

Horizontal 6A Permitting Update



west virginia department of environmental protection

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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...



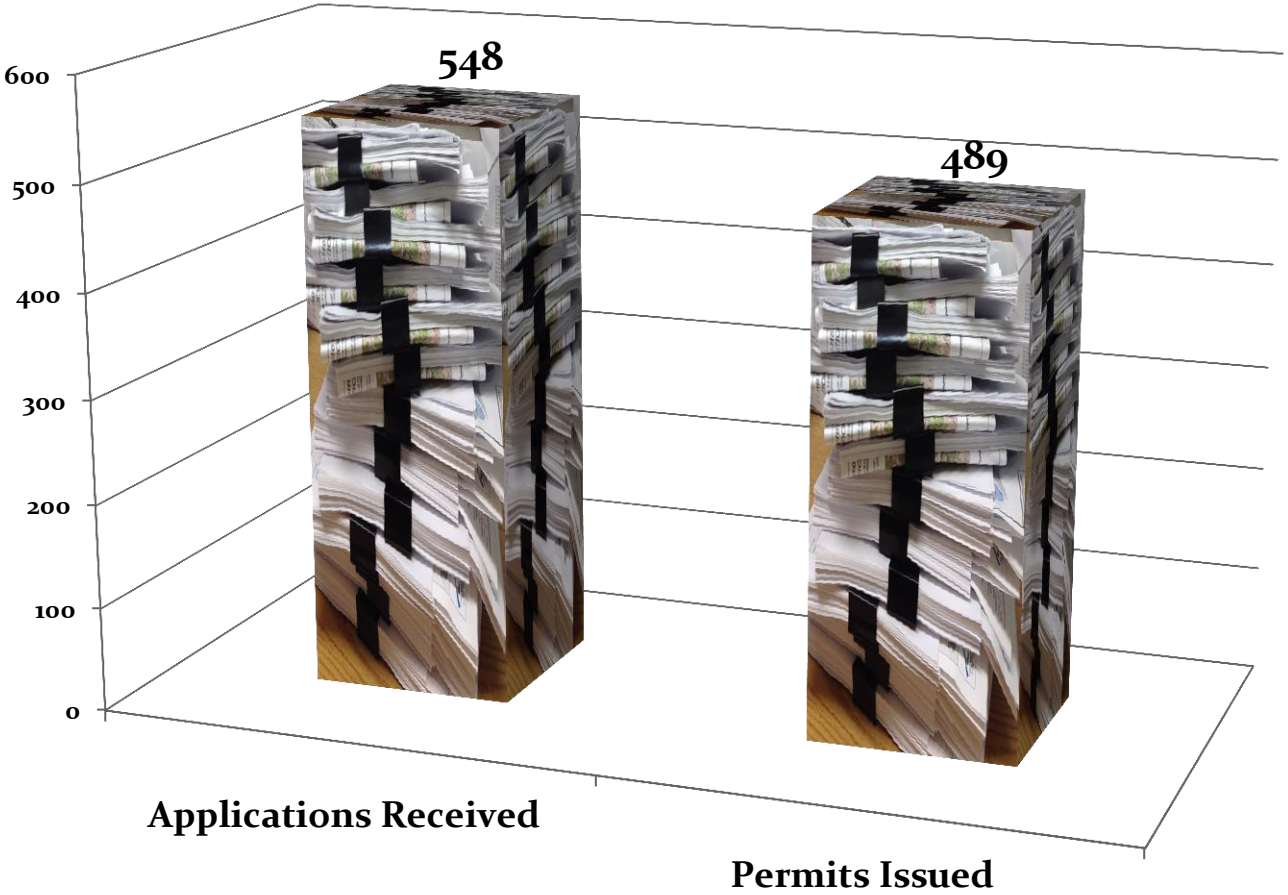
Holy Permit Applications!

