

Crestone Bennett D OGDP - Plans	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	Applicant Response	403944406
304.c.(1). Emergency Spill Response Program	Within 2640' of GUDI/or relevant surface water			Not applicable.				NA		X
304.c.(2). Noise Mitigation Plan	ALWAYS			This plan seems to be a draft copy, is this the final copy of the plan?	Update to remove "DRAFT" from pages.			okay to pass completeness	The NMP has been modified slightly since the original version. In addition to removing "draft", the equipment configuration had been modified to a relatively small degree. The noise model had been updated to account for these changes.	X
304.c.(2). Noise Mitigation Plan	ALWAYS			2 Gas compressors are listed under the equipment and are shown on the eastern side of the proposed pad equipment, the side towards the two RBUs. The Noise plan does not make mention of these two compressors and it is not clear if the noise from this equipment was considered in the production noise calculations. Were these included in the calculations? What mitigations will be done to ensure that these compressors do not exceed noise limits for the neighboring RBUs?	Update description of production noise calculations to clarify whether this equipment was included in the calculations and consider additional BMPs for managing sound specifically related to high noise equipment during production as sound walls will no longer be present to contain noise.			okay to pass completeness	The original submittal accounted for all equipments' sound signatures, including the compressors, to ensure compliance and mitigate if necessary. During all phases of operations, Crestone is anticipated to be in compliance with ECMC 400 series rules. Addition of sound walls or other further sound attenuation are not necessary to meet compliance during any phase, but Crestone has committed to installing soundwalls during drilling and completions to further mitigate sound, light and visual distractions. The moving of production equipment has been accounted for in this revision and the NMP demonstrates Crestone still achieves compliance in all phases.	X
304.c.(3). Light Mitigation Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(4). Odor Mitigation Plan	Within 2000' of BU			No issues identified.				okay to pass completeness		X
304.c.(5). Dust Mitigation Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(6). Transportation Plan	If RLG requires or Dir requests			No issues identified.				okay to pass completeness		X
304.c.(7). Operations Safety Management Program	ALWAYS			No issues identified.				okay to pass completeness		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	The Bennett - Watkins Fire District has been asked to review and sign the EPR. The request to review was initiated in December 2024, and Crestone has been in contact each month since. Once a signed copy is received it will be provided to ECMC.	X
304.c.(8). Emergency Response Plan	ALWAYS			Plan does not include a description of equipment, typical quantities of hydrocarbon liquids and other hazardous, reactive and flammable materials stored.	Update to include information.	Yes		okay to pass completeness	Plan has been updated	X
304.c.(8). Emergency Response Plan	ALWAYS			Plan does not include a description of sensitive areas that may be impacted by a spill or release and the plans for protecting those areas. Since this location is proposed to be directly adjacent and upgradient to NWI mapped and field verified wetlands this information should be included.	Update to include information.	Yes		okay to pass completeness	Plan has been updated	X
304.c.(9). Flood Shut-In Plan	Within floodplain			Not applicable.				NA		X
304.c.(10). Hydrogen Sulfide Drilling Operations Plan	Within known H2S zones			Not applicable.				NA		X
304.c.(11). Waste Management Plan	ALWAYS			No issues identified.				okay to pass completeness		X

