

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?	403539157
COMPLETENESS REVIEW Plan not required		304.c.(1)		DT			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?	403539157
COMPLETENESS REVIEW No Noise Mitigation Plan submitted, requesting Lesser Impact Area Exemption - Approved by JN		304.c.(2)		DT		x	

304.c.(3). Light Mitigation Plan

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?	403539157
No identified issues				DT			x

304.c.(4), Odor Mitigation Plan

Issue identified by staff:
COMPLETENESS REVIEW
Plan not required

Suggested correction:

Specific Rule (optional)
304.c.(4)

Referenced
in guidance
document?

SME
reviewer

DT

Applicant Response:

Staff second review: Was
the issue addressed?

403539157

x

304.c.(5). Dust Mitigation Plan

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?	403539157
Soil type (and area of each type) provided for the location and part of access road, but not all of it.	Comparing the Access Road Map to the soil survey, the access road starts in soil type BvC. Add this information to the plan.			DT		Yes	x
One of the BMPs is armoring the working surfaces with road base.	Add detail listing what exactly will get road base and when.			DT		Yes	x
The access road maintenance isn't clear. The BMP regarding automation for wells and production does not explain how this will reduce dust.	Please describe how the access road will be maintained.			DT		Yes	x
	Add detail why this is reduce dust.			DT		Yes	

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?	
COMPLETENESS REVIEW No issues identified		304.c.(6)		DT			403539157 x

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(7)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
Plan says that MOC and PSSR documents are stored per Bison retention policies, but does not explain what those are.	Explain what the retention policies are so we know where the records are stored, how long the records are kept, and how soon they can be provided after an ECMC request.		Yes	DT		Yes	x
A checklist or checklists are not included in the PSSR to document how the pre-startup review is conducted.	Include the necessary checklists to the plan.		Yes	DT		Yes	x

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?	403539157
Emergency Response Plan does not show it was reviewed and approved by local emergency response agency.	Show that the plan was reviewed and approved by local emergency response agency by having them sign and date the plan or by attaching email confirmation that they have seen the plan and are in agreement with it.	602.j.(1)		DT	<p>The EAP was sent to the local fire district for review on 5/1/24. A Bison employee spoke with the Bennett-Watkins Fire District on 4/25/24 and they indicated they are willing to sign the EAP but it needs to be approved by the Arapahoe Office of Emergency Management. Bison held a pre-application meeting with the County but the County permit application (including the EAP) has not yet been submitted to the County. It is our experience that the EAP does not need to be signed, and the the RGL application does not need to be submitted/approved prior to ECMC Completeness. Please advise if this policy has changed.</p> <p>Bison added the following language to Section 9 of the EAP:</p> <p>Bison IV Operating, LLC personnel and contractors train to achieve an understanding of roles and response actions in various emergency response scenarios. When a site or facility is involved in an emergency event, Bison personnel are trained to take the appropriate action to safeguard human life, protect the public, protect the environment and surrounding property, comply with regulations, and maintain or restore operations, if possible. Personnel must immediately communicate information about emergency events to their supervisor. The supervisor will immediately initiate appropriate notification procedures. In the event a supervisor cannot be reached, Bison personnel will initiate the necessary notifications by contacting the EHS on-call emergency telephone number (refer to Section 3).</p>	Yes	x
Information regarding what the employees are supposed to do in an emergency is not included.	Please add this information to the plan.			DT		Yes	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?	403539157
COMPLETENESS REVIEW Plan not required		304.c.(9)		DT			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?	403539157
COMPLETENESS REVIEW Plan not required		304.c.(10)		DT		x	

