

## 216. COMPREHENSIVE DRILLING PLANS

- a. **Purpose.** Comprehensive Drilling Plans are intended to identify foreseeable oil and gas activities in a defined geographic area, facilitate discussions about potential impacts, and identify measures to minimize adverse impacts to public health, safety, welfare, and the environment, including wildlife resources, from such activities. An operator's decisions to initiate and enter into a Comprehensive Drilling Plan are voluntary.
- b. **Scope.** A Comprehensive Drilling Plan shall cover more than one (1) proposed oil and gas location within a geologic basin, but its scope may otherwise be customized by the operator to address specific issues in particular areas. Although operators are encouraged to develop joint Comprehensive Drilling Plans covering the proposed activities of multiple operators where appropriate, Comprehensive Drilling Plans will typically cover the activities of one operator.
- c. **Information requirements.** Operators are encouraged to submit the most detailed information practicable about the future activities in the geographic area covered by the Comprehensive Drilling Plan. Detailed information is more likely to lead to identification of specific impacts and agreement regarding measures to minimize adverse impacts. The information included in the Comprehensive Drilling Plan shall be decided upon by the operator, in consultation with other participants. Information provided by operators to federal agencies to obtain approvals for surface disturbing activities on federal land may be submitted in support of a Comprehensive Drilling Plan. The following information may be included as part of a Comprehensive Drilling Plan, depending on the circumstances:

**Discussion:** In the table below, Staff has identified portions of Rule 216.c. that will be necessary for staff to evaluate in order to make a recommendation to the Commission regarding the variance requested in Crestone Peak's pending CDP application. At a minimum, staff needs the information checked as "Conceptual" in the table below. Staff also has identified information in addition to the express requirements for Rule 216 that it believes are necessary to evaluate Crestone Peak's pending CDP application; these elements appear in red text in the table below. Again, staff believes it is necessary to evaluate the new "conceptual" elements in order for staff to evaluate for the Commission the request to "grant a Rule 502.b variance to Rule 303 by placing a temporary hold on accepting any new Form 2, Applications for Permit to Drill, or Form 2As, Oil and Gas Location Assessments for the Application Lands in order to preserve the intent of a Commission Rule 216 Comprehensive Drilling Plan."

Staff views the CDP application process as iterative: Elements identified as "conceptual" must be provided initially but most likely will be updated throughout the application evaluation process. Staff anticipates that the applicant will provide updated or modified information from the "conceptual" phase at the "preliminary" and "final" stages of the process; similarly, information initially provided during the "preliminary" phase likely will be updated or modified prior the "final" stage.

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CDP Plan Elements	Conceptual	Preliminary	Final
(1) A U.S. Geological Survey 1:24,000 topographic map showing the proposed oil and gas locations, including proposed access roads and gathering systems reasonably known to the operator(s);	x		
(2) A current aerial photo showing the proposed oil and gas locations displayed at the same scale as the topographic map to facilitate use as an overlay;	x		
<i>Identify the locations of any known planned manmade surface water bodies that do not appear on existing topographic maps or aerial photos.</i>	x		
<i>Provide a map to identify floodplains</i>	x		
(3) Overlay maps showing the proposed oil and gas locations, including all proposed access roads and gathering systems, drainages and stream crossings, and existing and proposed buildings, roads, utility lines, pipelines, known mines, oil or gas wells, water wells known to the operator(s) and those registered with the State Engineer's Office, and riparian areas;		x	
<i>Identify the locations of planned access roads, well pads, production facilities, and oil, water, and gas pipelines.</i>		x	
<i>Provide a phasing plan with the planned timing for build out of access roads, well pads, production facilities and oil, water, and gas pipelines. High level concept of timeline with reservoir test or wild cat wells.</i>		x	
(4) A list of all proposed oil and gas facilities to be installed within the area covered by the Comprehensive Drilling Plan over the time of the Plan and the anticipated timing of the installation;		x	
<i>Describe the conceptual well pad and facility locations, as well as planned pipeline routes.</i>	x		
<i>Describe the conceptual planned timing/phasing of oil and gas operations, commencing with oil and gas location construction through drilling and completion within each proposed drilling and spacing unit within the CDP area.</i>	x		
<i>Describe the estimated well count and tank count at each oil and gas location and production facility</i>	x		
<i>Describe the use and location of any planned centralized Oil and Gas Facilities and underground injection facilities.</i>	x		
<i>Describe by quarter-quarter section any lands for which Surface Use Agreement or right of way has been executed for well pads, production facilities, access roads or pipelines.</i>	x		
(5) A plan for the management of exploration and production waste;			x
<i>Describe the general drill cuttings management plan</i>	x		
(6) A description of the wildlife resources at each oil and gas location;			

