

DIRECTOR'S RECOMMENDATION

Vecta Oil & Gas LTD (Vecta), Operator ID #10267. Sammons Ranch OGD, OGD ID #480998, Form 2C 402710215, Form 2A 402640997, 402693280, 402695913, 402696494, Form 2B 402679835, Docket # 210600096

Pursuant to Rule 306, the Director submits to the Commission this recommendation for the Vecta Sammons Ranch OGD located in Las Animas County.

BACKGROUND

On June 16, 2021, Vecta Oil and Gas LTD (Vecta) filed an application for an Oil and Gas Development Plan (OGDP) with the Colorado Oil and Gas Conservation Commission (COGCC). Staff returned the Form 2As to the operator on 7/16/2021 and 10/1/2021 to make corrections prior to the determination the application was complete on October 28, 2021. Multiple revisions were coordinated between Staff and the applicant throughout the technical review process. This recommendation is based on the information in the four Form 2As, the Form 2B, and the hearing application as of January 28, 2022. No additional revisions will be made to the application prior to the Commission hearing scheduled for February 16, 2022.

Vecta Sammons OGD Proposed Development:

The proposed OGD includes 640-acres of application lands in Township 31 South, Range 53 West, Sections 10 and 15. The OGD is sited in a rural rangeland area of Las Animas County, approximately 5 1/2 miles north of the Town of Kim on the Eastern Plains.

Vecta proposes four new Oil and Gas Locations that will each have a single vertical exploratory (wildcat) well for helium production. No other production or associated equipment is planned for the locations, as the helium will be transported via pipeline to an off-location skid mounted helium unit located on private property, where it will be purified, compressed, and loaded onto a tube trailer for transport. Vecta does not anticipate that petroleum hydrocarbons will be associated with the helium.

Surface Lands:

The proposed Oil and Gas Locations lie on Fee Surface and are located inside of the mineral development area. The operator's right to construct is granted through a Surface Use Agreement (SUA) signed on December 30, 2020. Each proposed location requires disturbance of 1.1 acre (to be reclaimed to 0.2 acres after interim reclamation). The access roads require a total disturbance of 2.6 acres.

Mineral Lands and Development:

Vecta has proposed wells for this OGD with the intent to develop Fee minerals as follows:.

- Four vertical wells to produce helium gas from the Lyons Formation, at an estimated depth of approximate 1,400 feet.
- The four wells will be drilled according to Rule 401.b for well completions less than 2,500 feet in depth (must be located more than 200 feet from a lease line and more than 300 feet from other wells in the same source of supply).
- No Drilling and Spacing Unit is being requested and none is required for this development.

Financial Assurance:

Staff confirmed that Vecta has a valid blanket plugging bond of \$60,000 for this OGD. No additional bonding is required per current COGCC Rules.

LOCAL GOVERNMENT PERMITTING AND PRE-APPLICATION CONSULTATIONS

Relevant Local and Proximate Governments:

Las Animas County is the relevant local government for the OGD. There are no proximate local governments to the proposed OGD.

Local Permit with Las Animas County:

Vecta indicated that a permit application was submitted by Vecta to the Las Animas County Land Use Department on 1/25/2022. An official approved permit has not yet been issued and local permits are not attached to the Form 2As. Staff has requested Vecta provide the local permit once approved; a Condition of Approval has been added to the Form 2A for the Operator to submit the approved local permit within 14 days of receipt if it is not issued prior to Form 2A approval.

EXEMPTION REQUESTS AND ADMINISTRATIVE CONSIDERATIONS

Lesser Impact Area Exemption Request Summary:

Vecta requested from the Director a Lesser Impact Area Exemption for the “Noise Mitigation Plan” (Rule 304.c.(2)) and the “Light Mitigation Plan” (Rule 304.c.(3)) based on a lack of proximate potential receptors that may be adversely impacted by noise or light. The nearest Residential Building Unit (RBU) is 3960 feet southwest of the Working Pad Surface (WPS) of the proposed Sammons 315315C location. An abandoned former homestead approximately 2180 feet west of the proposed Sammons 315310C was determined to be uninhabitable based on a photograph provided to Staff, and was thus not regarded as a RBU. There are no High Priority Habitats (HPH) within a mile of the proposed locations.

