

Schedule 13
Change Request for FY 08-09 Budget Request Cycle

Request Title: Decision Item FY 08-09 Base Reduction Item FY 08-09 Supplemental FY 07-08 Budget Request Amendment FY 08-09
 Department: Contract Funding to Assist with Well Permit Applications and Follow-up Regulatory Reports
 Priority Number: Natural Resources
 Ga of 24

Dept. Approval by: *Billie Spive*
 OSPB Approval: *JMZ*
 Date: 1-18-2008
 Date: 1-18-08

	1		2		3		4		5		6		7		8		9		10	
	Prior-Year Actual FY 06-07	Fund	Appropriation FY 07-08	Fund	Supplemental Request FY 07-08	Fund	Total Revised Request FY 07-08	Fund	Base Request FY 08-09	Fund	Decision/ Base Reduction FY 08-09	Fund	November 1 Request FY 08-09	Fund	Budget Amendment FY 08-09	Fund	Total Revised Request FY 08-09	Fund	Change from Base (Column 5) FY 08-10	Fund
Total of All Line Items	Total	4,457,447	4,862,468	0	4,862,468	4,675,823	4,675,823	0	4,675,823	0	4,675,823	4,675,823	362,898	5,038,721	0	5,038,721	0	0	0	
	FTE	47.00	53.00	0.00	53.00	53.00	53.00	0.00	53.00	0.00	53.00	53.00	0.00	53.00	0.00	53.00	0.00	0	0	
	GF	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
	GFE	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
(4) Oil and Gas Conservation Commission Program Costs	CF	2,297,110	4,164,277	0	4,164,277	4,323,595	4,323,595	0	4,323,595	0	4,323,595	4,323,595	362,898	4,686,493	0	4,686,493	0	0	0	
	CFE	2,160,337	698,191	0	698,191	352,228	352,228	0	352,228	0	352,228	352,228	0	352,228	0	352,228	0	0	0	
	FF	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Letternote revised text:
 Cash Fund name/number, Federal Fund Grant name: Oil and Gas Conservation and Environmental Response Fund (Fund 170)
 IT Request: Yes No
 Request Affects Other Departments: Yes No
 If Yes, List Other Departments Here:

CHANGE REQUEST for FY 08-09 BUDGET REQUEST CYCLE

Department:	Natural Resources
Priority Number:	6a out of 24
Change Request Title:	Contract Funding to Assist with Well Permit Applications and Follow-up Regulatory Reports

SELECT ONE (click on box):

- Decision Item FY 08-09
- Base Reduction Item FY 08-09
- Supplemental Request FY 07-08
- Budget Request Amendment FY 08-09

SELECT ONE (click on box):

Supplemental or Budget Request Amendment Criterion:

- Not a Supplemental or Budget Request Amendment
- An emergency
- A technical error which has a substantial effect on the operation of the program
- New data resulting in substantial changes in funding needs
- Unforeseen contingency such as a significant workload change

Short Summary of Request:

The Oil and Gas Conservation Commission (OGCC) is requesting \$362,898 cash funds for five contractors to assist with well permitting and follow-up regulatory reports. Funds for this request will come from the Oil and Gas Conservation and Environmental Response Fund (Fund #170).

