised to align with the Hearing Application.	Yes - SS 2/20		
OGDP Application - paragraphs 2, 9, 11, and relief paragraph C refer to the OGDP as "Marquis OGDP", but the Form 2C calls it the "Great Plains Extension". Which name is correct?	Either the webforms or the Hearing Application materials need to be revised to the correct OGDP Name.	SS	The map has been revised to align with the Hearing Application.	Yes - SS 2/20		

COMPLETENESS REVIEW		Docket# 230600217
Attorney Name: CHRIS MCGOWNE	Attorney Email Address: CJMCOWNE@MCGOWNELAW.COM; CJMCOWNE@GMAIL.COM	
Permitter Name: Ginger Malasauskas	Permitter Email: ginger.malasauskas@state.co.us	
Engineer Name: Diana Burn	Engineer Email: Diana.Burn@state.co.us	
Hearing Officer Name: Jon Peskin	Hearing Officer Email: jon.peskin@state.co.us	

Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
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Applicant Response:

<u>OGLA Review Notes</u>			
Testimony page 3: Engineering Testimony summary paragraph 1 states the application is seeking "... to establish an 80-acre drilling and spacing unit...", but the Geologic and Land summaries state it will be a 160 acre DSU?	Revise acreages across testimonies so that are correct and congruent with each other.		
Exhibit A: OGDG application lands are not identified on the map.	Revise map to identify the OGDG application lands.		
OGDP Application: paragraph 2 does not list the application lands	Revise to include the application lands in QtrQtr designation (similarly to how the Surface locations have been identified and to how the lands were identified in Exhibit C Spacing Application).		
Application Lands Inconsistency: the Hearing Application (OGDP and Spacing) indicates that the application lands will be "160 acres, NW/4 Sec 23 7S52W", but the Form 2C OGDG Map and one of the Related Location Flowline Maps (403196730: Marquis 1) indicate that the application lands are instead "320 acres, N/2 Sec 23 7S52W". Which is correct?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct application lands for this OGDG.		
OGDP Application: paragraph 5 conflicts with the Form 2C and Form 2A materials which state both locations are new. Is the Marquis-67S52W23SWNW Oil and Gas Location, (Location ID: 311736) being amended or not?	Either the webforms or the Hearing Application materials need to be revised to indicate the correct status of the location(s) being sought.		
OGDP Application: paragraph 5 appears to have extra sentences inserted that makes it confusing to determine which location is new and which well is on what location. This should be rewritten for clarity.	Paragraph should be rewritten to clearly state which wells and locations are new versus existing. One suggestion would be to have separate paragraphs for each location.		
Spacing Application: the target re-entry well Marquis 1 (API: 05-073-06190) does not comply with the proposed unit boundary setback of "no closer than 600 feet from the unit boundary". Well is approximately 390' from the proposed unit boundary.	Application should either: 1) revise the proposed setbacks; 2) request that the existing well be exempt from the unit boundary setbacks; or 3) state that the Operator will seek a Rule 401.c Exception Location as part of their Form 2 submittal.		

corrected 2/20
corrected 2/20
corrected 4/11
corrected 2/20
corrected 2/20
corrected 2/20
revised 2/20

The typographical error has been amended to reflect 160

The application lands have been highlighted in blue on the amended Exhibit A

The QQ sections have been placed in the body of paragraph 2 after the applicable location.

The DSU will be the NW/4 Sec 23 7S52W, the webform application materials will be amended

It will be a re-entry of the Marquis-67S52W23SWNW

The paragraph has been rewritten for clarity

We have amended the DSU to allow for the wells to be located nearer to the lease line that provided for in the rule. This was done per instructions from staff.

