

1625 Broadway
Suite 2200
Denver, CO 80202

Tel: 303.228-4000
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www.nobleenergyinc.com



March 10, 2017

Mr. Steven Mah
NOAV Specialist, Enforcement Team
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 800
Denver, CO 80203

RE: COGCC NOAV No. 401202313
Noble Energy, Inc. - Lilli Unit 14-5 API #05-123-13434

Dear Mr. Mah:

Noble Energy, Inc. (Noble) respectfully submits this letter as evidence of completion of the requirements outlined by the Colorado Oil & Gas Conservation Commission (COGCC) in NOAV No. 401202313 dated February 10, 2017. Noble has taken the following actions:

- Form 21 Mechanical Integrity Test (Document #401218123) submitted on 2/24/17 for the Lilli Unit 14-5 via e-forms. Copies of the documents are attached for your review.
- Form 21 Mechanical Integrity Test (Document #401219269) submitted on 2/27/17 for the Dillos PC LD Federal 15-74H via e-forms. This MIT was witnessed by the inspector, however, the Form 21 submittal was inadvertently overlooked. This issue was identified as a result of Noble's investigation and development of Noble's standard operating procedure. Copies of the forms are attached for your review.
- Noble's Production Engineering group has developed a standard operating procedure (SOP) to ensure that Mechanical Integrity Tests are conducted in a timely manner and submitted to the COGCC properly. The intent is that the SOP and Noble's internal systems of record will prevent future issues associated with completing or documenting Mechanical Integrity Tests in accordance with the designated testing frequency. A copy of the SOP is attached for your review.

It is Noble's intent to have adequately satisfied the requirements identified in the NOAV as it relates to Mechanical Integrity Tests. Please feel free to contact me at 970-304-5273 or scott.park@nbleenergy.com should you have any questions. Thank you for your time and assistance.

Sincerely,

A handwritten signature in blue ink that reads "Scott Park".

Scott Park
DJBU EHSR Manager

Cc: Bob Koehler - COGCC

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:
401202313
Date Issued:
02/10/2017

NOTICE OF ALLEGED VIOLATION - ISSUED

Per Rule 522, the Director has reasonable cause to believe that a violation of the Act, or of any Commission rule, order, or permit has occurred, the Director will require the operator to remedy the violation and may commence an enforcement action seeking penalties by issuing a Notice of Alleged Violation (NOAV). Per Rule 523, an operator who violates the Act, or a Commission rule, order, or permit may be subject to a penalty imposed by Commission order.

OPERATOR INFORMATION

OGCC Operator Number: <u>100322</u>	Contact Name and Telephone:
Name of Operator: <u>NOBLE ENERGY INC</u>	Name: <u>Scott Park</u>
Address: <u>1625 BROADWAY STE 2200</u>	Phone: <u>(970) 304-5273</u> Fax: <u>()</u>
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u>	Email: <u>scott.park@nblenergy.com</u>

Well Location, or Facility Information (if applicable):

API Number: 05-123-13434-00 Facility or Location ID: _____
 Name: LILLI UNIT Number: 14-5
 QtrQtr: SESW Sec: 5 Twp: 8N Range: 58W Meridian: 6
 County: WELD

ALLEGED VIOLATION

Rule: 316B
 Rule Description: Mechanical Integrity Test
 Initial Discovery Date: _____ Was this violation self-reported by the operator? No
 Date of Violation: _____ Approximate Time of Violation: _____
 Was this a discrete violation of obvious duration? No
 Description of Alleged Violation:
 Pursuant to Rule 316B., Operator is required to submit a Mechanical Integrity Test Form 21 within 30 days of the test. Noble Energy Inc. (Operator) conducted a mechanical integrity test (MIT) on the Lilli Unit #14-5 well, API 123-13434, (Well) on July 27, 2016 (Document #684901826), and a Form 21 should have been submitted by August 26, 2016. To date, no Form 21 has been submitted, violating Rule 316B.
 Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 03/13/2017
Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.
 Operator shall submit a Form 21 for the MIT conducted July 27, 2016 by March 13, 2017. In Operator's NOAV Answer, due 28 days after Operator's receipt of this NOAV pursuant to Rule 522.d.(2)., Operator shall submit a written plan that explains how MIT's will timely be completed and reported in the future.