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(11)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
The summary table on page 9 has a column "Lab Analysis Required for Physical or Chemical Hazards", but does not describe what physical or chemical hazards the waste may poze.	Add a column that describes what physical or chemical hazards there are for each type of waste stream.		Yes	DT		Yes	x
A description of the haul routes to the disposal facilities is not included	Describe the haul route or show the route clearly on the included map.		Yes	DT		Yes	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?	403539157
COMPLETENESS REVIEW Plan not required		304.c.(12)		DT			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?	403539157
Plan says Working Pad Surface will be 9.52 acres, but the Light Mitigation Plan, the Dust Mitigation Plan, the Transportation Plan, and the Operations Safety Management Plan say the Working Pad Surface is 11.8 acres.	Make sure description of disturbances, reclamation, and working pad surface sizes are consistent throughout all plans and attachments, and be specific about what is being referred to. Both Working Pad Surface and Production Pad areas are required.			DT		Yes	x
Proposed timeframes and duration of all oil and gas operations, as well as fee or federal surface not included.	Include timeframes and duration of all oil and gas operations are included in the site description, as well as fee or federal surface. Remove this			DT		Yes	x
The BMP: 'Flowline integrity testing per ECMC 1100 Series Rules', is from the rules.	BMP from the list.			DT		Yes	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?	403539157
On the last page both test pits are labeled as 'Test Pit #1'.	Make sure the second test pit is labeled as such.	Verify the number of soil probes and their locations and list all of		DT		Yes	x
The map on page 13 shows the location of 13 soil probes around the pad, but on the last page the report says there were 12 soil probes and only lists the details of 12 soil probes.	Make sure they are consistent.	the details.		DT		Yes	x

304.c.(15). Stormwater Management Plan

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?	403539157
Stormwater Plan has the WPS of 14.87 while other plans have 11.8 with interim reclamation of 9.52 acres.	Make sure this plan (and all other plans and attachments) are using WPS and interim reclamation terminology consistently.			DT		Yes	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?	403539157
COMPLETENESS REVIEW No identified issues		304.c.(16)		DT			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?	403539157
COMPLETENESS REVIEW No issues identified.		304.c.(17)		DT			x

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(18)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
The plan does not include the seller or address for the water suppliers.	Include the seller's name and address. If they do not want it published it doesn't need to be, but ECMC staff will need to review it.			DT		Yes	x

304.c.(19). Cumulative Impacts Plan

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(19)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
Table 2 lists the disturbances for the pad but refer to it as a 1 well pad instead of 16.	Change to reflect the 16 wells.			DT		Yes	x
Plan doesn't include timeline of when they expect to have pipelines in place.	Add timeline for the pipelines to the plan.			DT		Yes	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?	403539157
COMPLETENESS REVIEW Plan not required		304.c.(20)		DT			x

304.c.(21). Geologic Hazard Plan

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
COMPLETENESS REVIEW Attachment not required		304.c.(21)		DT			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?	403539157
COMPLETENESS REVIEW No identified issues		304.b.(7).F		DT			x

ALA DATASHEET

Issue identified by staff:
COMPLETENESS REVIEW
Attachment not required

Suggested correction:

Specific Rule
(optional)
304.b.(2)

Referenced in
guidance document?

SME
reviewer

DT

Applicant Response:

Staff second review: Was
the issue addressed?

403539157

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?	403539157
COMPLETENESS REVIEW Attachment not required		304.b.(2)		DT			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?	403539157
COMPLETENESS REVIEW Attachment not required				DT			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?	403539157
COMPLETENESS REVIEW Attachment not required				DT			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?	403539157
The nearest building on the Cultural Features Map is listed as 3268' SW of the Working Pad Surface. The 2A has the nearest building as 3637' NE of the Working Pad Surface.	Adjust so information on both Cultural Features Map and the 2A are accurate and consistent.			DT		Yes	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?	403539157
COMPLETENESS REVIEW No issues identified		304.b.(7).H		DT		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?	403539157
COMPLETENESS REVIEW Attachment not required		304.b.(7).J		DT			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?	403539157
COMPLETENESS REVIEW Attachment not required		604.b.(1)		DT			x

GEOLOGIC HAZARD MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
COMPLETENESS REVIEW No identified issues		304.b.(7).1		DT			x

GIS data

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(8)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
Data not loading.	Please submit			DT		Yes	x