...We received **30** one day in September

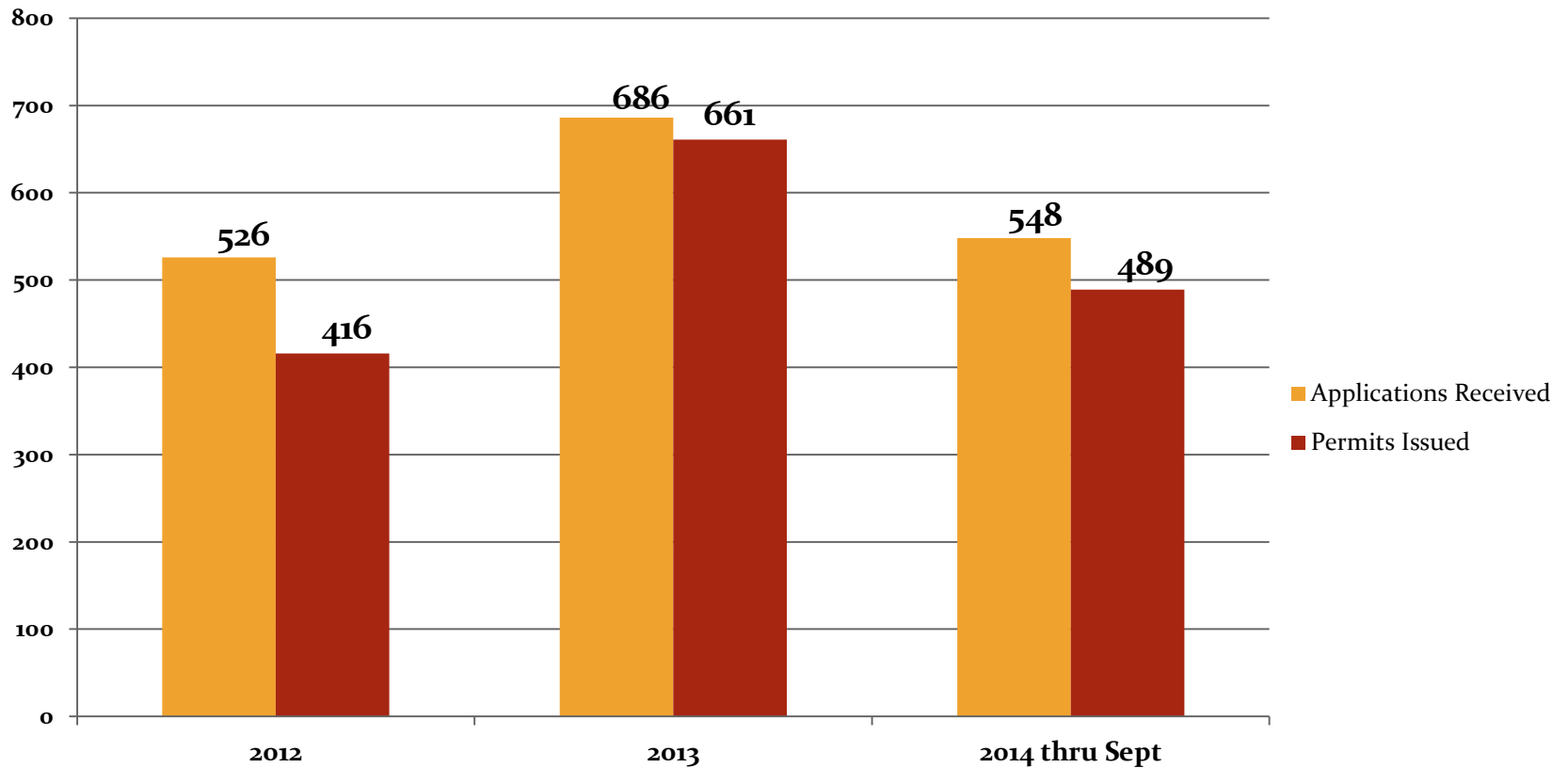
And **544**
applications
so far this
year