Rule: 326.a
 Rule Description: Injection Wells
 Initial Discovery Date: _____ Was this violation self-reported by the operator? No
 Date of Violation: _____ Approximate Time of Violation: _____
 Was this a discrete violation of obvious duration? No
 Description of Alleged Violation:
 Pursuant to Rule 326.a.(4)A., dedicated injection wells must have mechanical integrity tests (MIT) conducted not less than every five years, or more frequently as required by Rule 326.a.(4)C. Noble Energy Inc. (Operator) conducted an MIT on the Lilli Unit #14-5 well,

API 123-13434, (Well) on June 21, 2011 (Document #2001160). Operator was due to conduct the next MIT on the Well by June 21, 2016, but the MIT was not conducted on the Well until July 27, 2016, as observed by COGCC staff (Document #684901826), violating Rule 326.a(4)A.

Abatement or Corrective Action Required to be Performed by Operator: _____ Corrective Action Due Date: 03/13/2017

Proper and timely abatement does not preclude the assessment of penalties and an Order Finding Violation.

In Operator's NOAV Answer, due 28 days after Operator's receipt of this NOAV pursuant to Rule 522.d.(2), Operator shall submit a written plan that explains how MIT's will timely be conducted in the future.

PENALTY

Penalties for violations alleged in this NOAV will be calculated pursuant to Rule 523, with daily penalties accruing pursuant to Section 34-60-121(1), C.R.S.

ANSWER

Pursuant to Rule 522.d.(2), the operator must file an Answer to this NOAV within 28 days of its receipt, or a default judgement may be entered. Hard copy answers are filed with the Commission Secretary at the Commission's Denver office and should also be emailed to dnr_cogccenforcement@state.co.us.

NOAV ISSUED

NOAV Issue Date: 02/10/2017

COGCC Representative Signature: _____



COGCC Representative: Bob Koehler

Title: Underground Injection Con

Email: bob.koehler@state.co.us

Phone Num: (303) 894-2100x5147

ATTACHMENT LIST

View Attachments in Imaged Documents on COGCC website (<http://ogccweblink.state.co.us/>) - Search by Document Number.

Document Number	Description
401206733	NOAV COVER LETTER
401206735	NOAV CERTIFIED MAIL RECEIPT

Total Attach: 2 Files

FORM
21

Rev
08/14

State of Colorado Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401218123

Date Received:

02/24/2017

MECHANICAL INTEGRITY TEST

- Duration of the pressure test must be a minimum of 15 minutes.
- An original pressure chart must accompany this report if this test was not witnessed by an OGCC representative. Injection well tests must be witnessed by an OGCC representative.
- For production wells, test pressures must be at a minimum of 300 psig.
- New injection wells must be tested to maximum requested injection pressure.
- For injection wells, test pressures must be at least 300 psig or average injection pressure, whichever is greater.
- A minimum 300 psi differential pressure must be maintained between the tubing and tubing/casing annulus pressure.
- Do not use this form if submitting under provisions of Rule 326.a(1)B. or C.
- Written OGCC notification must be provided 10 days prior to the test via Form 42, Field Operations Notice
- Packers or bridge plugs, etc., must be set within 100 feet of the perforated interval to be considered a valid test.

