

Alternative Location Analysis (ALA)

Operator Training Series

January 5, 2021



COLORADO
Oil & Gas Conservation
Commission

Department of Natural Resources

Sabrina Trask
Senior Oil & Gas Location Assessment Specialist



Agenda

1. Two Scenarios: “old school” v. “new school”
2. ALA as a planning tool
 - *Identifying and selecting the “right” proposed location*
3. ALA as a collaboration/consensus builder
 - *Pre-application consultation(s)*
 - *Local/federal permit process*
4. ALA as a regulatory requirement - how do I get it right?
 - *Form 2A tab: pre-application consults and ALA data*
 - *Form 2A attachment: ALA Datasheet*
 - *Form 2A attachment: ALA Narrative Summary (with map)*
 - *Tier Classification System - scale of permitting complexity*
5. Final considerations & summary

Scenario 1 – “old school”

- Proposed location selected with little or no alternative location analysis
- Pre-application consultation may result in difficult feedback from stakeholders; consensus not achieved; conflict between local and COGCC permit
- Permit process is slow due to requests for more information, additional formal consultations, requests for more BMPs, addition of COAs, etc.

Result:

- Time and money wasted
- Conflict with local permit
- Slow permitting process
- Permit approval decision is harder to make



Scenario 2 – “new school”

- Proposed location selected using ALA to avoid impacts to receptors through thoughtful location siting, minimize any impacts through well-designed BMPs, and mitigate any impacts that cannot be avoided or minimized
- Pre-application consultation may result in positive feedback from stakeholders; consensus reached; agreement between local and COGCC permit
- Permit process is straightforward since proposed location has been “vetted” through the ALA process

Result:

- Time and money well spent
- Consensus with local permit
- Streamlined permitting
- Permit approval decision is easier to make





