

Alternative Location Analysis (ALA) Overview

Operator Meeting

December 15, 2020



COLORADO
**Oil & Gas Conservation
Commission**

Department of Natural Resources

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ALA Topics

1. SB 19-181 and Rule requirements
2. Form 2A updates
 - a. *New tab*: pre-application consult and ALA data
 - b. *New attachment*: ALA Data Template
 - c. *New attachment*: ALA Narrative Summary
3. Tier Classification System Tool
4. ALA Guidance documents
5. Final considerations & summary



SB 19-181 and Rule Requirements

- Mandated per SB 19-181

(11) (c) THE COMMISSION SHALL ADOPT RULES THAT:

(I) ~~ADOPT AN ALTERNATIVE LOCATION ANALYSIS PROCESS~~ AND SPECIFY CRITERIA USED TO IDENTIFY OIL AND GAS LOCATIONS AND FACILITIES PROPOSED TO BE LOCATED NEAR POPULATED AREAS THAT WILL BE SUBJECT TO THE ALTERNATIVE LOCATION ANALYSIS PROCESS; AND

- 304.b.(2).A = Applicability
- 304.b.(2).B = Criteria (i through x)
- 304.b.(2).C = Contents
- 304.b.(2).D = Director's request for additional info
- 301.f.(3) = Pre-application consult
- 301.f.(4) = Sequential Permitting

Form 2A: Alternative Location Analysis Tab – **NEW TAB** mock up (1 of 2 slides)

Relevant Local Government or Federal Pre-application Consultation:

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)?

Date of local government consultation:

9/1/2020



Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)?

Date of federal consultation:

<M/d/yyyy>



Was CPW involved in a pre-application consultation?

Date of CPW consultation:

9/1/2020



Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application? If yes, attach the ALA to the Form 2A.

ALA Applicability and Criteria:

Complete this section to determine if an ALA is required for this proposed Oil and Gas Location.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B?

If YES, list below the criteria met in Rule 304.b.(2).B, and attach an ALA to the Form 2A.

304.b.(2).B Criteria Met:
i – within 2000' of RBU
<input type="button" value="Add"/> <input type="button" value="Remove"/>



Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i:

Provide an explanation for the waiver request and attach supporting information if necessary:

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A.

Form 2A: Alternative Location Analysis Tab – **NEW TAB** mock up (2 of 2 slides)

Alternative Locations Dashboard:

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

Alt Loc #	Latitude	Longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
1	39.686317	-104.69000	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	1 BU 1700' SW
2	39.686317	-104.69500	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Working w/Surface Owner on SUA
3	39.686317	-104.68500	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	BU 700', school 1500', 1000' to Erie

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ALA Data Template Attachment

		Proposed Location			Alt Loc 1			Alt Loc 2			Alt Loc 3		
Reference Point		Latitude	Longitude	Latitude	Longitude	Latitude	Longitude	Latitude	Longitude	Latitude	Longitude		
304.b.(2).C.ii --> 304.b.(3).A													
Distance to nearest Cultural Feature:		Distance	Direction	Distance	Direction	Distance	Direction	Distance	Direction	Distance	Direction		
Building													
Residential Building Unit													
HOBUs													
Designated Outside Activity Area													
Public Road													
Above-ground Utility													
Railroad													
Property Line													
School Facility													
Child Care Center													
Boundary of DIC													
RBU, HOBUs, or School Facility within a Disproportionately Impacted Community within 2000 feet													
304.b.(2).C.ii --> 304.b.(3).B													
Number of cultural features within:		0-500 feet	501-1,000 feet	1,001-2,000 feet	0-500 feet	501-1,000 feet	1,001-2,000 feet	0-500 feet	501-1,000 feet	1,001-2,000 feet	0-500 feet	501-1,000 feet	1,001-2,000 feet
BUs													
RBUs													
HOBUs													
School Properties													
School Facilities													
DOAAs													
304.b.(2).C.iii.aa													
304.b.(2).B Criteria Met (include as many lines as needed, and provide a brief description of each criteria met)													
304.b.(2).C.iii.bb													
Location within DIC or within 2000' of DIC? YES or NO													
		Distance	Direction	Distance	Direction	Distance	Direction	Distance	Direction	Distance	Direction		
If YES, distance to nearest BU:													
If YES, distance to nearest HOBUs:													
If YES, distance to nearest School:													
If YES, describe community outreach efforts per 304.b.(2).C.iii													
If YES, the number and description of existing Oil and Gas Locations, Facilities, and Wells within 2000' of any RBU, HOBUs, or School within 2000' of the proposed location		Number	Description	Number	Description	Number	Description	Number	Description	Number	Description		
304.b.(2).C.iii.cc													

Data requirements directly from Rule 304.b.(2).C

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ALA Data Template Attachment

Data requirements not specific to Rules, but necessary to analyze alternative locations

