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## Public Resources Code Section 3285 – Annual Inventory, Map and Statement Submissions

### Best Practice Guidelines

(See also [Notice to Operators No. 2025-03](#))

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The following summarizes some of the requirements applicable to operator 2025 and 2026 annual inventories, maps, and sensitive receptor statements from the California Public Resources Code (PRC §) and the California Code of Regulations, title 14 (CCR §).<sup>1</sup>

**Recent regulatory update:** On April 27, 2026, the Office of Administrative Law approved the [SB 1137 First Implementation Regulations](#). The regulations were filed with the Secretary of State and take effect July 1, 2026. Annual inventories due after July 1, 2026, must comply with the updated regulations. Operators should review the final text and any subsequent CalGEM guidance before submitting.

These guidelines were created to provide operators with general feedback based on the 2025 submission and to serve as quick reference for future submission. However, operators are encouraged to independently review all requirements in [PRC § section 3285](#) and [CCR §§ sections 1765.2, 1765.6, 1765.7, 1765.8, and 1765.9](#), and follow all applicable requirements.

For issues or questions please contact the SB 1137 Implementation Team at [SB1137Implementation@conservation.ca.gov](mailto:SB1137Implementation@conservation.ca.gov)

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<sup>1</sup> Permanent regulations have been adopted and take effect July 1, 2026. Annual inventories due after July 1, 2026, will need to comply with the updated regulations.

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## 1. Annual Submission Requirements

1. **Annually, by July 1**, all operators must submit:
  - o Sensitive Receptor Inventory
  - o Sensitive Receptor Map
  - o Sensitive Receptor Statement (for wells/facilities outside HPZ) (PRC § 3285(a), (b); CCR §§ 1765.6, 1765.7, 1765.8, and 1765.9.)
2. All **active and idle wellheads** and **production facilities** must be included (PRC § 3285(a), (b); CCR § 1765.6(a)(1).)

### Common Issue identified:

- ⚠ **Missing required documents** (e.g., Inventory, Map, or Statement not submitted)
- ⚠ **Incomplete annual submission package** (e.g., only inside-HPZ wells submitted; outside-HPZ wells/facilities omitted)
- ⚠ **Wrong documents submitted for requirement** (e.g., well list or statement submitted instead of a map)
- ⚠ **Incorrect WellSTAR upload type** (e.g., document uploaded under the wrong category or document type)
- ⚠ **Bundled or unclear uploads** (e.g., inventory, map, and statement combined into one file instead of separate documents)

## 2. Location Data (Latitude & Longitude) & HPZ Determination

1. All wells/facilities listed in Inventory list and maps must include **accurate Latitude and Longitude** and location must be accurately depicted in maps. (PRC § 3285(a)(1)(A); CCR §§ 1765.7(a)(3)(E), 1765.7(a)(4)(D), and 1765.8(a)(1)(C).)
2. The Latitude and Longitude ideally should
  - o at least have 6 digits after decimal.
  - o coordinates are required under Article 2.5; the coordinates must be provided in decimal degrees with an accuracy of plus or minus ten feet using the geodetic datum North American Datum of 1983 (NAD83). (CCR § 1765.2(d).)
3. Distances should be evaluated using accurate spatial information. (CCR §§ 1765.2(d), 1765.7, and 1765.8.)
4. If near boundary:
  - o Verify using accurate spatial data
  - o Do not rely on approximate coordinates
5. For locations near an HPZ boundary, operators should verify the location using accurate spatial data (CCR § 1765.9)
6. Even if HPZ status is known, **correct Lat/Long is still required** (CCR § 1765.9)
7. Ensure that the Coordinates align with:
  - o Survey data
  - o Most recent Satellite imagery

### Common Issue identified:

- ⚠ **Missing coordinates** (e.g., latitude or longitude not provided)
- ⚠ **Incorrect coordinate format** (e.g., not decimal degrees, unclear datum, insufficient precision)