ALA as a planning tool

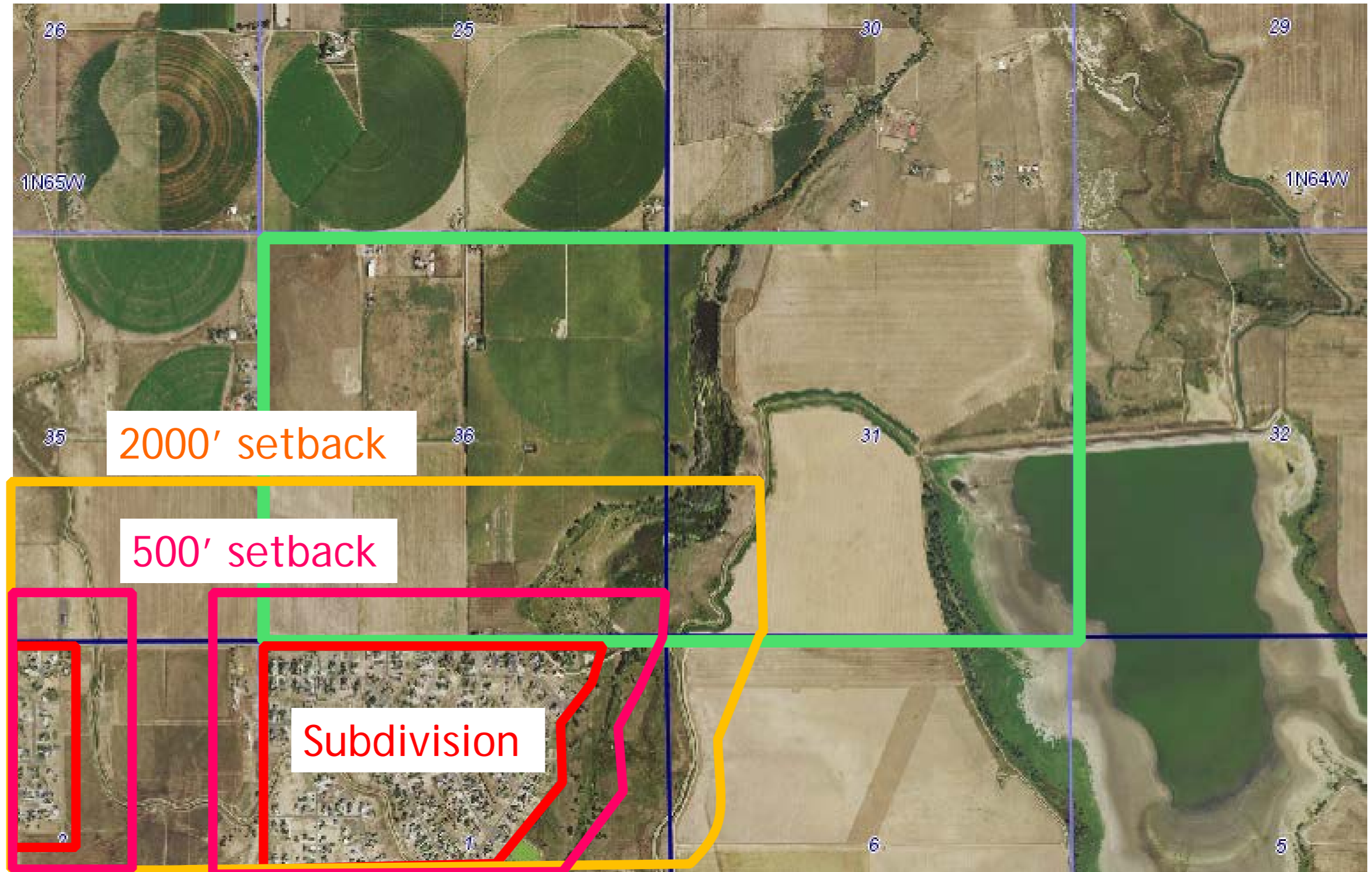
Selecting the “right” proposed location

- Seek surface locations that avoid potential receptors:
 - People: Building Units, Schools, DI Communities, etc.
 - Water resources: floodplains, wetlands, Public Water System infrastructure, etc.
 - Wildlife resources: High Priority Habitats
- Seek surface locations that avoid multiple jurisdictional boundaries
- Seek surface locations that do not require complex permitting such as variances, waivers or informed consent, additional formal consultations

