

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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(1)		AP			X	X
Not required.								

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?		
COMPLETENESS REVIEW Not required. LIAE requested.		304.c.(2)		AP			X	X

304.c.(3). Light Mitigation Plan

			Referenced in guidance document?		Applicant Response:	Staff second review: Was the issue addressed?		403647283	403649068
Issue identified by staff:	Suggested correction:	Specific Rule (optional)		SME reviewer					
COMPLETENESS REVIEW		304.c.(3)							
Not required. LIAE requested.				AP		X		X	

304.c.(4), Odor Mitigation Plan				Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403647283	403649068
Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.c.(4)							
Not required.					AP			X	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?	403647283	403649068
The table provided illustrating length of each development phase should also include operations schedule (month and year) for when each operational phase is expected to begin.	Update the table to include these details.			AP	To avoid discrepancies, Crestone believes this timeline should only be listed on Form 2A. Duplicating it elsewhere creates inconsistencies if deadlines aren't met.	yes - information on the Form 2A on the Submit Tab Comments section.	X	X
Table indicate monthly totals for construction and completions phase that do not equate according to the annual amounts. Construction total annual is 1274 and duration is only 2 months so monthly should be half of 1274 and Completions total is 13570 and duration is about 3 months so should be closer to monthly 4500.	Update to be accurate.			AP	Updated - Months are considered 31 days	yes	X	
Table indicate monthly totals for construction and completions phase that do not equate according to the annual amounts. Construction total annual is 1274 and duration is only 2 months so monthly should be half of 1274; Drilling total is 3487 so monthly should be 3487 divided by the 3 months; Completions total is 13570 and duration is about 3 months so should be closer to monthly 4500.	Update to be accurate.			AP	Updated - Months are considered 31 days	yes		X
Table indicates 62 days for construction for both locations but the North location already exists.	This should be less amount of time considering it already exists. Either update or provide an explanation.			AP	It is generally easier to build a pad that doesn't include areas that you have to avoid. Additionally the north location includes a substantial amount of earthwork as noted in the grading plan in the layout drawings. Therefore we have estimated it will take approximately the same amount of time to grade.	yes	X	
In the Well Pad Construction Phase section, second paragraph, it refers to the well pad disturbance acres being 4.80 acres (North) and 9.16 acres (South), when this is actually the WPS.	The rule requires the acres of soil disturbances. Update to include the full acres of disturbance (i.e. Oil and Gas Location) and clarify that the 4.80 acres is the WPS that will be covered with the aggregate.	427.a.(3)		AP	Total Disturbance was added to the plan. It says the surface of the access road and well pad will be covered in Class 6 aggregate material or recycle asphalt. Surface of the well pad that is covered in that material is the WPS The rule says that we MAY use the BMPs listed which includes the one you mentioned. If this language included WILL USE the BMPs listed then we would have committed to that BMP. In lieu of restricting construction on high-wind days operator has committed to using fresh water to reduce the transportability of dust.	no - not rule bust	X	X
The Proposed Best Management Practices does not include the commitment to restrict construction activity during high wind days.	Update to include this BMP as required by rule.	427.a.(7).C.		AP		no - not rule bust	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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(6)						
No issues.				AP			X	
North location plan was submitted for the South location.	Remove and replace with the South location Transportation Plan.			AP	The attached plan contemplates both locations.	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?		
COMPLETENESS REVIEW		304.c.(7)		AP			403647283	403649068
No issues.							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?		
COMPLETENESS REVIEW		304.c.(8)						
The plan does not indicate the date the plan was finalized and approved by the local responding agency. The plan does not provide the schedule or interval of exercises and training that will be coordinated with the local government and responders.	Update to include signature of responding agency or provide correspondence indicating coordination with the agency and acceptance by the agency.		yes	AP	Usually we can provide a statement on the submit table such as: "the ERP will be coordinated with the relevant emergency response agency. The approved copy will be provided to staff prior to hearing or via Form 4 sundry prior to construction of the location."	no, not rule bust - Form 2A only states that the ERP will be coordinated with the relevant emergency response agency. Staff will add a COA for operator to submit via Form 4 Sundry.	X	X
	Update with required details.		yes	AP	Added training interval to the plan	no - not rule bust	X	X
			https://ecmc.state.co.us/documents/reg/Forms/instructions/Plans/Guidance%20304.c.(8)%20Emergency%20Response%20Plan.pdf					

