



January 31, 2017

Mr. Jeremy I. Ferrin
Enforcement Officer
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Noble Energy, Inc.
NOAV #401103177 – Actions Taken to Correct Deficiencies

Dear Mr. Ferrin:

On September 23, 2016, an NOAV was issued to Noble Energy Inc. (Noble) for failure to submit proper paperwork to approve a temporarily abandoned (TA) status for the Doll #23-1 well (API 05-123-11886). On October 13, 2016, Noble submitted the Form 4 and 5A with supporting documentation and also a new standard operating procedure (SOP) to guide future compliance to complete the corrective actions of the Doll #23-1 NOAV. The following actions were completed to close out the NOAV corrective actions.

- Form 4 Sundry Notice with Standard Operating Procedure for Tracking TA Status – *Document #401130264 submitted October 13, 2016*
- Form 5A Completed Interval Report resubmitted with ticket attached – *Document #400884429 submitted October 13, 2016*

Following the corrective actions being completed, the COGCC requested a meeting on December 14, 2016 to discuss the compliance considerations associated with the Doll #23-1 as it related to Noble's TA practices for other wells. In particular, Noble and COGCC discussed a list of wells Noble developed that identified further actions to be taken based on their TA status. The list addressed eleven categories of further actions to be taken, while taking into consideration application of potential inconsistent direction stemming from application of well bore integrity (WBI) TA status and Form 5A requirements outlined in applicable regulations and operator guidance documents.

At the December 14, 2016 meeting, COGCC asked Noble to provide additional information and identify and undertake corrective actions for the list of wells discussed and document the response, which was to be completed by the end of January.

Consistent with the requests during our December 14, 2016 meeting, please find below a summary of the information requested, understood outcomes from our meeting, and/or actions taken or being taken by Noble as to the list of TA wells. The summary is provided based on the eleven categories discussed during our meeting. Additional detail to support the summaries provided below are found in the attached charts and spreadsheets.

- **Category 1:** Prior to the receipt of the NOAV, Noble correctly submitted thirty-one (31) Form 5As, which were approved by the COGCC. These Form 5As had the plug ticket and/or operator summary attached, which facilitated the review and approval process. COGCC staff determined on December 14, 2016 that no further action was required by Noble.

- **Category 2:** Noble identified eleven (11) Form 5As that had been deleted from the COGCC's E-Form system. COGCC staff agreed to research these 11 and it was determined that they were deleted, unintentionally, by Noble staff. The forms had been returned to Draft by the COGCC staff so that the plug ticket and/or operator summary could be attached. Noble staff resubmitted the 11 Form 5As to report correct well status and the Form 4 to request continued TA status at the request of the COGCC staff. These actions were required as a result of the December 14, 2016 meeting.
- **Category 3:** Noble plugged and abandoned six (6) wells that were previously temporarily abandoned (TA). Of the six wells, five (5) required the submittal of the Form 5A in order to report the correct well status. The sixth well was plugged within days of the plug being set, therefore, the Form 5A was not required. Noble did not submit any Form 4s for these six wells due to the fact that they were plugged and abandoned within 6 months of the plug being set. These submittals were required at the request of the COGCC staff during the December 14, 2016 meeting.
- **Category 4:** Three (3) wells were producing when Noble became aware of the need to submit the proper documentation to the COGCC regarding temporarily abandoned wells. The wells had a plug set, but the plug was removed without a Form 5A being submitted to the COGCC. As a result of the December 14, 2016 meeting, the Form 5A was submitted to correct the well status and the Form 4 was not required due to the removal of the plug.
- **Category 5:** As a result of the December 14, 2016 meeting, the COGCC requested that the 106 wells that did not have the plug ticket and/or operator summary attached to the previously submitted Form 5As, be submitted via Form 4 Sundry Notice. Submittal via the Form 4 eliminated the need for the COGCC staff to return all 106 Form 5As to Draft so that the appropriate document could be attached. The attached spreadsheet details the document number for each Form 4 that correlates to the well and/or the Form 5A.
- **Category 6:** Noble discovered six (6) additional wells that required the submittal of the Form 5A to correct the well status and the Form 4 to request continued TA status. This discovery was made as a result of an internal investigation associated with the NOAV. It was determined by the COGCC staff during the December 14, 2016 that these documents were required. Both forms have been submitted and document numbers and submittal dates are listed on the attached spreadsheet.
- **Category 7:** Upon understanding that the plug ticket and/or operator summary was required as an attachment to the Form 5A for wells that had been temporarily abandoned, Noble attached the plug ticket and/or operator summary to seven (7) Form 5As prior to receipt of the NOAV. Many, if not all of these, are still in process at the COGCC. It was determined by the COGCC staff at the December 14, 2016 meeting that no further action was required by Noble.
- **Category 8:** Noble identified two (2) wells that had the plugs removed prior to 60 days, therefore, no documentation was required to be submitted to the COGCC for review and approval. The COGCC staff agreed at the December 14, 2016 meeting that no additional action was required by Noble.
- **Category 9:** Noble has two (2) wells that still have the plug in the hole and are considered to be temporarily abandoned. These wells will be plugged and abandoned in the near future. The Form 5A to report the correct well status and the Form 4 to request continued TA status were filed upon request by the COGCC staff as a result of the December 14, 2016 meeting.
- **Category 10:** Noble incorrectly identified two (2) wells as being temporarily abandoned; however, no plug had been set. The COGCC staff agreed at the December 14, 2016 meeting that no additional action was required by Noble.
- **Category 11:** Noble identified four (4) wells that had plugs set that did not have a Form 5A and a Form 4 submitted for each well prior to trading them to PDC. The COGCC staff agreed at the December 14, 2016

meeting that no further action was required by Noble due to the lack of ownership and control over the plug remaining or being removed.

In addition to this summary and the associated chart, the attached spreadsheet provides the submittal dates as well as the document numbers, by well, for the associated Form 5A, Form 4 and Form 7.

The Form 7 Monthly Production Reporting associated with the 186 wells captured by the NOAV has been reviewed, corrected, and submitted to the COGCC via E-Forms, as necessary.

Please do not hesitate to contact me at scott.park@nblenergy.com or 970-304-5273 should you have any technical questions or concerns regarding this submission and associated actions. Any legal questions should be directed to Denee DiLuigi at 303-228-4251 or denee.diluigi@nblenergy.com.

Sincerely,



Scott Park
DJBU EHSR Manager

Enclosures: Noble TA for WBI_1-31-17.xls

cc: Marc McGill, Noble Energy
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