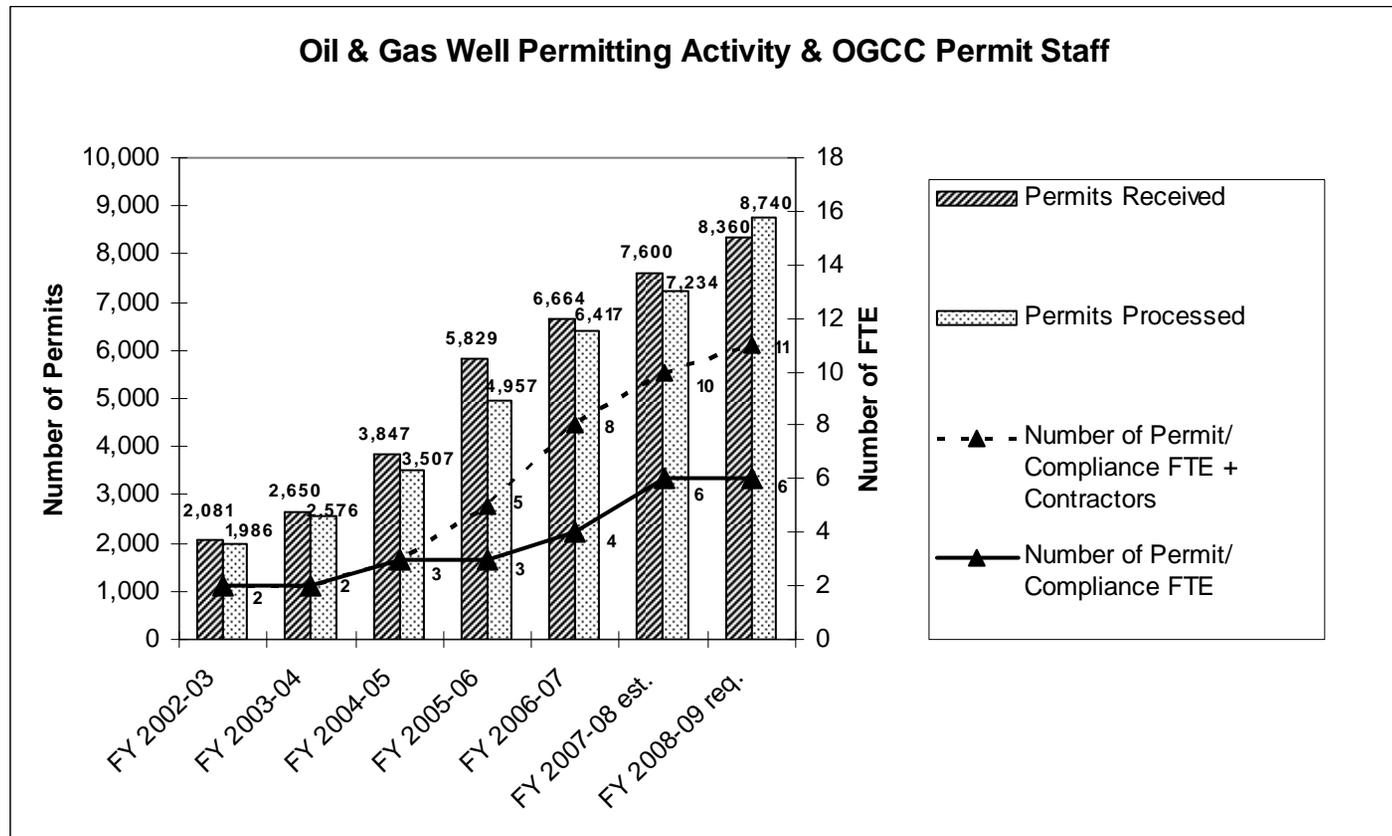
Background and Appropriation History:

The OGCC's FY 2007-08 Program Cost line item includes \$257,088 for four contractors to assist in the review of oil and gas well permit applications and follow-up regulatory reports (FY 2007-08 Figure Setting document, dated February 20, 2007, page 60). This funding was intended to be a one-time extension of contract funding that was originally appropriated through a FY 2005-06 emergency supplemental and the FY 2006-07 long bill.

In addition to the contractors, a request for two permit/compliance technicians was approved by the JBC for FY 2007-08. These new full-time employees have been hired and are expected to be working independently by June 2008. When the OGCC FY

2008-09 budget was prepared, it was anticipated that the additional staff, which brought the total permit/compliance staff to 6.0 FTE, would be able to handle the workload without the assistance of contractors by July 2008. However, additional “per well” workload, the loss to industry of two well trained contractors in November and December 2007, and updated projections on the number of permit applications expected to be received in fiscal years 2007-08 and 2008-09, indicate that the permit/compliance staff will find itself shorthanded when the contractors leave at year-end.

