

State of Colorado  
Oil and Gas Conservation Commission

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Document Number:  
401358213  
Date Received:  
07/28/2017

FIR RESOLUTION FORM

CA Summary:  
4 of 4 CAs from the FIR responded to on this Form  
4 CA Completed  
0 Factual Review Request

OPERATOR INFORMATION

OGCC Operator Number: 100322  
Name of Operator: NOBLE ENERGY INC  
Address: 1625 BROADWAY STE 2200  
City: DENVER State: CO Zip: 80202  
Contact Name and Telephone:  
Name:  
Phone: ( ) Fax: ( )  
Email:

Additional Operator Contact:

Contact Name Phone Email  
Tesla Dougherty 970-304-5245 tesla.dougherty@nblenergy.com

COGCC INSPECTION SUMMARY:

FIR Document Number: 682402391  
Inspection Date: 07/11/2017 FIR Submit Date: 07/14/2017 FIR Status:

Inspected Operator Information:

Company Name: NOBLE ENERGY INC Company Number: 100322  
Address: 1625 BROADWAY STE 2200  
City: DENVER State: CO Zip: 80202

LOCATION - Location ID: 445209

Location Name: LC11-13 Number: Pad County:  
Qtrqr: SWS Sec: 11 Twp: 9N Range: 59W Meridian: 6  
W  
Latitude: 40.759150 Longitude: -103.951390

FACILITY - API Number: 05-123-00 Facility ID: 445209

Facility Name: LC11-13 Number: Pad  
Qtrqr: SWS Sec: 11 Twp: 9N Range: 59W Meridian: 6  
W  
Latitude: 40.759150 Longitude: -103.951390

CORRECTIVE ACTIIONS:

1  CA# 86094

Corrective Action: Comply with Rule 603.f. to control and manage weedy, annual vegetation to prevent weed waste and prevent spread of dispersing seeds onto adjacent lands. Date: 07/28/2017

Response: CA COMPLETED Date of Completion: 07/28/2017

Operator Comment: A flowline was being built between the two pads. The contaminated fill in question was actually native soil (Epping Silt Loam) spoils from the excavation to lay the flowline. The material was removed long enough to lay the flowline and then replaced. The topsoil pile was not contaminated from imported fill

COGCC Decision: Approved pending re-inspection

COGCC Representative: Operator comment provided is NOT in response to the corrective action issued by COGCC for this inspection. Operator needs to make sure their response is addressing the correct corrective action. COGCC is only passing this "Approved Pending re-inspection" because the Operator provided an attached document (with photos) demonstrating that some weed management was performed.

2  CA# 86095

Corrective Action: Control, manage, and prevent weedy, annual vegetation on all topsoil stockpiles by 7/28/2017. Seeding is a best management practice to prevent weed establishment and accomplishes interim reclamation requirements. Seed the topsoil stockpiles during the next favorable seeding season.

Date: 07/28/2017

Response: CA COMPLETED

Date of Completion: 07/28/2017

Operator Comment: The access point was actually a permitted ROW for a flowline between pads. The flowline ROW was excavated the flowline was laid then and backfilled.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Operator comment provided is NOT in response to the corrective action issued by COGCC for this inspection. Operator needs to make sure their response is addressing the correct corrective action. COGCC is only passing this "Approved Pending re-inspection" because the Operator provided an attached document (with photos) demonstrating that some weed management was performed.

3  CA# 86096

Corrective Action: Perform reclamation in portions of the interim reclamation area in accordance to Rule 1003. Establish vegetation with total perennial, non-invasive uniform plant cover of at least eighty (80) percent of reference area levels. Use a seed mixture requested by the surface owner, or a mixture prescribed by the local county NRCS. Ensure erosion controls are implemented to stabilize the seeded soil, and continue to monitor and manage this site until the location meets Rule 1003 standards.

Date: 10/16/2017

Response: CA COMPLETED

Date of Completion: 07/28/2017

Operator Comment: Noble Energy completed repairs on the BMPs installed as per the Noble BMP manual. A copy of Noble's BMP manual was provided to the COGCC for reference. Additional Hydro-mulch has been applied, sediment traps have been cleaned, and erosion areas around the pad have been repaired. Noble will continue to maintain BMPs as needed.

COGCC Decision: **Not Approved**

COGCC Representative: Operator comment provided is NOT in response to the corrective action issued by COGCC for this inspection. Operator needs to make sure their response is addressing the correct corrective action. Operator did not address or respond to this corrective action in either the Operator comment section or attached document.

4  CA# 86097

Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. Corrective actions from the previous inspection were not resolved therefore the corrective action dates on this inspection remain the same from the previous inspections. See COGCC Comments for addition details.

Date: 05/09/2017

Response: CA COMPLETED

Date of Completion: 07/28/2017

Operator Comment: Tracking pads were not installed because there were not issues with carrying sediment off site or issues with rutting.  
  
Sediment traps are used in conjunction with other BMPs as needed to minimize the transportation of sediment in stormwater runoff. Noble uses sediment traps in conjunction with other BMPs to control transportation of sediment in stormwater runoff. The reference to Noble needing sediment traps with a capacity of 3600 ft<sup>3</sup> per acre was suggested when the only BMP on site was a sediment trap.

COGCC Decision: **Not Approved**

Operator provided an attached document (with photos) stating that sediment traps have been enlarged; however, it does not appear the sediment traps have been enlarged to a sufficient size. When comparing COGCC and Noble photos side-by-side, some of the sediment traps appear to be the same size or slightly enlarged. Operator

COGCC Representative: has not provided construction calculations from the site specific stormwater plan demonstrating that the installed BMPs are sufficient.

**OPERATOR COMMENT AND SUBMITTAL**

Comment:

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

Print Name: Tesla Dougherty

Signed: \_\_\_\_\_

Title: EHS Tech

Date: 7/28/2017 3:33:51 PM

**ATTACHMENT LIST**

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

<u>Document Number</u>	<u>Description</u>
401358213	FIR RESOLUTION SUBMITTED
401358214	Response to a Follow-up Inspection

Total Attach: 2 Files