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

Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?		
COMPLETENESS REVIEW			304.c.(9)						
Not required.					AP			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?		
COMPLETENESS REVIEW		304.c.(10)					403647283	403649068
Not required.				AP			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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(11)						
						No, not rule bust.		
Drilling Waste Management section is not specific as to what type of oil based drilling fluid will be used.	Update with specifics as the Commissioner s require this information to be addressed. Update with specifics of the			AP	Specifying the type of oil-based mud in the Waste Management Plan seems unnecessary, and in our experience with all of our other approved plans, this detail hasn't been required. Oil-based mud type primarily affects odor, not the actual disposal process. Regardless of the specific oil-based mud used, the disposal method remains the same. Including this information in the Waste Management Plan only creates additional work for updates and increases the potential for inconsistencies if the mud type changes.	Typically found in Odor plan but since this plan is not required I often see it. Operators have never had an issue previously. Trying to address in the DR as the Commissioners have routinely inquired on this. CDPHE is requiring a consultation so staff will wait for this consultation to get this information.	X	X
Flowback and Production Waste Management sections both state that produced water will either be trucked or piped off location.	operational plans for this specific location. Update volume amounts for accuracy or provide explanation why one well difference does not change volumes of the waste streams.			AP	Language updated	yes	X	X
The Waste Stream Table's volumes are the same for both proposed locations but the South is one more well.				AP	The estimated daily volume remains the seme, but if you look at the duration it is increased with the pad with more wells.	yes	X	X
The Approved Waste Disposal Facilities section does not meet requirements. This information is required to be site specific and a haul route map(s) are required to illustrate the routes to the disposal facilities from the proposed location. Additionally, location details, such as address, are also to be included for the facilities. There is an asterisk before Approved Waste Disposal Facilities, but does not have a footnote reference tying to it. The "Please note - " language regarding the operators choice to add approved facilities will result in a COA being placed on the Form 2A requiring that the Waste Plan be updated if additional facilities not included on the list will be used.	Update with required details related to the disposal facilities to be used for this proposed location and include a haul route map illustrating the routes to all of the facilities. Remove the unintended asterisk.	yes		AP	Added map with all possible waste disposal locations along with the haul route to nearest arterial road, routes beyond that are subject to change due to various road closures, third party routing to other locations, and other various factors.	yes	X	X
				AP	Updated	yes	X	X
	Remove language or agree to COA.			AP	Agree to COA.	yes	X	X
The provided note above Best Management Practices section starting with "Please note..." is not acceptable language.	Remove the language and consider alternative language that acknowledges the possibility of changes and for what reasons and committing to communication with ECMC to advise.			AP	Removed language	yes	X	X
			https://ecmc.state.co.us/documents/reg/Forms/instructions/plans/Guidance%20304.c.(11)%20Waste%20Management%20Plan.pdf					

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?		
COMPLETENESS REVIEW			304.c.(12)						
Not required.					AP			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?		
							403647283	403649068
Section 2.2 states that the Site slope directions but the Hydromap do not adequately illustrate this.	Update plan to ensure accuracy and alignment with all OGD application componentes.			AP		yes	X	X
Section 4.1.2. states there are two separate locations that the topsoil will be stockpiled but the layout drawings only show one location.	Update plan to ensure accuracy and alignment with all OGD application componentes.			AP		no, layout drawings show one location. not rule bust		X
Section 4.3 states that the areas no longer in use to be reclaimed is 9.355 acres but the layout drawings show 5.41 acres.	Update plan to ensure accuracy and alignment with all OGD application componentes. Update the "should" language to "will" to communicate the operator's commitment to their practices. Update to include the required soil map.			AP		no, still discrepancy with the layout drawings, the Form 2A and this Plan. not a rule bust - 2A listed acreages are what is enforceable		X
Section 5.1 includes two sentences that state what "should" occur, instead of what "will" occur. The OGD plans need to communicate the operator's committed practices.	Updated drawings and plans for accuracy or provide additional detail as to how your calculations were determined.			AP		no, not rule bust.	X	X
Add the NRCS Soil Map from SWMP to this Topsoil Plan.		yes		AP		no, not rule bust.	X	X
Construction drawing calculations for topsoil stockpile seem less than what should be calculated for 15.11 acres at 10" deep across the location. Staff calculate it closer to 20,300 cubic yards. Staff agrees with the slope ratio of 4:1 and the height of the pile.					AP/DA (Reclan All comments addressed from video call.	yes	X	
Staff has several concerns regarding topsoil and interim plans and layout drawings. Staff requests a video call to discuss further prior to making revisions and resubmitting.	Coordinate with Staff (both LAS and Reclamation) to further discuss.				AP/DA (Reclan All comments addressed from video call. https://ecmc.state.co.us/documents/reg/OpGuidance/Guidance%20304.c.(14)%20Topsoil%20Protection%20Plan.pdf	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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(15)						
Bottom portion of Section B uses variable language "if any" when discussing topsoil piles.	Update the plan with language that is site specific. The facility layout drawings depict there will be topsoil piles.			AP	Section II.B has been corrected to describe location of topsoil & soils stockpiles	yes	X	X
	Bottom portion of Section B speaks to site development including the installation of production equipment, but this location is a well only pad.			AP	Section II.B has been corrected to remove reference to production equipment	yes	X	
	Section E.2. discusses non-cropland criteria which is not applicable to this location, since the location is sited on cropland.			AP	Section III.E.2. has been corrected and the reference to non-cropland criteria has been removed	yes	X	X
Plan is missing the details required for the Post-Construction Stormwater Program. Remove the following appendixes: Access Road Map, Location photos, Hydrology Map and the references to them in the narratives. Appendix C NRCS Web soil survey map (p.1-3) should be removed from the SWMP and combined with the other map and included in the Topsoil Plan.	Update to be site specific to the proposed location. Update to include rule requirement information.	1002.f.(3)		AP	Section IV has been added to address Post Construction Stormwater	yes	X	X
	Remove these appendixes.			AP	Appendix A-D removed, and references throughout the plan have been updated to the appropriate Form 2A Exhibit or Plan	yes	X	X
	Remove and add to the Topsoil Plan. Attach the Map Unit Soil Descriptions to the Form 2A as a separate and independent attachment.			AP	Appendix C removed, and plan has been updated to reference the Topsoil Management Plan and NRCS Map Unit Soils Attachment	yes	X	X
Appendix C - Remove the Map Unit Soil Description pages.				AP	Appendix C removed, and plan has been updated to reference the Topsoil Management Plan and NRCS Map Unit Soils Attachment	yes	X	X
BMPs need to include description of site inspection frequency.	Update BMP list to address site inspection frequency. Provide detail to explain how a water well can be a receiving water.			AP	Appendix B - Site Specific SWMP Best Management Practices (BMPs), (formerly Appendix F), has been updated to include inspection frequency, and further described in Section III.	yes	X	X
Section II.A. states the nearest receiving water is a water well.				AP	Water well is considered as the nearest water feature, and incorrectly identified as the nearest receiving water. The plan has been updated to correct the nearest receiving water feature as the unnamed tributary from Box Elder Creek	yes		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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(16)						
In section II.A. it states the access road travels from the location "east" to the public road, but it should read "west".	Update for accuracy. Ensure accuracy and alignment through all components of the OGD application.			AP	The CMP size has been corrected	yes	X	X
The plan makes multiple references to an existing access road where the layout drawings illustrate this as a proposed access road.				AP	The reclamation timeframe has been correction to "3 months" for the consideration of crop-land.	yes, layout drawings updated	X	
The plan states there are two existing 24" CMP but the layout drawings illustrate one 24" and one 18", The plan makes multiple reference to "within 6 months" when it should be within 3 months of the date of production for locations in cropland.	Update plan to ensure accuracy and alignment with all OGD application componetes.			AP	Access Road length of 682' is correct. The length on the Layout Drawings has been corrected.	yes	X	
	Update to meet rule requirements. Ensure accuracy and alignment through all components of the OGD application.	1003.b.		AP	Access Road length of 678' is correct. The length on the Layout Drawings has been corrected.	yes	X	X
Section III.A. indicates that the access road is 682' but the drawings show 594'.	Ensure accuracy and alignment through all components of the OGD application.			AP	The Interim Reclamation acreage has been updated to 12.85 acres, and has also been updated in the Layout Drawings	yes plan updated to 594'	X	
Section III.A. indicates that the access road is 678' but the drawings show 578'.				AP	Hydrology Map has been updated to include flow direction.	yes layout drawings updated		X
Section III.A. indicates 4.55 acres for interim acres but should be 12.85 interim acres.	Update plan to ensure accuracy and alignment with all OGD application componetes.			AP	Water well is considered as the nearest water feature, and was previously incorrectly identified as the nearest "receiving water". The plan has been updated to correct the nearest receiving water feature as the unnamed tributary from Box Elder Creek	yes		X
Section 2.2 state the Site slope directions but the Hydromaps do not adequately illustrate this.	Update plan to ensure accuracy and alignment with all OGD application componetes. Please provide detail to explain how a water well can be a receiving water.			AP	Following discussions with ECMC Staff, the Topsoil Management Plan, SWMP, Interim Reclamation Plan & Layout Drawings have been update accordingly.	no, but not rule bustyes Hydro r X		X
Appendix A discusses the nearest receiving water as being a water well.				AP		yes		X
Staff has several concerns regarding topsoil and interim plans and layout drawings. Staff requests a video call to discuss further prior to making revisions and resubmitting.	Coordinate with Staff (both LAS and Reclamation) to further discuss.			AP/DA (Reclamation)		yes	X	