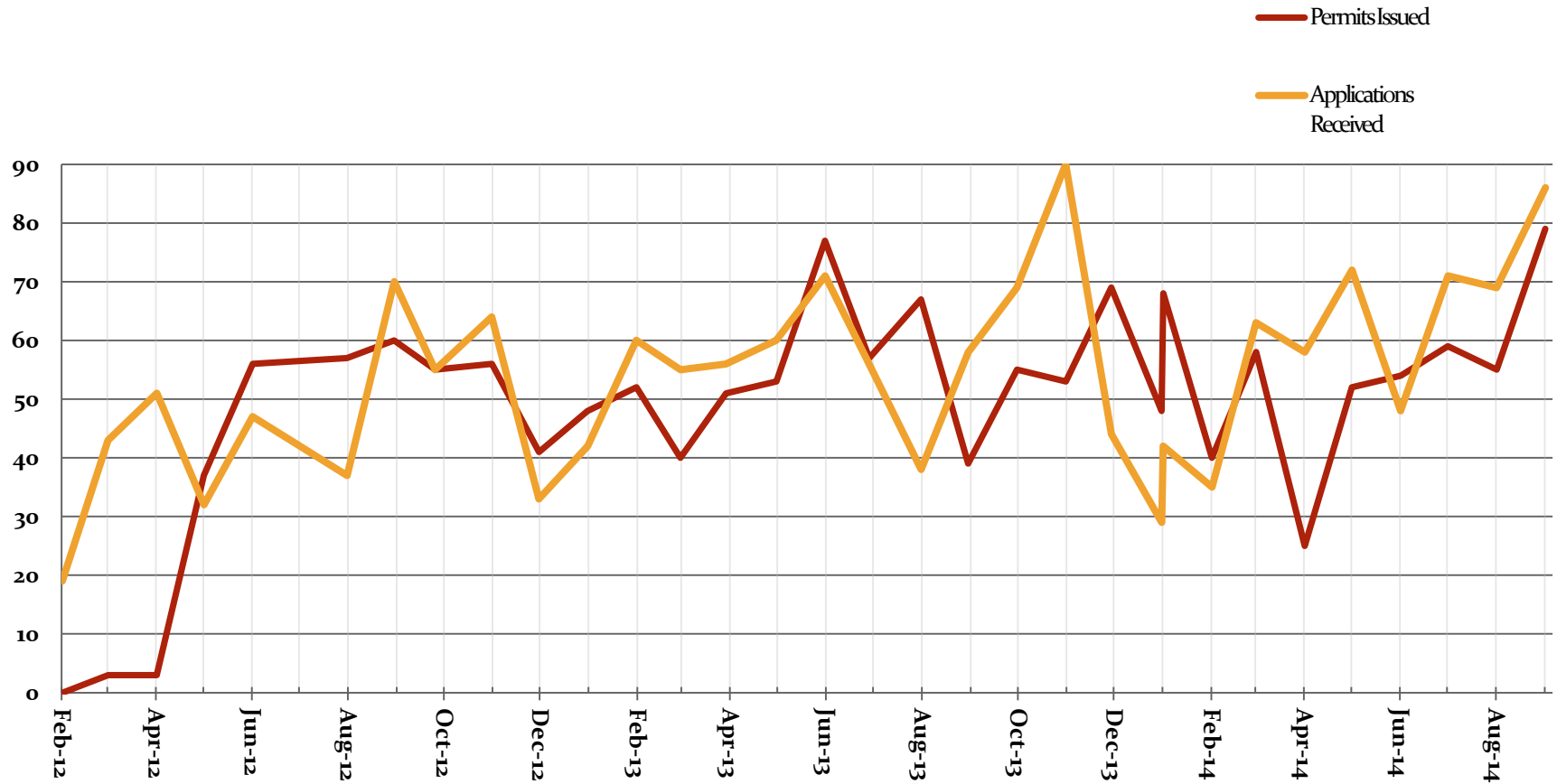
H6A Applications Received and Issued so far in 2014



