

Crestone State Harvard/Yale and State Wetterhorn/Handies OGDPP												
Required?	Substantially equivalent submission? Check if YES	Lesser Impact Area Exemption Request? Check if YES	Issues identified	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Staff second review	Applicant Response	403876560	403876571	
304.c.(1). Emergency Spill Response Program	Within 2640' of GUD/lor relevant surface water			Not applicable.			NA			X	X	
304.c.(2). Noise Mitigation Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(3). Light Mitigation Plan	ALWAYS			The State Harvard/Yale Light Plan states that there will be 17 wells, however the Form 2A states that there will be 18.			okay to pass completeness	Yes	The State Harvard/Yale Lighting Plan has been revised to reflect 18 wells.	X		
304.c.(4). Odor Mitigation Plan	Within 2000' of BU			Not applicable.			NA			X	X	
304.c.(5). Dust Mitigation Plan	ALWAYS			The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2B.	Update all Plans to accurately account for the estimated number of truck trips.		okay to pass completeness		No, the Dust Plans list "Monthly Truck Trips", but the Transportation Plans list daily "Highest PCE" numbers and average daily round trips. These numbers are not the same if added together to be equivalent to the monthly numbers and do not match if multiplied to be monthly values either despite being listed as daily round trip vehicle miles.	The Dust Mitigation Plan for the State Harvard-Yale and State Wetterhorn-Handies have been revised to match the Transportation Plan. The 2B has been updated to reflect the correct monthly/total trips.	X	X
304.c.(6). Transportation Plan	If RLG requires or Dir requests			The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2A.	Update all Plans to accurately account for the estimated number of truck trips.		okay to pass completeness		No, the Dust Plans list "Monthly Truck Trips", but the Transportation Plans list daily "Highest PCE" numbers and average daily round trips. These numbers are not the same if added together to be equivalent to the monthly numbers and do not match if multiplied to be monthly values either despite being listed as daily round trip vehicle miles.	The Dust Mitigation Plan for the State Harvard-Yale and State Wetterhorn-Handies have been revised to match the Transportation Plan. The 2B has been updated to reflect the correct monthly/total trips. These plan match what was submitted to Arapahoe County.	X	X
304.c.(7). Operations Safety Management Program	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(8). Emergency Response Plan	ALWAYS			Plan not signed and approved by local emergency response agency.	Include version approved by local emergency response agency or add statement describing the attempts to acquire approval by the local emergency response agency explaining why an approved copy cannot be provided at this time.		okay to pass completeness		Yes, a COA will be added to each location.	Bennett Fire and Rescue is currently reviewing the EAP for both locations. Crestone will provide the signed plans ASAP. Crestone agrees to a COA to provide approved plans prior to construction.	X	X
304.c.(8). Emergency Response Plan	ALWAYS			Plan does not include staffing details of local emergency response agencies (Full-time, Part-time, etc).	Update to include staffing details for all local and mutual aid agencies.	Yes	okay to pass completeness	Yes		Language has been added regarding staffing of local emergency response agencies on page 16 of the PDF.	X	X
304.c.(9). Flood Shut-In Plan	Within floodplain			Not applicable.			NA			X	X	
304.c.(10). Hydrogen Sulfide Drilling Operations Plan	Within known H2S zones			Not applicable.			NA			X	X	
304.c.(11). Waste Management Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(12). Gas Capture Plan	If not committed to connect to gathering system			Not applicable.			NA			X	X	
304.c.(13). Fluid Leak Detection Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(14). Topsoil Protection Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(15). Stormwater Management Plan	ALWAYS			Non-structural BMPs should be descriptive, not just a list of processes. Since these are already detailed in other Plans such as the Topsoil Plan no changes are required, however we recommend adding more detail to this plan for future submissions.			okay to pass completeness		Acknowledged.	X	X	
304.c.(16). Interim Reclamation Plan	ALWAYS			All BMPs should be in an easily copy-and-pasteable form as they need to be manually added to the Form 2A. In this case these BMPs are acceptable but we ask that future submissions have a simplified list of BMPs rather than the individual breakdown as included in this Plan.			okay to pass completeness		Acknowledged.	X	X	
304.c.(17). Wildlife Plan	ALWAYS			Plan states that CPW recommends surveys for Burrowing Owls but the BMPs do not list any specific commitments to surveys being conducted.	Update to include information regarding if and when surveys will be conducted related to Burrowing Owls.		okay to pass completeness		No. The plan includes details of these surveys, however the list of BMPs does not. The list of BMPs is required in plans because these BMPs must be manually added to the Form 2A from each plan as part of the completeness process. We recommended adding this to the list of BMPs so that it is included on the Form 2A. This both helps us to understand what Crestone is agreeing to do, and helps the commissioners to understand how protective you plan to be. We recommend adding this, however if you choose not to leave a comment stating so below.	Please refer to page 13, section 11, table 3, listing surveys we committed to and the timing of the surveys.	X	X
304.c.(18). Water Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(19). Cumulative Impacts Plan	ALWAYS			No issues identified.			okay to pass completeness			X	X	
304.c.(20). Community Outreach Plan	Within 2000' of DIC BU			Not applicable.			NA			X	X	
304.c.(21). Geologic Hazard Plan	Within 1 mile of hazard			Not applicable.			NA			X	X	
Second review												
Required?	Substantially equivalent submission? Check if YES	Lesser Impact Area Exemption Request? Check if YES	Issues identified: (insert a new row for each plan issue)	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Staff second review: Was the issue addressed or new issue identified?	Applicant Response	403876560	403876571	
304.c.(5). Dust Mitigation Plan	ALWAYS			The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2B.	Update all Plans to accurately account for the estimated number of truck trips.		okay to pass completeness		Crestone clarified that the Dust plan and Transportation plans use different types of vehicles to calculate their trip mileages as the ECOM Rules for the Dust plan only call for Truck Trips whereas the Transportation plan considers all vehicle trips. No changes are necessary.	X	X	
304.c.(6). Transportation Plan	If RLG requires or Dir requests			The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2A.	Update all Plans to accurately account for the estimated number of truck trips.		okay to pass completeness		Crestone clarified that the Dust plan and Transportation plans use different types of vehicles to calculate their trip mileages as the ECOM Rules for the Dust plan only call for Truck Trips whereas the Transportation plan considers all vehicle trips. No changes are necessary.	X	X	
304.c.(17). Wildlife Plan	ALWAYS			Plan states that CPW recommends surveys for Burrowing Owls but the BMPs do not list any specific commitments to surveys being conducted.	Update to include information regarding if and when surveys will be conducted related to Burrowing Owls.		okay to pass completeness		Crestone opted not to make the recommended changes. As the plan does state that they will conduct surveys it does meet Rule requirements.	X	X	