The graph below shows the increase in new well permitting activity over the last five years and the expected growth during fiscal years 2007-08 and 2008-09. The solid line represents the number of permit/compliance FTE during this time frame, while the dashed line represents the number of permit/compliance FTE plus contractors. For example, the solid and dashed lines indicate that in FY 2007-08 the OGCC’s resources include six permit/compliance FTE and four contractors for a total of ten permit/compliance staff members. Five contractors are requested for FY 2008-09, increasing the permit compliance staff to a total of eleven.



General Description of Request:

A significantly higher than anticipated number of permit applications received in early FY 2007-08, coupled with a growing workload associated with each permit, has required the OGCC to re-think its anticipated June 2008 release of contractors. With a forecast for continued high levels of oil and gas drilling activity, reducing the OGCC's permitting resources below the current level would likely lead to a significant backlog of drilling permit applications and follow-up regulatory reports. In fact, the current level of

resources is expected to be inadequate. Funding for one additional contractor, for a total of five, needs to be available in FY 2008-09 to address the anticipated workload.

The type and cost of contractors are shown in the table below. The FY 2007-08 budget request specified three different types of contractors: 1) Record Administrators, who input data from permit applications and regulatory reports into the Colorado Oil and Gas Information System (COGIS); 2) a Permit Technician, who would focus on the review of permit applications; and 3) an Engineering/ Environmental Technician, who would focus on follow-up regulatory reports for compliance. In reality, the latter two types of contractors provided very similar support roles for the permit/compliance technicians, such as reviewing electronic well logs and other regulatory reports, so for simplicity they are referred to as contract permit/compliance technicians in this request.

Cost Estimate for Six Contractors

Type of Contractor	Number of Contractors	Hours Worked	Hourly Rate	Total Cost
Records Administrators	2.0	4,160	\$16.21	\$67,434
Permit/Compliance Technicians	3.0	6,240	\$47.35	\$295,464
Total Cost				\$362,898

The FY 2007-08 request for two permit/compliance technicians and a one-time extension of four contractors was based on the assumption that drilling permit applications would increase to about 7,000 in FY 2007-08 and that each full-time, fully trained technician could process an average of 100 permits per month, while accomplishing all other tasks, such as reviewing follow-up regulatory reports. The OGCC's latest projection for FY 2007-08 has increased to about 7,600, based on a monthly average of 613 permit applications received over the last six months, June through November 2007. As the number of permit applications has increased beyond expectations, so has the complexity of the permits and follow-up regulatory reports. As a result, the capacity of a full-time

fully trained permit/compliance technician has been reduced to a figure below 100 permits per month. The “per well” workload increases are primarily attributed to:

- Electronic Submission of Well Logs. A Denver office-based enforcement officer was requested and approved for FY 2006-07. This new position gives the OGCC the resources it needs to enforce more frequently against regulatory reporting violations. For example, an OGCC rule, effective July 2004, which requires the electronic submission of well logs, did not initially receive uniform compliance, due to the potential competitive edge gained by companies who keep this important geologic data out of the public domain. The presence of an enforcement officer has resulted in a significant improvement in compliance rates. However, better compliance equates to more well logs to review. Two of the OGCC’s contractors currently spend nearly 100% of their time reviewing and approving these logs. This work will shift to the full-time permit/compliance technicians when the contractors depart.

Well logs are used by the OGCC to establish maximum injection volumes for injection wells, to verify the depth at which pipe is set, and to confirm that aquifers and production zones are properly cemented. Although paper copies of the well logs are still submitted to the OGCC, the digital versions of them allow for electronic analysis by staff and industry. The availability of this essential information over the Internet fosters oil and gas development, a statutory charge of the OGCC.

