

COGCC Form 2 - Process

COGCC Review Workflow

Operator Training

January 14, 2021



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

Overview

- Form 2 - What happens when you hit submit
- OGLA Review of Existing Locations
 - Rule 308.c.(1).B. - review of existing locations
 - Considerations During Review
 - Information that may be requested
- Rule 308.c.(2) - Form 2 Denial

NOTES:

This process applies to Form 2s for wells on an existing Location or on a Location with a Form 2A approved prior to January 15, 2021.

The review process for Form 2s with approved OGDPs will be provided at a later date.

Form 2 - What happens when you hit submit

- When a Form 2 is submitted it will go directly to IN PROCESS status
 - Similar to Form 4, 5, 5A, 6, etc.
 - No completeness review
 - No public comment period
- Once IN PROCESS three technical review tasks are assigned to the Form 2:
 - Permitting, Engineering, & OGLA
 - ◆ OGLA task assigned to OGLA Supervisor (John Noto)
 - ◆ OGLA Supervisor will assign the OGLA Reviewer task



Form 2 - What happens when you hit submit

- During technical review all three groups will be reviewing concurrently
- At any point in the technical review any group may:
 - Pass their task if the form meets applicable rule requirements
 - Put forms ON HOLD or change task to Pending to request more information
 - Return forms to DRAFT
 - Recommend to the Director the forms be denied



OGLA Review of Existing Locations

- Rule 308.c.(1).B:

The Director will review the Oil and Gas Location where the Well is located to ensure that necessary and reasonable conditions of approval are applied to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources.

- Existing location review is being taken very seriously and will be thorough



OGLA Review of Existing Locations

- Considerations during OGLA technical review of existing locations will include, but is not limited to:
 - Does the siting of these wells conform with adopted rules?
 - ◆ Rule 1002.e.Surface disturbance minimization
 - Expect questions relating to using existing locations or consolidating operations
 - ◆ New Rule 604 setbacks
 - If the location were to be permitted today, would it meet any Alternative Location Analysis Criteria (Rule 304.b.(2).B.)?
 - Did this location already undergo Director Review through the Objective Criteria Review process?
 - ◆ An approved Objective Criteria Review Memo does NOT mean automatic approval of the OGLA task
 - ◆ The Objective Criteria were finalized on May 16, 2019 and since then new rules have been approved
 - ◆ In many cases the new rules go further than what was covered in the Objective Criteria and the OGLA review of existing locations will reflect this



Information that may be requested

- Types of information that may be requested from an Operator by the OGLA review may include, but not be limited to:
 - Updated/enhanced BMPs
 - New BMPs not previously provided
 - Any of the information required under Rule 304.b.
 - Any of the Plans required under Rule 304.c.
- In some cases, providing BMPs, Plans, and information via Sundry may not be enough information to allow for the Director to determine if a location is appropriately protective
 - In some cases, a full OGD application may be requested
 - In other cases, the Director may deny the Form 2



Rule 308.c.(2) - Form 2 Denial

- If a Form 2 is denied: Rule 308.c.(2) states:

The Director may deny any Form 2 that does not meet all requirements of the Commission's Rules, or does not provide necessary and reasonable protections for, or minimize adverse impacts to, public health, safety, welfare, the environment, and wildlife resources. The Director will put forth the reason for the denial. If the Director denies a Form 2, the Operator has the right for a hearing in front of the Commission at an upcoming hearing.



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