



COLORADO

**Oil & Gas Conservation
Commission**

Department of Natural Resources

1120 Lincoln Street, Suite 801

Denver, CO 80203

April 5, 2022

Mr. Ward Giltner
Prospect Energy LLC, Operator Number 10312
1036 Country Club Estates Dr
Castle Rock, CO 80108

I am writing to request additional information regarding your Form 2, Application for Permit to Drill, to recomplete and operate the MSSU 30-8 well (Document Number: 402704523; Received 10/29/2021; API # 05-069-06253) (“Form 2”). Following a review of your proposed operations, Colorado Oil and Gas Conservation Commission (“COGCC”) Staff and I have concluded that your proposal constitutes a significant change to the design and operation of an oil and gas location. Pursuant to COGCC Rules, you must obtain an approved Form 2A and Oil and Gas Development Plan (“OGDP”) from the Commission before the Director will consider the Form 2. The only Form 2 for the MSSU 30-8 well was approved on April 25, 1985. No Form 2A has ever been submitted for this location (Location ID# 333083).

For any significant change to the design and operation of an Oil and Gas Location (“Location”), COGCC Rule 304.a.(3) requires operators to submit a completed Form 2A. Since the Location at issue was originally constructed, the area surrounding the Location has changed significantly. The Location is now within 2,000 feet of several residential buildings units, which has increased the potential for adverse impacts to public health, safety, or welfare. The increased potential for adverse impacts and your proposed changes to operations constitute a significant change requiring a new Form 2A.

COGCC Rules also require an approved OGDP or Form 2A for the Location before the Director can approve or deny a Form 2. COGCC Rule 303.a. states that any Location which meets the criteria of Rule 304.a. (i.e., any Location requiring a Form 2A) must have an approved OGDP or Form 2A. Per COGCC Rule 308.a., I cannot approve or deny your Form 2 to recomplete and operate an existing well until you obtain an approved OGDP or Form 2A from the Commission.

Additionally, Rule 308.c. requires that the Director assess and address potential impacts to public health, safety, and welfare as part of the review of a Form 2. COGCC Staff and I cannot adequately assess or address potential impacts without the information provided in an approved Form 2A.



Mr. Ward Glitner

March 30, 2022

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Based on the foregoing, I request that you submit and obtain an approved Form 2A and an OGDG for the Location at issue. Upon providing the Form 2A and the OGDG, COGCC Staff and I will review your Form 2.

If you have any questions, please contact my office.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sabrina Trask".

Sabrina Trask
Planning & Permitting Manager