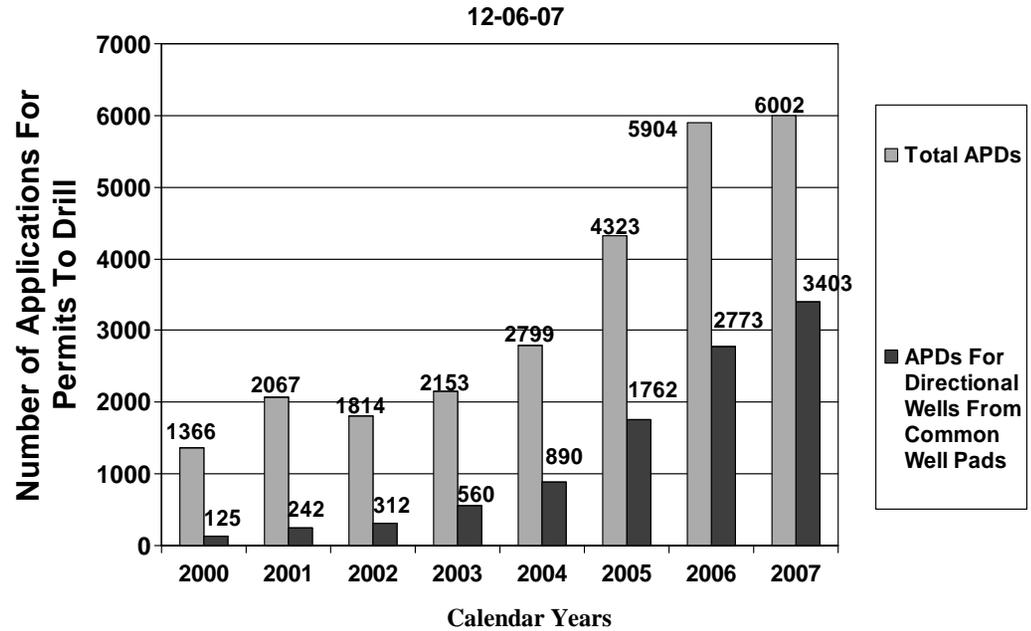
- Global Positioning System (GPS) Technology. An OGCC rule, effective October 30, 2005, requires oil and gas operators to submit GPS coordinates on both the drilling permit application and the drilling completion report. If the “before” and “after” GPS coordinates are different, the permit/compliance technician must spend time validating the location, which involves contacting the operator if the difference is greater than 100 feet. The OGCC also adopted a policy requiring the submission of GPS coordinates for all active wells drilled prior to October 30, 2005. Operators have until October 2010 to submit GPS coordinates for about

28,000 active wells. All must be reviewed and processed by the OGCC permit/compliance staff. A recent increase in compliance with the new rule and policy is another example of how the presence of an enforcement officer has impacted the workload of the permit/compliance staff.

Although extra staff is needed in the near term to ensure the data is handled properly, the surge in compliance rates is a good problem for the state to have, because GPS coordinates ensure that all wells are accurately located on the OGCC's Geographic Information System (GIS) maps, which are available on the agency's website and widely used by the State, local governments, industry, and private citizens. They also assist inspectors when they are trying to locate a well for a bond release inspection or to respond to a complaint. Old wells covered in brush are often very difficult and time-consuming to find.

- Directional Drilling. The sharp increase in directional drilling over the last couple of years has also contributed to the technicians' workload. Permit applications for directional wells increased from 1,762 wells in CY 2005 to 2,773 in CY 2006. As of early December 2007, 3,403 directional wells had been permitted, representing 57% of all drilling permits processed. The graph below shows the growth in directional drilling permits over the last seven years. These wells significantly reduce the impact to the environment, but they are more complex and time consuming to permit. The proposed well bore paths must be carefully evaluated to ensure the protection of correlative rights and to avoid interference with other nearby directional wells.

