

STATE OF
COLORADO

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

COGCC Form 2A review for Noble Energy's N36 TANK location - Doc# 401051680

2 messages

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

Wed, Sep 7, 2016 at 2:15 PM

To: susan.miller@nblenergy.com, Sherri Robbins <sherri.robbs@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Susan,

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

- 1) In the Cultural Distance section you have listed the distance from the nearest production facility to a railroad as 4,555 feet. However, the Location Drawing distance table indicates the nearest railroad is greater than one mile and I was unable to identify any railroad within one mile of this Oil & Gas Location during my review. Please confirm the distance to the nearest railroad from a production facility on this Oil & Gas Location.
- 2) In the Cultural Distance section you have listed the distance from the nearest production facility to a property line as 7 feet. Yet you have an Operator Comment that states "*The production facility equipment on the west edge of the disturbance area will be located greater than 35' from the property line.*" I believe the distance of 7 feet is from the edge of the production facility area and not the nearest individual production facility. As the distance of 7 feet will raise concerns, it would be better to have it agree with your Operator Comment. Please provide me with a revised distance from the nearest production facility to a property line.
- 3) In the Water Resources section you have listed the distance to the nearest downgradient surface water feature as being 864 feet. However, the Hydrology Map clearly shows a ditch to the east, that is downgradient of the location, and approximately 69 feet away. Therefore, I would like to revise this distance from 864 feet to 69 feet.
- 4) Due to the proximity of the ditch mentioned in my Comment #3 above, I would like to place the following Condition of Approval on this Amended Form 2A: "*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 ditch located 69 feet northeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products.*"

Please respond to this correspondence by October 7, 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 Resources1120 Lincoln St., Suite 801
Denver, CO 80203
doug.andrews@state.co.us
303-894-2100 Ext. 5180**Justin Garrett** <Justin.Garrett@nblenergy.com>

Wed, Sep 7, 2016 at 4:06 PM

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

Cc: Denver Regulatory <DenverRegulatory@nblenergy.com>, Greeley Permitting <greeleypermitting@nblenergy.com>

I am handling these permits for Susan.

I put responses in Red.

Thank you Doug.

Justin Garrett

Regulatory Analyst

Office 303-228-4449

Justin.Garrett@nblenergy.com

Please send questions to 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, September 07, 2016 2:15 PM

To: Susan Miller; Sherri Robbins; Denver Regulatory

Subject: EXTERNAL: COGCC Form 2A review for Noble Energy's N36 TANK location - Doc# 401051680

Susan,

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

1) In the Cultural Distance section you have listed the distance from the nearest production facility to a railroad as 4,555 feet. However, the Location Drawing distance table indicates the nearest railroad is greater than one mile and I was unable to identify any railroad within one mile of this Oil & Gas Location during my review. Please confirm the distance to the nearest railroad from a production facility on this Oil & Gas Location. **Please change to 5280'. That was a typo.**

2) In the Cultural Distance section you have listed the distance from the nearest production facility to a property line as 7 feet. Yet you have an Operator Comment that states "*The production facility equipment on the west edge of the disturbance area will be located greater than 35' from the property line.*" I believe the distance of 7 feet is from the edge of the production facility area and not the nearest individual production facility. As the distance of 7 feet will raise concerns, it would be better to have it agree with your Operator Comment. Please provide me with a revised distance from the nearest production facility to a property line. **Yes, please change it to 35' to match the comment. Should we proceed to do this in the future when the distance to the property line from the edge of location is less than an acceptable distance from the nearest piece of equipment? I would like to discuss this with you when you are available.**

3) In the Water Resources section you have listed the distance to the nearest downgradient surface water feature as being 864 feet. However, the Hydrology Map clearly shows a ditch to the east, that is downgradient of the location, and approximately 69 feet away. Therefore, I would like to revise this distance from 864 feet to 69 feet. **Yes, please change it to 69'**

4) Due to the proximity of the ditch mentioned in my Comment #3 above, I would like to place the following Condition of Approval on this Amended Form 2A: *"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 ditch located 69 feet northeast of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."* **Yes, this COA is OK.**

Please respond to this correspondence by October 7, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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