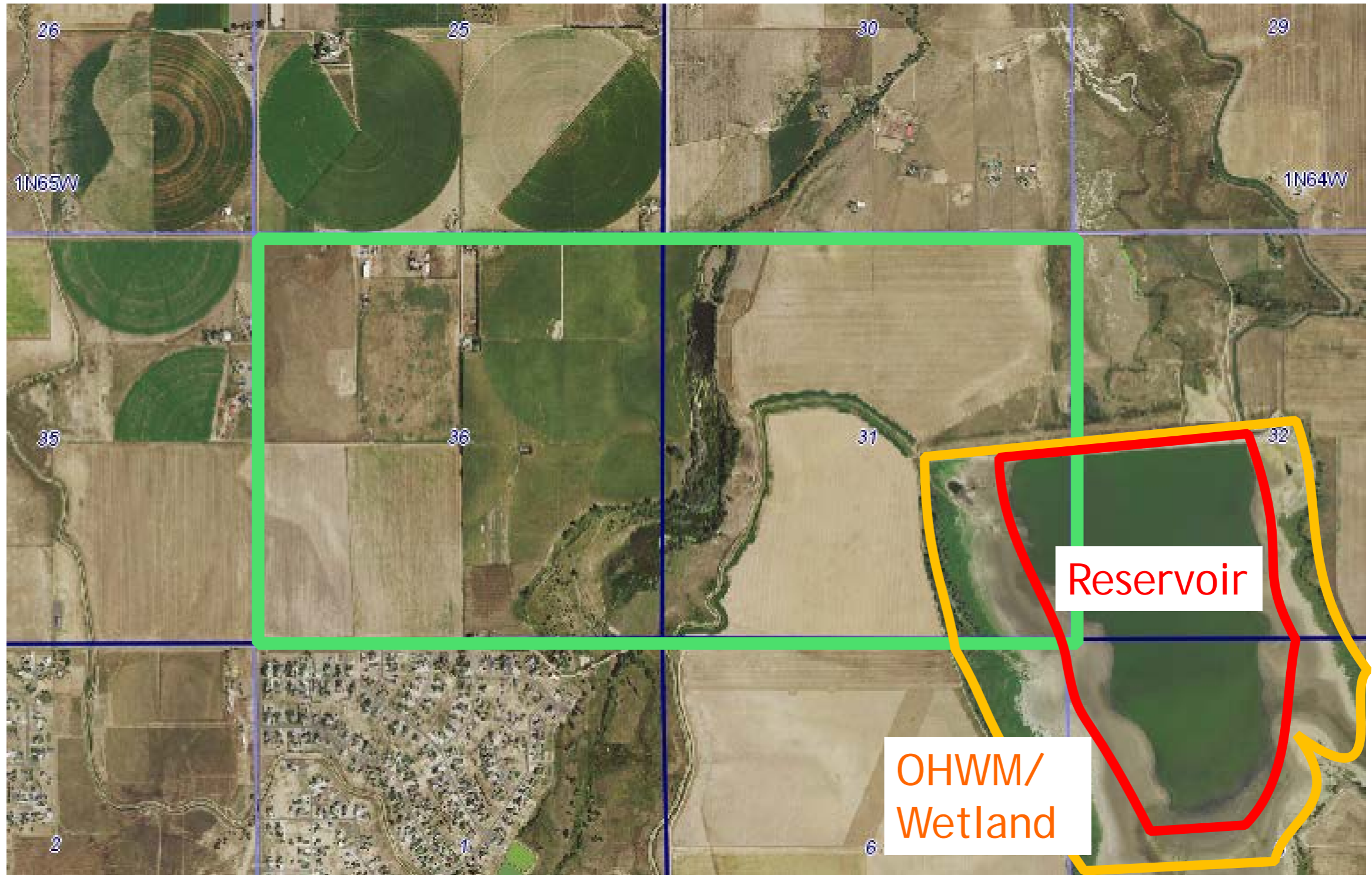
ALA as a Planning Tool



ALA as a Planning Tool



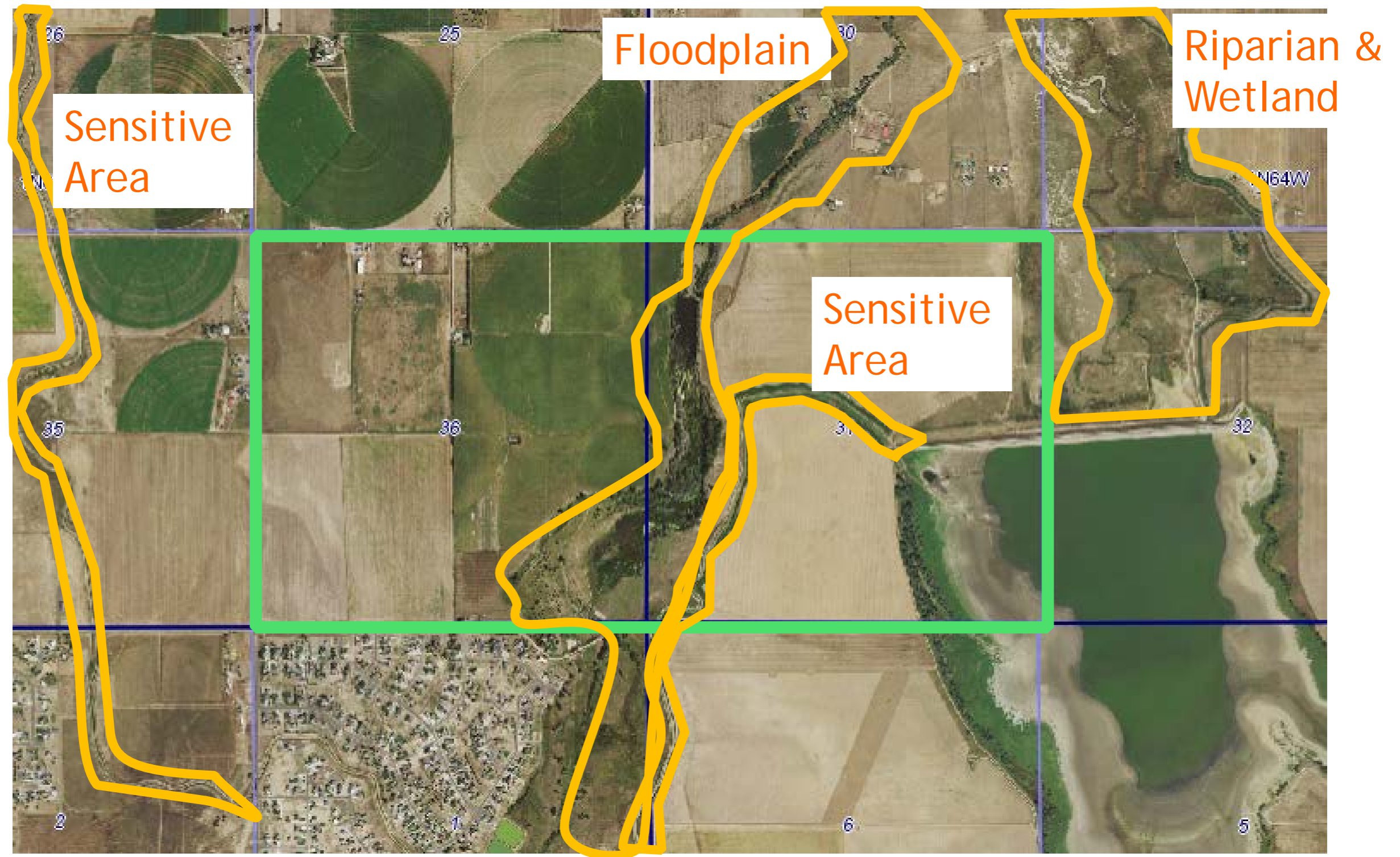
ALA as a Planning Tool



ALA as a Planning Tool

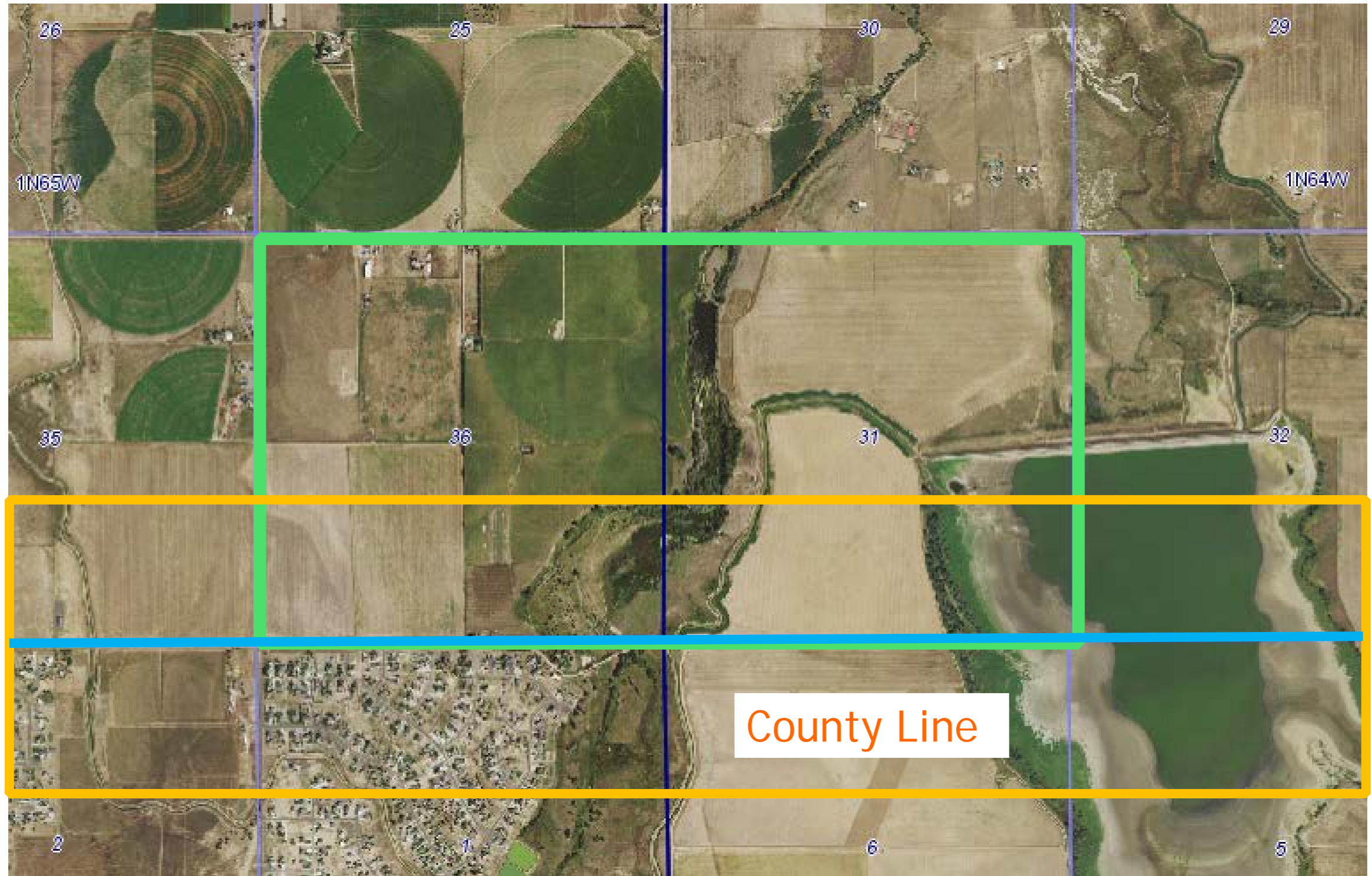


ALA as a Planning Tool

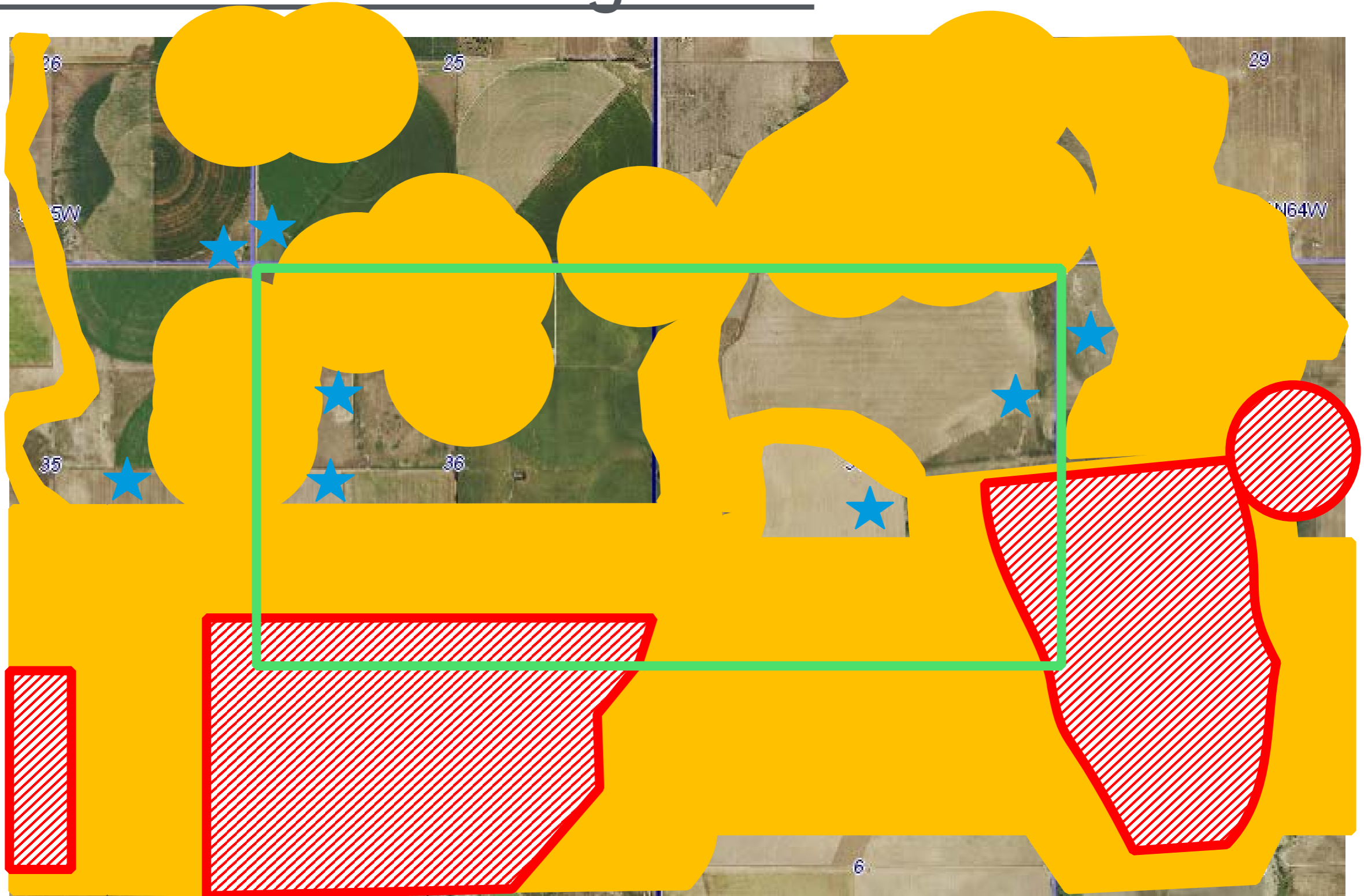


ALA as a Planning Tool



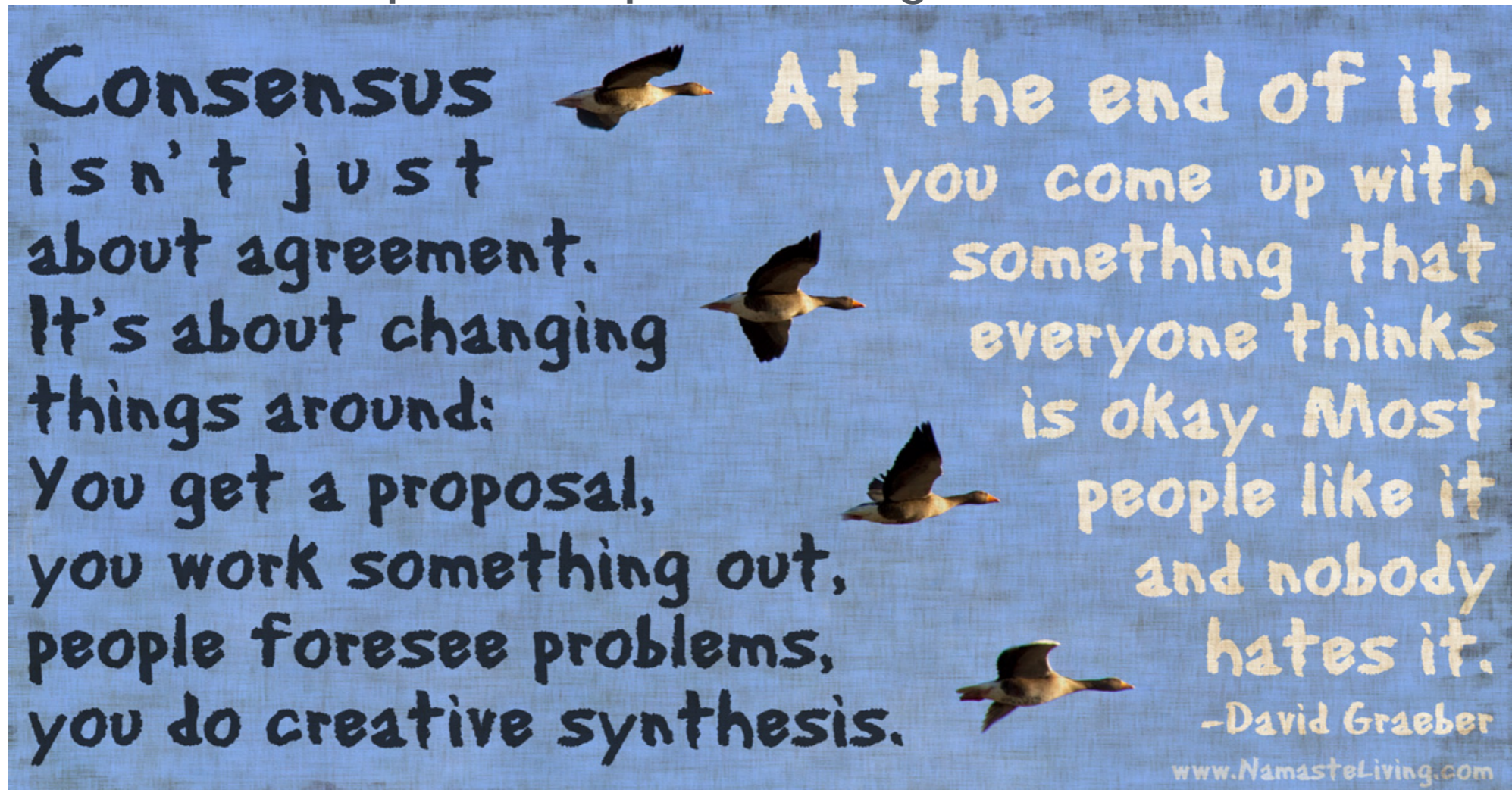


ALA as a Planning Tool



ALA as a collaboration/consensus builder

- Pre-application consultation