	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403647283	403649068
Issue identified by staff: COMPLETENESS REVIEW		304.c.(17)						
Operating requirement 2 related to disinfection practices is not sufficiently answered. Response needs to be site specific, which is applicable, and needs to identify which practice will be implemented. Needs to actually provide the information that is being asked.	Update to fully answer the operating requirement.	1202.a.(2)		AP	Answer was updated to fully address the operating requirement. "Water for this project will be sourced from a third-party lay flat distribution system, which is permitted and operated separately by the third party." yes	X		X
Operating requirement 6 related to seed mix type is not sufficiently answered. Response needs to be site specific. The Topsoil and Interim Plans commit to a certain seed type. This should be referenced here and identified as to whether or not it is CPW-recommended.	Update to fully answer the operating requirement.	1202.a.(6)		AP	The response on the Aspen North WPP was fixed to match the response on the Aspen South WPP and fully address the operating requirement. yes	X		
Operating requirement 7 related to CPW recommended fencing is not sufficiently answered. Response should be site specific and align with Interim Plan that states the perimeter will be fenced with wildlife fencing.	Update to fully answer the operating requirement.	1202.a.(7)		AP	Answer was updated to fully address the operating requirement. "This location is subject to Relevant Local Government (City of Aurora) fence design requirements (see Interim Reclamation Plan for fence design details)." yes	X		X
Operating requirement 8 related to the nesting season and construction is not sufficiently answered. Response needs to be update with specifics... not able to determine planned development schedule as the Dust Plan needs the table updated. Is it expected to occur outside or inside the nesting season.	Update to fully answer the operating requirement.	1202.a.(8)		AP	This response is intentionally phrased this way, addressed based on seasonal applicability rather than current construction timeline applicability, to account for any possible schedule adjustments. This also aligns with the way CPW recommended that Operators address these Operating Requirements. yes	X		X
	Update BMP list to include the additional applicable BMPs resulting from the field survey.			AP	A BMP list was added at the end of Sec 5 with all the applicable surveys to be conducted. yes	X		X
BMP list does not include the applicable BMPs resulting from the field survey.								
Section 5 indicates the wrong date that the field survey took place.	Update for accuracy.			AP	Survey date was updated 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?	403647283	403649068
COMPLETENESS REVIEW		304.c.(18)						
The overview drawing of the lay-flat route illustrates Kiser Pit, but nothing in this Water Plan or the Waste Plan indicates this.	Update applicable plans to address the Kiser Pit role in the proposed operations.			AP	To improve clarity, the water plan has been revised. It now specifies that the Kiser Pit is a temporary storage location managed by an external hauler. This location holds fresh water transported from Barr Lake.	yes	X	X
The Reuse and Recycle portion of the plan is not clearly written.	Rewrite to explicitly state whether or not recycled or reused water is anticipated to be used.			AP	Revised language in this section.	yes	X	X
Under the Completion Operations section the liability language does not meet the intent of the plan's requirements.	Remove the language.			AP	Removed language.	yes	X	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?	403647283	403649068
Plan does not provide a description for each Resources Impact Type.	Update to include required descriptions for each impact type. Update to explain the methodology used and the extent (area) at which each impact was analyzed.			AP	Additional descriptions have been added where applicable.	no, not rule bust	X	X
Plan does not identify what the Cumulative Impact Assessment Area (CIAA) is for each resource impact type.		303.a.(5)		AP	This is not a requirement for a Cumulative Impacts Plan per 304.c.(19). Which is consistent with our other prior and subsequent filings that have been deemed to meet rule requirements The estimates are provided on the Form 2B and create more opportunities for discrepancies between the two documents which is consistent with our other prior and subsequent filings that have been deemed to meet rule requirements	no, not rule bust	X	X
Plan does not provide estimates for what the air resource impacts are estimated to be in result of the proposed development. Air resources section references Appendix A, which is not included.	Update to include details. Include Appendix A. Ensure accuracy and consistency among all OGDG components. Ensure accuracy and consistency among all OGDG components. Ensure accuracy and consistency among all OGDG components.	303.a.(5)		AP		no, not rule bust	X	X
				AP	Removed reference	yes	X	X
Plan states 1-2 months for construction but Dust Plan shows 62 days (2 months).				AP	This has been updated to match the dust plan	yes	X	X
Plan states that the access road s 682' but the drawings show it 594'.				AP	Access Road Map footage of 682' is correct. The Layout Drawings have been updated to reflect this length.	yes	X	
Plan states that the access road s 678' but the drawings show it 578'.				AP	Access Road Map footage of 678' is correct. The Layout Drawings have been updated to reflect this length.	yes		X
At the end of the Timing and Description section under 2.2.2. Drilling section, a incomplete sentence remains that should be deleted. Section 2.3 Production Operations requires several revisions, as this location is a well-only pad.	Delete the sentence or complete the sentence so it makes sense. Update to be accurate and site specific.			AP	Updated language	yes	X	X
				AP	Updated language	yes	X	
Section 3.0 Public Health Impacts does not mention what the estimates are expected to be and the reasoning for such expectation for health resources, nor does it identify what the CIAA is (i.e. if it is expected to be no acute or chronic human health risk, why).	Update with the additional detail. Include Appendix C.	303.a.(5)		AP	This isn't a requirement based on the rule. Estimates are provided on the Form 2B. Mitigation measures to reduce cumulative impacts are included which is what is required by rule. Added additional dialogue clarifying the point of this section as well as discussion regarding the CIPP.	no, not rule bust	X	X
				AP	Removed	yes	X	X
Appendix C is referenced but not included. Water Resources section does not address whether or not there are surface water resources with an OHWM within 500 feet of the proposed chemical storage area or whether or not it is sited within a flood zone.	Update with the additional detail.	303.a.(5)		AP	Updated to include discussion regarding the lack of water features with a OHWM.	yes	X	X
Water Resources section does not speak to water use - the water volumes and and water source types planned for this location. Additionally, how will the water be transported to location for both drilling and completion operations. Will it be trucked or piped? Last sentence of 4.1 states that Crestone is testing the use of water recycling, but does not clarify that this proposed development will not be reusing or recycling water.	Update with the additional detail. Update with clarifying statement. Ensure accuracy and consistency among all OGDG components. Update to include reference to the nearest downgradient unnamed tributary and its distance from the location. Ensure accuracy and consistency among all OGDG components. Update with additional site specific design features.	303.a.(5)		AP	Volumes are found on both the water plan and the Form 2B. This section speaks to how we are trying to reduce water usage and protect surface water and groundwater.	no, not rule bust	X	X
				AP	Updated.	yes	X	X
4.3 section states that 1000' from the pad was reviewed but the Topsoil Plan states the field survey only reviewed 500' from the location.				AP	Updated	yes	X	X
4.3 section states that no contamination pathways were immediately downgradient, but does not follow this up with specifics.		303.a.(5)		AP	Updated	yes	X	X
4.3 section references production facilities, but this a well only pad.				AP	There are still production facilities (separators and a GL Meter bldg on the Aspen North.	yes, updated to remove non-applicable equipment	X	
4.3 section discussed how Crestone's designs help prevent fluid migration but does not speak to site specifics. Section 5.0 incorrectly references the location as "northeast" of intersection and east of "48th" Ave. This is incorrect, and should read "southeast" and east of "56th".	Update for accuracy.			AP	Added additional detail.	yes	X	X
				AP	Updated	yes		X

