

## Allison, Rick

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**From:** SMiller@nobleenergyinc.com  
**Sent:** Thursday, July 26, 2012 3:19 PM  
**To:** Allison, Rick  
**Cc:** RVeldman@nobleenergyinc.com; KMiller@nobleenergyinc.com; SFriedman@nobleenergyinc.com; RAntonio@nobleenergyinc.com  
**Subject:** Noble - Kaufman Locations  
**Attachments:** Flare E-Mail Chain COGCC.docx

Hi Rick,

Please see Noble's response to your e-mail below, regarding the CPW's recommendations for the noted (2) permits in order to allow the permits to move to COGCC for approval. It is important to keep in mind that these wells are exploration locations. Full development of this area may or may not occur based on the results of these and other exploration wells.

KAUFMAN PC GL18-78HN	400259387
KAUFMAN PC GL20-68HN	400258985

The following BMP's were provided by Celia Greenman who has since retired from the CPW. Please see Noble's response below.

- 1) Restrict well site visitations for operational purposes to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to June 1).
- 2) Use noise reduction equipment on compressors and other development and production equipment, such as pump jacks and compressors, so that operational noise will not exceed 49 dB measured at 30 feet from the source.
- 3) Utilize an enclosed flare system to avoid the visual disturbance to birds during the breeding and production cycle.
- 4) Design tanks and other facilities with structures such that they do not provide perches or nest substrates for raptors, crows and ravens.

Noble's response:

Item 2): Noble will adhere to the COGCC's Noise Abatement rule 802 which is more appropriate for oil and gas operations. The level noted under Celia's BMP is not attainable and compliance with 49 dBA 30 feet from our operations is just not possible. 49 dBA is too low of a threshold to be practical based on technology at this time. The Wyoming Fish and Game Department cite a noise abatement level of "Limit noise sources to 10 dBA above natural, ambient noise (~39 dBA) measured at the perimeter of a lek from March 1 to May 15." At 1,300 feet away dBA for a conventional well is 55 dBA but with coiled tubing it is 40 dBA. Therefore, even with advanced technology we cannot be less than 49 when 30 feet from the source.

Items 1), 3) and 4): Noble is amenable to these proposed BMP's. Please see attached e-mail chain for item 3).

Kathi Green, Celia Greeman's replacement, provided additional BMP's noted below. Please see Noble's response below.

- 1) Complete sharptail grouse lek surveys in potential development sites in spring 2013. CPW will be happy to provide protocols upon request.

- 2) No surface occupancy within 0.4 mile of any known plains sharp-tailed grouse lek.
- 3) Avoid oil and gas operations within 1.25 miles of any known plains sharp-tailed grouse lek, and within mapped plains sharp-tailed grouse breeding or summer habitat outside the 1.25 mile buffer. Select sites for development that will not disturb suitable nest cover or brood-rearing habitats within 1.25 miles of an active lek, or within identified nesting and brood-rearing habitats outside the 1.25 mile perimeter.
- 4) Where oil and gas activities must occur within 1.25 miles of plains sharp-tailed grouse leks or within other mapped plains sharp-tailed grouse breeding or summer habitat, conduct these activities outside the period between March 1 and June 30.
- 5) Restrict well site visitations to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to June 1). Minimize surface disturbance and fragmentation of plains sharp-tailed grouse habitat through use of the smallest facility footprints possible, use of multiple well pads, clustering of roads and pipelines, and the widest possible spacing of surface facilities.
- 6) When compressor stations must be sited within 1.25 miles of plains sharp-tailed grouse active and inactive (within last 10 years) lek sites, locate compressor stations no closer than 2500 feet from the lek.
- 7) Use noise reduction equipment on compressors and other development and production equipment.
- 8) Use topographical features to provide visual concealment of facilities from known lek locations and as a noise suppressant.