 - ALA is intended to minimize the risk of siting conflicts between local or federal permits and COGCC permits
- Concurrent/sequential permitting





ALA as a regulatory requirement - “How do I get it right?”

- Form 2A tab: what is it and how do I get it right?
- Attachment: Consultation Summary (only if pre-app consult occurred)
- Attachment: ALA Dataset (required with ALA)
- Attachment: ALA Narrative Summary (required with ALA)
- Tier Classification System

Form 2A: Alternative Location Analysis Tab - *NEW TAB* (1 of 2)

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:

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

Date of federal consultation:

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 process? 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, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA Narrative Summary and ALA Datasheet. See Rule 304.b.(2).B.i-x for full text of criteria.

- | | |
|---|--|
| <input type="checkbox"/> i. WPS < 2,000 feet from RBU/HOB | <input type="checkbox"/> vi.aa. WPS within a surface water supply area |
| <input type="checkbox"/> ii. WPS < 2,000 feet from School/Child Care Center | <input type="checkbox"/> vi.bb. WPS < 2,640 feet from Type III or GUDI well |
| <input type="checkbox"/> iii. WPS < 1,500 feet from DOAA | <input type="checkbox"/> vii. WPS within/immediately upgradient of wetland/riparian corridor |
| <input type="checkbox"/> iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA | <input type="checkbox"/> viii. WPS within HPH and CPW did not waive |
| <input type="checkbox"/> v. WPS within a Floodplain | <input type="checkbox"/> ix. Operator using Surface bond |
| | <input type="checkbox"/> x. WPS < 2,000 feet from RBU/HOB/School within a DIC |

Form 2A: Alternative Location Analysis Tab - *NEW TAB* (2 of 2)

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.

YES ▾

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).

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 Rule 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
			<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"/>	

