

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, December 15, 2009 2:35 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Noble Energy, SGV PAD 7K, NESW Sec 7 T8S R95W, Garfield County, Form 2A #40014197 Review

Scan No. 2032703      CORRESPONDENCE      2A#400014197

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**From:** LPavelka@nobleenergyinc.com [mailto:LPavelka@nobleenergyinc.com]  
**Sent:** Tuesday, December 15, 2009 1:27 PM  
**To:** Kubeczko, Dave  
**Subject:** Re: Noble Energy, SGV PAD 7K, NESW Sec 7 T8S R95W, Garfield County, Form 2A #40014197 Review

I agree with you COA's 4 & 5, we would do this as standard procedure. When you say secondary containment is there something that you have in mind, or is there some type of commitment that we need to know about. We have a lot of stormwater precautions in place that can also act as secondary containment. With BLM in this area they also have some pretty strict standards. Lets put 6/1/2009 for construction and put 12/1/2009 for reclamation. Hope this helps thanks

"Kubeczko, Dave" <[Dave.Kubeczko@state.co.us](mailto:Dave.Kubeczko@state.co.us)>

To <[lpavelka@nobleenergyinc.com](mailto:lpavelka@nobleenergyinc.com)>

cc

12/14/2009 05:32 PM

Subject Noble Energy, SGV PAD 7K, NESW Sec 7 T8S R95W, Garfield County, Form 2A #40014197 Review

Linda,

I have been reviewing the SGV PAD 7K **Form 2A** (#400014197). COGCC requests the following clarifications regarding the data Noble has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** The dates for construction (02/17/2010) and interim reclamation (04/17/2010) seem too close together, especially since 13 wells are planned for this pad. Can you check on this. I can make the change if you send an email with this request.
1. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 347 feet. COGCC guidelines require designating all locations with close proximity to surface water (i.e., less than 500 feet) a **sensitive area** and requiring the following conditions of approval (COAs):  
**COA 4** - Location is in a sensitive area because of close proximity to surface water, therefore, operator must ensure 110 percent secondary containment for any volume of fluids contained at well site during drilling and completion operations.  
**COA 5** - Operator must implement best management practices to contain any unintentional release of fluids.

COGCC would appreciate your concurrence with attaching these COAs to the Form 2A permit prior to passing the OGLA review. The other issues are very minor and I would like to get this passed. If you have any questions, please do not hesitate to call me at (970) 625-2497 x5 (office) or (970) 309-2514 (cell), or email. Thanks.

Dave

**David A. Kubeczko, PG**  
**Oil and Gas Location Assessment Specialist**

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