Surface Ownership				
Additional Information				
604.a considerations				
604.b considerations				
Any variance or other relief required				
Tier Classification				
The following items should be answered in a written narrative format and attached to the Form 2A as "ALA Narrative Summary" (PDF format)				
Description of potential impacts to health, safety, welfare, wildlife, and the environment related to the development of this location				
Description of advantages and disadvantages associated with this location				
Permitting considerations for this location				
Conditions or factors that make the location unavailable				
Any other considerations				

ALA Narrative Summary attachment

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TIER CLASSIFICATION SYSTEM FOR QUICK ASSESSMENT OF PROPOSED AND ALTERNATIVE LOCATIONS BASED ON 304.b.(2).B CRITERIA, SITING CONSIDERATIONS, VARIANCES, AND MINERAL DEVELOPMENT

Tier	Which 304.b.(2).B criteria does the alternative location meet?	Rules 604 (setbacks) and 1202 (HPH) considerations:	Siting-related Variances or other Relief considerations:	Can the alternative location fully develop the minerals proposed by the 2A?	
Tier I	No criteria met	<ul style="list-style-type: none"> Complies with 604.a setbacks 604.a.(2) exception avoided 604.a.(4) consent avoided 604.b conditions avoided Complies with 1200-series 	No variance required	Yes: Tier I-A	No: Tier I-B
Tier II	One criterion met: iii, iv, v, vi, vii, or ix	<ul style="list-style-type: none"> Complies with 604.a setbacks 604.a.(2) exception avoided 604.a.(4) consent avoided 604.b conditions avoided Complies with 1200-series 	No variance required	Yes: Tier II-A	No: Tier II-B
Tier III <i>(Note: If CPW waives ALA per 304.b.(2).B.viii, criterion viii is not met)</i>	One criterion met: i* or viii† <i>*HOBU is not a school or child care center. †HPH is 1202.c.(1).R, S, or T, and CPW waives the application of the rule, or HPH is 1202.d.</i>	<ul style="list-style-type: none"> Complies with 604.a setbacks 604.a.(2) exception avoided or satisfied 604.a.(4) consent avoided or satisfied 604.b conditions avoided or satisfied For criterion viii: <ul style="list-style-type: none"> If HPH is 1202.d: CPW-approved Wildlife Mitigation Plan and Compensatory Mitigation required 	No variance required For criterion viii: <ul style="list-style-type: none"> If HPH is 1202.c.(2).R, S, or T: Director’s exception required 	Yes: Tier III-A	No: Tier III-B
Tier IV	Two or more criteria met: i*, iii, iv, v, vi, vii, viii†, ix, or x* <i>*HOBU is not a school or child care center. †HPH is 1202.c.(1).R, S, or T, and CPW waives the application of the rule, or HPH is 1202.d.</i>	<ul style="list-style-type: none"> Complies with 604.a setbacks 604.a.(2) exception avoided or satisfied 604.a.(4) consent avoided or satisfied 604.b conditions avoided or satisfied For criterion viii: <ul style="list-style-type: none"> If HPH is 1202.d: CPW-approved Wildlife Mitigation Plan and Compensatory Mitigation required 	No variance required For criterion viii: <ul style="list-style-type: none"> If HPH is 1202.c.(2).R, S, or T: Director’s exception required 	Yes: Tier IV-A	No: Tier IV-B
Tier V	Criteria i**, ii, viii‡, or x** met, or, any Location that requires a variance for siting considerations <i>**HOBU is a school or child care center. ‡ HPH is 1202.c.(1).A-T and CPW has not waived</i>	Varies	For criteria i, ii, or x: variance required for 604.a.(3). For criterion viii: variance required for 1202.c. Any Location that requires a siting-related variance.	Yes: Tier V-A	No: Tier V-B

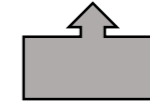
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Tier Classification System Examples