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

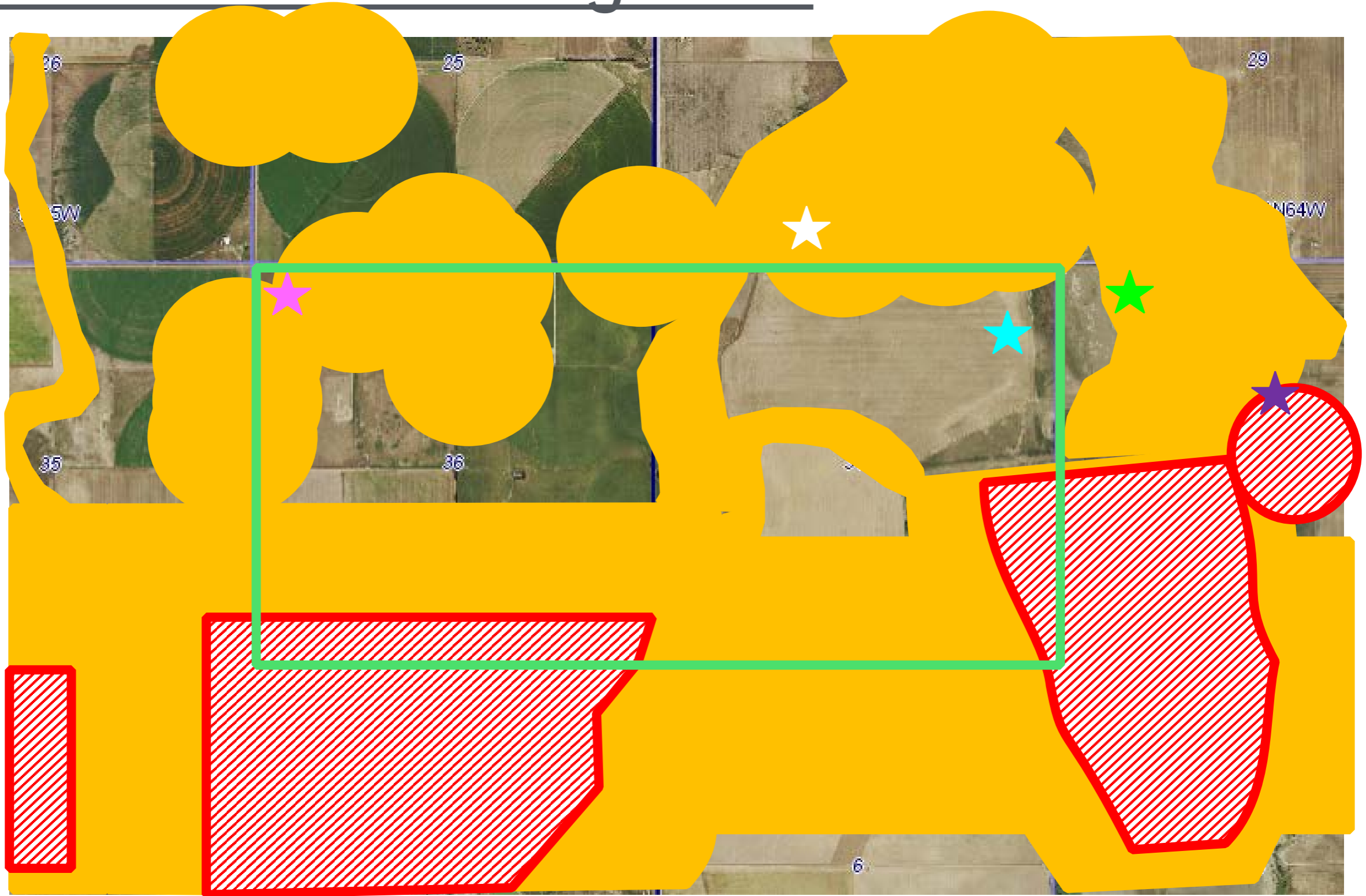
Tier	Which 304.b.(2).B criteria does the alternative location meet?	Rules 604 (setbacks) and 1202 (HPH) considerations:	Siting-related Variances or other Relief considerations:	Can the alternative location fully develop the minerals proposed by the 2A?	
Tier I	No criteria met	<ul style="list-style-type: 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.</i> <i>†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.</i> <i>†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.</i> <i>‡ 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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ALA as a Planning Tool



ALA as a Planning Tool



ALA Guidance Documents

- Alternative Location Analysis Guidance
- Alternative Location Analysis Tier System
- Alternative Location Analysis Data Template

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SB 19-181 | Objective Criteria | **Mission Change Guidance** | Public Comments | Rulemakings | Calendar

Mission Change Guidance

[Ask a Question](#) | [View Questions & Answers](#) | Search:

Form or Process	Guidance Document	Contact(s)	Contact Email(s)
2, 2A, 2B, & 2C	Rule 301 - Mission Change Permit Transition	Elias Thomas	elias.thomas@state.co.us
2A	Alternative Location Analysis Overview ✓	Sabrina Trask	sabrina.trask@state.co.us
2A	Alternative Location Analysis Guidance ✓	Sabrina Trask	sabrina.trask@state.co.us
2A	Alternative Location Analysis Tier System ✓	Sabrina Trask	sabrina.trask@state.co.us
2A	Alternative Location Analysis Data Template ✓	Sabrina Trask	sabrina.trask@state.co.us



Final Considerations

- Early planning should include ALA to help you identify your proposed location
- Early involvement and collaboration with relevant local government, proximate local government(s), federal land manager(s), COGCC, CPW, etc.
- Form 2A: new tab, ALA Datasheet attachment, ALA Narrative Summary attachment
- Guidance doc, ALA Data Template, Tier Classification Table available on our website

Thank you

Questions?

Sabrina Trask
sabrina.trask@state.co.us



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