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<i>On the topographic map or aerial photo provided under element No. 1 or 2 above, Identify SWAs and RSOs.</i>	<b>x</b>		
(7) Wildlife information that is determined necessary after consultation with the Colorado Parks and Wildlife;		<b>x</b>	
(8) Locations of all proposed reference areas to be used as guides for interim and final reclamation;			<b>x</b>
(9) Past economic uses to which the land has been put in the previous ten (10) years reasonably known to the operator(s);		<b>x</b>	
<i>Identify any existing agreements or ongoing coordination efforts with local governments that will apply to oil and gas exploration and production activities within the proposed CDP area.</i>	<b>x</b>		
(10) Any planned variance requests that are reasonably known to the operator as identified per 216.e.;		<b>x</b>	
<i>Identify any known or anticipated additional variance requests</i>	<b>x</b>		
(11) Proposed best management practices or mitigation to minimize adverse impacts to resources such as air, water, or wildlife resources;		<b>x</b>	
<i>Identify appropriate Rule 603 best practices</i>		<b>x</b>	
<i>Identify any planned oil and gas facility or production facility locations that would be within a Designated Setback Location or Urban Mitigation Area.</i>	<b>x</b>		
<i>Identify appropriate Rule 604.c. Mitigation Measures best practices</i>		<b>x</b>	
(12) A list of all parties that participated in creating the Comprehensive Drilling Plan pursuant to Rule 216.d.(2).		<b>x</b>	
<i>Provide a list of all local governmental designees, HOAs, and Planned Unit Developments within the CDP area.</i>	<b>x</b>		
<i>Provide a list of surface and mineral owners within the proposed CDP area.</i>		<b>x</b>	
<i>216.d.(2) Colorado Department of Public Health and Environment, the Colorado Parks and Wildlife, local governmental designee(s), and all surface owners.</i>		<b>x</b>	
<i>Other Parties who should be considered for participation in the CDP process: Emergency Responders, Neighborhood Groups, Irrigation companies, Special Water and Sanitation Districts.</i>		<b>x</b>	

**d. Procedure.**

(1) A proposed Comprehensive Drilling Plan shall describe the operator’s reasonably <b>foreseeable oil and gas development activities.</b>		<b>x</b>	
Identify Applicant's mineral ownership percentage within the CDP area using color-coding to indicate the following tiers: 0%; 1-49%; 50-99%; 100%.	<b>x</b>		
(2) The operator(s) shall invite the Colorado Department of Public Health and Environment, the Colorado Parks and Wildlife, local governmental designee(s), and all surface owners to participate in the development of the Comprehensive Drilling Plan. In many cases, participation by these agencies and individuals will facilitate identification of potential impacts and development of conditions of approval to minimize adverse impacts.		<b>x</b>	
(3) The operator(s) shall provide a summary of the proposed identified measures to minimize adverse		<b>x</b>	

**e. Variances and site-specific approvals.**

(1) Identify any rule variances to be incorporated and all of the requirements for granting variances.		<b>x</b>	
(2) Practices and conditions agreed to in an accepted Comprehensive Drilling Plan shall be:			
A. Included as conditions of approval in any Form 2 or other permit for individual wells or other ground-disturbing activity covered by the Plan, where no Form 2A is required under Rule 303.d.(2).B.			<b>x</b>
B. Included as conditions of approval in any Form 2, Form 2A, or other permit for individual wells or other ground-disturbing activity covered by the Plan, where a Form 2A is required under Rule 303.d.(1).			<b>x</b>
Any permit-specific condition of approval for wildlife habitat protection will be included only with the consent of the surface owner.			<b>x</b>