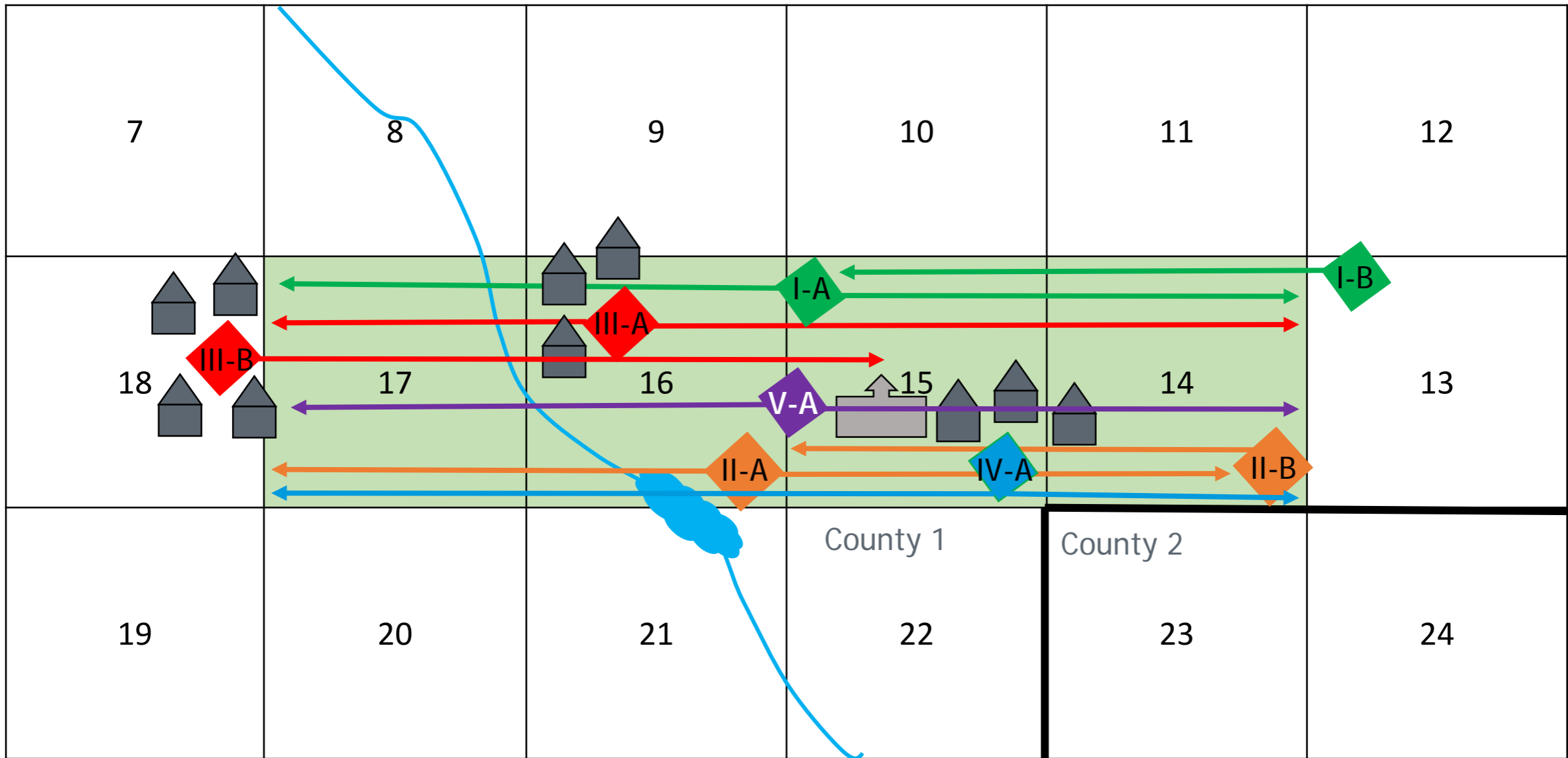
Minerals to develop in green; sections 14-17.



Residential Building Unit



School Facility



Tier I-A: Location does not meet any 304.b.(2).B criteria; can develop all minerals.

Tier I-B: Location does not meet any 304.b.(2).B criteria; can only develop partial minerals.

Tier II-A: Location meets one 304.b.(2).B criteria (vii, immediately upgradient from a riparian corridor or wetland); can develop all minerals.

Tier II-B: Location meets one 304.b.(2).B criteria (iv, within 2000' of a county boundary); can only develop partial minerals.

Tier III-A: Location meets one 304.b.(2).B criteria (i, within 2000' of RBU); can develop all minerals.

Tier III-B: Location meets one 304.b.(2).B criteria (i, within 2000' of RBU); can only develop partial minerals.

Tier IV-A: Location meets two 304.b.(2).B criteria (i, within 2000' of RBU, and iv, within 2000' of county line); can develop all minerals.

Tier V: Location meets one 304.b.(2).B criteria (ii, within 2000' of School); can develop all minerals.

ALA Guidance Documents

- Rule 304.b.(2) Alternative Location Analysis Operator Guidance: first version available today
 - Tier System
 - How to conduct the ALA
 - Information about maps required per 304.b.(2).C.i
 - Information on ALA Narrative Summary
- ALA Data Template: first version available today
 - Instructions coming soon
- Form 2A Checklist (including ALA tab): coming soon

Final Considerations

- Form 2A: new tab, ALA Data Template attachment, ALA Narrative Summary attachment
- Guidance doc, ALA Data Template, Tier Classification Table available on our website
- Per the Statement of Basis and Purpose (SBP) page 80: “Because the alternative location analysis process is new, the Commission appreciates that the Commissioners, the Commission’s Staff, operators, local governments, and other stakeholders will need to engage in an iterative process to determine how the process works, and the process may require continuous refinement.”

Thank you

Questions?



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