- ⚠ **Incorrect placement** (e.g., offshore, wrong field, wrong county, or miles away from known location)
- ⚠ **Duplicate coordinates** (e.g., same latitude/longitude repeated for multiple wells without explanation)
- ⚠ **Unclear HPZ status** (e.g., inside/outside HPZ designation missing or not verifiable)
- ⚠ **Conflicting HPZ determination** (e.g., inventory says inside HPZ, but map or statement suggests outside HPZ)
- ⚠ **HPZ determination based on inaccurate location data** (e.g., wrong coordinates used to support inside/outside status)
- ⚠ **Unsupported outside-HPZ determination** (e.g., insufficient evidence or explanation provided)
- ⚠ **Unsupported HPZ layer/source used** (e.g., non-CalGEM or inconsistent HPZ layer used for determination)

### 3. Inside HPZ – Sensitive Receptor Requirement

1. As explained in NTO [No. 2025-03] only **one sensitive receptor is required** to establish an HPZ for inventory and mapping purposes. Ensure receptor clearly demonstrates HPZ (the 3200 feet radius). ([PRC § 3285\(a\)\(2\)](#); [CCR §§ 1765.6\(a\)\(1\), 1765.7\(a\)\(1\)\(C\), and 1765.8\(a\)\(1\)\(C\)](#))
2. Multiple receptors are **not** required once HPZ is established: ([CCR § 1765.7\(a\)\(1\)\(C\) & 1765.8\(a\)\(1\)\(C\)](#))
3. A sensitive receptor inventory and map must identify sensitive receptors based on the location of the operator's wellheads and production facilities, consistent with ([CCR § 1765.6](#), [PRC § 3285\(a\)](#); [CCR §§ 1765.6\(a\)\(1\), 1765.7\(a\)\(1\)\(C\), and 1765.8\(a\)\(1\)\(C\)](#))
4. For grouped facilities (P&ID), one receptor per group is acceptable ([CCR §§ 1765.7\(a\) and 1765.8\(a\)](#))

#### Common Issue identified:

- ⚠ **Sensitive receptor not shown** (e.g., receptor missing from map for wells/facilities identified as inside HPZ)
- ⚠ **Nearest receptor not identified** (e.g., no label, name, or clear symbol for the receptor used to support HPZ status)
- ⚠ **Distance to receptor missing** (e.g., no distance provided between well/facility and nearest sensitive receptor)
- ⚠ **Unclear receptor symbology** (e.g., receptor symbol does not match legend or is difficult to distinguish)
- ⚠ **HPZ buffer shown without receptor context** (e.g., map shows buffer but not the actual sensitive receptor)
- ⚠ **Poor map readability for receptor review** (e.g., labels/symbols obscure wells, facilities, or receptors)

### 4. Outside HPZ – Statement Requirements

1. A statement is required for each well/facility outside HPZ: ([PRC § 3285\(a\)\(2\)](#); [CCR §§ 1765.6\(a\)\(3\) and 1765.9\(a\)](#))
2. Must include:
  - All features are within **3,200 feet**

- Explanation why each is NOT a sensitive receptor  
(CCR § 1765.9(a)(1), CCR § 1765.9(a)(1)(A), (C).)
3. Must:
- explain why each identified feature does not meet the definition of “sensitive receptor”. (CCR § 1765.1, CCR § 1765.9(a)(2).)
  - submitted in .txt, .docx, or .pdf format. (CCR § 1765.9(a)(3))
  - Provide sufficient details for verification
4. Ensure there are no:
- Vague statements (e.g., stating “not sensitive” stated without explaining why)
  - Missing justification

**Common Issue identified:**

- ⚠ **Missing outside-HPZ statement** (e.g., no statement submitted for wells/facilities identified outside HPZ)
- ⚠ **Incomplete nearby-feature identification** (e.g., buildings, parks, public recreation areas, or other potential sensitive receptors within 3,200 feet not identified)
- ⚠ **Vague justification** (e.g., “not sensitive” stated without explaining why)
- ⚠ **No feature-specific explanation** (e.g., statement does not explain each nearby feature individually)
- ⚠ **Missing basis for determination** (e.g., no data source, assumption, field verification, or supporting evidence provided)
- ⚠ **Statement does not support conclusion** (e.g., outside-HPZ conclusion cannot be verified from the statement)