304.c.(12). Gas Capture Plan	If not committed to connect to gathering system			Not applicable.				NA		X
304.c.(13). Fluid Leak Detection Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(14). Topsoil Protection Plan	ALWAYS			The pictures included in the topsoil plan only show the soil after removal, they do not show the topsoil horizons in situ and therefore make it very difficult to differentiate between soil horizons or see the depth at which each section of soil was collected. In the future we recommend including pictures of the boring after the soil has been removed from the ground so the soil horizons can be seen in situ.				okay to pass completeness		X
304.c.(14). Topsoil Protection Plan	ALWAYS			Section 4.3 states that the disturbance during the production phase will be 6.28 acres, however the Form 2A states that the post interim reclamation area will be 7.42 acres. Due to this discrepancy the amount of topsoil stated to be stored for final reclamation is insufficient. This is also the case for the Layout Drawings.	Update to use consistent post interim reclamation acreages and topsoil volumes to ensure sufficient topsoil is stored for final reclamation.			okay to pass completeness	The Topsoil Protection Plan has been updated.	X
304.c.(15). Stormwater Management Plan	ALWAYS			Appendix E. Site Specific Stormwater BMPs lists descriptions of every type of BMP however it does not include an easily copy and pastable list of concrete Best Management Practices. These physical BMPs such as berms, culverts, etc. should be accompanied by a list of Best Management Practices describing how these physical BMPs will be implemented at this location. These BMPs need to be easily copy and pastable as they will need to be copied from the Plans into the Form 2A prior to passing completeness for this OGD.	Add a list of BMPs describing how this location is protective in relation to stormwater management.			okay to pass completeness	The SWMP has been updated and reattached; see page 26 for BMP list.	X
304.c.(16). Interim Reclamation Plan	ALWAYS			Section 3.0 of this plan states "Interim reclamation shall occur no later than three (3) months on cropland or twelve (12) months on non-cropland after the drilling phase commences.", however Rule 1003.b. states "Interim reclamation shall occur no later than three (3) months on crop land or six (6) months on non-crop land after such operations unless the Director extends the time period because of conditions outside the control of the operator."	Update to describe whether you plan to meet Rule 1003.b.	1003.b.		okay to pass completeness	The Interim Rec Plan has been updated and reattached.	X
304.c.(17). Wildlife Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(18). Water Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(19). Cumulative Impacts Plan	ALWAYS			No issues identified.				okay to pass completeness		X
304.c.(20). Community Outreach Plan	Within 2000' of DIC BU			Not applicable.				NA		X
304.c.(21). Geologic Hazard Plan	Within 1 mile of hazard			Not applicable.				NA		X

Crestone Bennett D OGD - Attachments	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	Applicant Response	403944406
304.b.(7).F. ACCESS ROAD MAP	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(2). ALA DATASHEET	If Loc meets ALA criteria			No issues identified.				okay to pass completeness		X
304.b.(2). ALA NARRATIVE SUMMARY	If Loc meets ALA criteria			No issues identified.				okay to pass completeness		X
No Rule requirement. CONSULTATION SUMMARY	If pre-app mtg			Form 2A states that a Pre-application consultation occurred with the RLG, but now LGD consultation summary was included.	Update to include summary of LGD consultation meeting.			okay to pass completeness	LGD consultation summary is attached.	X
No Rule requirement. CPW CONSULTATION	If pre-app mtg			The Form 2A states that Crestone is in the process of obtaining a 1202.a.(3) waiver from CPW for this location. As discussed via email, this waiver has been acquired.	As discussed via email, consultation on this waiver has occurred. Attach correspondence summary with CPW to the Form 2A			okay to pass completeness	CPW waiver is attached.	X
304.b.(3). CULTURAL FEATURES MAP	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(7).H. DIRECTIONAL WELL PLAT	If any directional wells			No issues identified.				okay to pass completeness		X
DISPROPORTIONATELY IMPACTED COMMUNITY MAP	Within 2000' of DIC BU/HOBU			Not applicable.				NA		X
304.b.(7).I. GEOLOGIC HAZARD MAP	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(8). GIS data	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(7).E. HYDROLOGY MAP	ALWAYS			No issues identified.				okay to pass completeness		X
604.b.(1). INFORMED CONSENT LETTER	within 2000' of RBU/HOBU			No Informed Consent Letter was included despite their being 2 RBUs within 2000' of the Working Pad Surface.	Include informed consent or describe which exception to Rule 604.b. this location meets.	604.b.		okay to pass completeness	In the 2A tab "cultural and safety setbacks", 604.b.(4) is checked for "request commission finding". Informed consent is currently	X
304.b.(7).B. LAYOUT DRAWING	ALWAYS			Tanks do not include volumes.	Update to include planned Tank volumes, including MLVTs.			okay to pass completeness	Volume has been added to the MLVT. Additionally, see note #3 on the Facility Layout Drawing.	X
304.b.(7).B. LAYOUT DRAWING	ALWAYS			Only one MLVT shown in Preliminary Well Completion Diagram, but Form 2A lists 2 MLVTs.	Update to show location of second MLVT or update Form 2A to accurately reflect the number of planned MLVTs.			okay to pass completeness	The count on the 2A has been changed to "1".	X
304.b.(7).B. LAYOUT DRAWING	ALWAYS			Layout Drawings list 4,735 C.Y. of "Topsoil stored for Final Rec" with a post interim reclamation area of 7.42 acres. This is not enough topsoil to reclaim the post interim	Update to store enough topsoil for final reclamation.			okay to pass completeness	The Layout Drawing has been updated.	X
304.d. LESSER IMPACT AREA EXEMPTION REQUEST	If asking to not submit required info			Not applicable.				NA		X
303.a.(6).B. LOCAL/FED FINAL PERMIT DECISION	If permit approved			No local Permit attached.	If a Local Permit has been submitted and approved, attach it to the Form 2A.			okay to pass completeness	The OGF permit has not been approved. It has been filed and details have been updated in the 2A.	X

