

**OGDP Information**

Crestone

State

Sunlight/Long

**OGDP Name** OGD

Brian

**Lead LAS Assigned** Christopher

**Form 2A Doc#** 404012825

**Form 2B Doc#** 404012829

**Form 2C Doc#** 404012830

**Docket #** 241200313

Crestone State Sunlight/Long OGD	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	Applicant Response (copied from returned spreadsheets)
304.c.(1). Emergency Spill Response Program	Within 2640' of GUDI/or relevant surface water							NA	
304.c.(2). Noise Mitigation Plan	ALWAYS			BMP tweak. Include in the BMP for the continuous monitoring that it is the three locations with the pre-operational ambient monitoring that will have the continuous	That this will be the case becomes apparent when reviewing the figures, but for this location in particular I want to have this be very (overly?) clear in the BMPs.			okay to pass completeness	The continuous monitoring BMP has been updated to reflect the 3 monitoring locations.
304.c.(3). Light Mitigation Plan	ALWAYS							okay to pass completeness	
304.c.(4). Odor Mitigation Plan	Within 2000' of BU			BMPs are on the Form 2A.				okay to pass completeness	
304.c.(5). Dust Mitigation Plan	ALWAYS							okay to pass completeness	
304.c.(6). Transportation Plan	If RLG requires or Dir requests							okay to pass completeness	
304.c.(7). Operations Safety Management Program	ALWAYS							okay to pass completeness	
304.c.(8). Emergency Response Plan	ALWAYS			Have Bennett-Watkins Fire Rescue and/or Arapahoe County Office of Emergency Management reviewed this plan?	Have local emergency response have an opportunity to review and comment.	602.j.		okay to pass completeness	The approved Will Serve Letter has been attached as "Other"
304.c.(9). Flood Shut-In Plan	Within floodplain							NA	
304.c.(10). Hydrogen Sulfide Drilling Operations Plan	Within known H2S zones							NA	
304.c.(11). Waste Management Plan	ALWAYS							okay to pass completeness	
304.c.(12). Gas Capture Plan	If not committed to connect to gathering system							NA	
304.c.(13). Fluid Leak Detection Plan	ALWAYS							okay to pass completeness	
304.c.(14). Topsoil Protection Plan	ALWAYS			Confirm 9 ft tall topsoil piles for after interim reclamation.				okay to pass completeness	The 9' topsoil post interim reclamation is confirmed to be correct.
304.c.(15). Stormwater Management Plan	ALWAYS			The attached plan appears to be a plan aimed at addressing a CDPHE Stormwater Permit, not ECOM Rule 1002.f.	Rule 1002.f. has a greater focus on what site specific controls and BMPs are planned for the initial plan for the location. This includes a BMP description for where/how a BMP will be used, not what the BMP is. While significant parts of the ECOM and CPDHE requirements overlap and can be used interchangeably, there are also major differences in focus.	1002.f.		okay to pass completeness	The revised plan has been included with this submittal focusing on the ECOM requirements.
304.c.(16). Interim Reclamation Plan	ALWAYS							okay to pass completeness	
304.c.(17). Wildlife Plan	ALWAYS			Updates may be needed to section on the access road. See 411 Variance for more detail.				okay to pass completeness	We have shifted the access road and no longer require a 411a variance. The wildlife plan has been updated to reflect the new road alignment.

304.c.(18). Water Plan	ALWAYS							okay to pass completeness	
304.c.(19). Cumulative Impacts Plan	ALWAYS			Include the SCADA system in the BMPs (discussed elsewhere, but not in the BMP section)	Additional BMP			okay to pass completeness	SCADA system information has been added to the BMP section: 8.3 Production operations #6
304.c.(20). Community Outreach Plan	Within 2000' of DIC BU							NA	
304.c.(21). Geologic Hazard Plan	Within 1 mile of hazard							NA	

