

STATE OF  
COLORADO

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

**COGCC Form 2A review of Noble Energy's LD-19-16 Tank location - Doc #400999524**

5 messages

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

Wed, Jul 27, 2016 at 11:33 AM

To: Jan Kajiwaru &lt;jan.kajiwaru@nblenergy.com&gt;, Sherri Robbins &lt;sherri.robbins@nblenergy.com&gt;, Penny Garrison - DNR &lt;penny.garrison@state.co.us&gt;

Jan,

As we discussed in our phone conversation this morning, based on what Noble Energy is proposing to do with the adjacent existing two well Timbro LD19-73HN & Timbro LD29-78HN and production facility pad (Location #430722), it would be better if this Form 2A amends that location to upgrade/add production facilities as opposed to creating a new location immediately adjacent to it. Doing this, does lead to some required modifications of this 2A as follows:

1) The Location Drawing needs to be revised to incorporate this amended Location, expanding the 500 foot improvement buffer.

2) The approved Form 2A for Location #430722 indicates there are 12 tanks (8 oil/4 water) on this location. The tank count on this Form 2A still lists the same number of tanks. As this amended Location will now also produce three other nearby well pads (with a total of 14 new wells across them) in addition to the two wells on this Location, I suspect the Facilities list needs to be revised also.

3) Because this existing Location is being amended, the size of the disturbed area during construction and after interim reclamation needs to be updated as well.

4) The original Form 2A for Location #430722 indicates the nearest downgradient surface water body is 915 feet. This is the intermittent stream shown on the Hydrology Map. Although you have indicated this intermittent stream was not discernible in the field, it could reappear during a heavy rainfall event. Therefore, I'd like to remain conservative in this assessment and change the distance from 6,940 feet back to the 915 feet.

5) You have listed one flare and no meter in the Facilities section. Please provide a BMP that addresses when/how Noble Energy anticipates using this flare. As your Location Drawing does show a gas line on Location #430722, we'd like to see Noble Energy tying into a gas sales line at the first sign of saleable quality gas and not flare unless necessary as addressed in COGCC Rule 805.b.(3)B.v.

Please respond to this correspondence by August 27, 2016. If you have any questions, please contact me. Thank you.

**Doug Andrews**

Oil &amp; Gas Location Assessment Specialist - Northeast Area

COLORADO  
Oil & Gas Conservation  
Commission  
Department of Natural Resources1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180**Jan Kajiwaru** <Jan.Kajiwaru@nblenergy.com>

Wed, Jul 27, 2016 at 1:45 PM

To: "Andrews - DNR, Doug" &lt;doug.andrews@state.co.us&gt;, Sherri Robbins &lt;Sherri.Robbins@nblenergy.com&gt;, Penny

Garrison - DNR <penny.garrison@state.co.us>

Doug

I am checking with the Greeley office and will be back with you as soon as possible.

Thanks

Jan

Jan Kajiwara

Regulatory Analyst III

EHSR

1625 Broadway Suite 2200  
Direct: 303.228.4092 | Cell: 720.351.7600

New email: [jan.kajiwara@nblenergy.com](mailto:jan.kajiwara@nblenergy.com)



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

**Sent:** Wednesday, July 27, 2016 11:33 AM

**To:** Jan Kajiwara; Sherri Robbins; Penny Garrison - DNR

**Subject:** EXTERNAL: COGCC Form 2A review of Noble Energy's LD-19-16 Tank location - Doc #400999524

[Quoted text hidden]

---

**Kate Miller** <[Kate.Miller@nblenergy.com](mailto:Kate.Miller@nblenergy.com)>

Thu, Jul 28, 2016 at 10:52 AM

To: "Doug Andrews ([doug.andrews@state.co.us](mailto:doug.andrews@state.co.us))" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>

Cc: Cody Ball <[Cody.Ball@nblenergy.com](mailto:Cody.Ball@nblenergy.com)>

Doug,

Thank you for your time this morning in regards to discussing Noble Energy's LD19-16 Tank Location (Doc#400999524).