The planned wells will be drilled with an air rotary drilling system. Air rotary drilling systems are often used to drill groundwater wells and are more similar in size to workover rigs (typically truck or trailer mounted) than the larger drilling rigs used for deeper, horizontal drilling (such as those seen commonly in the DJ Basin). Due to the shallow nature of the planned wells, actual drilling times are estimated to be seven to ten days per well. Construction and drilling will take place

during daylight hours only, notwithstanding any unplanned circumstance that may require nighttime operations.

Based on Staff's review of information provided in the "Lesser Impact Area Exemption Request" attachment during the Form 2A 'Completeness Review', Staff determined that the potential noise and light impacts to the public and wildlife will be so minimal as to cause no concern. Therefore, the Director granted the Lesser Impact Area Exemption Request for both plans on October 21, 2021. Vecta is required to comply with all applicable noise and light mitigation requirements per Rules 423 and 424. Due to the scale of operations, daylight operations only, and the distance between the locations and any receptors, Staff did not request any additional noise- or light-related BMPs.

COA - Reference Area Pictures:

If the final land use for a proposed Location includes rangeland, Rule 304.b.(9).B requires an applicant to provide Reference Area Pictures in order to document the type, density, and quality of vegetation currently present in a nearby reference location that is considerably similar to the proposed location. These Reference Area Pictures are used during the interim and final reclamation processes to aid the operator and Reclamation Staff in ensuring reclaimed conditions meet or exceed that observed prior to construction. Vecta was unable to provide Reference Area Pictures that adequately showcased the vegetation in the height of the growing season. Pursuant to Rule 304.b.(9).B.ii, an applicant may submit these Pictures up to 12 months after the Form 2A. Staff added a COA on each of the four Form 2As to require Vecta to submit these pictures timely and appropriately via a Form 4 Sundry.

PUBLIC COMMENTS

The public comment period was open for 30 days from October 28, 2021 to November 28, 2021, per Rule 303.d.(1).A.ii. No public comments were received on the Form 2As during the Public Comment Period. No public comments were received in the eFiling system as of 1/27/2022.

COGCC STAFF'S TECHNICAL REVIEW HIGHLIGHTS

This section addresses issues related to siting, public health, safety, welfare, the environment, and wildlife resources, within the context of SB 19-181 for Vecta's proposed locations in the Sammons Ranch OGD.

Alternative Location Analysis (ALA)

The proposed location does not meet any of the criteria listed in Rule 304.b.(2); an ALA was not required and none was submitted. Staff identified no significant concerns regarding the siting of the OGD or any of the four proposed Locations.

Public Health, Safety, and Welfare Considerations

Staff confirmed there are no Residential Building Units (RBUs), High Occupancy Building Units, School Facilities, or Child Care Centers within 2,000 feet of any of the four proposed Locations. Only one proposed location (Sammons 315315C) has an RBU within one mile; that RBU is approximately 3,960 feet southwest of the WPS. The OGDG is not within a Disproportionately Impacted (DI) Community, nor are any of the Locations within 2,000 feet of a Building Unit within a DI Community.

While the location falls under the regulatory authority of the COGCC, Vecta will not be producing hydrocarbon liquid or hydrocarbon gas, but instead plans to produce helium gas. No hydrocarbons are anticipated to be encountered during the drilling of this well and no hydrocarbons are anticipated to be produced or will be stored at this proposed location.

Staff concludes that there are no significant potential direct adverse impacts to public health, safety, and welfare.

Environmental Resource Considerations

Water Resources:

The Operator indicated that the proposed Oil and Gas Locations do not lie within a Sensitive Area for water resources due to the proximity to surface water and estimated depth to groundwater greater than 100 feet below ground surface. There is a shortage of information about water depths near these locations, with the nearest water well (permit 251880–), reported as a dry hole to 160 feet. The nearest water wells with measured static water levels are along Two Butte Creek, approximately 180 feet lower in elevation than the proposed locations.