Complete the Attachment

Checklist

OP OGCC

OGCC Operator Number: 100322	Contact Name: Julie Webb	Pressure Chart		
Name of Operator: NOBLE ENERGY INC	Phone: (720) 587-2223	Cement Bond Log		
Address: 1625 BROADWAY STE 2200		Tracer Survey		
City: DENVER State: CO Zip: 80202 Email: jwebb@progressivepcs.net		Temperature Survey		
API Number: 05-123-13434	OGCC Facility ID Number: 245639	Inspection Number		
Well/Facility Name: LILLI UNIT	Well/Facility Number: 14-5			
Location QtrQtr: SESW Section: 5 Township: 8N Range: 58W Meridian: 6				

SHUT-IN PRODUCTION WELL INJECTION WELL Last MIT Date: 6/21/2011 12:00:00 AM

Test Type:

Test to Maintain SI/TA status 5-Year UIC Reset Packer

Verification of Repairs Annual UIC TEST

Describe Repairs or Other Well Activities: _____

Wellbore Data at Time of Test				Casing Test Use when perforations or open hole is isolated by bridge plug or cement plug; use if cased-hole only with plug back total depth. Bridge Plug or Cement Plug Depth <input type="text"/>
Injection Producing Zone(s)	Perforated Interval	Open Hole Interval		
DSND	6396-6402			
Tubing Casing/Annulus Test				
Tubing Size:	Tubing Depth:	Top Packer Depth:	Multiple Packers?	
2.875	6300	6300	<input type="checkbox"/>	

Test Data (Use -1 for a vacuum)

Test Date	Well Status During Test	Casing Pressure Before Test	Initial Tubing Pressure	Final Tubing Pressure
07-27-2016	SHUT-IN	0	295	293
Casing Pressure Start Test	Casing Pressure - 5 Min.	Casing Pressure - 10 Min.	Casing Pressure Final Test	Pressure Loss or Gain
800	800	800	800	0

Test Witnessed by State Representative? OGCC Field Representative Pesicka, Conor

OPERATOR COMMENTS:

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.
Signed: _____ Print Name: Julie Webb
Title: Senior Regulatory Analyst Email: jwebb@progressivepcs.net Date: 2/24/2017

Based on the information provided herein, this Notice (Form 21) complies with COGCC Rules and applicable orders and is hereby approved.
COGCC Approved: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY:

Attachment Check List

Att Doc Num

Name

401218123

FORM 21 SUBMITTED

Total Attach: 1 Files

General Comments

User Group

Comment

Comment Date

Stamp Upon
Approval

Total: 0 comment(s)

Click here to reset the form

FORM 21 Rev 3/13

State of Colorado Oil and Gas Conservation Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)-894-2100 Fax: (303)-894-2109

FOR OGCC USE ONLY

MECHANICAL INTEGRITY TEST

- Fill out Part II of this form if well tested is a permitted or pending injection well. Send original plus one copy.
1. Duration of the pressure test must be a minimum of 15 minutes.
2. A pressure chart must accompany this report if this test was not witnessed by a OGCC representative.
3. For production wells, test pressures must be a at minimum of 300 psig.
4. Injection well tests must be witnessed by an OGCC representative.
5. New injection wells must be tested to maximum requested injection pressure.
6. For injection wells, test pressures must be at least 300 psig or average injection pressure, whichever is greater.
7. A minimum 300 psi differential pressure must be maintained between the tubing and tubing/casing annulus pressure.
8. Do not use this form if submitting under provisions of Rule 326.a.(1) B. or C.
9. OGCC notification must be provided 10 days prior to the test via Form 42.
10. Packers or bridge plugs, etc., must be set within 100 feet of the perforated interval to be considered a valid test.

Complete the Attachment Checklist

OGCC Operator Number: Contact Name and Telephone: Eric Erker
Name of Operator: Noble Energy Inc.
Address: 2155 17th Ave.
City: Greeley State: CO Zip: 80202
API Number: 05-123-13434 Field Name: Lilli Field Number: 49970
Well Name: Lilli Unit Number: 14-5
Location (QtrQtr, Sec, Twp, Rng, Meridian): SESW, 5, 8N, 58W, 6PM

Table with columns Oper and OGCC, rows Pressure Chart, Cement Bond Log, Tracer Survey, Temperature Survey, Other Report 1, Other Report 2

SHUT-IN PRODUCTION WELL [] INJECTION WELL [x] Facility No.:

Part I. Pressure Test

- 5-Year UIC Test [x] Test to Maintain SI/TA Status [] Reset Packer []
Verification of Repairs [] Tubing/Packer Leak [] Casing Leak [] Other (Describe):

Describe Repairs:

NA - Not Applicable Wellbore Data at Time of Test
Injection/Producing Zone(s): D-Sand
Perforated Interval: 6396-6402
Open Hole Interval: N/A
Casing Test [x] NA

Tubing Casing/Annulus Test [] NA
Tubing Size: 2.875 Tubing Depth: 6300 Top Packer Depth: 6300 Multiple Packers? [] Yes [x] No

Test Data table with columns: Test Date, Well Status During Test, Date of Last Approved MIT, Casing Pressure Before Test, Initial Tubing Pressure, Final Tubing Pressure, Starting Casing Test Pressure, Casing Pressure - 5 Min., Casing Pressure - 10 Min., Final Casing Pressure, Pressure Loss or Gain During Test

Test Witnessed by State Representative? [x] Yes [] No
OGCC Field Representative (Print Name): Connor Residen

Part II. Wellbore Channel Test

Complete only if well is or will be an injection well.

Indicate method used for cement integrity test, attach appropriate records, charts, or logs unless previously submitted.

Tracer Survey [] CBL or Equivalent [] Temperature Survey []
Run Date:

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: Eric Erker

Signed: [Signature] Title: Ass. Foreman Date: 7-27-16

OGCC Approval: Title: Date:

Conditions of Approval, if any:

FORM
21
Rev
08/14

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401219269

Date Received:

02/27/2017

MECHANICAL INTEGRITY TEST

1. Duration of the pressure test must be a minimum of 15 minutes.
2. An original pressure chart must accompany this report if this test was not witnessed by an OGCC representative. Injection well tests must be witnessed by an OGCC representative.
3. For production wells, test pressures must be at a minimum of 300 psig.
4. New injection wells must be tested to maximum requested injection pressure.
5. For injection wells, test pressures must be at least 300 psig or average injection pressure, whichever is greater.
6. A minimum 300 psi differential pressure must be maintained between the tubing and tubing/casing annulus pressure.
7. Do not use this form if submitting under provisions of Rule 326.a(1)B. or C.
8. Written OGCC notification must be provided 10 days prior to the test via Form 42, Field Operations Notice
9. Packers or bridge plugs, etc., must be set within 100 feet of the perforated interval to be considered a valid test.

Complete the Attachment
Checklist

OP OGCC

OGCC Operator Number: <u>100322</u> Contact Name <u>Julie Webb</u>	Pressure Chart		
Name of Operator: <u>NOBLE ENERGY INC</u> Phone: <u>(720) 587-2223</u>	Cement Bond Log		
Address: <u>1625 BROADWAY STE 2200</u>	Tracer Survey		
City: <u>DENVER</u> State: <u>CO</u> Zip: <u>80202</u> Email: <u>jwebb@progressivepcs.net</u>	Temperature Survey		
API Number : 05- <u>123-33564</u> OGCC Facility ID Number: <u>423352</u>	Inspection Number		
Well/Facility Name: <u>DILLOS PC LD FEDERAL</u> Well/Facility Number: <u>15-74H</u>			
Location QtrQtr: <u>NWNE</u> Section: <u>15</u> Township: <u>9N</u> Range: <u>58W</u> Meridian: <u>6</u>			

SHUT-IN PRODUCTION WELL INJECTION WELL Last MIT Date: _____

Test Type:

Test to Maintain SI/TA status 5-Year UIC Reset Packer

Verification of Repairs Annual UIC TEST

Describe Repairs or Other Well Activities: _____

Wellbore Data at Time of Test				Casing Test	
Injection Producing Zone(s)	Perforated Interval	Open Hole Interval		Use when perforations or open hole is isolated by bridge plug or cement plug; use if cased-hole only with plug back total depth. Bridge Plug or Cement Plug Depth <div style="border: 1px solid black; padding: 2px; display: inline-block;">6088</div>	
NBRR	6213-9828				
Tubing Casing/Annulus Test					
Tubing Size:	Tubing Depth:	Top Packer Depth:	Multiple Packers?		
			<input type="checkbox"/>		