HYDROLOGY MAP

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?	403539157
The map shows a NWI-mapped wetland inside the proposed pad area, but the CI Plan indicated a review determined there was no wetland there.	Remove the area marked as a wetland inside the pad location from the map.	304.b.(7).E		DT		Yes	x
The map doesn't include flow direction from the location.	Add arrows indicating the flow direction on the map.			DT		Yes	x

LAYOUT DRAWING

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?	403539157
<p>MLVT on 2A equipment list not found on facility layout drawings. The Facility Layout drawings should be a series of drawings with the construction drawing including two cross sections of the area, a rig layout drawing with all equipment required for drilling, a completions drawings showing all equipment necessary for completions and an additional drawing for flowback if necessary and a production drawing of all equipment to be on location during production operations.</p>	<p>Add MLVT to layout drawing,</p>	<p>304.b.(7).B</p>		<p>DT</p>		<p>Yes</p>	<p>x</p>
	<p>Provide all of the required drawings for this location.</p>		<p>Yes</p>	<p>DT</p>		<p>Yes</p>	<p>x</p>

**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?	403539157
COMPLETENESS REVIEW		304.d					
<p>Operator requested a Rule 304.d Lesser Impact Area exemption from the Rule 304.c Noise Mitigation Plan. The request is based on the distance to the nearest RBU and no mapped HPH within 2000 feet. Based on the potentially impacted resources not present in the area and potential impacts being so minimal, Staff supports the request.</p>				JN		x	

LOCAL/FED FINAL PERMIT DECISION

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 303.a.(6).B	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
The RLG application has not been submitted at the time of the OGDG being submitted. Follow up	Provide information on the local permit status.			DT	<p>Form 2A has been modified as follows:</p> <p>A pre-submittal meeting was held with Arapahoe County on 7-13-23. The County permit application has not yet been submitted. The pre-submittal meeting notes are attached to this 2A.</p>	Yes	x

LOCATION DRAWING

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?	403539157
There is no table showing the improvements, their distances, and directions from the WPS. Unclear what pink circle is SW on pad on the 2000' buffer.	Add a table that clarify what was marked on the drawings, what they are, how far they are from the WPS, and which direction. Explain what this is.	304.b.(7).A		DT DT		Yes Yes	x x

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?	403539157
The pictures don't match up to the inset map with the wells. The west field of view should be looking across the wells while the south field view should be looking down the rows of well stakes.	Figure out which direction corresponds to which picture and correct the labeling on the attachment.			DT		Yes	x

NRCS MAP UNIT DESC

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?	403539157
The NRCS map unit description only describes the disturbed pad location and not the full access road disturbance. BvC at the bottom of the access road area is missing.	Add the missing soil type component to the attachment.	304.b.(10)		DT		Yes	x

OTHER

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?	403539157
The final reclamation diagram is attached to the interim reclamation plan and isn't needed there.	Remove this OTHER-Final Reclamation diagram.			DT		Yes	x

PRELIMINARY PROCESS FLOW DIAGRAMS

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).D	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
A diagram for flowback operations was not included.	Include a diagram for flowback operations, and clearly distinguish the two diagrams from each other.			DT		Yes	x
The diagram makes it look like there are 2 O2 Destroyers and 2 Blowers, but the 2A shows 2 "Blower/O2 Destructor"	Make consistent.			DT		Yes	x
There are 4 gas compressors shown in the Preliminary Process Flow Diagram, but there are 3 gas compressors listed in the 2A equipment list.	Make consistent.			DT		Yes	x
The 2A Equipment list has 4 meter/sales buildings, but only two are shown on the Preliminary Process Flow Diagram (one sales meter and one buyback meter)	Make consistent.			DT		Yes	x

REFERENCE AREA MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
COMPLETENESS REVIEW Attachment not required		304.b.(9).B.i		DT			x

REFERENCE AREA PICTURES

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
COMPLETENESS REVIEW Attachment not required		304.b.(9).B.ii		DT			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?	403539157
COMPLETENESS REVIEW No identified issues.		304.b.(7).G		DT		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?	403539157
COMPLETENESS REVIEW No identified issues		304.b.(12).B		DT			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?	403539157
COMPLETENESS REVIEW Attachment not required		604.a.(4)		DT			x

