SLIDES: Comprehensive Drilling Plans

Dave Neslin

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Conference on Best Practices for Community and Environmental Protection

Comprehensive Drilling Plans

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RULE 216
COMPREHENSIVE DRILLING PLANS

THE COMMISSION’S VIEW (SBP at 21)

• “[A] flexible planning and permitting tool, which operators can tailor to their needs and circumstances.”

• Intended “to encourage landscape level planning and regulatory review as contemplated by HB 07-1298.”

• Anticipated “to better address cumulative effects, promote efficiency, and facilitate more win-win situations.”

• “[T]he opposite of a one-size-fits-all approach.”
RULE 216
COMPREHENSIVE DRILLING PLANS

A PRIMER

• Voluntarily initiated by operator (Rule 216.a.)
• More than 1 location (Rule 216.b.)
• Information decided by operator in consultation with participants. Certain information suggested. (Rule 216.c.)
• Must invite CDPHE, CDOW, LGDs, and surface owners to participate (Rule 216.d. (2))
• Shall consider proposed operations and effects and identify conditions to minimize adverse impacts (Rule 216.d. (3) & (5))
• May incorporate variances (Rule 216.e. (1))
• Must be accepted by Commission (Rule 216.d. (4))
• CDP Conditions included in Form 2/2A approvals (Rule 216.e. (2))
• Depending on information included, and procedures followed, may eliminate need for Form 2A or certain Form 2A requirements (Rule 216.f. (1) & (2))
• Results in expedited processing of Form 2s and Form 2As (Rule 216.f. (3) & (4))
• CDP conditions presumed to be sufficient in hearings on Form 2/Form 2A approvals (Rule 216.f. (5))
• Good for 6 years (Rule 216.g.)
• Subject to modification (Rule 216.h.)
## RULE 216
### COMPREHENSIVE DRILLING PLANS

**COMPANIES PURSUING COMPREHENSIVE DRILLING PLANS (JANUARY 2009)**

<table>
<thead>
<tr>
<th>Company Name</th>
<th>Location</th>
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<tbody>
<tr>
<td>Antero Resources</td>
<td>Laramie</td>
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<td>Bill Barrett Corporation</td>
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<td>Williams</td>
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<td>Gunnison Energy</td>
<td></td>
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</tbody>
</table>
RULE 216
COMPREHENSIVE DRILLING PLANS

POTENTIAL BENEFITS FOR OPERATORS

• Eliminate all or part of Form 2A requirements

• Expedite COGCC processing and permitting

• Increase efficiency by “bundling” applications and consolidating regulatory reviews

• Increase predictability by defining mitigation requirements at the outset
RULE 216
COMPREHENSIVE DRILLING PLANS

POTENTIAL BENEFITS FOR THE STATE

• Increase efficiency by “bundling” applications and consolidating regulatory reviews

• Better address cumulative effects

• Facilitate more win-win solutions that achieve both energy production and environmental/wildlife protection
OTHER PLANNING TOOLS

• Geographic Area Plans (Rule 513)

• Wildlife Mitigation Agreements (Rule 1202.d (2))

• Pre-Application Consultation with CDPHE, CDOW, and Surface Owner