Number of Oil and Gas Well Permits For Wells Drilled Directionally From Common Well Pads In Colorado



With contractors currently assisting the permit/compliance section, it is difficult to determine exactly how many permits a full-time technician will be able to review each month when all follow-up regulatory work, which includes the review and processing of electronic well logs, drilling completion reports, well abandonment reports, and various other reports, is shifted back to them. The OGCC's best estimate is an average of 85 permits per month. During the second half of FY 2006-07, the permit/compliance staff of 4.0 FTE and 4.0 contractors processed an average of 512 permits per month. If it is assumed that the four full-time staff members were responsible for processing a monthly average of about 340 permits (85 permits x 4.0 FTE), the contributions of the four contractors were equivalent to about 172 permits per month. With no further increases to the per-well workload, the two new permit/compliance technicians hired in FY 2007-08 will bring the full-time staff's contribution to about 510 permits per month when they are fully trained after six to eight months on the job. With the assistance of four contractors, the total capacity by the end of FY 2007-08 should be about 682 per month.

Table 1 below represents the OGCC’s expectations for FY 2007-08. The year commenced with a large backlog due to record levels of permit applications and regulatory reports during the last four months of FY 2006-07. An all-time record of 728 permit applications was received in June, 2007, driving the total number of permit applications in the queue to about 1,100 and the “backlog” of permit applications, those that have been in the queue for more than 30 days, to over 400. If 7,600 permit applications are received in FY 2007-08, as expected, the additional permit/compliance FTE and four contractors will not be sufficient to stem the growing backlog. By the end of FY 2007-08 a typical drilling permit application will take 34 days beyond the OGCC’s goal of 30 days for a total of 64 days (or 2 months) to process.

Table 1: FY 2007-08 with 6.0 Permit Compliance FTE and 4.0 Contractors

FY 2007-08 Months	<u>Projected Permit Applications Received</u>	<u>Projected Permits Processed</u>	<u>Projected Permit Applications Withdrawn</u>	<u>Projected Backlog of Permit Applications</u>	<u>Projected Additional Days (beyond 30) to Approve Backlog</u>
July	643	513	9	559	33
August	692	588	1	656	34
September	512	476	17	797	51
October	508	605	6	689	35
November	594	672	8	552	25
December	525	550	7	520	29
January	567	578	8	501	26
February	612	606	9	499	25
March	661	631	9	520	25
April	712	656	10	566	26
May	768	678	11	645	29
June	806	682	11	758	34
Totals	7,600	7,234	106	N/A	N/A

Note: Figures in italics are actual numbers. The rest are projections. The projected backlog of permit applications can generally be calculated as follows: *Projected Backlog of Permit Applications (from previous month)* + *Projected Permit Applications Received* – *Projected Permits Processed* – *Projected Permit Applications Withdrawn*. The calculations for the actuals over the first five months of the fiscal year do not work out perfectly because the model assumes a “first in – first out” process. It also assumes the queries for all the figures are run on the same day. The query for determining the number of permit applications in the queue for more than 30 days does not run automatically like the others and is sometimes a day or two ahead or behind, due to availability of staff.

Table 2 below represents the agency’s drilling permit projections for FY 2008-09. These permit figures appear extremely high until examined in the context of the last few years. Fiscal years 2005, 2006, and 2007 saw increases in permit applications of 45%, 51%, and 14%, respectively. The OGCC was caught short handed each year, due to estimates that were too conservative. Table 2 also indicates that the current mix of six full-time permit/compliance technicians and four contractors will not be adequate and that additional resources will be required. Under this scenario a drilling permit would take approximately 66 days to process (30 day goal + 36 additional days) by the end of FY 2008-09.

Table 2: FY 2008-09 with 6.0 Permit/Compliance FTE and 4.0 Contractors

FY 2008-09 Months	Projected Permit Applications Received	Projected Permits Processed	Projected Permit Applications Withdrawn	Projected Backlog of Permit Applications	Projected Additional Days (beyond 30) to Approve Backlog
July	690	682	10	757	34
August	696	682	10	761	34
September	696	682	10	765	34
October	696	682	10	770	34
November	696	682	10	774	35
December	696	682	10	778	35
January	696	682	10	783	35
February	698	682	10	789	35
March	698	682	10	795	35
April	698	682	10	802	36
May	700	682	10	810	36
June	700	682	10	818	36
Totals	8,360	8,184	116	N/A	N/A

Table 3 shows that one additional permit/compliance contractor would gradually increase the agency’s capacity by about 50 permits per month, so that by October 2008 total output would reach 732 per month. The permit backlog would gradually be reduced to a more reasonable level. Although the processing time would still exceed the agency’s goal of 30 days, a 41 day turnaround is much more acceptable than the 58-day alternative above and far better than 202 days (30 day goal + 172 day backlog), which would be the result of having no contract assistance, as seen in Table 4 below.

