

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

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## Noble's proposed production facility disturbance size

3 messages

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

Wed, Feb 3, 2016 at 2:30 PM

To: Sherri Robbins &lt;sherri.robbins@nblenergy.com&gt;, Justin Garrett &lt;justin.garrett@nblenergy.com&gt;, jan.kajiwara@nblenergy.com

Cc: John Noto - DNR &lt;john.noto@state.co.us&gt;, Greg Deranleau - DNR &lt;greg.deranleau@state.co.us&gt;

Sherri,

Recently we have reviewed several Noble Energy Form 2As for proposed production facilities that have us questioning whether what Noble is proposing is in compliance with COGCC Rule 1002.e. - Surface Disturbance Minimization. We are concerned that the proposed size of the production facility area is unnecessarily large given the number of production equipment listed in the Facilities section of their respective Form 2As. Specifically, the following Noble Energy Form 2As:

LC22-04 MULTI (Doc #400924647) - The provided Location Drawing and Facility Layout Drawing show a production facility area of approx. 17 acres.

LC24-6 Tank (Doc #400887597) - The provided Location Drawing and Facility Layout Drawing show a production facility area of 19.3 acres.

LC11-16 MULTI (Doc #400900292) - The provided Location Drawing shows a production facility area of approx 22 acres. I requested a Facility Layout Drawing on January 13, 2016, but have not received it yet.

Shadow A26-668 Multi (Doc #400938469) - The provided Location Drawing shows a production facility area of approx 5.7 acres.

Lapp A15-655 Multi (Doc #400921791) - The provided Location Drawing shows a production facility area of approx 8.26 acres.

This trend with Noble of proposing large surface disturbances is concerning as we routinely receive Form 2As for production facilities from other operators in the DJ Basin that propose considerably smaller location sizes with similar, and sometimes larger, number of production facilities. Before we can approve these Form 2As, we would like to hear from Noble as to how each of these large disturbances are in compliance with COGCC Rule 1002.e. If you find that a meeting would be better suited to discussing this issue, we would be glad to have one. Thank you.

**Doug Andrews**

Oil &amp; Gas Location Assessment Specialist - Northeast Area

**COLORADO**Oil & Gas Conservation  
Commission

Department of Natural Resources

1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)

303-894-2100 Ext. 5180

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**Sherri Robbins** <Sherri.Robbins@nblenergy.com>

Thu, Feb 4, 2016 at 10:58 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Justin Garrett <Justin.Garrett@nblenergy.com>, Jan Kajiwara <Jan.Kajiwara@nblenergy.com>, Scott Park <Scott.Park@nblenergy.com>

Cc: John Noto - DNR <john.noto@state.co.us>, Greg Deranleau - DNR <greg.deranleau@state.co.us>

Doug –

Thank you for your email. I am working with our Greeley folks to see what we can do to resolve the situation or to provide the COGCC with a better explanation.

Sherri

**From:** Andrews - DNR, Doug [mailto:[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)]

**Sent:** Wednesday, February 03, 2016 2:31 PM

**To:** Sherri Robbins; Justin Garrett; Jan Kajiwara

**Cc:** John Noto - DNR; Greg Deranleau - DNR

**Subject:** EXTERNAL: Noble's proposed production facility disturbance size

Sherri,

Recently we have reviewed several Noble Energy Form 2As for proposed production facilities that have us questioning whether what Noble is proposing is in compliance with COGCC Rule 1002.e. - Surface Disturbance Minimization. We are concerned that the proposed size of the production facility area is unnecessarily large given the number of production equipment listed in the Facilities section of their respective Form 2As. Specifically, the following Noble Energy Form 2As:

LC22-04 MULTI (Doc #400924647) - The provided Location Drawing and Facility Layout Drawing show a production facility area of approx. 17 acres.

LC24-6 Tank (Doc #400887597) - The provided Location Drawing and Facility Layout Drawing show a production facility area of 19.3 acres.