An unnamed drainage to Two Butte Creek runs southeast of the Sammons 315310D location, at a distance of approximately 16 feet. Vecta provided recent photographs showing the drainage, which is highly disturbed by cattle grazing, lacks an ordinary high water mark, and is not a Waters of the State (see Location Pictures attachment doc# 402696754 on Form 2A doc# 402696494). Although Staff has no significant concern about water resources related to this small drainage, Staff conducted additional evaluation of the stormwater controls at the 315310D to ensure a reduction in the risk of sediment or chemicals from that location reaching the drainage and moving to Two Butte Creek, approximately 3,550 feet to the east.

A similar, unnamed, drainage to Two Butte Creek runs southeast of the Sammons 315315C, at a distance of approximately 630 feet. This drainage has a small man-made impoundment (stock pond) for livestock watering. Staff reviewed aerial imagery of the stock pond taken intermittently over a period of approximately 18 years (via Google Earth Pro). Three out of nine images clearly indicated water was present. This drainage (and any water released from the stock pond) flow southeast approximately 3,490 feet to a confluence with Two Butte Creek.

Site Specific Measures to Address Water Resources:

Vecta provided BMPs to ensure the protection of groundwater at the location. Staff has reviewed those BMPs and included them on the Form 2A. A summary of Vecta's relevant minimization and mitigation measures includes:

1. Wattles or silt fence will be placed on the downgradient side of the Oil and Gas Location.
2. The temporary fuel tank used for well drilling will have integrated secondary containment.
3. The drill rig and motors will have liners underneath.

COGCC Staff Analysis of Water Resource Considerations:

Based on this information, Staff concludes the risk of contamination from this location to groundwater and surface water features will be minimized by the successful implementation of the proposed BMPs.

Wildlife Resource Considerations

Staff evaluated each Location's potential for adverse impacts to wildlife resources through desktop review and Vecta's Wildlife Protection Plan. None of the four proposed locations are in, or within one mile of, a Colorado Parks and Wildlife (CPW) mapped High Priority Habitat (HPH), and no state or federal threatened or endangered species are mapped in the area.

Staff concludes that there are no significant potential direct adverse impacts to wildlife resources. Vecta will comply with all applicable 1200-Series Rules regarding the protection of wildlife resources.

DIRECTOR'S RECOMMENDATION:

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGD's proposed operation and its potential impacts on public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that this OGD complies with all applicable requirements of the Commission's Rules. The Director recommends that the Commission approve the Vecta Sammons Ranch OGD.

FORM
2A

Rev
01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

402640997

Date Received:

06/16/2021

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <https://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

OGDP ID:

Expiration Date:

☒ New Location ☐ Refile ☐ Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210600096		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

<No existing OGDP number provided>

CONSULTATION

- ☐ This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
- ☐ This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
- ☐ This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
- ☐ This Location includes a Rule 309.e.(2).E variance request.
- ☐ This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 10267

Name: VECTA OIL & GAS LTD

Address: 575 UNION BLVD #208

City: LAKEWOOD State: CO Zip: 80228

Contact Information

Name: Mathew Goolsby

Phone: (303) 618-7736

Fax: ()

email: mdgoolsby@comcast.net

FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20210089 ☐ Gas Facility Surety ID (Rule 711): _____
- ☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: Sammons Number: 315310C

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NESW Section: 10 Township: 31S Range: 53W Meridian: 6 Ground Elevation: 5556

Latitude: 37.355100 Longitude: -103.350590

GPS Quality Value: 6.0 Type of GPS Quality Value: PDOP Date of Measurement: 02/25/2021

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is: LOCATION ID # FORM 2A DOC #



RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: LAS ANIMAS Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. No

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted: 01/25/2022

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: In Process

Status/disposition date: _____

If Relevant Local Government permit has been approved or denied, attach final decision document(s).

Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Robert Lucero, Land Use Officer Contact Phone: 719.845.2577

Contact Email: robert.lucero@lasanimascounty.org

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted: _____

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location: _____

Status/disposition Date: _____

If Federal agency permit has been approved or denied, attach the final decision document(s).

Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: _____ Contact Phone: _____

Contact Email: _____ Field Office: _____

Additional explanation of local and/or federal process:

LOCAL GOVERNMENT INFORMATION:

Vecta provided 30-day notice to Las Animas County on February 21, 2021. Vecta has been in communication with the county regarding local permitting. At the county's direction, we will provide Form 2A data after submittal to the COGCC. County permitting consists of a 14-day administrative review.