<p>Spacing Application: the formations being sought are listed throughout as the "Dakota and Cheyenne formations", but relief paragraph D states "production of the J-Sandstone formation"?</p> <p>OGDP Application - paragraphs 2, 9, 11, and relief paragraph C refer to the OGDP as "Marquis OGDP", but the Form 2C calls it the "Great Plains Extension". Which name is correct?</p>	<p>Formations being sought for spacing must be consistent throughout the application and the formations requested in the Spacing Application must match the Formations listed in the OGDP Hearing Application.</p> <p>Either the webforms or the Hearing Application materials need to be revised to the correct OGDP Name.</p>	<p>corrected 2/20</p> <p>corrected 2/20</p>	<p>This has been corrected</p> <p>This has been revised throughout the packet</p>
<p><u>Permitting Review Notes</u></p> <p>Concern: Application does not include the field name required by Rule 503.c. Field name should be Wildcat.</p> <p>Concern: Map does not include the county and field name required by Rule 503.c.</p>	<p>Topic: Field</p> <p>Topic: Map</p>	<p>corrected 2/22</p> <p>corrected 2/22</p>	<p>Please see add in caption, Paragraph 2,</p> <p>Amended</p>
<p><u>Geologic Testimony</u></p> <p>Concern: Dakota and Cheyenne are not mentioned.</p> <p>Concern: A brief description of geologic age, depositional environment, and lithology should be part of this testimony for each of the formations included in this application.</p> <p>Concern: Dakota and Cheyenne are not mentioned.</p> <p>Concern: A brief description of thickness, lateral extent and depth for each formation to be spaced should be part of this testimony.</p> <p>Concern: There is no structure map for the Dakota or Muddy, which is spaced by the unit.</p> <p>Concern: There is no isopach map for the Dakota or Muddy, which is spaced by the unit.</p> <p>Concern: A cross-section of the formation(s) to be spaced by this application underlying the Application Lands is required as part of the geologic testimony.</p> <p>Concern: Type log should be labeled with the API number as well as name.</p> <p>Concern: All exhibits must contain a key or legend including an explanation of any color-coding used and a scale, as appropriate.</p>	<p>Topic: Geologic Summary of Formation(s) to be Spaced</p> <p>Topic: Location and Extent of Formation(s) to be Spaced</p> <p>Topic: Exhibit, Structure Map</p> <p>Topic: Exhibit, Isopach Map</p> <p>Topic: Exhibit, Cross-Section</p> <p>Topic: Exhibit, Type Log</p> <p>Topic: All Exhibits</p>	<p>corrected 2/22</p> <p>corrected 2/22</p> <p>5/28 corrected not corrected 2/22</p> <p>5/28 corrected not corrected 2/22</p> <p>5/28 corrected not corrected 2/22</p> <p>5/28 corrected not corrected 2/22</p> <p>5/28 corrected not corrected 2/22</p>	<p>The target formation is the Cherokee. All documents have been amended to make that clearer. The Dakota and Cheyenne are not target formations. The other information has been added</p> <p>The target formation is the Cherokee. All documents have been amended to make that clearer. The Dakotah and Cheyenne are not target formations. The other information has been added</p> <p>These are unable to be created due to the lack of well control in the area. Th Marquis one is the only well to have penetrated the target formation in the area</p> <p>These are unable to be created due to the lack of well control in the area. The Marquis one is the only well to have penetrated the target formation in the area</p> <p>The cross section is Pennsylvanian System, Des Moines Series</p> <p>We have added the location and API</p> <p>We have color coded the exhibits that color</p>

Engineering Testimony

Concern: The testimony provided (minimal details) would support statewide spacing with 600' setbacks to unit lines - previously drilled well MARQUIS #1 (073-06190) as a proposed re-entry does not have 600' setback. Provided anticipated decline curve analysis implies gas production is expected (105 MMcf EUR), gas infrastructure does not

CLARIFICATIONS OR
ADDITIONAL INFORMATION
REQUESTED

Engineering

satisfied 3/7

The leases are held to the west by the Operator. Further, we have amended the DSU to request lessor intervals.