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304.b.(7).F. ACCESS ROAD MAP	ALWAYS			Drainage to Aurora Reservoir from parts of the access road are a concern. See 411 Variance.	A new route for the access road, even if it deviates from the existing two-track.			okay to pass completeness	We shifted the access road outside of the 1,000' buffer of Aurora Reservoir.	
304.b.(2). ALA DATASHEET	If Loc meets ALA criteria							okay to pass completeness		
304.b.(2). ALA NARRATIVE SUMMARY	If Loc meets ALA criteria							okay to pass completeness		
No Rule requirement. CONSULTATION SUMMARY	If pre-app mtg							review not completed		
No Rule requirement. CPW CONSULTATION	If pre-app mtg							review not completed		
304.b.(3). CULTURAL FEATURES MAP	ALWAYS							okay to pass completeness		
304.b.(7).H. DIRECTIONAL WELL PLAT	If any directional wells							okay to pass completeness		
304.b.(7).J. DISPROPORTIONATELY IMPACTED COMMUNITY MAP	Within 2000' of DIC BU/HOBU							NA		
304.b.(7).I. GEOLOGIC HAZARD MAP	ALWAYS							okay to pass completeness		
304.b.(8). GIS data	ALWAYS			See Access Road Map concerns. See 411 Variance				okay to pass completeness	We shifted the access road outside of the 1,000' buffer of Aurora Reservoir.	
304.b.(7).E. HYDROLOGY MAP	ALWAYS							okay to pass completeness		
604.b.(1). INFORMED CONSENT LETTER	within 2000' of RBU/HOBU							NA		
304.b.(7).B. LAYOUT DRAWING	ALWAYS			Confirm purpose of drill rig generators and fuel tank.	Is it for only well control in the case of a power outage, or other?			okay to pass completeness	The generators and fuel tanks are there for back up in case of the loss of utility power..	
304.d. LESSER IMPACT AREA EXEMPTION REQUEST	if asking to not submit required info							NA		
303.a.(6).B. LOCAL/FED FINAL PERMIT DECISION	if permit approved			Update if approved.				okay to pass completeness		
304.b.(7).A. LOCATION DRAWING	ALWAYS							okay to pass completeness		
304.b.(4). LOCATION PICTURES	ALWAYS							okay to pass completeness		
304.b.(10). NRCS MAP UNIT DESC	ALWAYS							okay to pass completeness		
No Rule requirement. OTHER	optional							review not completed		
304.b.(7).D. PRELIMINARY PROCESS FLOW DIAGRAMS	ALWAYS			Flowback phase diagram is not included	If the only flowback phase operations are the sand can noted in the production diagram, respond with some elaboration on this review sheet.			okay to pass completeness	Since flowback is routed through permanent production equipment, the only flowback phase operation equipment is the temporary sand can and flowback sand storage depicted in the production phase diagram.	
304.b.(9).B.i. REFERENCE AREA MAP	if non-crop							okay to pass completeness		
304.b.(9).B.ii. REFERENCE AREA PICTURES	if non-crop							okay to pass completeness		

304.b.(7).G. RELATED LOCATION AND FLOWLINE MAP	ALWAYS							okay to pass completeness	
304.b.(12).B. SURFACE AGRMT/SURETY	if exists or req'd			Attachment notes that a Surface Use Agreement will be required prior to disturbance. SUA is not part of the attachment.	Attach SUA.			completeness stage issues	The SUA has been attached but is still pending SLB approval due to the shift of the access road.
604.a.(4). WAIVERS	within 500' of RBU and no SUA							NA	
304.b.(7).C. WILDLIFE HABITAT DRAWING	ALWAYS							okay to pass completeness	
No Rule requirement. [any other doc the operator attached]	Optional			the protection of the Public Water Drinking Supply (Aurora Reservoir) from the Access Road and Flowline/Pipeline Corridor that is part	Location of access road and flowline/pipeline corridor.			okay to pass completeness	Crestone shifted the access road outside of the 1,000' buffer of Aurora Reservoir.