H6A Apps Received & Issued 2012 to 2014

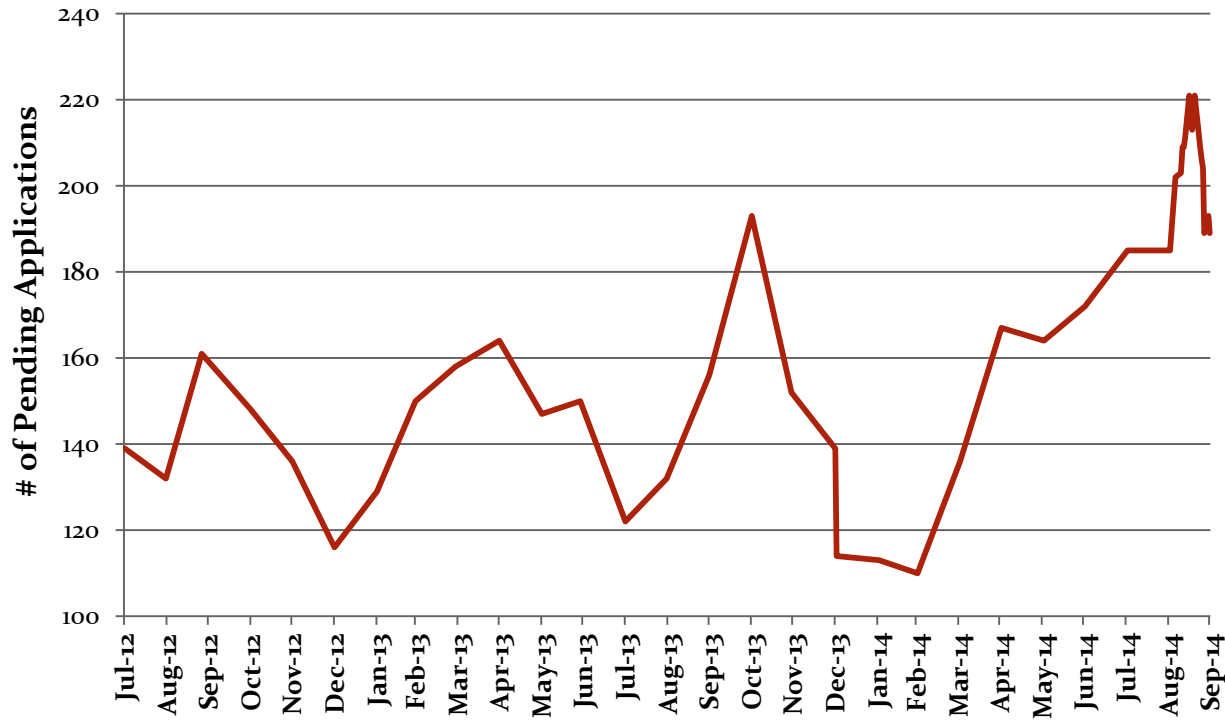


H6A Apps Received & Issued Monthly 2012-Present



Result: More pending H6A permit applications than ever before

H6A Applications Pending at OOG from 2012 to 2014



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

Month	Apps Rec'd	Permits Issued
Jan	42	68
Feb	35	40
Mar	64	58
Apr	61	25
May	72	52
June	48	54
July	71	59
Aug	69	55
Sept	86	79
TOTAL	548	489

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

Reasons for Returned Permit Applications

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



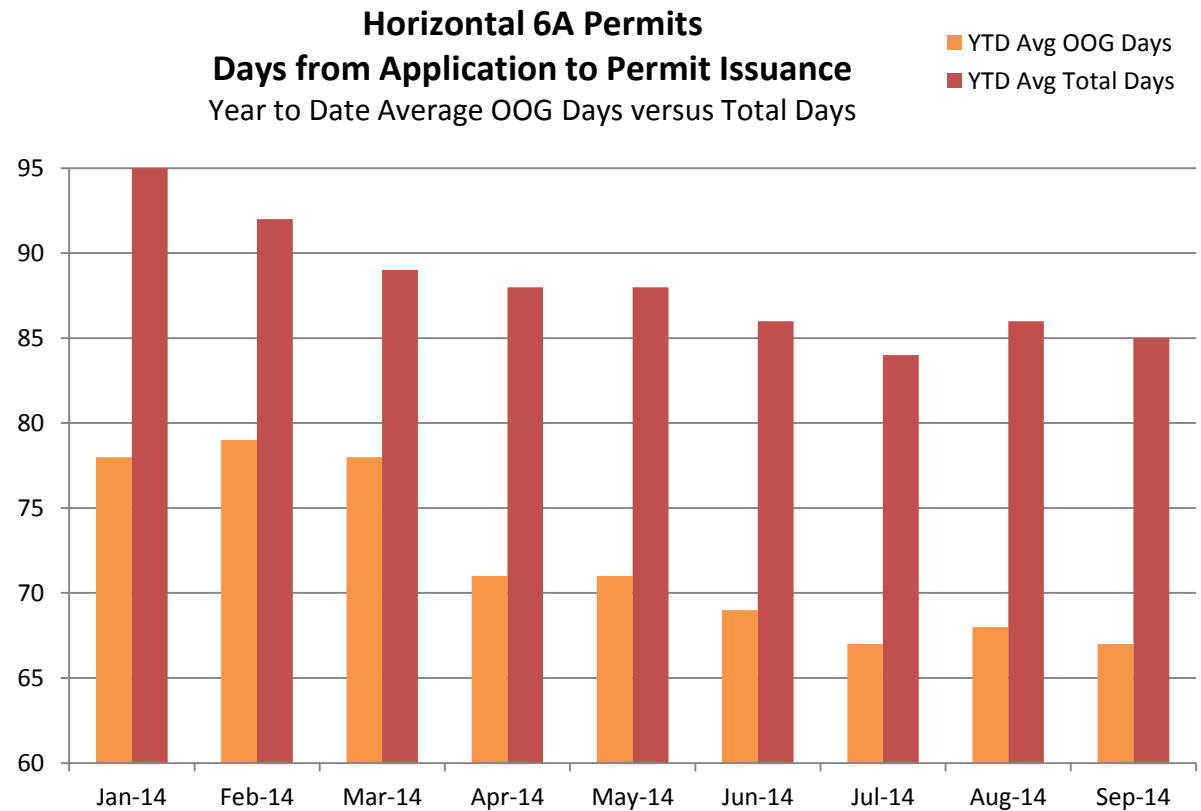
Operator Response to Notices of Deficiency (NODs)