Table 3: FY 2008-09 with 6.0 Permit/Compliance FTE and 5.0 Contractors

FY 2008-09 Months	<u>Projected</u> Permit Applications Received	<u>Projected</u> Permits Processed	<u>Projected</u> Permit Applications Withdrawn	<u>Projected</u> Backlog of Permit Applications	<u>Projected</u> Additional Days (beyond 30) to Approve Backlog
July	690	707	10	732	31
August	696	720	10	698	29
September	696	725	10	659	28
October	696	732	10	614	25
November	696	732	10	568	24
December	696	732	10	522	22
January	696	732	10	477	20
February	698	732	10	433	18
March	698	732	10	389	16
April	698	732	10	346	14
May	700	732	10	304	13
June	700	732	10	262	11
Totals	8,360	8,740	116	N/A	N/A

Table 4: FY 2008-09 with 6.0 Permit/Compliance FTE and 0.0 Contractors

FY 2008-09 Months	<u>Projected</u> Permit Applications Received	<u>Projected</u> Permits Processed	<u>Projected</u> Permit Applications Withdrawn	<u>Projected</u> Backlog of Permit Applications	<u>Projected</u> Additional Days (beyond 30) to Approve Backlog
July	690	510	10	929	55
August	696	510	10	1,105	66
September	696	510	10	1,281	76
October	696	510	10	1,458	87
November	696	510	10	1,634	97
December	696	510	10	1,810	108
January	696	510	10	1,987	118
February	698	510	10	2,165	129
March	698	510	10	2,343	140
April	698	510	10	2,522	150
May	700	510	10	2,702	161
June	700	510	10	2,882	172
Totals	8,360	6,120	116	N/A	N/A

Consequences if Not Funded:

Not funding this request would result in significant across-the-board backlogs of drilling permit applications and regulatory compliance reviews, which would unnecessarily delay natural gas and oil production that would otherwise contribute to the national supply of

energy. Colorado ranks sixth in the nation in natural gas production – enough to meet the natural gas needs of 10 million homes. With natural gas prices dictated by supply and demand relationships, production delays in Colorado would have an impact on natural gas prices, regionally and nationally. In addition to interrupting the supply of energy, delays in drilling permits will financially impact the industry because: 1) drilling rigs must be released by the operator to avoid high standby rates and getting them back can be time consuming and expensive (i.e. moving a drilling rig from one basin to another can cost over \$100,000); 2) mineral leases may expire before the wells are commenced; and 3) agreements with surface owners are often no longer valid, because conditions have changed, such as the season in which the well was originally scheduled to be drilled.

Although the economic impacts of permit delays are significant, equally important are the environmental impacts. Timely review of follow-up regulatory reports can prevent impacts to ground water, surface water, and soil. Impacts to these resources can cause impacts to public health and wildlife. The OGCC simply cannot shortcut any aspect of the regulatory process. There is too much at stake in regards to public health and safety and impacts to Colorado’s environment.

Calculations for Request:

Summary of Request FY 08-09	Total Funds	General Fund	Cash Funds (Fund 170)	Cash Funds Exempt	Federal Funds	FTE
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STATE OF COLORADO FY 08-09 BUDGET REQUEST CYCLE: Department of Natural Resources

Summary of Request FY 08-09	Total Funds	General Fund	Cash Funds (Fund 170)	Cash Funds Exempt	Federal Funds	FTE
Total Request	\$362,898	0	\$362,898	0	0	0.0
Records Administrators (2.0 contractors)	\$67,434	0	\$67,434	0	0	0.0
Permit/Compliance Technicians (3.0 contractors)	\$295,464	0	\$295,464	0	0	0.0

Assumptions for Calculations:

Hourly rates increase by 3% over the average hourly rates actually charged in FY 2007-08 for these positions. Each of the four contractors will work 2080 hours.