**5. Inventory (Data Submission Requirements)**

1. Inventory must be submitted in Excel or CSV format: (CCR § 1765.7(b))
2. A template for operators to submit required inventory for inside and outside of an HPZ is available on CalGEM’s website at: [Annual Inventory Workbook Template](#).
3. Must include:
  - Accurate Lat/Long
  - Correct API numbers
  - All other required fields  
(CCR § § 1765.7(a)(1) through (a)(4))
4. Ensure that there are no:
  - P&A wells in submissions.
  - Cancelled wells or Wells not under CalGEM jurisdiction.
  - Missing wells
  - Incorrect API numbers
  - Do not include personally identifiable information (CCR § § 1765.7(c))
5. P&ID may be used if all required data is included. (CCR § 1765.7(a))

**Common Issue identified:**

- ⚠ **CalGEM template not used** (e.g., operator submitted custom format instead of required template)

- ⚠ **Missing assets** (e.g., wells or production facilities omitted from inventory)
- ⚠ **Missing asset identifiers** (e.g., API number, well name, facility ID, or facility type missing)
- ⚠ **Incorrect or inconsistent asset information** (e.g., API number, well name, field name, or facility details do not match CalGEM records)
- ⚠ **Missing HPZ designation** (e.g., inside/outside HPZ status not provided)
- ⚠ **Incomplete facility description** (e.g., facility type or categorical description missing or unclear)
- ⚠ **Non-required assets included without clarification** (e.g., plugged and abandoned wells included without explanation)
- ⚠ **Data import issue** (e.g., merged headers, extra rows, or inconsistent formatting prevents comparison/import)
- ⚠ **File format issue** (e.g., inventory not submitted in Excel/CSV format)

## 6. Maps (Spatial Requirements)

1. Maps must clearly show:
  - Wellheads & production facilities
  - Sensitive receptors
  - Distance/radius  
(CCR §§ 1765.8(a), (b), (c), and (d))
2. Maps must:
  - Be geographically accurate (not schematic)
  - Include clear labeling and scale
  - Include overview maps if multiple maps submitted  
(CCR § 1765.8(a), (b))
3. Maps must:
  - presented in a letter-sized (8.5 x 11 inch) layout
  - formatted as PDF
  - have a resolution of at least 300 dpi
  - use a map scale no greater than 1:24,000  
(CCR § 1765.8(b))
4. Pipelines must be shown when using P&ID/plot plans: (CCR § 1765.8(a)(2))
5. Map must not include personally identifiable information (CCR § § 1765.7(c))
6. Examples of statements and maps are also available at [Operator Resources](#):

### Common Issue identified:

- ⚠ **Incorrect map scale** (e.g., scale greater than 1:24,000)
- ⚠ **Missing required map elements** (e.g., scale, legend, labels, or necessary orientation/context missing)
- ⚠ **Incorrect page or file format** (e.g., not 8.5 x 11, not PDF, or low-resolution PDF)
- ⚠ **Schematic/non-geographic maps** (e.g., maps are not spatially accurate or cannot support distance review)
- ⚠ **No overview/index map** (e.g., multiple detailed maps submitted without clear location context)
- ⚠ **Unclear map symbols** (e.g., symbols are inconsistent, unexplained, or do not match the legend)

- ⚠ **Incomplete asset display** (e.g., not all applicable wells, facilities, or tank settings shown)
- ⚠ **Sensitive receptors missing from maps** (e.g., receptors not displayed for HPZ determination)
- ⚠ **Spatial relationship unclears** (e.g., map does not clearly show relationship between wells/facilities and receptors)
- ⚠ **HPZ boundary or 3,200-foot context missing** (e.g., no buffer, boundary, or distance context provided)
- ⚠ **Pipeline/facility path unclear** (e.g., pipeline route or facility footprint not shown when needed)
- ⚠ **Partial map coverage** (e.g., maps only show well, only tank settings, or only a subset of facilities)