5.2 section does not provide discussion on light and noise impacts...how these nuisances can impact aquatic wildlife resources and ecosystems and then discussion on specifics of what light and noise impacts are from the proposed location.	Update with additional information.	303.a.(5)	AP	The plan outlines the potential impacts and the lack of features that could be impacted.	no, not rule bust	X	X
6.0 section does not include a table of proposed acres to be disturbed (location, flowlines, access roads)	Update with additional information.	303.a.(5)	AP	The Form 2A, Form 2B, layout drawings all contain this information. Dialogue regarding what we are doing to reduce cumulative impacts is outlined which is what required by rule.	no, not rule bust	X	X
6.0 section references 3:1 topsoil slopes but layout drawings and other plans show 4:1.	Ensure accuracy and consistency among all OGDG components.		AP	Updated	yes	X	X
6.0 section discusses seed mix generally, but interim plan identifies the specific mix.	Ensure accuracy and consistency among all OGDG components.		AP	Updated the wording to include a reference to the interim reclamation plan for details.	yes	X	X
7.0 section has several references to a production facility that is not part of this proposed development.	Update to be accurate and site specific.		AP	Updated.	yes	X	
8.0 section refers to production facilities that do not align with this proposed development.	Update to be accurate and site specific.		AP	Updated	yes	X	
8.0 section inaccurate references slope ratio.	Update to be accurate and site specific.		AP	Updated	yes	X	X
8.0 section includes reference to a sound barrier that is not illustrated on the drawings.	Update to be accurate and site specific.		AP	Updated	yes		X