	<u>Contract Records Administrator</u>	<u>Contract Permit/ Compliance Tech</u>
FY 2007-08 rate	\$15.74	\$45.97
<u>Increase by 3%</u>	<u>x 1.03</u>	<u>x 1.03</u>
Estimated rate for FY 2008-09	\$16.21	\$47.35
Estimated hours per contractor	2,080	2,080
Number of contractors	2	3
Total number of hours	4,160	6,240
Hours x Rate	\$67,434	\$295,464

Impact on Other Government Agencies:

At this time the OGCC does not believe that this request would cause impacts to other state agencies

Cost Benefit Analysis:

The cost benefit analysis below focuses on the potential environmental impact of understaffing the permit/compliance unit.

Assessment of Annual Incremental Risk Attributed to Alternative 2 - "No Action" (not funding contract permit/compliance staff)								
Issue	Impact to	Cost Per Occurrence	Annual Frequency	Annual Cost of Impacts	Health Safety and Welfare Impact	Incremental Risk Factor	Cost of Incremental Risk	Cost Incurred by
Contamination from improperly constructed wells, due to delay in review of well construction paperwork ^A	Surface owners, surface waters, soils, ground water	\$60,000	10	\$600,000	High	29%	\$174,000	Industry and OGCC
Contamination from improperly plugged and abandoned wells, due to delay in review of well plugging paperwork ^B	Surface owners, surface waters, soils, ground water	\$60,000	10	\$600,000	High	29%	\$174,000	Industry and OGCC
Additional Issues due to current workload								
Delay in delivery of information to stakeholder community ^C	Govt., Industry, Resellers, Public	\$47	2,000	\$94,000	Low	100%	\$94,000	Various
Total Cost				\$1,294,000			\$442,000	

Footnotes:

- A. A completion report¹ must be submitted by the oil and gas operator within 30 days of drilling a well. Due to heavy workload, OGCC staff cannot track wells that have been drilled but not reported. Completion reports that are submitted must be reviewed for completeness and correctness. This includes confirming that the report is for the well the operator claims it is, in addition to checking for compliance with permit conditions. If the associated data, such as well logs and directional surveys, are not included or are incorrect then the correct information must be sought. The failure to review a completion report in a timely manner will allow approximately ten wells per year to escape detection of cementing deficiencies for a period long enough to create an adverse impact to groundwater. The delay could easily be five months or greater at current permit levels. Treatment systems can be installed to mitigate impacts from hydrocarbon contamination. For domestic water wells these systems cost approximately \$60,000.
- B. Prior to plugging and abandoning any oil and gas well in Colorado, the well operator must submit a report proposing the methodology to be used in plugging the well. This report is approved (sometimes with corrections) and returned to the operator. After the well is plugged and abandoned the operator must submit a subsequent report showing how the well was actually plugged. These reports are used to discover improperly plugged wells. Due to the high activity level, the OGCC has difficulty tracking wells that have been plugged and abandoned, but have not been properly reported as plugged. The additional permitting/compliance contractors would allow the OGCC to find wells that have been plugged but not reported. The failure to review a plugging report in a timely manner will allow approximately ten wells per year to escape detection of cementing deficiencies for a period long enough to create an adverse impact to groundwater. The delay could easily be five months or greater at current permit levels. Treatment systems can be installed to mitigate impacts from hydrocarbon contamination. For domestic water wells these systems cost approximately \$60,000.

¹ A drilling completion report (OGCC Form 5) provides the OGCC with information about a new well, including the depths at which pipe was set, the quantity of cement used, the tops and bottoms of each cement job, geologic information, and production test results.