LC11-16 MULTI (Doc #400900292) - The provided Location Drawing shows a production facility area of approx 22 acres. I requested a Facility Layout Drawing on January 13, 2016, but have not received it yet.

Shadow A26-668 Multi (Doc #400938469) - The provided Location Drawing shows a production

Lapp A15-655 Multi (Doc #400921791) - The provided Location Drawing shows a production facility area of approx 8.26 acres.

*Doug Andrews*

303-894-2100 Ext. 5180

Tue, Feb 9, 2016 at 3:43 PM

Cc: Justin Garrett <Justin.Garrett@nblenergy.com>, Jan Kajiwara <Jan.Kajiwara@nblenergy.com>, Sherri Robbins <Sherri.Robbins@nblenergy.com>, "Noto - DNR, John" <john.noto@state.co.us>, Greg Deranleau <greg.deranleau@state.co.us>, Permitting <permitting@nobleenergyinc.com>, Scott Park <Scott.Park@nblenergy.com>

Please refer to comments to your questions below. Per our discussion this morning, we have reviewed and revised some of our acreage calculations. There are a few reasons for the changes that include identifying the need for a new process for more accurate calculations, changes in days of storage required at these locations which drops required acreage, well count changes, facility design changes, etc.

<https://mail.google.com/mail/u/0/?ui=2&ik=6cde1142d7&view=pt&q=LC22-04&qs=true&search=query&th=152a90b6201a0048&siml=152a90b6201a0048&siml...> 3/5

applications moving.

Scott Park

Noble Energy Inc.

970-415-0778

Please note my new email address: [Scott.Park@nblenergy.com](mailto:Scott.Park@nblenergy.com)

**From:** Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]  
**Sent:** Wednesday, February 03, 2016 2:31 PM  
**To:** Sherri Robbins; Justin Garrett; Jan Kajiwar  
**Cc:** John Noto - DNR; Greg Deranleau - DNR  
**Subject:** EXTERNAL: Noble's proposed production facility disturbance size

Sherri,

Recently we have reviewed several Noble Energy Form 2As for proposed production facilities that have us questioning whether what Noble is proposing is in compliance with COGCC Rule 1002.e. - Surface Disturbance Minimization. We are concerned that the proposed size of the production facility area is unnecessarily large given the number of production equipment listed in the Facilities section of their respective Form 2As. Specifically, the following Noble Energy Form 2As:

LC22-04 MULTI (Doc #400924647) - The provided Location Drawing and Facility Layout Drawing show a production facility area of approx. 17 acres.

Two Separate Facilities built on the same foot print, double the equipment because these wells cannot commingle separate units per Federal measurements requirements.

Total acres needed for these facilities= 16 acres

LC24-6 Tank (Doc #400887597) - The provided Location Drawing and Facility Layout Drawing show a production facility area of 19.3 acres.

Total acres needed for this facility= 8 acres

LC11-16 MULTI (Doc #400900292) - The provided Location Drawing shows a production facility area of approx 22 acres. I requested a Facility Layout Drawing on January 13, 2016, but have not received it yet.

Total acres needed for this facility= 10 acres

Shadow A26-668 Multi (Doc #400938469) - The provided Location Drawing shows a production facility area of approx 5.7 acres.

Total acres needed for this facility= 5.1 acres

Lapp A15-655 Multi (Doc #400921791) - The provided Location Drawing shows a production facility area of approx 8.26 acres.

Total acres need for this facility= 5.1 acres

This trend with Noble of proposing large surface disturbances is concerning as we routinely receive Form 2As for production facilities from other operators in the DJ Basin that propose considerably smaller location sizes with similar, and sometimes larger, number of production facilities. Before we can approve these Form 2As, we would like to hear from Noble as to how each of these large disturbances are in compliance with COGCC Rule 1002.e. If you find that a meeting would be better suited to discussing this issue, we would be glad to have one. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area

1120 Lincoln St., Suite 801

Denver, CO 80203

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