## 7. Data Consistency, Coordinate Precision & Formatting

1. Ensure consistency across:
  - inventory, map(s), and statement
  - location of wellheads, production facilities, and sensitive receptors should be consistent across all submitted materials  
([CCR §§ 1765.2\(d\), 1765.7, 1765.8, and 1765.9](#))
3. Maintain sufficient decimal precision (min of six digits after the decimal)
4. Validate:
  - API numbers
  - Field names
  - Facility identifiers
  - Location data

## 8. Special Cases (Inaccessible / Uncertain Wells)

1. For buried/inaccessible wells:
  - Provide best available coordinates  
Note: Operators must also apply for the **Inaccessible Well Classification** in WellSTAR by completing the Inaccessible Idle Well form to ensure proper documentation of buried or inaccessible wells.
2. Clearly explain:
  - Coordinate/location data source
  - Assumptions used
  - And any limitations  
([CCR §§ 1765.2\(d\), 1765.7, 1765.8, and 1765.9.](#))
3. Need to include observation wells also if any

### Common Issue identified:

- ⚠ **Buried or inaccessible well/facility not explained** (e.g., operator does not explain why location could not be confirmed)
- ⚠ **Uncertain location unsupported** (e.g., best available coordinates or supporting documentation not provided)
- ⚠ **Nearby structure not classified** (e.g., operator does not explain whether structure is occupied, public, recreational, or sensitive)

## 9. Templates & Tools: Please refer to the [Notice to Operators No. 2025-03](#))

- Use CalGEM-provided:
  - Inventory templates
  - Map examples
  - Statement examples
- Improves compliance and minimizes potential review delays
- Examples of statements and maps are also available at [Operator Resources](#):
  - **Inside the Health Protection Zones:**
    - [Annual Receptor\(s\) Inventory Submission Map Example – Wells Inside HPZ](#)
    - [Annual Receptor\(s\) Inventory Submission Map and Statement Example – Wells and Facility Aggregates Inside HPZ](#)
    - [NOI Sensitive Receptor \(s\) Map Example – Inside HPZ](#)
  - **Outside the Health Protection Zones:**
    - [Annual Receptor\(s\) Inventory Submission Map Example – Wells Outside HPZ](#)
    - [Annual Receptor\(s\) Inventory Submission Map and Statement Example – Wells and Facility Aggregates Outside HPZ](#)
    - [NOI Sensitive Receptor \(s\) Map and Statement Example – Outside HPZ](#)

### Common Issue identified:

- ⚠ **Unclear file naming** (e.g., file does not identify operator, field, year, or document type)
- ⚠ **Duplicate uploads** (e.g., multiple versions uploaded without identifying current version)
- ⚠ **Outdated or incorrect document version submitted** (e.g., prior draft or wrong reporting year uploaded)
- ⚠ **Submission date unclear** (e.g., upload date or document date missing/unclear)
- ⚠ **Required documents difficult to identify** (e.g., documents embedded in combined files or mislabeled attachments)

## 10. Compliance & Enforcement

1. Deadline: **July 1 annually**. Any submission after July 1 will be considered a late submission.
2. Failure to submit inventories, maps and/or statements when required, in the required formatting, may result in:
  - Notices of Violation
  - Enforcement actions[\(PRC § 3224 & PRC § 3236 & PRC § 3236.2 & PRC § 3236.5\)](#)

## 11. Submission Process Best practice (WellSTAR)

All submissions should be made via WellStar using the **Organization Questionnaire**

### Inventory, Map, and Statement Submissions

There are three document types in WellSTAR specifically for HPZ annual inventories:

1. Annual Sensitive Receptor Inventory
2. Annual Sensitive Receptor Map
3. Annual Sensitive Receptor Statement

The required sensitive receptor inventory, map, statements, and any associated information should be submitted by uploading relevant documents into WellSTAR using the “**Organization Questionnaire**” Form Document Upload capability.

