



STATE OF
COLORADO

Andrews - DNR, Doug <doug.andrews@state.co.us>

Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664

15 messages

Andrews - DNR, Doug <doug.andrews@state.co.us>

Fri, Aug 16, 2013 at 12:08 PM

To: jkajiwara@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Jan,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and I have a few comments.

- 1) In the Construction section you have indicated that the size of the location after interim reclamation will be the same as during construction (13.00 acres). Or in other words, no interim reclamation of the disturbed area will take place. Yet you also indicate that interim reclamation will begin three months after construction commences. Because interim reclamation of disturbed areas affected by drilling or subsequent operations must take place as per COGCC Rule 1003.b, please provide me with a realistic size of the location after interim reclamation that conforms with our rules and I will change it on the Form 2A.
- 2) In the Future Land Use section you have indicated that the location will be a leased oil & gas operations area. This is not an acceptable future land use. The purpose of this section of the Form 2A is to convey the land use of the disturbed area after oil and gas operations have ceased so that final reclamation standards can be established. Please provide me with an appropriate Future Land Use and I will change it on the Form 2A. If Future Land Use is not Crop Land, also provide me with a Reference Area Map and Reference Area Photos.
- 3) So that I may better understand Noble's proposed intentions to utilize the entire acreage of the cattle feed lot for their oil and gas operations, please provide me with a Construction Facility Layout Drawing that illustrates the proposed layout and arrangement of all drilling and production equipment on the disturbed area.
- 4) Please provide me with a copy of the Surface Use Agreement for this oil and gas location and I will add it to the list of Attachments.
- 5) Due to the proximity of surface water to the oil and gas location, I would like to add the following Condition of Approval:

"Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the irrigation ditch located 300 feet south and the irrigation canal located 312 feet northeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."

Please feel free to contact me if you have any questions. Thank you.

—

R. Douglas Andrews

Oil & Gas Location Assessment Specialist
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us
303-894-2100 Ext. 5180

JKajiware@nobleenergyinc.com <JKajiware@nobleenergyinc.com>

Mon, Aug 19, 2013 at 8:08 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>, SRobbins@nobleenergyinc.com

Doug,

I am attaching the SUA and letting you know that I am working on your email.

Thanks Doug,
Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

To: jkajiware@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Date: 08/16/2013 12:08 PM

Subject: EXTERNAL: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664

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SUA.pdf
6232K

JKajiware@nobleenergyinc.com <JKajiware@nobleenergyinc.com>

Wed, Aug 28, 2013 at 3:18 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Doug

I have been addressing these issues, but have not received all the information. I will be out of town till 9/4 and just wanted you to know I am working on this.

Thanks
Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

To: jkajiware@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Date: 08/16/2013 12:08 PM

Subject: EXTERNAL: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664

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JKajiwar@nobleenergyinc.com <JKajiwar@nobleenergyinc.com>
To: doug.andrews@state.co.us

Thu, Sep 12, 2013 at 8:42 AM

Sorry for the delay and appreciate your patience. Please feel free to contact me if you have any questions.
Thanks Doug.

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: jkajiwar@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>
Date: 08/16/2013 12:08 PM
Subject: EXTERNAL: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664

Jan,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and I have a few comments.

1) In the Construction section you have indicated that the size of the location after interim reclamation will be the same as during construction (13.00 acres). Or in other words, no interim reclamation of the disturbed area will take place. Yet you also indicate that interim reclamation will begin three months after construction commences. Because interim reclamation of disturbed areas affected by drilling or subsequent operations must take place as per COGCC Rule 1003.b, please provide me with a realistic size of the location after interim reclamation that conforms with our rules and I will change it on the Form 2A. **Please remove reclamation date. Due to the unique parcel of land and the size of this facility which includes the well pads along with our safety set backs on the equipment we anticipate this area will be fully utilized in oil and gas operations area.**

2) In the Future Land Use section you have indicated that the location will be a leased oil & gas operations area. This is not an acceptable future land use. The purpose of this section of the Form 2A is to convey the land use of the disturbed area after oil and gas operations have ceased so that final reclamation standards can be established. Please provide me with an appropriate Future Land Use and I will change it on the Form 2A. If Future Land Use is not Crop Land, also provide me with a Reference Area Map and Reference Area Photos. **Please change to Improved Pasture.**

3) So that I may better understand Noble's proposed intentions to utilize the entire acreage of the cattle feed lot for their oil and gas operations, please provide me with a Construction Facility Layout Drawing that illustrates the proposed layout and arrangement of all drilling and production equipment on the disturbed area. **Noble would like to request a COA for this as the field is working on this.**

4) Please provide me with a copy of the Surface Use Agreement for this oil and gas location and I will add it to the list of Attachments. **Copy sent on**

8/19/13

5) Due to the proximity of surface water to the oil and gas location, I would like to add the following Condition of Approval:

"Operator must implement site-specific best management practices in accordance with good engineering practices, including, but not limited to, construction of a berm or diversion dike, site grading, or other comparable measures, sufficient to protect the irrigation ditch located 300 feet south and the irrigation canal located 312 feet northeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."Noble agrees to this COA.

Please feel free to contact me if you have any questions. Thank you.

--

R. Douglas Andrews

Oil & Gas Location Assessment Specialist
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us
303-894-2100 Ext. 5180

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Andrews - DNR, Doug <doug.andrews@state.co.us>

Thu, Sep 12, 2013 at 2:57 PM

To: JKajiwara@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Jan,

At this time I'm not willing to add a COA to this Form 2A regarding the future submission of a Facility Layout Drawing. I need this drawing as part of my review of the Form 2A to better understand how and why Noble will need all of the disturbed area for their wells and production equipment and that no interim reclamation at all will occur. While you have indicated on the Form 2A that quite a number of wells and production equipment is planned for this location, 13 acres is a very large area to utilize and we want to see operators minimize their surface disturbance from oil and gas operations as much as possible. When an operator tells us that they will require a large disturbance area and that no interim reclamation will occur, it is important that they also provide additional information on the Form 2A to support that position. Please send me a Facility Layout Drawing at your earliest convenience so that I may complete my review of this Form 2A.

