

Would you like the COGCC to
consistently approve your APDs
and Form 2As in 30-45 days?

September 2014



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Of course, you would like to have your applications approved in 30-45 days!

and, the COGCC wants to approve your APDs and Form 2As in 30 - 45 days

But, the reality of the 2014 median approval times:

- APDS = 52
- Form 2As = 46

means that we have a serious, mutual problem



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“our mutual problem”

What is the cause of “our mutual problem”?

1. Poor quality submittals
2. Inconsistent COGCC technical review processes
3. Lack of detailed guidance documents & training

What is the solution to “our mutual problem”?

- Partnership between COGCC and Operators that addresses and eliminates the factors that cause slow technical reviews



The “plan” to eliminate the factors that cause slow technical reviews

- Hold COGCC Staff and Operators Accountable
- Provide COGCC Staff and Operators Tools to Succeed
 1. Reject poor quality submittals
 2. Implement review standards for COGCC staff for consistency
 3. Provide guidance documents and training to Operators



“the plan” Part 1

Reject poor quality submittals

How will that *help*?

- A. Applications that are complete and accurate will be processed more quickly
- B. COGCC staff will spend less time correcting errors and omissions



“the plan” Part 1

Reject poor quality submittals

How will that *work*?

- A. The COGCC will return your applications if *significant problems* are found in the technical review (after it has passed completeness and is In-Process)
- B. Applications that are not complete and accurate will be “**rejected**” for corrections
- C. Returned applications will need to be RE-submitted, restarting the “clocks”
- D. Returned applications will need to be reviewed again



What are “significant problems”?

We want applications approved more quickly, *in a shorter amount of time*, so it is all about **time**...

The most **time-consuming** corrections involve **attachments**

- ✓ adding missing attachments
- ✓ replacing incorrect attachments

So, attachments problems are significant.



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Now you are really frustrated because....

- ✓ COGCC staff members change their minds all the time – they never want the same thing twice.
- ✓ Different COGCC staff members want different attachments with different things included.
- ✓ You are not sure which attachments are required.
- ✓ You never know what must be included on an attachment.



WHOA!!!! What????

***These are serious problems that need
to be solved!***

***So – that is what Part 2 & 3 of
“the plan” are for...***



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“the plan” Part 2

Implement review standards for COGCC staff

How will that **help**?

- A. Operators will be confident that they will receive the same answer to the same question
 - 1. From different staff members on the same application
 - 2. From the same staff member on different applications

- B. The consistency of the COGCC technical review process will be improved
 - 1. The same attachments will be required on similar applications
 - 2. The same components will be required on similar attachments



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“the plan” Part 2

Implement review standards for COGCC staff

How will that **work**?

- A. The COGCC will develop standards for the technical review requirements for APD and Form 2A attachments
 1. Attachments required for each form
 2. Required components of each attachment
- B. COGCC staff will be trained on the attachment standards
- C. An application will be reviewed by a COGCC supervisor prior to rejection to ensure consistent implementation of the standards



“the plan” Part 3

Provide guidance documents and training to Operators

How will that *help*?

- A. Operators (and their contractors and consultants) will be able to submit attachments that meet the requirements of the COGCC
 - 1. Attachments required for each form
 - 2. Required components of each attachment
- B. Operators will know which attachments are required for a form
- C. Operators will know what needs to be included on an attachment



“the plan” Part 3

Provide guidance documents and training to Operators

How will that **work**?

- A. The COGCC will develop technical guidance documents for APD and Form 2A attachment requirements including:
 - 1. Attachments required for each form
 - 2. Required components of each attachment
- B. The COGCC will provide training to operators for APD and Form 2A attachment requirements
- C. Operators will have access to technical guidance documents for attachment requirements.



Does this sound like a reasonable plan?

Are you thinking it *could* work?

Except, now you have questions and....

....you need some answers....



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When will this “plan” happen?

September 2014 = Preparations for Implementation

1. Write Standards for APD and Form 2A Attachments
2. Train COGCC Staff
3. Provide Training for Industry
4. Publish Guidance for Industry

November 1, 2014 = Begin Rejecting Forms



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How will you know if a form has been returned?

The eForm system will send you an automatic email notification – just like those for other steps in the eForm process.



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How will you know **what** to fix?

FIRST - Check the comments on the returned form on the Print Preview PDF

COGCC staff will provide details in a comment – just like a form returned-to-draft during completeness

SECOND - Ask for help from COGCC staff

Always possible by e-mailing or picking up the phone

We will review attachments before you submit (or resubmit) them – **if** you ask us to



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How will you know **how** to fix it?

FIRST – Attend the training

SECOND - Read the guidance

THIRD - Ask for help from COGCC staff

Always possible by e-mailing or picking up the phone

We will review attachments before you submit (or resubmit) them – **if** you ask us to



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What about all the data and attachments?

Data – all the data will remain as originally submitted on the form

Attachments – all the attachments will be deleted (to avoid confusion upon re-submittal), including uploaded Directional Data & Offset Well Evaluations

TIP: Keep your attachment file handy until the APD or Form 2A has been approved!



But...will *every* attachment problem be “significant”?

No – but the **time** adds up quickly, so here are the limits:

1. A Form 2 that requires 2 or more attachments to be added or replaced will be returned
2. A Form 2A that requires 3 or more attachments to be added or replaced will be returned
3. A pad of Form 2s that requires a total of 4 or more attachments to be added or replaced -1 wrong attachment on the first 4 Form 2s - will be returned



What about related forms that do not have “significant problems”?

Related forms that do not have “significant problems” will be placed *On Hold* to wait for the returned applications:

- ❖ When all three limits are reached, the Form 2A and all Form 2s in the pad will be returned.
- ❖ When Limits 1 or 3 are reached, all Form 2s in the pad will be returned and the Form 2A will be placed on hold.
- ❖ When Limit 2 is reached, the Form 2A will be returned and all Form 2s in the pad will be placed on hold.



The “plan” to solve to “our mutual problem” of APD and 2A approvals over 50 days

- Partnership between COGCC and Operators that addresses and eliminates the factors that cause slow technical reviews

Factors that cause slow technical review

1. Poor quality submittals
2. Inconsistent COGCC technical review processes
3. Lack of detailed guidance documents & training for Operators

Eliminate these factors

1. Reject poor quality submittals
2. Implement review standards for COGCC staff for consistency
3. Provide guidance documents and training to Operators



Sounds like a lot more work!

It will be, at first....for you *and* for us....

- ❖ You will correct returned applications
- ❖ We will review them – a *second* time
- ❖ You will learn how to prepare complete, accurate attachments – with help from us



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Will it work?

We sure hope so, and we won't know until we try....

How will we know if it does work?

When your applications are consistently
approved in 30 - 45 days!



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the FUTURE for this Partnership

Our Common Goal: Timely processing of **ALL** forms

Online Training Program for Operators

- ❖ Detailed online and interactive training classes
- ❖ Will require contractor to help create
- ❖ Form 2 and Form 2A by January 2015



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What questions do you have?

Thank you.



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