WILDLIFE HABITAT DRAWING

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?	403539157
No issues identified.		304.b.(7).C		DT			x

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

		SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
Issue identified by staff:	Suggested correction:				
The nearest building on the Cultural Features Map is listed as 3268' SW of the Working Pad Surface. The 2A has the nearest building as 3637' NE of the Working Pad Surface.	Adjust so information on both Cultural Features Map and the 2A are accurate and consistent.	DT		Yes	x
The Preliminary Process Flow Diagram makes it look like there are 2 O2 Destructors and 2 Blowers, but the 2A shows 2 "Blower/O2 Destructor"	Make consistent.	DT		Yes	x
There are 4 gas compressors shown in the Preliminary Process Flow Diagram, but there are 3 gas compressors listed in the 2A equipment list.	Make consistent.	DT		Yes	x
The 2A Equipment list has 4 meter/sales buildings, but only two are shown on the Preliminary Process Flow Diagram (one sales meter and one buyback meter)	Make consistent.	DT		Yes	x
Cultural Features map indicates Adams County boundary is within 2000' of the WPS, but they are not listed as a Proximate Local Government.	Add Adams County to the Proximate Local Government information.	SS		Yes	x
There is no doc. number in the Financial Assurance section.	Add a document number for the Plugging, Abandonment, and Reclamation selection.	DT		Yes	x

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

Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
The total disturbance acreage in the 2B should include the access road.	Update to include the disturbance from the access road.	DT	Form 2B surface disturbance totals in the Oil & Gas Location tab have been revised to include the access road acreage. See image to the right.	Yes	x
There is only one soil type of disturbed soils, which is correct for the pad, but not the pad and access road.	Add the disturbed soil type found in the proposed access road area.	DT	Form 2B soil acreages in the Oil & Gas Location tab have been revised to include the access road acreages. See image to the right.	Yes	x

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

		SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403539157
Issue identified by staff: Cultural Features map indicates Adams County boundary is within 2000' of the WPS, but they are not listed as a Proximate Local Government.	Suggested correction: Add Adams County to the Proximate Local SS Government information.			Yes <input checked="" type="checkbox"/>	

COMPLETENESS REVIEW		Docket# 230900310	
Attorney Name: KELSEY WASYLENKY; JAMIE JOST Permitter Name: Eden Espino-Rodriguez Engineer Name: Diana Burn Hearing Officer Name: Matthew Berman		Attorney Email Address: KWASYLENKY@JOSTENERGYLAW.CO M; JJOST@JOSTENERGYLAW.COM Permitter Email: eden.espino-rodriquez@state.co.us Engineer Email: Diana.Burn@state.co.us Hearing Officer Email: matthew.berman@state.co.us	
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>OGLA Review Notes</u>			
None.	None.	There were no OGLA Review issues identified in the hearing application at this time.	
<u>Permitting Review Notes</u>			
Concern: The size of the OGDG should be 4447 acres because of the lots in the lands		Topic: Size of OGDG (acres)	corrected 3/11
Concern: The sizes of the DSUs are incorrect because of the lots in the lands. The Northern DSU is 1269 acres, the Middle DSU is 1913 acres and the Southern DSU is 1265 acres		Topic: Size of Unit(s) (acres)	corrected 3/11
<u>Geologic Testimony</u>			
None.	None.	There were no issues identified in the Geologic Testimony at this time.	
<u>Engineering Testimony</u>			
Concern: analogs chosen may not reflect current completion techniques for accurate determination of expected drainage - current proposed development would appear to not necessarily fully develop the proposed acreage - asking for 150' and 300' setbacks but well spacing much greater - center DSU 6 wells, north and south only 5; higher density spacing to the west not utilized as analogs		CLARIFICATIONS OR ADDITIONAL INFORMATION REQUESTED Topic: Engineering Testimony Narrative	Engineering Sent back 4/28/24, corrected 6/11

Applicant Response:

corrected 3/11

corrected 3/11

Sent back 4/28/24, corrected 6/11