304.c.(20). Community Outreach Plan

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

Issue identified by staff:		Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403647283	403649068
Suggested correction:								
COMPLETENESS REVIEW		304.c.(21)						
Not required.				AP			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?		
COMPLETENESS REVIEW		304.b.(7).F					403647283	403649068
Map shows 682' but layout drawing shows different length and layout drawing shows proposed. CI plan also does not align with acres.	Ensure accuracy of length and disturbance acres across all OGD components.			AP	Access Road Map footage of 682' is correct. The Layout Drawings have been updated to reflect this length.	yes	X	
Proposed access road length does not align with layout drawings showing 578'.	Ensure accuracy and consistency among all OGD components.			AP	Access Road Map footage of 678' is correct. The Layout Drawings have been updated to reflect this length.	yes		X
Only the WPS is illustrated but guidance requires the oil and gas location.	Update to meet requirements.		yes	AP	Access Road Map has been updated to include the boundary for the Oil & Gas Location.	yes		X
		https://ecmc.state.co.us/documents/reg/Forms/instructions/attachment_guidance/Guidance%20304.b.(7).F%20Access%20Road%20Map.pdf						

ALA DATASHEET

Issue identified by staff:
COMPLETENESS REVIEW
Not required.

Suggested correction:

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

Referenced in guidance document?

AP

Applicant Response:

Staff second review: Was the issue addressed?

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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?		
COMPLETENESS REVIEW		304.b.(2)						
Not required.				AP			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?	403647283	403649068
COMPLETENESS REVIEW								
Not required.							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?	403647283	403649068
COMPLETENESS REVIEW				AP			X	X
No issues.								

CULTURAL FEATURES MAP

Issue identified by staff:	Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?		
COMPLETENESS REVIEW		304.b.(3)		AP			403647283	403649068
No issues.							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?	403647283	403649068
COMPLETENESS REVIEW		304.b.(7).H						
No issues.				AP			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?	403647283	403649068
COMPLETENESS REVIEW Not required.		304.b.(7).J		AP			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?	403647283	403649068
COMPLETENESS REVIEW		304.b.(7).I						
First page has two items in the legend that are not applicable.	Update legend to only include applicable items in referenced drawing.			AP	Legend on Sheet 1 has been updated to include only the geologic features that are present within the viewport/scale of the map.	yes	X	X
Second page is missing.	Update to include page 2.			AP	Sheet 2 has been included in the updated drawing set.	yes		X

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)		AP				
No issues.						X	403647283	403649068

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?	403647283	403649068
COMPLETENESS REVIEW		304.b.(7).E						
Add an arrow on the location indicating water flow to align with both the Topsoil and the Interim Reclamation Plans.	Add arrow to map.			AP	Updated	yes	X	X
The water well direction is different for the OGL and the WPS columns.	Update both fields to be SW to be accurate.			AP	Water well was removed since it was greater than 2640 from the location.	yes	X	
The downgradient directions listed are not accurate as indicated in the Interim plan and the contour lines.	Update to ensure accuracy and alignment with all OGDG components.			AP	Arrows have been added.	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?		
COMPLETENESS REVIEW			604.b.(1)						
Not required.					AP			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?	403647283	403649068
COMPLETENESS REVIEW		304.b.(7).B						
Drawings refer to the existing access road as the "proposed" access road.	Update for accuracy and alignment between all OGD components. Update with required details.			AP	Layout Drawings have been updated to "Existing Access Road"	yes	X	
Pipeline/Utility corridors disturbance acreage not included.	Ensure accuracy and consistency among all OGD components.		yes	AP	Pipeline disturbance has been added to Sheet 2 of the Layout Drawings	yes	X	
Facility Layout drawing is missing the Instrument Air Skid as illustrated on the Process Flow Diagram.				AP	Instrument Air Skid has been added to the Facility Layout Drawing	yes	X	
The noted elevations for existing and final elevations are all one digit short.	Update for accuracy.			AP	Elevation notations for Existing and Final Grade (EG, FG) have been updated to reflect the 4 digit elevation value. In the previous version, these elevation markers were truncated and included a Note in the Legend: "Existing Ground Elev. At Corner Stake (Truncated less 5,000 Feet)"	yes		X
Staff has several concerns regarding topsoil and interim plans and layout drawings. Staff requests a video call to discuss further prior to making revisions and resubmitting.	Coordinate with Staff (both LAS and Reclamation) to further discuss.			AP/DA (Reclan Section	The Construction Layout Drawing - Plan View has been updated to reflect the areas of topsoil stripping with 3 distinct topsoil categories associated with this pad expansion: Topsoil Area to be Stripped and Replaced, Existing Topsoil Pile to be Removed and Relocated & Topsoil Area to be Stripped and Stockpiled. The quantities for each categories are included in a tabular format in the lower right side of the drawing, as well as in the Approximate Earthwork Quantities Table on the Construction Layout- Cross	yes	X	
					https://ecmc.state.co.us/documents/reg/for ms/instructions/attachment_guidance/Layout%20Drawing%20Attachment%20Guidance%20304.b.(7).B.pdf			