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)? No

Date of local government consultation: _____

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

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. No

ALA APPLICABILITY AND CRITERIA

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.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? No

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

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

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. No

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:

< No row provided >

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Monte SammonsPhone: 719.643.5405Address: 23200 County Rd 199.1

Fax: _____

Address: _____

Email: triangle4@hotmail.comCity: Kim State: CO Zip: 81049Surface Owner at this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ IndianCheck only one: ☐ The Operator/Applicant is the surface owner.☒ The Operator has a signed Surface Use Agreement for this Location – attach SUA.☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.☐ All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.Surface Owner protection Financial Assurance type: N/A Surety ID Number: _____Mineral Owner beneath this Oil and Gas Location: ☒ Fee ☐ State ☐ Federal ☐ IndianMinerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: YesLease description if necessary: All the S/2 Section 10, T31S, R53W, and All the W/2 Section 15, T31S, R53W, 6 PM**SITE EQUIPMENT LIST**

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	<u>1</u>	Oil Tanks	<u>0</u>	Condensate Tanks	<u>0</u>	Water Tanks	<u>0</u>	Buried Produced Water Vaults	<u>0</u>
Drilling Pits	<u>0</u>	Production Pits	<u>0</u>	Special Purpose Pits	<u>0</u>	Multi-Well Pits	<u>0</u>	Modular Large Volume Tank	<u>0</u>
Pump Jacks	<u>0</u>	Separators	<u>0</u>	Injection Pumps	<u>0</u>	Heater-Treaters	<u>0</u>	Gas Compressors	<u>0</u>
Gas or Diesel Motors	<u>0</u>	Electric Motors	<u>0</u>	Electric Generators	<u>0</u>	Fuel Tanks	<u>0</u>	LACT Unit	<u>0</u>
Dehydrator Units	<u>0</u>	Vapor Recovery Unit	<u>0</u>	VOC Combustor	<u>0</u>	Flare	<u>0</u>	Enclosed Combustion Devices	<u>0</u>
Meter/Sales Building	<u>0</u>	Pigging Station	<u>0</u>	Vapor Recovery Towers	<u>0</u>				

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Well Head	<u>1</u>

OTHER TEMPORARY EQUIPMENT

Temporary Equipment Type	Number
30 day diesel genset for well devel	<u>1</u>
Temporary rig fuel tank	<u>1</u>

GAS GATHERING COMMITMENTOperator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

4" diameter HDPE underground flowline for inert helium gas

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply):				
				604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	5280 Feet		SW					
Residential Building Unit (RBU):	5280 Feet		SW	☐	☐	☐		☐
High Occupancy Building Unit(HOBU)	5280 Feet		S	☐	☐	☐		☐
Designated Outside Activity Area:	5280 Feet		S					
Public Road:	1210 Feet		W					
Above Ground Utility:	1290 Feet		W					
Railroad:	5280 Feet		W					
Property Line:	1220 Feet		N					
School Facility:	5280 Feet		S					
Child Care Center:	5280 Feet		S					
Disproportionately Impacted (DI) Community:	5280 Feet		W					
RBU, HOBU, or School Facility within a DI Community.	5280 Feet		W	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	0	0
Residential Building Units	0	0	0
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 1.10

Size of location after interim reclamation in acres: 0.20

Estimated post-construction ground elevation: 5556

DRILLING PROGRAM

Will a closed-loop drilling system be used? No

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: _____

Drilling Fluids Disposal Method: _____

Cutting Disposal: OFFSITE

Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

1) Well will be drilled with air. NO DRILLING MUD WILL BE USED.

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: _____ or Document Number: _____

Centralized E&P Waste Management Facility ID, if applicable: _____

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

Rangeland

Describe the Relevant Local Government's land use or zoning designation:

Agricultural

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☒ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

Rangeland

Reference Area Latitude: 37.355640

Reference Area Latitude: -103.350590

Provide a list of plant communities and dominant vegetation found in the Reference Area.