Crestone State Sunlight/Long OGD		Issues identified: (insert a new row for each 2A tab issue)	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response (copied from returned spreadsheet)	404012825	
Location ID & Local Govt Info	Include the related remote location for the produced water takeaway.					okay to pass completeness	The State Harvard 1H location has been added as a remote location.		
Location ID & Local Govt Info	Update local government siting information, if applicable.					okay to pass completeness	The status of local application has been updated.		
Water Resources	Water well used for depth to shallowest groundwater is approximately 4.75 miles away from the location, near the State Harvard/Yale proposed location.	Research for depth to groundwater closer to the location.				okay to pass completeness	Depth to groundwater has been revised to reflect a depth of 133' as noted in the well logs of the closest water well shown on the Hydrology map.(DWR Permit# 47701-F)		
Wildlife Resources	Updates may be needed based on the access road and 411 Variance.					okay to pass completeness	The WMP has been revised to reflect the road shift to the east, and no longer requires a 411 variance.		

Crestone State Sunlight/Long OGD	Issues identified: (insert a new row for each 2B tab issue)	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response (copied from returned spreadsheet)	404012829
OGDP Scale Data	should include the Aquatic Sportfish Management Waters HPH for that the access				okay to pass completeness	The access road has been move out of Aquatic Sportfish Management Waters.	
Oil and Gas Location Data	Depth to groundwater. With the well that this number was taken				okay to pass completeness	Depth to groundwater has been revised to reflect a depth of 133' as noted in the well logs of the closest water well shown on the Hydrology	

Crestone State Sunlight/Long OGD	Issues identified:	Suggested corrections:	Specific Rules (optional)	Referenced in guidance document?	Status	Applicant Response (copied from returned spreadsheet)			
Form 2C	None				okay to pass completeness				

Hearing Application

<b>COMPLETENESS REVIEW</b>		241200313
<b>Attorney Name: JAMIE JOST; KELSEY WASYLENKY</b>	<b>Attorney Email Address: JJOST@JOSTENERGYLAW.COM; KWASYLENKY@JOSTENERGYLAW.COM</b>	
<b>Permitter Name: Missti Mason</b>	<b>Permitter Email: missti.mason@state.co.us</b>	
<b>Engineer Name: Diane McCoy</b>	<b>Engineer Email: diane.mccoy@state.co.us</b>	
<b>Hearing Officer Name: Elias Thomas</b>	<b>Hearing Officer Email: elias.thomas@state.co.us</b>	
<b>Issue identified by staff:</b>	<b>Suggested correction:</b>	<b>Explanation: SME reviewer</b>
<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: introductory paragraph in Exhibit C - Item#4 incorrectly refers to the request for 16 new wells, as within the "State Sunlight DSU".		TOPIC
		Requested Relief
		Corrected
Exhibit F, page 4, paragraph 11: "State Sunlight-Long pad" should be corrected to "State Sunlight/Long pad"		Typographic and Other Errors
		Corrected

**Applicant Response:**

Concern: The removal of Paragraph 4 and part of Para 11 in Exhibit C is unnecessary as the location is within and subject to the CAP.

Application part of CAP??

Corrected

Concern: The vacating of the specific part of Order # 535-97 should be clear in the requested relief in Exhibit C. The requested relief does not indicate which underlying 640-acre DSU of Order 535-97 is being vacated. The requested relief should specify Order# 535-97 is being vacated in part for Section 24, Township 5 South, Range 65 West, 6th P.M specifically.

Requested Relief

Corrected

Concern: Para 15 implies that an order is being amended to establish the 3840-acre proposed drilling and spacing units. "/or" should be added to the sentence to clarify.

Geologic Testimony

None.

None.

There were no Review issues identified in the Geologic Testimony at this time.

Engineering Testimony

none

[review Engineering

There were no  
Review issues  
identified in the  
Engineering  
Testimony at this  
time.

Diane McCoy