Test Data (Use -1 for a vacuum)

Test Date	Well Status During Test	Casing Pressure Before Test	Initial Tubing Pressure	Final Tubing Pressure
02-19-2015	TEMPORARILY ABANDONED	0		
Casing Pressure Start Test	Casing Pressure - 5 Min.	Casing Pressure - 10 Min.	Casing Pressure Final Test	Pressure Loss or Gain
502	500	499	498	-4

Test Witnessed by State Representative? OGCC Field Representative Binschus, Chris

OPERATOR COMMENTS:

Bill Rains witnesses the MIT, his name is not listed in the OGCC Field representative list.

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: _____ Print Name: Julie Webb
 Title: Senior Regulatory Analyst Email: jwebb@progressivepcs.net Date: 2/27/2017

Based on the information provided herein, this Notice (Form 21) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: _____

Date: _____

CONDITIONS OF APPROVAL, IF ANY:

Attachment Check List

Att Doc Num

Name

401219269	FORM 21 SUBMITTED
401219427	FORM 21 ORIGINAL
401219429	PRESSURE CHART

Total Attach: 3 Files

General Comments

User Group

Comment

Comment Date

		Stamp Upon Approval
--	--	---------------------

Total: 0 comment(s)

Click here to reset the form

FORM 21 Rev 9/14

State of Colorado Oil and Gas Conservation Commission



1120 Lincoln Street, Suite 801, Denver, Colorado 80203 (303)-894-2100 Fax: (303)-894-2109

FOR OGCC USE ONLY
Document Number:
Date Received:

MECHANICAL INTEGRITY TEST

- 1. Duration of the pressure test must be a minimum of 15 minutes.
2. An original pressure chart must accompany this report if this test was not witnessed by a OGCC representative.
3. For production wells, test pressures must be a at minimum of 300 psig.
4. New injection wells must be tested to maximum requested injection pressure.
5. For injection wells, test pressures must be at least 300 psig or average injection pressure, whichever is greater.
6. A minimum 300 psi differential pressure must be maintained between the tubing and tubing/casing annulus pressure.
7. Do not use this form if submitting under provisions of Rule 326.a.(1) B. or C.
8. OGCC notification must be provided 10 days prior to the test via Form 42.
9. Packers or bridge plugs, etc., must be set within 100 feet of the perforated interval to be considered a valid test.

Complete the Attachment Checklist

OGCC Operator Number: 100322
Name of Operator: NOBLE ENERGY INC.
Address: 1625 BROADWAY STE 2200
City: DENVER State: CO Zip: 80202
API Number: 05-123-33564 OGCC Facility ID Number:
Well/Facility Name: DILLOS FEDERAL PC LD Well/Facility Number: 15-74HN
Location QtrQtr: NWNE Section: 15 Township: 9N Range 58W Meridian:

Table with columns for Oper and OGCC, and rows for Pressure Chart, Cement Bond Log, Tracer Survey, Temperature Survey, Inspection Number.

[X] SHUT-IN PRODUCTION WELL [] INJECTION WELL Last MIT Date:

Test Type:
[X] Test to Maintain SI/TA status [] 5- year UIC [] Reset Packer
[] Verification of Repairs [] Annual UIC Test

Describe Repairs or Other Well Activities:

Wellbore Data at Time of Test
Injection/Producing Zone(s) Perforated Interval: Open Hole Interval:
Casing Test
Use when perforations or open hole is isolated by bridge plug or cement plug; use if cased-hole only with plug back total depth.
Bridge Plug or Cement Plug Depth 6088'

Tubing Casing/Annulus Test
Tubing Size: 7" Tubing Depth: Top Packer Depth: Multiple Packers? [] Yes [X] No

Test Data table with columns: Test Date (2-19-15), Well Status During Test (Shut In), Casing Pressure Before Test (0), Initial Tubing Pressure (N/A), Final Tubing Pressure, Casing Pressure Start Test (502), Casing Pressure - 5 Min. (500), Casing Pressure - 10 Min. (499), Casing Pressure Final Test (498), Pressure Loss or Gain During Test (-4)

Test Witnessed by State Representative? [X] Yes [] No
OGCC Field Representative (Print Name): Bill Rains

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct, and complete.