Plant Community	Dominant vegetation
Disturbed Grassland	Sand Dropseed
Disturbed Grassland	Blue Grama
Disturbed Grassland	Red Threeawn
Disturbed Grassland	Western Wheatgrass
Disturbed Grassland	Buffalo Grass
Disturbed Grassland	Rabbitbrush

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at <https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/> or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: WC - Plughat-Villegreen Complex

NRCS Map Unit Name: WeB - Wiley Silt Loam

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 2150 Feet SW

Spring or Seep: 5280 Feet NE

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 168 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Well No. 246019-A was drilled in Section 11 to 35' with a static water level of 19'. Well No. 80461-A was drilled in Section 14 to 100' with a static water level of 15'. These wells are not representative. The wells were drilled approximately 130' lower in elevation than Sammons Ranch in creek bottom lands adjacent to Twin Butte Creek.

A more representative Well No. 251880 in Section 9 was drilled to 160' but was a dry hole. A representative well, Well No. 306362 in Section 13, was drilled to 200' with a static water level of 140'. Since this static water level is approximately 28' lower in elevation than Sammons Ranch, Vecta estimated the approximate depth to groundwater at Sammons Ranch as 168'.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 5280 Feet E

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water

System intake?

Provide the distance and direction to the nearest downgradient wetland, measured from the Working

Pad Surface: 5280 Feet E

Provide a description of the nearest downgradient surface Waters of the State:

The nearest downgradient surface waters of the state is Two Butte Creek, an intermittent stream. An ephemeral feature upstream of Two Butte Creek is heavily disturbed from historical cattle grazing.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

☒ Federal (FEMA) ☒ State ☒ County ☐ Local

☐ Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? No

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- ☐ This location is included in a Wildlife Mitigation Plan
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- ☐ This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- ☐ This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- ☐ A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred _____ on:

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- ☐ The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- ☐ The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- ☐

The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.

☐ The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.

☐ The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.

☐ The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.

☐ The applicant has obtained a Rule 1202.a CPW waiver.

☐ The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

No HPHs apply to this location, access roads, or flowline corridor.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: \$ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

No HPHs apply to this location.

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: \$ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? No

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 13

- ☐ (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- ☐ (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- ☐ (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- ☐ (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- ☒ (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- ☒ (6) Transportation Plan
- ☒ (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- ☒ (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- ☐ (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- ☐ (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- ☒ (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- ☒ (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- ☒ (13) Fluid Leak Detection Plan
- ☒ (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- ☒ (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- ☒ (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- ☒ (17) Wildlife Plan consistent with the requirements of Rule 1201
- ☒ (18) Water Plan
- ☒ (19) Cumulative Impacts Plan
- ☐ (20) Community Outreach Plan
- ☐ (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- ☐ This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission

Order number: NO

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- | | |
|--|--|
| ☐ 304.b.(1). Local Government Siting Information | ☐ 304.c.(1). Emergency Spill Response Program |
| ☐ 304.b.(2). Alternative Location Analysis | ☒ 304.c.(2). Noise Mitigation Plan |
| ☐ 304.b.(3). Cultural Distances | ☒ 304.c.(3). Light Mitigation Plan |
| ☐ 304.b.(4). Location Pictures | ☐ 304.c.(4). Odor Mitigation Plan |
| ☐ 304.b.(5). Site Equipment List | ☐ 304.c.(5). Dust Mitigation Plan |
| ☐ 304.b.(6). Flowline Descriptions | ☐ 304.c.(6). Transportation Plan |
| ☐ 304.b.(7). Drawings | ☐ 304.c.(7). Operations Safety Management Program |
| ☐ 304.b.(8). Geographic Information System (GIS) Data | ☐ 304.c.(8). Emergency Response Plan |
| ☐ 304.b.(9). Land Use Description | ☐ 304.c.(9). Flood Shut-In Plan |
| ☐ 304.b.(10). NRCS Map Unit Description | ☐ 304.c.(10). Hydrogen Sulfide Drilling Operations Plan |
| ☐ 304.b.(11). Best Management Practices | ☐ 304.c.(11). Waste Management Plan |
| ☐ 304.b.(12). Surface Owner Information | ☐ 304.c.(12). Gas Capture Plan |
| ☐ 304.b.(13). Proximate Local Government | ☐ 304.c.(13). Fluid Leak Detection Plan |
| ☐ 304.b.(14). Wetlands | ☐ 304.c.(14). Topsoil Protection Plan |
| ☐ 304.b.(15). Schools and Child Care Centers | ☐ 304.c.(15). Stormwater Management Plan |
| | ☐ 304.c.(16). Interim Reclamation Plan |
| | ☐ 304.c.(17). Wildlife Plan |
| | ☐ 304.c.(18). Water Plan |
| | ☐ 304.c.(19). Cumulative Impacts Plan |
| | ☐ 304.c.(20). Community Outreach Plan |
| | ☐ 304.c.(21). Geologic Hazard Plan |