LESSER IMPACT AREA EXEMPTION
REQUEST

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.d	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403647283	403649068
The LIAE Letter does not explicitly indicate what the evidence provided shows.	Update the letter to indicate either 304.d.(1).A. or 304.c.(1).B.			AP	Updated.	yes	X	X
Operator requested a Rule 304.d Lesser Impact Area exemption from the Rule 304.c.(2) Noise Mitigation Plan. The request is based on the potentially impacted receptors or resources not present in the area, the nearest wildlife high priority habitats and residential building units are more than one mile from the proposed location. Staff recommends approval of the request.				JN			X	X
Operator requested a Rule 304.d Lesser Impact Area exemption from the Rule 304.c.(3) Light Mitigation Plan. The request is based on the potentially impacted receptors or resources not present in the area, the nearest wildlife high priority habitats and residential building units are more than one mile from the proposed location. Staff recommends approval of the request.				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?		
COMPLETENESS REVIEW		303.a.(6).B					403647283	403649068
Form 2A indicates a date for the local government permit but left blank the field that indicates what the status is. Unable to verify if the local permit has been approved or not and if so, needs to be indicated on the 2A and attached to the 2A.	update all applicable OGD components to allow for adequate review.			AP	Both Aspen North and South locations have secured siting approval through the Aurora Operator Agreement (OA). We will submit site-specific administrative permit applications to the local government within the next 30 days. Once submitted, Crestone will keep the commission staff updated on the submission date. Upon permit approval, Crestone will promptly provide the approval materials and date.	yes	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?		
COMPLETENESS REVIEW		304.b.(7).A		AP				
No issues.							X	X

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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?	403647283	403649068
Missing field of view aerial image.	Update to include required image.			AP	Updated	yes	X	

NRCS MAP UNIT DESC

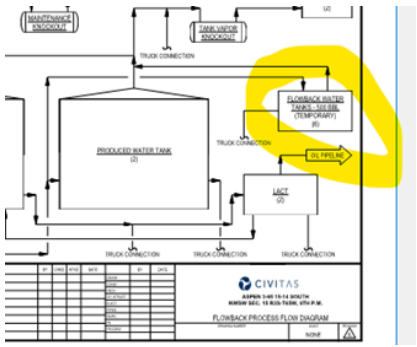
Issue identified by staff:		Suggested correction:	Specific Rule (optional)	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?		
COMPLETENESS REVIEW			304.b.(10)						
No issues.					AP			X	X

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?		
COMPLETENESS REVIEW								
Land Use Description attachment has no issues.				AP			X	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?	403647283	403649068
Note provided stating that wells and equipment counts vary needs to be removed.	The PFD for the production phase indicates the adequate counts which align with the Form 2A.			AP	Updated	no, revised attachment not submitted. Not rule - bust	X	
The Flowback Phase under the wells states that well counts vary.	Remove this and indicate the well count as proposed on the Form 2A. Update to ensure alignment throughout all OGDG components. Update to ensure alignment throughout all OGDG components.			AP	Updated	no, revised attachment not submitted. Not rule - bust	X	
The Instrument Air Receiver is not included on the Form 2A.	Remove the duplicate page. Update to ensure alignment throughout all OGDG components.			AP	Updated	yes	X	
Missing temp flowback water tanks as indicated on layout drawings and 2A temp equipment counts.				AP	They are located on the second page next to the produced water tanks.	yes		X
Third page is the same as page 2.				AP	Third page is slightly different, the temp tanks/sand cans/flowback sand tank is removed	yes		X
Equipment counts not aligning with the 2A: PFD shows 3 2PH-Sep but 2A only has 2 heater-treaters PFD shows 2 blowcase and 2 bulk separators but 2A doesn't include these				AP	Updated Heater Treaters = Bulk treaters (added clarifying information on PFD/Layout drawings	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?		
COMPLETENESS REVIEW		304.b.(9).B.i						
Not required.				AP			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?		
COMPLETENESS REVIEW		304.b.(9).B.ii						
Not required.				AP			X	X

RELATED LOCATION AND FLOWLINE MAP

Issue identified by staff: COMPLETENESS REVIEW	Suggested correction:	Specific Rule (optional) 304.b.(7).G	Referenced in guidance document?	SME reviewer	Applicant Response:	Staff second review: Was the issue addressed?	403647283	403649068
Missing off location flowlines, and both the existing location with indication of the proposed locations. The map is for the OGDPA which should be the same for each location.	Update to include required details. Update to include required details.		yes	AP	Updated	yes	X	X
Missing the proposed location: Bijou 3-65 19-24 North Pad in Section 21	Update to include required details.		yes	AP	Updated	yes	X	X
Missing the proposed Oil and Gas Location symbol for the red dashed line in the legend. Update the "Oil/Gas Location" in the legend to read "Existing Oil/Gas Location" to adequately differentiate between the proposed Oil and Gas Location.	Update to include required details. Remove reference or update with more details.		yes	AP	Updated	yes	X	X
Quicksilver 3-65 16-17-18-13 label does not make sense.				AP	Removed	yes	X	X
					https://ecmc.state.co.us/documents/reg/Forms/instructions/attachmentsguidance/Related%20Location%20and%20Flowline%20Map%20Guidance%20304.b.(7).G.pdf			