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

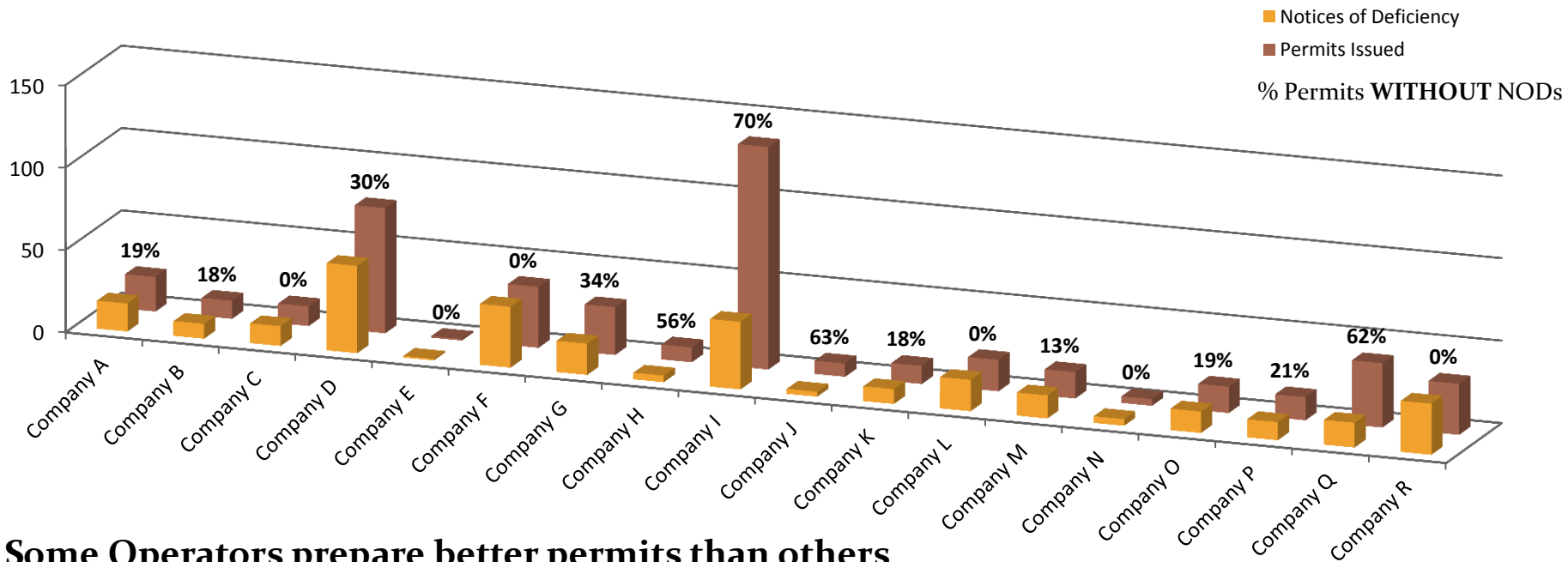
**Take home message:
NODs are being
resolved very slowly**



NODs on Permits Issued so far this year

Issued Permits in 2014	Permits without NODs	Percent of Permits without NODs
489	177	36%

2014 H6A Application Statistics by Operator




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?



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Permitting**

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