OPERATOR COMMENTS AND SUBMITTAL

Comments	Vecta O&G, Ltd. proposes to develop up to 4 exploratory (wildcat) conventional vertical helium gas wells, flowlines, and access on existing disturbed rangeland in rural Las Animas County. The development avoids impacts to public health, safety, welfare, the environment, and wildlife by exhibiting the following: (1) Inert helium gas extraction with no known oil or natural gas entrained with the helium resource. The finding is based on historical well log and scout information for this location. (2) No hydrocarbons or hazardous air pollutants associated with the helium gas wells. (3) The nearest residence is approximately 0.75 miles away from the nearest Sammons Ranch well (315315C). (4) Each well pad contains a single well with 160-acre pad spacing. (5) Well pad footprints are limited to approximately 1.1 acres during 7-10 days of drilling and will be reclaimed to approximately 0.2 acres during interim reclamation. (6) Conventional vertical well drilling requires no fracking or proppant. (7) The wells generate no produced water. There is no on-site storage of produced water, oil, natural gas, or condensate. (8) The nearest waterbody is > 0.5 mi away. (9) There is no high priority habitat or mapped species of concern within 1 mile. Wells have been planned to be on center in a quarter section. All of the drawings submitted with the application indicate that the well is on center. However, the well plots in the following quarter-quarter section: NE ¼ SW ¼, Section 10.
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I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.

Signed: _____ Date: 06/16/2021 Email: mdgoolsby@comcast.net

Print Name: Mathew Goolsby Title: Vice President-Operations

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ Director of COGCC Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type

Description

Planning	Prior to the commencement of construction, Operator will submit, by Form 4 Sundry, the Relevant Local Government permit approval.
Planning	Operator will submit a Form 4 Sundry to include Reference Area Pictures consisting of 5 color photographs of the Reference Area, including 4 taken from each cardinal direction, and 1 taken from above the Reference Area. Each photograph will be identified by date taken, Well or Oil and Gas Location name, and direction of view. The photographs will be taken during the peak growing season and will clearly depict vegetation cover and diversity. These photographs may be submitted at any time up to twelve (12) months after the approval of this Form 2A.

2 COAs

Best Management Practices

No BMP/COA Type

Description

1 Traffic control	• Drivers will observe posted speed limits to protect public and driver safety. • Drivers will observe posted speed limits on unpaved roads to avoid or minimize fugitive dust. • Drivers will be instructed to maintain vehicle speeds of 15 mph on unpaved roads. • Drivers will cover and secure loads to prevent debris from entering roadways. • Vehicles will be maintained in good working condition to avoid excess emissions and safety concerns.
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2	Storm Water/Erosion Control	Structural • Wattles or silt fence will be placed on the downgradient side of the Oil and Gas Location. • Stormwater diversions will be created when there is evidence of ponding or erosion runnels. • The temporary fuel tank used for well drilling will have integrated secondary containment. The drill rig and motors will have liners underneath. Non-Structural • Waste materials will be bagged or containerized to avoid contact with precipitation. • The well pad will be inspected for excessive erosion. Where needed, areas will be recompact. • Vehicles and equipment will be monitored for leaks during well development. • Ingress, egress, and parking will occur in designated areas. • Spill response materials and absorbents will be containerized and available on site. • The location will be inaccessible to the public to prevent unauthorized access and excessive wear on access roads. • Stabilization and revegetation will be performed as part of interim reclamation. • During well development, stormwater monitoring will be performed daily. Areas that require correction for stormwater control will be addressed or repaired promptly. • During production, an operator will be onsite an estimated 2-3 times per week. Site inspection will identify areas that require maintenance or repair to control stormwater and correct excessive erosion on the well pad or access roads. Stormwater inspection will be performed at least every 7 days during well production and every 30 days after interim reclamation.	
3	Material Handling and Spill Prevention	• Site personnel will be trained in detecting and addressing spills that may occur on site. • Spills or releases will be investigated, controlled, or contained, in accordance with Rule 912.a. • If a spill or release meets criteria in Rule 912.b, it will be reported as specified in the rule. • A catastrophic loss of freshwater will be bermed using the skid steer available on site. • Equipment and transfer lines will be monitored daily during well drilling and completion for signs of drips, leaks, or spills, which will be promptly corrected. • Flowlines will be installed consistent with Rule 1102. In accordance with Rule 1104, before a flowline is put into service, it will be pressure tested to maximum pressure for AVO leak detection. • The operator will maintain shutoff valves on helium gas flowlines in accordance with Rule 1103.a. • Per Rule 1104.c, the operator will conduct a monthly AVO survey to detect failures or signs of leaks from the wellhead and flowline. • The operator will conduct annual flowline integrity testing in accordance with Rule 1104.f. • Site personnel will be instructed on procedures for documenting and recordkeeping inspections and testing.	

