

## Kubeczko, Dave

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**From:** Kubeczko, Dave  
**Sent:** Tuesday, January 12, 2010 2:36 PM  
**To:** Kubeczko, Dave  
**Subject:** FW: Noble Energy SGV Federal 6-44C (PAD 8D), NWNW Sec 8 T8S R95W, Garfield County, Form 2A #400019225 Review

Scan No 2032747      CORRESPONDENCE      2A#400019225

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**From:** LPavelka@nobleenergyinc.com [mailto:LPavelka@nobleenergyinc.com]  
**Sent:** Tuesday, January 12, 2010 8:03 AM  
**To:** Kubeczko, Dave  
**Subject:** Re: Noble Energy SGV Federal 6-44C (PAD 8D), NWNW Sec 8 T8S R95W, Garfield County, Form 2A #400019225 Review

Dave, I do not know why we used evaporation pit, we have a closed loop system and a cutting pit. Any mud left over will move with the rig and be used over. We also accept the COA's listed below and do most of it as a standard procedure. thank you for your time

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

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

cc

01/11/2010 06:12 PM

Subject Noble Energy SGV Federal 6-44C (PAD 8D), NWNW Sec 8 T8S R95W, Garfield County, Form 2A #400019225 Review

Linda,

I have been reviewing the SGV Federal 6-44C (PAD 8D) **Form 2A** (#400019225). COGCC requests the following clarifications regarding the data Noble Energy has submitted on or attached to the Form 2A prior to passing the Oil and Gas Location Assessment.

1. **Construction (Section 6):** Mud Disposal: Offsite was selected for mud disposal; however the method selected, Evaporation Pit, would suggest that Onsite disposal is the actual method, unless Noble has a centralized location offsite for mud disposal. If you could confirm. I can make the change (if necessary) if you send an email with this request.
2. **Water Resources (Section 14):** Form 2A indicates that the distance to the nearest surface water is 362 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 2** - Location is in a sensitive area because of close proximity to surface water; therefore either a lined drilling pit or closed loop system must be implemented.

**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 issue is minor and I would like to pass this permit. In the future, if the distances between facilities (i.e., well pad, separator units, tank batteries) is greater than 100 feet, then separate Form 2As will be required for each facility location. New guidance for the Form 2A application permit will be coming out in February or March 2010 discussing the criteria for when separate Form 2As are needed. 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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