Crestone State Harvard/Yale and State Wetterhorst/H andles OGD	Required?	Substantially equivalent submission? Check if YES	Lesser Impact Area Exemption Request? Check if YES	Issues identified	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Staff second review	Applicant Response	403876560	403876571
304.b.(7).F. ACCESS ROAD MAP	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(2).ALA DATASHEET	If Loc meets ALA criteria			No issues identified.				okay to pass completeness			X	X
304.b.(2).ALA NARRATIVE SUMMARY	If Loc meets ALA criteria			No issues identified.				okay to pass completeness			X	X
No Rule requirement. CONSULTATION SUMMARY	If pre-app mtg			Not applicable.				NA			X	X
No Rule requirement. CPW CONSULTATION	If pre-app mtg			No issues identified.				okay to pass completeness			X	X
304.b.(3). CULTURAL FEATURES MAP	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(7).H. DIRECTIONAL WELL PLAT	if any directional wells			No issues identified.				okay to pass completeness			X	X
304.b.(7).J. DISPROPORTION ATELY IMPACTED COMMUNITY MAP	Within 2000' of DICBU/HOBU			Not applicable.				NA			X	X
304.b.(7).I. GEOLOGIC HAZARD MAP	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(8).GIS data	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(7).E. HYDROLOGY MAP	ALWAYS			No issues identified.				okay to pass completeness			X	X
604.b.(3). INFORMED CONSENT LETTER	within 2000' of RBUI/HOBU			No issues identified.				okay to pass completeness			X	X
304.b.(7).B. LAYOUT DRAWINGS	ALWAYS			Tanks and MLVTs do not include Volumes.	Update to include estimated Volumes for all Tanks shown on Layout Drawings.			okay to pass completeness	Yes	The submit tab describes the MLVTs including quantity and volume. We have added this information to the layout drawings too.	X	X
304.d. LESSER IMPACT AREA EXEMPTION REQUEST	if asking to not submit required info			Not applicable.				NA			X	X
303.a.(6).B. LOCAL/FED FINAL PERMIT DECISION	if permit approved			Not applicable.				NA			X	X
304.b.(7).A. LOCATION DRAWING	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(4). LOCATION PICTURES	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(10). NRCS MAP UNIT DESC.	ALWAYS			No issues identified.				okay to pass completeness			X	X
No Rule requirement. OTHER	optional			Not applicable.				NA			X	X
304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS	ALWAYS			Tanks do not list volumes.	Update diagrams to include expected volumes for all Tanks.		Yes	okay to pass completeness	Yes	Tank Volumes have been added to the PFD for each locatin.	X	X
304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS	ALWAYS			Each diagram shows "VRT (1)", however the Form 2A's each list 7 Vapor Recovery Units. I do not see any other equipment that may show the remaining 6 listed Vapor Recovery Units.	Update to reflect accurate equipment counts.			okay to pass completeness	Yes, Equipment counts were changed and there are no longer any Vapor Recovery Towers included in this submission. Additionally, the Tank counts have changed.	The VRT count on both 2As have been revised to reflect 1 VRT.	X	X
304.b.(9).B.I. REFERENCE AREA MAP	if non-crop			No issues identified.				okay to pass completeness			X	X
304.b.(9).B.II. REFERENCE AREA PICTURES	if non-crop			No issues identified.				okay to pass completeness			X	X
Second review	ALWAYS			No issues identified.				okay to pass completeness			X	X
304.b.(12).B. SURFACE AGRMT/SURETY	if exists or req'd			No issues identified.				okay to pass completeness			X	X
604.a.(4). WAIVERS	within 500' of RBUI and no SUA			Not applicable.				NA			X	X
304.b.(7).C. WILDLIFE HABITAT DRAWING	ALWAYS			No issues identified.				okay to pass completeness			X	X
No Rule requirement. (any other doc the operator attached)	Optional			No issues identified.				okay to pass completeness			X	X