Please review the following reasons of Noble's proposal to keep this location as "New" and not "Amended" addressed in your email as questions 1, 2, and 3.

Construction of the proposed LD19-16 Production Facility will take place directly West of the existing Timbro LD19-73HN & Timbro LD29-78HN Production Facility (Location ID 430722).

After construction is complete for the new facility and production is online from the new 13 wells listed below, Noble will reroute the existing Timbro LD19-73HN & Timbro LD29-78HN to the new facility. The purpose of the new facility is to handle all production in a centralized location that is associated with this development plan. Noble requests to keep the proposed production facility and the existing facility separate due to internal cost tracking and working interest owner conflicts. Noble will reclaim the existing Production Facility (Location ID: 430722) to COGCC 1103 Interim Reclamation standards beginning within the 2017 calendar year. During construction these locations may appear continuous but after reclamation has been conducted there will be a distinct difference in locations. Noble believes this will assist with inspections in the future.

At this time, Noble is scheduled to start construction on this project the first week in August of 2016 (next week).

We appreciate your time and please let us know if you have any additional questions.

Thanks,

**Kate Miller & Cody Ball**

DJ Business Unit

2115 117<sup>th</sup> Avenue

Greeley, Colorado 80634

Direct: 970-304-5129

[Kate.Miller@nbleenergy.com](mailto:Kate.Miller@nbleenergy.com)



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

**Sent:** Wednesday, July 27, 2016 11:33 AM

**To:** Jan Kajiwaru; Sherri Robbins; Penny Garrison - DNR

**Subject:** EXTERNAL: COGCC Form 2A review of Noble Energy's LD-19-16 Tank location - Doc #400999524

Jan,

[Quoted text hidden]

---

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

Thu, Jul 28, 2016 at 1:59 PM

To: Kate Miller &lt;Kate.Miller@nblenergy.com&gt;

Cc: Cody Ball &lt;Cody.Ball@nblenergy.com&gt;

Kate &amp; Cody,

This clarification is acceptable but you mention Rule 1103 Interim Reclamation. Rule 1103 is about pipeline abandonment. I believe you meant Rule 1003 as that is the Rule that deals with interim reclamation. Please confirm and if so, I will correct and add this to the Operator's comments section. Also, I would like to add the following Condition of Approval based on this.

*"Operator shall submit a Form 4 Sundry for Location #430722 to remove that location's production facilities and update the after interim reclamation size of the disturbed area within one month of the Timbro LD 19-73HN & Timbro LD 29-78HN wells producing to this location."*

This COA doesn't mean that Noble has one month to complete interim reclamation of that existing production facility. Just that we will also want to know what the new size of the location after interim reclamation will be when that production facility is removed. Please also don't forget to respond to my Comment #4 & 5 in my original email. 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

[Quoted text hidden]

---

**Jan Kajiwara** <Jan.Kajiwara@nblenergy.com>

Tue, Aug 2, 2016 at 3:24 PM

To: "Andrews - DNR, Doug" &lt;doug.andrews@state.co.us&gt;, "Garrison, Penny" &lt;Penny.Garrison@state.co.us&gt;

Cc: Sherri Robbins &lt;Sherri.Robbins@nblenergy.com&gt;, Justin Garrett &lt;Justin.Garrett@nblenergy.com&gt;

Doug,

Please the responses below in red for each of your concerns. Let me know if there is anything else you need. I will be on vacation starting on Thursday, so please send any questions to [DenverRegulatory@nblenergy.com](mailto:DenverRegulatory@nblenergy.com) and they will be addressed.