The following steps should be followed to upload the documents at organization level:

- A. Start a new “**Organization Questionnaire**” Form
- B. Complete Form Steps 1-3 in WellSTAR
- C. Upload documents associated with appropriate document types at Step 4
  - Actions > Add New > Upload New Document
  - Category = “Organization”
  - Type = “Annual Sensitive Receptor (Inventory, map, or statement)”
- D. Complete Form Steps 5-6 in WellSTAR to submit the Form

For issues or questions related to **uploading documents into WellSTAR**, please contact [WellSTAR@conservation.ca.gov](mailto:WellSTAR@conservation.ca.gov)

For a complete understanding of the bill along with other information and resources kindly visit: [Understanding California's Oil and Gas Safety Zones: Senate Bill 1137](#)

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## Regulatory Compilation (PRC § 3285 & 14-CCR § 1765.6–1765.9)

1. **Public Resources Code 3285:** [PRC § 3285 – Official California Legislature Page](#)

2. **California Code of Regulations (CCR §) – Title 14, Division 2, Chapter 4**

Note: CCR § sections (1765.6–1765.9) are **not always individually indexed like PRC § sections**. They are accessed via the [full regulatory chapter](#).

### Main CCR § Chapter Link (Contains 1765.1–1765.9)

Title 14 CCR § – Oil and Gas Regulations (Full Chapter)

- [CCR § 1765.2 – Measuring Distances](#)
  - [CCR § 1765.6 – Annual Submission of Sensitive Receptor Inventory and Map](#)
  - [CCR § 1765.7 – Sensitive Receptor Inventory Content/Format](#)
  - [CCR § 1765.8 – Sensitive Receptor Map Content/Format](#)
  - [CCR § 1765.9 – Determination that a Location is Not Within an HPZ](#)
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# Quick Compliance Checklist

## 1. Annual Submission Package

- ✓ Sensitive Receptor Inventory submitted.
- ✓ Sensitive Receptor Map submitted.
- ✓ Sensitive Receptor Statement submitted, if applicable.
- ✓ Submission covers both inside-HPZ and outside-HPZ wells/facilities.
- ✓ Documents are uploaded under the correct WellSTAR document type.
- ✓ Inventory, Map, and Statement are submitted as separate, clearly identifiable files.
- ✓ File names clearly identify operator, operator code, field, year, and document type.

## 2. Inventory Compliance

- ✓ Inventory uses CalGEM-required template or approved format.
- ✓ Inventory is submitted in Excel/CSV format.
- ✓ Required columns are present and not renamed, deleted, or merged.
- ✓ Operator name and operator code are included.
- ✓ Field name is included.
- ✓ API number is provided for each well.
- ✓ Well name is provided.
- ✓ Facility ID, facility type, and facility description are provided where applicable.
- ✓ Active/idle status is clear.
- ✓ Inside/outside HPZ designation is provided.
- ✓ Plugged and abandoned wells are excluded or clearly explained if included.
- ✓ All applicable wells and production facilities are included.
- ✓ Inventory counts match map and statement counts.

## 3. Location / Coordinate Review

- ✓ Latitude and longitude are provided for each applicable well/facility.
- ✓ Coordinates are in decimal degrees.
- ✓ Coordinate datum is clear, preferably NAD83.
- ✓ Coordinates have sufficient precision.
- ✓ Coordinates place the asset in the correct field/county/location.
- ✓ Coordinates do not place assets offshore, miles away, or in an obviously incorrect location.
- ✓ Duplicate coordinates are explained, if present.
- ✓ Coordinates are consistent with CalGEM GIS, WellSTAR, imagery, inspection records, or well-file evidence.
- ✓ Minor coordinate discrepancies do not affect HPZ determination.
- ✓ Significant coordinate discrepancies are corrected or explained.

## 4. HPZ Determination

- ✓ Inside/outside HPZ status is clear for each asset.
- ✓ HPZ determination is based on accurate coordinates.
- ✓ HPZ determination is consistent across inventory, map, and statement.
- ✓ Operator HPZ determination aligns with CalGEM GIS or is adequately explained.