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?		
COMPLETENESS REVIEW		304.b.(12).B		AP				
No issues.							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		604.a.(4)						
Not required.				AP			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?	403647283	403649068
COMPLETENESS REVIEW			304.b.(7).C						
All pipeline and utility corridors associated with the location and operations should be illustrated according to guidance. The off-location flowlines to the South location are missing.		Update to include required detail.		yes	AP AP	Updated	yes	X	
No issues.									X
				https://ecmc.state.co.us/documents/reg/Forms/instructions/attachment/guidance/Guidance%20304.b.(7).C%20Wildlife%20Habitat%20Drawing.pdf					

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

			Staff second review: Was the issue addressed?		
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:		
			Both Aspen North and South locations have secured siting approval through the Aurora Operator Agreement (OA).	403647283	403649068
Relevant local government siting information section needs some updating. A status/disposition date is provided but nothing indicates what this status is for. The comments advise that the siting permit with Aurora has been approved so that field should be changed to "yes" with the approval date added. Additionally, The RLG or Fed Pre-app Consultation section may need updating. If no consultation how did the siting get approved but the application is still pending submittal? Also, siting was approved without discussion or review of alternative locations with the local government?	Review both referenced sections and ensure to answer all applicable fields. Remove the included CDPHE BMPs. After CDPHE Consultation, the agreed upon BMPs will be added from the revised CDPHE BMP list.	AP	We will submit site-specific administrative permit applications to the local government within the next 30 days. Once submitted, Crestone will keep the commission staff updated on the submission date. Upon permit approval, Crestone will promptly provide the approval materials and date.	yes	X
Remove the CDPHE BMPs. Site equipment list is missing the Instrument Air Skid as illustrated on the Process Flow Diagram.	Ensure accuracy and consistency among all OGDG components.	AP	Removed	yes	X
Site equipment list needs updating. ERP shows 6 oil tanks but 2A shows 4. Process Flow Diagram (PFD) shows 3 heater treaters but 2A shows 2. PFD shows 2 blowcases, 2 bulk separators, maintenance KO, and tank KO but all missing on the 2A. PFD does not show any temp. water tanks but 2A shows 6.	Ensure accuracy and consistency among all OGDG components.	AP	Updated	yes	X
Flowline description incorrectly references "Extraction" and the described off location flowline is not included in the Form 2B acres of disturbances.	Update for accuracy and consistency among all OGDG components.	AP	Updated	yes	X
Acres of interim reclamation may need updating for both locations. This will be further discussed in an upcoming call with Reclamation Staff and operator. If needing to be updated, ensure to update across all applicable OGDG components.	Discuss further with staff and determine if changes across all OGDG applicable components need to be updated.	AP	Updated	yes	X
Final land use indicates "non-irrigated crop land" but the Land Use Description attachment states that the final land use will be to return the land to commercial use.	Ensure accuracy and consistency among all OGDG components.	AP	The Land Use Description attachment has been updated	yes	X
Water well direction needs to be updated to SW.	Update to SW for accuracy.	AP	direction updated to SW	yes	X
The distance to the nearest downgradient wetland should align with the Hydro map and be the same as the nearest surface Waters of the State of 617' W (North) and 1605' S (South). The description provided should be kept.	Update to align with the mapped data.	AP	The hydrology map indicates there are no wetlands within a half-mile of the site. This is because the mapped surface water features (NHD-Mapped River/stream) is not associated with wetlands that meet the qualifications. Description of the surface waters of the state has been updated to reflect this.	yes	X
No compensatory mitigation is required therefore an answer to "Have all Compensatory Mitigation Plans been approved for this Location" should not be answered.	Delete the response for both Direct and Indirect sections as it is not applicable. Please remove the included CDPHE BMPs to allow for a more clean approach to adding applicable BMPs resulted from the CDPHE consultation process. CDPHE has confirmed their intent to consult on these locations.	AP	The Form 2A does not allow for those boxes to be left blank. Please see error to the right	yes	X
CDPHE BMPs should be added after consultation.		AP	Removed	yes	X
			Per Operator emailed request, Staff added the following comment to the Form 2A submit tab comments section:		
			Proposed changes Disturbance Area: The Disturbance Area will be expanded to drill seven (7) additional wells on the location. Equipment: Existing facilities will be removed and consolidated with those on the Aspen South Pad, requiring adjustments to equipment counts. The existing well will continue to produce after the proposed expansion.	yes	X
Form 2A needs to have a comment on the Submit Tab indicating what is being amended on the location for all amended Form 2As.	Update with a comment explaining this location exists and whether or not it is being expanded from its originally permitted disturbance acreage, and advising what the plans for the existing producing well is.	AP			

Form has errors (2)