4	Dust control	Speed Restrictions • Speeds will be limited to 15 mph on the Sammons Ranch access roads. Regular Road Maintenance • Regular inspection will occur for the Sammons Ranch access roads for evidence of inadequate drainage and formation of potholes. • Grading, blading, and filling potholes will be performed to maintain the road surface and discourage vehicles from widening the roadway or contributing to erosion. Restricting Construction Activity During High Wind Days • The 1-day well pad construction will be scheduled to avoid high-wind warnings issued for eastern Las Animas County. Phase Truck Trips Construction (Total) 2 Drilling (Total) 12 Completion (Total) 12 Production (Per Month) 30 Dust Suppression • Blowing soil and failure of the soil to stabilize and form a crust on the location during construction and after interim reclamation will indicate that a dust suppression BMP is needed. In that event, a water truck will be used to wet the pad surface to form a crust. Interim Reclamation • Area not needed for production will be reclaimed in accordance with Rule 1003. Dust Tracking • Aggregate will be placed at the apron where the Sammons Ranch access road ties into Highway 109. The aggregate will serve as a wheel shaker to reduce dirt from being tracked onto the paved road. Topsoil Stockpile • The stockpile will be mounded with a slope of approximately 1:3 to prevent loose soils and promote vegetative growth. • Vehicle tracking perpendicular to the slope angle will be used to improve short term stabilization. • Vegetation will be allowed to establish, with crimped straw mulching, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity.	
5	Interim Reclamation	Topsoil Protection Short-Term • Vegetation removal and soil disturbance on the Oil and Gas Location will be minimized to the area sufficient to site and level a water well-sized drill rig and equipment for shallow vertical well drilling. • The operator will salvage and segregate topsoil based on soil characteristics of texture, color, structure, consistency, and organic matter. • Salvaged topsoil will be mounded on the Oil and Gas Location with a slope of approximately 1:3. • Vehicle tracking perpendicular to the slope angle will be used to improve short term stabilization. • Topsoil will be protected from contamination by stockpiling it in a location free from drilling, fuel storage, and parking. • Soil removed during flowline trenching will be segregated based on changes in physical characteristics. The soil layers will be windrowed adjacent to the trench. • Soils from the flowline trench will be replaced promptly in the same order in which they were removed. Long-Term • The topsoil stockpile will be protected from compaction by designating it with surveyor staking and flagging as topsoil for reclamation. • The topsoil stockpile will be protected from wind degradation by mounding at an approximately 1:3 steepness to prevent loose soils while promoting continued microbial activity. • The topsoil stockpile will be protected from erosion by ensuring that stormwater controls and diversions are installed, as needed, to divert stormwater away from the stockpile. • Vegetation will be allowed to establish, with crimped straw mulching, in order to stabilize the stockpile, outcompete weeds, and promote soil microbial activity. • The duration of stockpiled topsoil is not anticipated to exceed one growing season because the Oil and Gas Location will support a single vertical helium gas well. Reclamation will occur during the first growing season after the well is drilled.	