- ✓ Non-CalGEM or third-party HPZ layers are not used as the sole basis without support.
- ✓ Assets near HPZ boundaries have been reviewed carefully.
- ✓ Missing or conflicting HPZ information is flagged for correction.

#### **5. Inside-HPZ Map / Sensitive Receptor Review**

- ✓ Sensitive receptor is shown for assets identified as inside HPZ.
- ✓ Nearest sensitive receptor is clearly identified.
- ✓ Distance to nearest sensitive receptor is included or spatially clear.
- ✓ Sensitive receptor symbol matches the legend.
- ✓ HPZ buffer is supported by visible receptor context.
- ✓ Map clearly shows relationship between wells/facilities and receptors.
- ✓ Labels and symbols do not obscure wells, facilities, or receptors.

#### **6. Outside-HPZ Statement Review**

- ✓ Outside-HPZ statement is provided where required.
- ✓ Statement identifies nearby buildings within 3,200 feet.
- ✓ Statement identifies parks/public recreation areas within 3,200 feet.
- ✓ Statement identifies other potential sensitive receptor locations within 3,200 feet.
- ✓ Statement explains why each nearby feature is not a sensitive receptor.
- ✓ Statement provides feature-specific justification.
- ✓ Statement includes basis, data source, assumptions, or verification method.
- ✓ Statement supports the outside-HPZ conclusion.
- ✓ Vague statements such as "not sensitive" are avoided or supplemented.

#### **7. Map Format/ Content Review**

- ✓ Map is submitted as PDF.
- ✓ Map is 8.5 x 11-page size.
- ✓ Map scale is no greater than 1:24,000.
- ✓ Map includes scale.
- ✓ Maps include legend.
- ✓ Map includes clear labels.
- ✓ Map is legible and high enough resolution for review.
- ✓ Maps are geographically accurate, not merely schematic.
- ✓ Multiple maps include an overview or index map, if needed.
- ✓ Map symbols are clear and consistent.
- ✓ Map shows all applicable wells.
- ✓ Map shows applicable production facilities.
- ✓ Map shows tank settings or facility footprints where relevant.
- ✓ Maps show sensitive receptors needed for HPZ determination.
- ✓ Maps shows HPZ boundary, buffer, or 3,200-foot context.
- ✓ Map shows pipeline or facility path where applicable.
- ✓ Map coverage matches the inventory.
- ✓ Map does not omit assets listed in the inventory.

#### **8. Data Consistency Review**

- ✓ Inventory coordinates match map locations.
- ✓ Inventory HPZ status matches map information.

- ✓ Inventory HPZ status matches statement information.
- ✓ Well counts match across inventory, map, and statement.
- ✓ Facility counts match across inventory, map, and statement.
- ✓ Field names are consistent across all documents.
- ✓ API numbers are consistent with CalGEM records.
- ✓ Duplicate or conflicting records are resolved.
- ✓ Operator-submitted data is consistent with CalGEM GIS, WellSTAR, imagery, and inspection records.

#### **9. Special-Case Review**

- ✓ Buried, inaccessible, or uncertain locations are clearly explained.
- ✓ Best available coordinates are provided.
- ✓ Supporting documentation is included for uncertain locations.
- ✓ Conflicting location sources are explained.
- ✓ Nearby structures are classified clearly.
- ✓ Field verification, imagery review, or other verification methods are documented where applicable.

#### **10. Compliance Decision**

- ✓ Submission is complete.
- ✓ Required documents are acceptable.
- ✓ Required content is present.
- ✓ Location data supports HPZ determination.
- ✓ Map supports inventory and statement.
- ✓ Statement supports outside-HPZ determination.
- ✓ No material errors affect compliance determination.
- ✓ Minor issues are documented but do not require resubmission.
- ✓ Material deficiencies are flagged for correction/resubmission.
- ✓ NOV or enforcement follow-up is recommended if required information remains missing or unresolved.