304.b.(7).A. LOCATION DRAWING	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(4). LOCATION PICTURES	ALWAYS			The "View North" photo seems to be the same treeline as shown to the south, just closer up. Based on aerial imagery the only tree line is to the south.	Update to include a photo that clearly depicts the view to the north.			okay to pass completeness	Location pictures have been updated and reattached.	X
304.b.(4). LOCATION PICTURES	ALWAYS			The "View South" photo seems to be taken from a point farther north than the "View West" and "View East" photos. The "View North" photo seems to match closer with the distance and	Update to include a photo that was taken from roughly the point shown in the Overhead View..			okay to pass completeness	Location pictures have been updated and reattached.	X
304.b.(10). NRCS MAP UNIT DESC.	ALWAYS			No issues identified.				okay to pass completeness		X
No Rule requirement. OTHER	optional			Per email correspondence a Neighborhood Meeting occurred.	Attach Neighborhood Meeting Summary.			okay to pass completeness	Comment added to the submit tab and a summary is attached as "OTHER".	X
304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(9).B.i. REFERENCE AREA MAP	if non-crop			No issues identified.				okay to pass completeness		X
304.b.(9).B.ii. REFERENCE AREA PICTURES	if non-crop			The Reference Area Picture attachment does not include the required 5th picture taken from above the Reference Area. Per Rule 304.b.(9).B.ii. this must be a picture, not aerial	Update to include downward facing photograph of the Reference Area. Drone imagery is recommended.	304.b.(9).B.ii.		okay to pass completeness	Reference area pictures have been updated and reattached.	X
304.b.(7).G. RELATED LOCATION AND FLOWLINE MAP	ALWAYS			No issues identified.				okay to pass completeness		X
304.b.(12).B. SURFACE AGRMT/SURETY	if exists or req'd			Not applicable.				NA		X
604.a.(4). WAIVERS	within 500' of RBU and no SUA			As discussed via email, the CPW waiver has been aquired and is missing.	As discussed via email, add the CPW waiver as an attachment to the Form 2A.			okay to pass completeness	I believe this should be referencing the 1202.a.(3). There are no RBUs within 500'.	X
304.b.(7).C. WILDLIFE HABITAT DRAWING	ALWAYS			No issues identified.				okay to pass completeness		X
No Rule requirement. [any other doc the	Optional			Not applicable.				NA		X