Print Name: CHRIS HOHNSTEIN

Signed: [Signature] Title: COMPLETIONS FOREMEN Date: 2-19-15

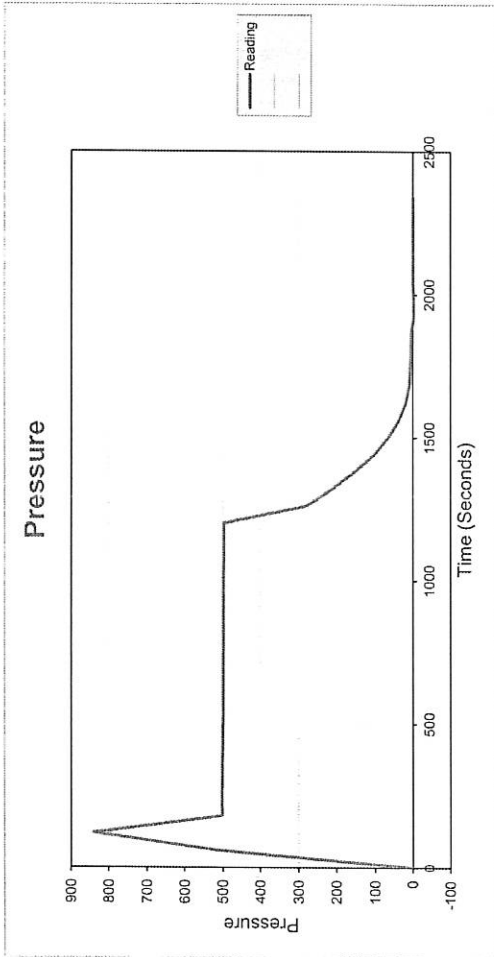
OGCC Approval: [Signature] Title: Field Inspector Date: 2-19-15

Conditions of Approval, if any:

Dillos Federal PC LD15-74HN

Gauge Information	
Serial Number	362375
Model	15KPS(XP2)
Message Store	
Units	PSI

Run Info	
Start Time	2/19/15 10:16:36 AM
Stop Time	2/19/15 10:56:30 AM
Logging Interval	60



Issue Date: 2/21/2017

Objective: Ensure MIT's are conducted in a timely manner and submitted to the state properly.

If well needs to have MIT completed:

- a. Production Engineer responsible for job creation in Generwell.
- b. Production Engineer ensures Form 21 is completed for job and also witnessed by state.
- c. Production Engineer & Foreman ensure Form 21 is submitted to Greeley techs.
- d. Greeley techs receive Form 21 and copy of pressure chart. Then they create PDF and submit online to State website via E-form.
- e. Greeley techs fill out Generwell boxes for MIT job (in screenshot below) once submitted to state, uploaded to Wellview, and state approval received.
- f. Noble Regulatory department informed by receiving "ping" in GW once these dates are filled out.

Regulatory	
Form 42 PA Filed Date	<input type="text"/> WJ
Form 42 PA Filed By	<input type="text"/> WJ
Form 42 Scheduled Date	<input type="text"/> WJ
Form 21 Submit Date	<input type="text"/> WJ
Form 21 Attached in WellView Date	<input type="text"/> WJ
Form 21 Approved Date	<input type="text"/> WJ
Form 2A Submit Date	<input type="text"/> WJ
Form 2A Approved Date	<input type="text"/> WJ
Form 4 Submit Date	<input type="text"/> WJ
Form 4 Approved Date	<input type="text"/> WJ
Form 5 Submit Date	<input type="text"/> WJ
Form 5A Approved Date	<input type="text"/> WJ