

STATE OF
COLORADO

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

RE: COGCC Amended Form 2A for Noble Energy's N36-16 Pad location - Doc #401052087

2 messages

Justin Garrett <Justin.Garrett@nblenergy.com>

Mon, Sep 12, 2016 at 11:21 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Susan Miller <Susan.Miller@nblenergy.com>, Sherri Robbins <Sherri.Robbins@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Thank you Doug. Responses in red.

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:** Monday, September 12, 2016 11:07 AM**To:** Susan Miller; Sherri Robbins; Denver Regulatory**Subject:** EXTERNAL: COGCC Amended Form 2A for Boble Energy's N36-16 Pad location - Doc #401052087

Susan,

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

1) In the Drilling and Waste Management section you have indicated that oil based drilling fluids will be used and that drilling fluids and cuttings will be disposed of Offsite at a Commercial Disposal facility. However, you have also indicated that a Beneficial Reuse of Land Application Plan has been submitted. Beneficial Reuse and Land Application are for bentonitic water based drilling fluids and cuttings disposal, not oil based. Because you have indicated Noble will use oil based muds, I would like to remove the reference to the Beneficial Reuse/Land Application Plan. **Yes, please do, although I believe that we have referred to that document on other locations where we are doing commercial disposal. Do you want us to not reference that document on commercial disposal sites in the future?**

2) In the Water Resources section you have indicated the nearest downgradient surface feature is 373 feet from this Oil & Gas Location. From the Hydrology Map, this appears to be a pond to the south. However, that pond is fed by a stream/ditch that is 55 feet to the southwest. As that stream/ditch is

closer and is also a mapped wetland, I would like to change the distance from 373 feet to 55 feet. **Yes, please change it.**

3) Due to the proximity of the stream/ditch 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 stream/ditch located 55 feet southwest of the oil and gas location from a release of drilling, completion, produced fluids, and chemical products."* **There is a comment stating that we will install a steel ring and liner on the west side of the location. I believe that is because of that ditch. If you still want to add the COA, that is fine (yes, please do it), since we know we will be complying with it.**

4) In the Water Resources section you have indicated the nearest water well is 4,760 feet from this Oil & Gas Location. The Location Drawing indicates there is an irrigation well 813 feet southeast. As this water well has been field verified, I would like to list it as the nearest water well. **OK. Change that too.**

Please respond to this correspondence by October 12, 2016. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



COLORADO
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Mon, Sep 12, 2016 at 11:35 AM

To: Justin Garrett <Justin.Garrett@nblenergy.com>

Cc: Susan Miller <Susan.Miller@nblenergy.com>, Sherri Robbins <Sherri.Robbins@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Justin,

If Noble will be doing Commercial Disposal of drilling fluids and cuttings, it would be better if you don't list the Beneficial Reuse/Land Application document. That document discusses the use of Noble Energy's own spreadfields. Listing both leads to uncertainty on our part as to exactly where the fluids and cuttings are going.

I wanted to put the COA on the Amended 2A even though you have provided the comment about the steel ring and liner so our Field Inspectors will know to look for that during their inspection. Our Field Inspectors don't have access to the Operator Comments section of the 2A when in the field. They do

have access to any BMPs and COAs on the 2As. For future submittals you could add that Operator comment as an Operator BMP.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Area



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