Crestone State Harvard/Yale and State Wetterhorn/Handies OGDP	Issues Identified	Suggested corrections:	Specific Rules (optional)	Issues identified	Status	Staff second review	Applicant Response	403876560	403876571
Water Resources	The "Basis for estimated depth to and description of shallowest groundwater occurrence" Section includes a \ between the 3 and the 6.	Remove typo for clarity.			okay to pass completeness	Yes	The text has been corrected to reflect 39', this was just a typo.		X
Equipment and flowlines Location ID & Local Govt Info	Each Preliminary Process Flow Diagram shows "VRT (1)", however the Form 2A's each list 7 Vapor Recovery Units. Update local permit information if permit decision has occurred.	Update to reflect accurate equipment counts either on the Form 2A or the Process Flow Diagrams.			okay to pass completeness	Yes. Other equipment changes have also occurred.	The VRTs have been removed from the 2As and the PFDs. Permit is still in process with Arapahoe County.	X	X
					okay to pass completeness	Yes		X	X

Crestone State Harvard/Yale and State Wetterhorn/Handies OGD	Issues Identified	Suggested corrections:	Specific Rules (optional)	Issues identified	Status	Staff second review	Applicant Response	403878575
Oil and Gas Location Data	The Access Road disturbance increases from the Construction acreage to the Post-Interim Reclamation acreage, the Access Road disturbance should not increase during Interim Reclamation	Update to show consistent Access Road acreage.			okay to pass completeness	Yes	The acreages have been revised to be consistent with the layout drawings.	X
Oil and Gas Location Data	The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2A.	Update all Plans to accurately account for the estimated number of truck trips.			okay to pass completeness	The Dust Mitigation Plan for the State Harvard-Yale and State Wetterhorn-Handies have been revised to match the Transportation Plan. The 2B has been updated to reflect the correct monthly/total trips.	The Dust Mitigation Plan for the State Harvard-Yale and State Wetterhorn-Handies have been revised to match the Transportation Plan. The 2B has been updated to reflect the correct monthly/total trips.	X
Second review	Issues Identified	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status		Applicant Response	
Oil and Gas Location Data	The Transportation Plan's stated truck trips per day do not match with the amount of truck trips shown on the Dust Plan and the Form 2A.	Update all Plans to accurately account for the estimated number of truck trips.			okay to pass completeness	Crestone clarified that the Dust plan and Transportation plans use different types of vehicles to calculate their trip milages as the ECOM Rules for the Dust plan only call for Truck Trips whereas the Transportation plan considers all vehicle trips. No changes are necessary.		X

Crestone State Harvard/Yale and State Wetterhorn/H andies OGD	Issues identified:	Suggested corrections:	Specific Rules (optional)	Issues identified	Status	Staff second review	Applicant Response	403876581
	Two individual OIL AND GAS DEVELOPMENT PLAN MAP attachments provided, but all of the OGD area needs to be on a single map.	OIL AND GAS DEVELOPMENT PLAN MAP must show the entire OGD area in a single map; combining the two single maps into a single 2-page PDF will not be satisfactory.			okay to pass completeness	Yes	The OGD map has been revised to to depict the OGD on a single map.	X

COMPLETENESS REVIEW		Docket# 240800192	
Attorney Name: KELSEY WASYLENKY; JAMIE JOST Permitter Name: Sam Champlin Engineer Name: Hearing Officer Name:	Attorney Email Address: KWASYLENKY@JOSTENERGYLAW.COM; JJOST@JOSTENERGYLAW.COM Permitter Email: sam.champlin@state.co.us Engineer Email: Diana.Burn@state.co.us Hearing Officer Email: stephen.smeltz@state.co.us		
Issue identified by staff:	Suggested correction:	Explanation:	SME reviewer
<u>LAS Review Notes</u>			
None.	None.	There were no LAS Review issues identified in the hearing application at this time.	
<u>Permitting Review Notes</u>			
Concern: This application does not include information regarding BLM minerals within the unit and the intent to communitize.		TOPIC BLM (federal) minerals within the unit and intent to Communitize	
<u>Geologic Testimony</u>			
None.	None.	There were no Review issues identified in the Geologic Testimony at this time.	
Second review			
<u>Engineering Testimony</u> Testimony provided supports the requested development		ACCEPTABLE OVERALL	Engineering

Applicant Response:

corrected 12/18