Noble's Response:

Item 1): Completion of sharp tail grouse lek surveys would require approval from the Landowner(s) to conduct survey operations on their land. When approached to receive approval from the land owners to conduct these surveys, we were denied. If we comply with the above BMPs and these locations are beyond the 0.4 NSO these surveys become unnecessary. In addition, this request is not consistent with past CPW requirements. Therefore, Noble is not amenable to this proposed BMP.

Items 2), 3), 4), 5) and 8): Noble is amenable to these proposed BMP's.

Item 6): Is not applicable. Installation of Compressor Station(s) will not be part Noble's oil and gas operations for this area.

Item 7): Noble will adhere to the COGCC's Noise Abatement rule 802. See Noble's response to Item 2) above.

Thank you.

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From: "Allison, Rick" <Rick.Allison@state.co.us>  
To: <KMiller@nobleenergyinc.com>, <SMiller@nobleenergyinc.com>  
Date: 07/11/2012 08:14 AM  
Subject: FW: Noble Energy Application for Wells in T11N R60W, Section 18

Kate and Susan,

Below are the latest recommendations from Colorado Parks and Wildlife regarding the Kaufman wells. I have placed this

recommendation onto the Kaufman PC GL18-78HN Form 2A on behalf of Parks and Wildlife. COGCC would appreciate Noble's acknowledgement of these recommendations and whether they are workable as wildlife BMPs for the Kaufman wells in Section 18 T11N R60W.

Also note that Kathi Green is handling Celia Greenman's former area for the interim.

Please call me with any questions.

Rick

**From:** Green, Kathi

**Sent:** Tuesday, July 10, 2012 3:31 PM

**To:** Allison, Rick

**Cc:** Florian, Troy; Leslie, Mark; Yamashita, Steve; George, Janet; Figueroa, Wendy

**Subject:** Noble Energy Application for Wells in T11N R60W, Section 18

Good Afternoon Rick

I've reviewed the proposed well site with our district wildlife manager and have reviewed the list of BMPs that we consider for plains sharp-tailed grouse. In this particular case, and without knowing what may have been discussed with Noble Energy already due to the recent retirement of our energy coordinator, I reviewed the emails you'd provided from Noble Energy. Our recommendation is for the following to ensure protection of plains sharp-tailed grouse which are historically recorded in this area.

- 1) Complete sharptail grouse lek surveys in potential development sites in spring 2013. CPW will be happy to provide protocols upon request.
- 2) No surface occupancy within 0.4 mile of any known plains sharp-tailed grouse lek.
- 3) Avoid oil and gas operations within 1.25 miles of any known plains sharp-tailed grouse lek, and within mapped plains sharp-tailed grouse breeding or summer habitat outside the 1.25 mile buffer. Select sites for development that will not disturb suitable nest cover or brood-rearing habitats within 1.25 miles of an active lek, or within identified nesting and brood-rearing habitats outside the 1.25 mile perimeter.
- 4) Where oil and gas activities must occur within 1.25 miles of plains sharp-tailed grouse leks or within other mapped plains sharp-tailed grouse breeding or summer habitat, conduct these activities outside the period between March 1 and June 30.
- 5) Restrict well site visitations to portions of the day between 9:00 a.m. and 4:00 p.m. during the lekking season (March 1 to June 1). Minimize surface disturbance and fragmentation of plains sharp-tailed grouse habitat through use of the smallest facility footprints possible, use of multiple well pads, clustering of roads and pipelines, and the widest possible spacing of surface facilities.
- 6) When compressor stations must be sited within 1.25 miles of plains sharp-tailed grouse active and inactive (within last 10 years) lek sites, locate compressor stations no closer than 2500 feet from the lek.
- 7) Use noise reduction equipment on compressors and other development and production equipment.
- 8) Use topographical features to provide visual concealment of facilities from known lek locations and as a noise suppressant.

If you have any questions or if there is need for further discussion, please do not hesitate to contact me or have the applicant contact me.

Sincerely,

Kathi Green

*Kathi Green*  
Colorado Parks & Wildlife  
NE Deputy Regional Manager

303 291-7275

[kathi.green@state.co.us](mailto:kathi.green@state.co.us)

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