Horizontal 6A
Permitting Update

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Oil & Gas Workshop, Charleston Civic Center
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Holy Permit Applications!

Last workshop I showed this picture of “what we sometimes receive in one day.”

It’s a stack of 13 H6A permit applications.

13 was a lot, until...
Holy Permit Applications!

...We received 30 one day in September.

And 544 applications so far this year.
H6A Applications Received and Issued so far in 2014

- Applications Received: 548
- Permits Issued: 489
H6A Apps Received & Issued
2012 to 2014

Applications Received
Permits Issued

- 2012: 526
- 2013: 686, 661
- 2014 thru Sept: 548, 489

Chart showing the comparison of applications received and permits issued from 2012 to 2014.
H6A Apps Received & Issued Monthly 2012-Present
Result: More pending H6A permit applications than ever before

OOG has had up to 221 H6A applications in various stages of review

<table>
<thead>
<tr>
<th>Month</th>
<th>Apps Rec’d</th>
<th>Permits Issued</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jan</td>
<td>42</td>
<td>68</td>
</tr>
<tr>
<td>Feb</td>
<td>35</td>
<td>40</td>
</tr>
<tr>
<td>Mar</td>
<td>64</td>
<td>58</td>
</tr>
<tr>
<td>Apr</td>
<td>61</td>
<td>25</td>
</tr>
<tr>
<td>May</td>
<td>72</td>
<td>52</td>
</tr>
<tr>
<td>June</td>
<td>48</td>
<td>54</td>
</tr>
<tr>
<td>July</td>
<td>71</td>
<td>59</td>
</tr>
<tr>
<td>Aug</td>
<td>69</td>
<td>55</td>
</tr>
<tr>
<td>Sept</td>
<td>86</td>
<td>79</td>
</tr>
<tr>
<td>TOTAL</td>
<td>548</td>
<td>489</td>
</tr>
</tbody>
</table>
What OOG is doing to get a handle on pending applications

Extra Work & Extra Help

• Working overtime to review apps
• Filling vacancies as quickly as possible
• Training additional OOG staff to review permits

Being More Picky

• Returning applications that are incomplete after administrative check
• Denying applications in which Operators do not address Notices of Deficiency (NOD) in a timely manner
OOG has returned several H6A applications lately, for reasons such as:

- No plat submitted with application
- Wrong operator name on plat
- Previous permit for subject well not released
- Publication notice less than 10 days old
- Rework with plat from original well work
- Application submitted on wrong forms
Operator Response to Notices of Deficiency (NODs)

**Orange bars** represent how long OOG had the app before issuing an NOD.

**Red bars** represent how long it took for the permit to be issued after the NOD was sent.

**Take home message:**
NODs are being resolved very slowly.
Some Operators prepare better permits than others

- 6 out of 18 Operators had an NOD on every permit applied for in 2014
- Only 4 out of 18 Operators have had greater than 50% without NODs
What we need Operators to do Better

1. Have everything needed for application when you apply:
   leases, waivers, proper notices, DOH letter, etc.

2. Respond to Notices of Deficiency in a timely way

3. Organize application per [H6A Checklist]

4. Use consistency in Pad and Well names

5. If there’s already an API number, put it on the forms

6. Use a cover letter on everything sent to OOG

“This language is in every NOD we send out.

“The items requested in this email will need to be received by the Office of Oil and Gas within 20 days to avoid the permit application being denied. If an Operator wishes to resubmit an application that has been denied, the Operator is required to complete and submit new forms, Mylar Plat and associated fees.”
Questions?

What questions do you have?

...want to know which Operator you are on the NOD graph?
Laura K. Cooper

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