Crestone Bennett D OGD - Form 2A	Issues identified	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response	403944406
Submit	Form 2A states that a 1202.a.(3) waiver is in process with CPW, however it is not attached. As discussed via email the waiver has been granted.	Attach approved waiver and update Form 2A with updated information regarding waiver.			okay to pass completeness	A comment has been updated and waiver is attached.	X
Location ID & Local Govt Info	Form 2A states that a Local Government Permit for Adams County had not yet been submitted.	If the Permit has been submitted update this section to include current status of the Local Government Permit.			okay to pass completeness	Submittal status and date have been updated to reflect the local permit is currently in process. Comment added with OGF number for reference.	X
Equipment and flowlines	Only one MLVT shown in Preliminary Well Completion Diagram in the Layout Drawings, but Form 2A lists 2 MLVTs.	Update to show location of second MLVT in Layout Drawings or update Form 2A to accurately reflect the number of planned MLVTs.			okay to pass completeness	Count changed to "1".	X
Location ID & Local Govt Info	Form 2A states that a Federal ADPs will be required for 4 wells at this location.	Update this section if any changes have occurred related to the status of Federal permitings.			okay to pass completeness	Nothing has been filed with BLM to date therefore no update.	X
Water Resources	The Form 2A states that you are 54 feet from a wetland that has been field verified however you state that the shallowest depth to groundwater is 254 feet based on a nearby DWR well. We understand that there may not be wells nearby that are accurate. Are you sure that there is not a better way to estimate depth to groundwater?	Update to give a more reasonable depth to groundwater.			okay to pass completeness	Groundwater depth and the basis for estimated depth has been updated.	X

Crestone Bennett D OGDP - Form 2B	Issues identified	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response	403951729
Water Resources	The Form 2A states that you are 54 feet from a wetland that has been field verified however you state that the estimated depth to groundwater is 254 feet. We understand that there may not be wells nearby that are accurate. Are you sure that there is not a better way to estimate depth to groundwater?	Update to give a more reasonable depth to groundwater.			okay to pass completeness	Groundwater depth has been updated and matches the 2A.	X

Crestone Bennett D OGDP - Form 2C	Issues identified:	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response
	No issues identified.				okay to pass completeness	

Hearing Application

COMPLETENESS REVIEW		Docket# 241100269
Attorney Name: JAMIE JOST; KELSEY WASYLENKY	Attorney Email Address: JJOST@JOSTENERGYLAW.COM; KWASYLENKY@JOSTENERGYLAW.COM	
Permitter Name: Ginger Malasauskas	Permitter Email: ginger.malasauskas@state.co.us	
Engineer Name: Diana Burn	Engineer Email: Diana.Burn@state.co.us	
Hearing Officer Name: Matthew Berman	Hearing Officer Email: matthew.berman@state.co.us	
Issue identified by staff:	Suggested correction:	Explanation: SME reviewer
<u>LAS Review Notes</u>		
OGDP Application: paragraph 2 and Relief Paragraph A: the number of new wells proposed by the Exhibit C Spacing exceed the number proposed in the OGDP application.	<p>Recommended Revisions:</p> <ul style="list-style-type: none"> - Paragraph 2: "Applicant seeks approval of an approximate 8,344-acre OGDP for the development and production of up to thirty (30) new horizontal wells, of which twenty-six (26) new horizontal..." - NEW additional paragraph or sentence in the application: Crestone acknowledges that an additional OGDP application will have to be filed in the future to drill all the wells proposed by the spacing in this OGDP application. - Relief Paragraph A: "...development of twenty-six (26) thirty (30) new horizontal wells within the.." 	OGDP well count should encompass all of the wells being proposed, not just the ones for the new location being proposed.
<u>Permitting Review Notes</u>		
Concern: The number of new wells listed in the spacing application exceeds the number listed in paragraph 2 in the OGDP application.		<p>TOPIC</p> <p>Number & Type of Proposed Wells</p>
<u>Geologic Testimony</u>		
Concern: Geology Testimony lists one county		County
Concern: Fieldname is incorrect in Geology Testimony		Field

Applicant Response:

Application updated corrected 3/21 and resubmitted

Application updated corrected 3/24 and resubmitted

Application updated corrected 3/24 and resubmitted

Application updated corrected 3/24 and resubmitted

Engineering Testimony

CLARIFICATIONS
OR ADDITIONAL
INFORMATION
REQUESTED Engineering

testimony provided potentially
supports requested
development - EUR values
appear to be mislabelled -
Mscf as
EUR for gas - no decline curve

data appears inconsistent with
its labelling (EUR gas of 400
Mscf not supported by well's
production records)- provide
analog decline curve

Application updated
corrected 3/31 and resubmitted

Application updated
corrected 3/31 and resubmitted