Thanks Doug,

Jan

Jan Kajiwara

Regulatory Analyst III

EHSR

1625 Broadway Suite 2200  
Direct: 303.228.4092 | Cell: 720.351.7600

New email: [jan.kajiwara@nblenergy.com](mailto:jan.kajiwara@nblenergy.com)



Please send questions to [DenverRegulatory@nblenergy.com](mailto:DenverRegulatory@nblenergy.com), so that anyone on the team (Susan Miller, Justin Garrett, Jan Kajiwara or Sherri Robbins) can assist you in the event the individual you emailed is not in the office.

**From:** Andrews - DNR, Doug [<mailto:doug.andrews@state.co.us>]  
**Sent:** Wednesday, July 27, 2016 11:33 AM  
**To:** Jan Kajiwara; Sherri Robbins; Penny Garrison - DNR  
**Subject:** EXTERNAL: COGCC Form 2A review of Noble Energy's LD-19-16 Tank location - Doc #400999524

Jan,

As we discussed in our phone conversation this morning, based on what Noble Energy is proposing to do with the adjacent existing two well Timbro LD19-73HN & Timbro LD29-78HN and production facility pad (Location #430722), it would be better if this Form 2A amends that location to upgrade/add production facilities as opposed to creating a new location immediately adjacent to it. Doing this, does lead to some required modifications of this 2A as follows:

- 1) The Location Drawing needs to be revised to incorporate this amended Location, expanding the 500 foot improvement buffer.
- 2) The approved Form 2A for Location #430722 indicates there are 12 tanks (8 oil/4 water) on this location. The tank count on this Form 2A still lists the same number of tanks. As this amended Location will now also produce three other nearby well pads (with a total of 14 new wells across them) in addition to the two wells on this Location, I suspect the Facilities list needs to be revised also.
- 3) Because this existing Location is being amended, the size of the disturbed area during construction and after interim reclamation needs to be updated as well.

New Comment for the LD19-16: After construction is complete for the new facility and production is online from the new 13 wells listed below, Noble will reroute the existing Timbro LD19-73HN & Timbro LD29-78HN to the new facility. The purpose of the new facility is to handle all production in a centralized location that is associated with this development plan. Noble requests to keep the proposed production facility and the existing facility separate due to internal cost tracking and working interest owner conflicts. Noble will reclaim the existing Production Facility (Location ID: 430722) to COGCC 1003 Interim Reclamation standards beginning within the 2017 calendar year. During construction these locations may appear continuous but after reclamation has been conducted there will be a distinct difference in locations. Noble believes this will assist with inspections in the future.

Noble Accepts the following COA: "Operator shall submit a Form 4 Sundry for Location #430722 to remove that location's production facilities and update the after interim reclamation size of the disturbed area within one month of the Timbro LD 19-73HN & Timbro LD 29-78HN wells producing to this location."

Doug Andrews Comment: This COA doesn't mean that Noble has one month to complete interim reclamation of that existing production facility. Just that we will also want to know what the new size of the location after interim reclamation will be when that production facility is removed.

4) The original Form 2A for Location #430722 indicates the nearest downgradient surface water body is 915 feet. This is the intermittent stream shown on the Hydrology Map. Although you have indicated this intermittent stream was not discernible in the field, it could reappear during a heavy rainfall event. Therefore, I'd like to remain conservative in this assessment and change the distance from 6,940 feet back to the 915 feet. **Please make this change.**

5) You have listed one flare and no meter in the Facilities section. Please provide a BMP that addresses when/how Noble Energy anticipates using this flare. As your Location Drawing does show a gas line on Location #430722, we'd like to see Noble Energy tying into a gas sales line at the first sign of saleable quality gas and not flare unless necessary as addressed in COGCC Rule 805.b.(3)B.v.

New Comment for the LD19-16: Noble Energy, Inc. will not be using an open flare with this facility. The facilities will be connected to a sales meter. The "Flare" on the permitting list is a back-up to the vapor recovery units. On this facility we will have an enclosed VOC combustor that will be back-up for one compressor.

New Facility Equipment:

1 allocation gas meter

2 Sales gas meters

1 buyback meter

Please respond to this correspondence by August 27, 2016. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & 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