C. Well information is vital to many users, including the oil and gas industry, government agencies, environmental community, and property owners (both surface and mineral). This information is vital to additional drilling and exploration in the state. At current permit levels, without additional support for the permit compliance unit, there would be a significant delay in processing reports, such as completion, plugging and miscellaneous information and making them available to the public electronically. The delay could be many months or more depending on permitting activity. The approximate hourly rate for a contractor to research files in the OGCC public room is \$47, which would be required if reports have not been processed and are unavailable on the Internet. The OGCC's website received over one million visits in FY 2006-07 and the number of visits continues to climb. The OGCC assumes that if a very small percentage of these website visits, less than one half of one percent, turned into public room visits, about 2,000 hours of contract hours would be required.

Definition of terms used in above chart:

Annual Frequency – Annual average number of total occurrences handled by OGCC staff.

Incremental Risk Factor - Reduced availability of staff to be able to deal with issues due to current workload (equivalent to 2.5 FTE out of 8.5 = 29% - because the 5.0 contractors are roughly equivalent, in terms of permit and regulatory report processing, to 2.5 additional FTE. These 2.5 "FTE equivalents" are added to the 6.0 current permit compliance FTE for a total of 8.5 FTE.)

Cost of Incremental Risk – Portion of annual cost of impacts that is at risk due to current workload management.

The contractors in this request cost \$362,898, which is less than the \$442,000 of incremental risk that is avoided. The benefit-cost ratio is 1.2-to-1.

Additionally, avoiding delays in the well permitting process would provide significant economic benefits to the State, the oil and gas industry, and the public. These estimates, however, vary so widely, depending on the set of assumptions used, that they were not included in this request.

Implementation Schedule:

Task	Month/Year
Contracts Awarded	June 2008
Contractors Commence Work	July 2008

Statutory and Federal Authority:

34-60-102(1) C.R.S. (2006, as amended by HB07-1341): Oil and Gas Conservation Act – declares it is to be in the public interest to foster the responsible, balanced development, production, and utilization of the natural resources of oil and gas in the state of Colorado in a manner consistent with protection of public health, safety, and welfare, including protection of the environment and wildlife resources...

34-60-106(2)(d) C.R.S. (2006, as amended by HB07-1341): The commission has the authority to regulate...Oil and gas operations so as to prevent and mitigate significant adverse environmental impacts on any air, water, soil, or biological resource resulting from oil and gas operations to the extent necessary to protect public health, safety, and welfare, including protection of the environment and wildlife resources, taking into consideration cost-effectiveness and technical feasibility.

Performance Measures:

STATE OF COLORADO FY 08-09 BUDGET REQUEST CYCLE: Department of Natural Resources

	<u>Outcome</u>	<u>FY 05-06</u> <u>Actual</u>	<u>FY 06-07</u> <u>Actual</u>	<u>FY 07-08</u> <u>Approp.</u>	<u>FY 08-09</u> <u>Request</u>
Decrease water contamination from active oil and gas operations.					
Number of impacts to surface water, ground water, and water wells, per thousand active oil & gas wells	Benchmark	1.81	1.81	1.81	1.81
	Actual	1.81	1.97		
Adequate staffing in the permit/compliance section is essential for the agency to meet the benchmark figure in FY 08-09.					
	<u>Outcome</u>	<u>FY 05-06</u> <u>Actual</u>	<u>FY 06-07</u> <u>Actual</u>	<u>FY 07-08</u> <u>Approp.</u>	<u>FY 08-09</u> <u>Request</u>
Decrease in health, safety, and environmental (other than water) incidences caused by oil & gas operations.					
Total number of citizen complaints per thousand active oil & gas wells	Benchmark	9.27	9.27	9.27	9.27
	Actual	9.27	10.71		
The OGCC will be unable to meet the benchmark for this measure without contract assistance for the permit/compliance work unit. Prevention and early detection of oil and gas impacts are central goals of the permit/compliance work unit.					