Compensatory mitigation information required

Compensatory mitigation information required

COMPLETENESS REVIEW (Form 2B topic) (topic/subtopic)					Staff second review: Was the issue addressed?	403647283	403649068
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:				
Location Information	North location lists 7 planned wells but should be 8.	AP	There is 1 existing with 7 planned wells, this is how we have captured this on past OGDPs that were in this situation.	yes; Operator requested Staff to correct this field via email.	X		
Water	The wetland distances should align with the surface Waters of the State, since these are mapped as wetlands and should also have the same evaluation comments as the surface Waters of the State.	AP	Per field verification the nearest and only water feature within 2640 of the location is not associated with an OHWM or wetlands and therefore was not included in the wetland measurement.	yes	X		X
Water	Both locations indicate that freshwater will be delivered by pipeline but the CI Plan does not advise this. Update the CI Plan with specific details aligning with this and identifying if piped for both drilling and completions.	AP	Added lay flat pipeline transport as a cumulative impact reduction	no, not rule bust	X		X
Ecosystem&Wildlife	Both locations list interim acres that may need to be revised based on upcoming discussions with Reclamation Staff. If this is to change then all OGDG component references need to be updated to align.	AP	The acreages should be consistent throughout all submittal items	yes	X		X
Ecosystem&Wildlife	Both locations land use acres need to be updated to total 2010 acres.		If the location were just a single point, like a dot on a map, and it had no surrounding area, then calculating the acreage within a 1-mile radius of that dot would only equal 2010 acres.				
			However, when you introduce a larger area, like a pad or property boundary, the 1-mile radius is going to extend beyond the dot itself and encompass the entire pad or a portion of it. This additional area will naturally increase the total acreage captured within the 1-mile radius.	yes	X		X
Public Health	Production emission data is not reflective of a well only pad. Update. Dust impacts for monthly construction and completions truck trips do not seem accurate and similar comment is placed on the Dust Plan tab. Same applies to the South location and the drilling trips do not align with the dust plan as well for the south location.		Updated	yes	X		
Public Health	Active number of locations and wells should be 1 (this is an existing location). The total acreage disturbance during construction should be 33.37 acres which is the total of both North and South locations.	AP	Truck trips should be consistent across all of the documents within the OGDG. Updated per guidance.	yes	X		X
Existing Oil&Gas	Permitted onsite storage should be 10 oil tanks and 4 PW tanks, which is what north was permitted for and what south is proposed for.		In the past we have not included pads proposed in the OGDG in these calculations	yes	X		
Existing Oil&Gas	Operations duration for South location indicates 8 weeks for construction which aligns with Dust plan but does not make sense that the north (existing site) will take the same duration of time. If updates for accuracy are needed ensure all applicable OGDG components are updated accordingly.	AP	Updated Reconstructing an existing location takes the same time as building a new location because you have to work around the existing equipment, wells and drainage structures.'	yes	X		
Location Information	South location lists 12 weeks for drilling but dust plan shows 93 days which is a little over 13 weeks. Update for accuracy.	AP	Rounded down to 13 form 13.29 weeks Updated, the Bijou permit has since been approved so it is 1 proposed and 1 permitted.	yes			X
Location Information Existing Oil&Gas	Active number of wells within a mile of the south location is 9 not 7. Total number of proposed locations should be 2 not one, which is this proposed south location and the proposed location in S21.	AP	In the past we have not included pads proposed in the OGDG in these calculations	yes			X

Existing Oil&Gas			Updated			
	Total acreage disturbance within a mile of the south location should be closer to 51.93 acres which is the sum of the three existing locations disturbance acres.	AP	In the past we have not included pads proposed in the OGDG in these calculations	yes		X
Existing Oil&Gas			Updated			
	Permitted onsite storage should be 24 oil tanks and 8 PW tanks, which is the total of all active and proposed locations within a mile of the south location.		In the past we have not included pads proposed in the OGDG in these calculations	yes		X
OGDG Scale Data						
	Total acres of new roads should be the total of both north and south location, which according to layout drawings is 2.46; however, notes on the Access Road Map and Layout Drawings question this amount because the north is existing. Review access road acres across all OGDG applicable components and ensure accurate. Additionally, the pipeline acres for the off-location flowlines need to be included from the north to the south.	AP	The north pad is utilizing all existing access road which would not fall into the category of new access road, so the only new access road acreage will be what is included in the layout drawing on the south pad that is outside of the proposed oil and gas location disturbance area (1.05 acres).	yes	X	X

COMPLETENESS REVIEW (Form 2C topic) (topic/subtopic)				Staff second review: Was the issue addressed?		
Issue identified by staff:	Suggested correction:	SME reviewer	Applicant Response:		403647283	403649068
No issues.		AP			X	X

COMPLETENESS REVIEW		Docket# 240100016	
Attorney Name: JAMIE JOST; KELSEY WASYLENKY	Attorney Email Address: JJOST@JOSTENERGYLAW.COM; KWASYLENKY@JOSTENERGYLAW.COM		
Permitter Name: Missti Mason	Permitter Email: missti.mason@state.co.us		
Engineer Name: Diana Burn	Engineer Email: Diana.Burn@state.co.us		
Hearing Officer Name: Jana Jacobs	Hearing Officer Email: jana.jacobs@state.co.us		
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>LAS Review Notes</u>			
OGDP Hearing Application - Relief Paragraph A: the existing well being brought into the OGDP is missing from the requested relief.	Recommended Revision: "Approve the approximate 4475-acre Aspen North\South OGDP for up to fifteen (15) new horizontal wells and one (1) existing well to be developed from one (1) existing..."		
<u>Permitting Review Notes</u>		TOPIC	
Concern: OGDP application requested relief should include the existing well (Aspen 3-65 15-14 2DH) in the total number of wells developing the OGDP.			
Concern: Exhibit C requested relief para B should include the part of Order No. 535-742 which will be vacated. The word amend, rather than vacate, would be better suited in this request.		Requested Relief	
Concern: The Spacing Order history should include. Order Nos. 535-89 & 535-511.		Citation of Applicable Prior Orders & Units	
<u>Geologic Testimony</u>			
None.	None.	There were no Review issues identified in the Geologic Testimony at this time.	
<u>Engineering Testimony</u>		ACCEPTABLE OVERALL	Engineering
Testimony provided supports requested development			

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Applicant Response:

corrected 4/5

all issues addressed (7/10)