6	Interim Reclamation	• Topsoil - Topsoil will be stockpiled on the location and will be restored on the reclaimed area. Salvaged topsoil will be replaced and contoured to maximize erosion control and soil stability. • Erosion control – Erosion controls will be installed and maintained to prevent stormwater runoff and erosion. Erosion controls are shown on Form 2A, Construction Layout Drawing and Facility Layout Drawing. • Weed control – The location will be monitored for the presence of invasive weeds. Invasive weeds will be treated to prevent them from establishing. • Seed mix – The operator will use the certified weed-free seed mix identified by NRCS and approved by the landowner. • Seeding method and Timing – Drill seeding or other method appropriate to promote vegetative success will be conducted during the first favorable growing season after well drilling is complete. • Fencing – Fencing will be installed around the wellhead. • Recontouring - Disturbed areas will be recontoured to blend with the pre-disturbance surface and restore natural drainage patterns. • Monitoring – The location will be monitored for vegetative success. It will be reseeded where needed to establish 80 percent of pre-disturbance cover.
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Total: 6 comment(s)

Attachment List

<u>Att Doc Num</u>	<u>Name</u>
1347857	LOCATION PICTURES
1347858	NRCS MAP UNIT DESC
1347871	SURFACE USE AGREEMENT
2369383	CORRESPONDENCE
402640997	FORM 2A SUBMITTED
402690346	SURFACE AGRMT/SURETY
402690347	MINERAL LEASE MAP
402690350	CORRESPONDENCE
402709800	LOCATION DRAWING
402709805	ACCESS ROAD MAP
402709806	CULTURAL FEATURES MAP
402709809	REFERENCE AREA MAP
402802340	HYDROLOGY MAP
402802342	RELATED LOCATION AND FLOWLINE MAP
402802344	PRELIMINARY PROCESS FLOW DIAGRAMS
402802345	LAYOUT DRAWING
402802346	LESSER IMPACT AREA EXEMPTION REQUEST
402822059	GEOLOGIC HAZARD MAP
402824194	WILDLIFE HABITAT DRAWING
402833962	LOCATION AND WORKING PAD GIS SHP
402833965	OTHER

Total Attach: 21 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	The Director has determined that the OGD application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	01/28/2022
OGLA	Updated requested information from 1/7 and 1/20. Received and attached updated SUA information. Received verbal concurrence to change depth to water description and add temporary fuel tank to equipment.	01/28/2022
OGLA	BMPs were transferred to the Form 2A from the plans.	01/20/2022
OGLA	Additional Information Requested on: 8. Plugging and Abandonment Bond 9. Relevant Local Government permit application. 10. Surface Use Agreement 11. Depth to water. 12. CDPHE BMPs 13. Verification of distances to property lines. 14. Verification of distances to surface waters.	01/20/2022
OGLA	Additional information requested from operator for: 1. Dust Mitigation Plan tracking BMP 2. Water Plan water source 3. Water Plan water storage 4. Cumulative Impacts Plan. Foraging animal and migratory bird pathway impacts. 5. Cumulative Impacts Plan. Soil impacts. 6. Location Pictures. Include aerial image with field of view of photos. 7. NRCS Map Unit Description. Remove excess soil types.	01/07/2022
OGLA	The Director has determined this OGD application is complete. Form pushed to IN PROCESS.	10/28/2021
OGLA	Lesser Impact Area exemption from Rule 304.c.(2) Noise Mitigation Plan. The Director granted the exemption request on October 21 based on the distances to RBUs, the short duration of construction and drilling activities and the plans for daylight only construction. The operator must comply with the noise levels specified in Rule 423-1.	10/27/2021
OGLA	Lesser Impact Area exemption from Rule 304.c.(3) Light Mitigation Plan. The Director granted the exemption request on October 21 based on the distances to RBUs, the short duration of construction and drilling activities, and the plans for daylight only construction.	10/27/2021
OGLA	This Form has been returned to Draft for the following: 1. Revision to Topsoil Protection Plan 2. Revision to Cumulative Impacts Plan 3. GIS shape file upload.	10/01/2021
OGLA	This Form has been returned to Draft for the following: 1. Revisions to multiple attachments. 2. Revisions to multiple plans. A spreadsheet with the issues listed above was created and sent to the operator.	07/16/2021

Total: 10 comment(s)

Public Comments

No public comments were received on this application during the comment period.