Thank you.

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--

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

doug.andrews@state.co.us

303-894-2100 Ext. 5180

JKajiwar@nobleenergyinc.com <JKajiwar@nobleenergyinc.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Fri, Sep 13, 2013 at 6:38 AM

Thanks Doug for your response. I will forward this to Greeley and have them address it.

Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: JKajiwar@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>
Date: 09/12/2013 02:57 PM
Subject: EXTERNAL: Re: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664
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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: JKajiwar@nobleenergyinc.com

Wed, Sep 25, 2013 at 1:45 PM

Jan,

Haven't heard anything from you on this one. I understand Noble has been busy with flood response but I don't want this one to fall off the radar for too long. Thanks.

[Quoted text hidden]

JKajiwar@nobleenergyinc.com <JKajiwar@nobleenergyinc.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Wed, Sep 25, 2013 at 1:47 PM

Thanks for asking Doug. Got an email from the field last week and they are working on it. I've been on vacation, so I'll check with them to see what's happening.

Thanks Doug.

Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: JKajiwar@nobleenergyinc.com
Date: 09/25/2013 01:45 PM
Subject: EXTERNAL: Re: Re: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664
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JKajiwar@nobleenergyinc.com <JKajiwar@nobleenergyinc.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: SRobbins@nobleenergyinc.com

Wed, Oct 2, 2013 at 8:19 AM

Hi Doug

Sorry for the delay. Here's the facility drawing. Let me know if you need anything else.

Thanks

Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: JKajiwara@nobleenergyinc.com
Date: 09/25/2013 01:45 PM
Subject: EXTERNAL: Re: Re: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664
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RELIANCE E23 SCALED FACILITY (2013-10-01)B.pdf

30K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: JKajiwara@nobleenergyinc.com

Wed, Oct 2, 2013 at 10:20 AM

Jan,

Thanks for the facility drawing, it is very helpful. From this drawing it appears that there will be some areas to the east and north of the seven wells that will not be used for production operations and can be interim reclaimed. Based on the scale of this drawing, at least 5 acres of area. It is important that operators make every effort to reclaim as much of a location as possible. This is especially critical for this location as there is house approximately 350 feet to the east and reclaiming as much of the disturbance as possible will mitigate fugitive dust from blowing onto and into that house. Please consider and discuss this with your group and let me know how much of this location can be interim reclaimed. Thanks.

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JKajiwara@nobleenergyinc.com <JKajiwara@nobleenergyinc.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: SRobbins@nobleenergyinc.com

Wed, Oct 2, 2013 at 10:49 AM

Doug

I spoke with our Landman in Greeley.

These are his comments:

While I understand that 13 acres may seem like quite a bit of disturbance with no interim reclamation, due to the odd shaped tract of land a 7 well pad and an 11 well facility our operations will take up most of the area due to equipment setbacks. We are reducing our footprint in this case by utilizing an abandoned feedlot which will not impede on any crops in an area that is heavily farmed. We also have an agreement with the surface owner to utilize this entire site as an oil and gas operations area.

Thanks Doug,
Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: JKajiware@nobleenergyinc.com
Date: 10/02/2013 10:20 AM
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Andrews - DNR, Doug <doug.andrews@state.co.us>
To: Greg Deranleau - DNR <greg.deranleau@state.co.us>

Wed, Oct 2, 2013 at 11:50 AM

Greg, for your information.
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Andrews - DNR, Doug <doug.andrews@state.co.us>

Wed, Oct 2, 2013 at 12:21 PM

To: jkajiware@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Jan,

After discussing this matter with OGLA Supervisor Greg Deranleau, we have decided that what Noble is requesting (no interim reclamation to be conducted at this location) does not conform with COGCC Rule 1003, which we do not have the authority to approve. Therefore, Noble will need to submit a 502.b. Variance request which Greg and I will review and then present to COGCC Director Lepore for his consideration. Thank you.

----- Forwarded message -----

From: **Andrews - DNR, Doug** <doug.andrews@state.co.us>

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JKajiware@nobleenergyinc.com <JKajiware@nobleenergyinc.com>

Fri, Oct 4, 2013 at 10:19 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>, SRobbins@nobleenergyinc.com, RBruner@nobleenergyinc.com

Doug,

Noble is preparing a 502.b variance for this locaton.

Please adjust the acreage on the Form 2A Document # 400420664, to reflect the acreage in the Surface Use Agreement, dated 5/9/2013 and signed 5/14/2013, of **12.7 acres**.

Thanks
Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
To: jkajiware@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>
Date: 10/02/2013 12:21 PM
Subject: EXTERNAL: Fwd: Re: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664
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JKajiwar@nobleenergyinc.com <JKajiwar@nobleenergyinc.com>

Fri, Oct 18, 2013 at 10:47 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Cc: Greg Deranleau - DNR <greg.deranleau@state.co.us>, SRobbins@nobleenergyinc.com

Doug,

Attached is our 502.b Variance request. Please review and let me know if there is anything else you need.

Thanks

Jan

From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

To: jkajiwar@nobleenergyinc.com, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Date: 10/02/2013 12:21 PM

Subject: EXTERNAL: Fwd: Re: Form 2A review for Noble's RELIANCE E 23-79HN - Doc #400420664

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502.b Request.pdf

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