



July 28, 2009

JT Romatzke
Area Wildlife Manager
Division of Wildlife
NW Region Service Center
711 Independent Ave.
Grand Junction, CO 81505

Re: Noble Energy Inc. – Hyrup 2-34B

Dear Mr. Romatzke:

Thank you for your letter of July 23, 2009 proposing certain conditions of approval with respect to four well permits on the Hyrup 2-34B existing well pad located in the SW/4SE/4 of Section 2, Township 8 South, Range 96 West, Garfield County.

Your proposed conditions of approval provide for a “moratorium” on all oil and gas activities during December, January, February, March and the first half of April of each year. Your conditions also restrict well site visitations between the hours of 10:00 a.m. and 3:00 p.m. and suggest that Noble Energy, Inc. (“Noble”) reduce well site visitations between December 1st and April 15th.

Noble rejects these conditions of approval for a number of reasons including the following:

1. The existing pad for the Hyrup 2-34B Well currently has five existing wells on the pad. Moreover, the four pending permits are all “refiled permits” as the prior permits had expired. Therefore, all of the permits which are pending on the Hyrup 2-34B pad were originally issued without these suggested conditions of approval.
2. We have had no landowner issues or landowner complaints regarding the five wells on this pad. Noble has a valid Surface Use Agreement covering this pad. We believe that our surface landowners will not endorse the moratorium conditions located on their property. The surface and minerals for this existing well pad are owned in private fee ownership and we believe imposing a moratorium exceeds the DOW’s jurisdictional authority.
3. This is a sensitive wildlife area - not a restricted surface occupancy area and there has been no scientific justification for the four and a half month moratorium.
4. As these permits were filed and posted on the website of the COGCC on June 8, 2009, the consultation period has expired and we believe that the conditions of approval are untimely not justified.

1625 Broadway
Suite 2200
Denver, Colorado 80202

Tel: 303.228.4000
Fax: 303.228.4280



JT Romatzke
July 28, 2009
Page 2

Therefore, please be advised that should these conditions of approval be incorporated into any of our permits, we will request a hearing before the Colorado Oil and Gas Conservation Commission. Thank you in advance for your cooperation.

Very truly yours,

NOBLE ENERGY, INC.

A handwritten signature in cursive script that reads 'Kate Shirley'.

Kate Shirley

cc: Dennis Ahlstrand
Thom Kerr
David Neslin
Jeff Crawford