

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:

401357234

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: 682402392

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: 445191

Location Name: LC15-01 Number: Pad County:

Qtrqr: NENE Sec: 15 Twp: 9N Range: 59W Meridian: 6

Latitude: 40.757440 Longitude: -103.956230

FACILITY - API Number: 05-123-00 Facility ID: 445191

Facility Name: LC15-01 Number: Pad

Qtrqr: NENE Sec: 15 Twp: 9N Range: 59W Meridian: 6

Latitude: 40.757440 Longitude: -103.956230

CORRECTIVE ACTIONS:

1 CA# 86098

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: 1. Weeds: Weedy, annual Russian thistle (Salsola tragus) and Kochia (Kochia scoparia) were observed throughout most disturbance areas, including topsoil stockpiles. Operator needs to control and manage both Russian thistle and Kochia using the best available practices, as this is weed waste and will spread onto adjacent lands. At maturity, Russian thistle often breaks off at the soil line and tumble long distances with the wind, widely dispersing seed for several kilometers (Stallings et al. 1995). Seed remains viable 2-3 years (Larimer County 5th Edition Weed Management Reference Guide).

COGCC Decision: Approved pending re-inspection

COGCC Representative: Operator comment restated COGCC's own comment from the inspection. Operator needs to make sure their response is addressing the corrective action. COGCC is only passing this "Approved Pending re-inspection" because the Operator provided an attached document (with photos) that was in response the corrective action issued by COGCC.

2 CA# 86099

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: 2. Protection of Soils: The topsoil stockpile has significant weed cover including Russian thistle and Kochia with no perennial vegetation that would compete with the weedy vegetation and generally work to decrease weed growth.

COGCC Decision: Approved pending re-inspection

COGCC Representative: Operator comment restated COGCC's own comment from the inspection. Operator needs to make sure their response is addressing the corrective action. COGCC is only passing this "Approved Pending re-inspection" because the Operator provided an attached document (with photos) that was in response the corrective action issued by COGCC.

3 CA# 86100

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: 3. Noxious Weeds: Vegetation in portions of the interim reclamation area is predominantly undesirable weedy plant species, Russian thistle and Kochia, and is likely hindering the establishment of desirable vegetation. These areas will need to be reseeded to establish a uniform vegetation cover of at least eighty (80) percent of reference area levels.

COGCC Decision: **Not Approved**

COGCC Representative: Operator comment restated COGCC's own comment from the inspection. Operator needs to make sure their response is addressing the corrective action. Operator did not address or respond to this corrective action in either the Operator comment section or attached document.

4 CA# 86101

Corrective Action: Install or repair required BMPs per Rule 1002.f. in accordance with good engineering practices. See COGCC Comments for addition details.

Date: 08/11/2017

Response: CA COMPLETED

Date of Completion: 07/28/2017

Operator Comment: 4. Storm Water: Noble Energy (Operator) does not appear to have implemented and maintained Best Management Practices (BMPs) to control stormwater runoff in a manner that minimizes erosion, transport of sediment offsite, and site degradation per Rule 1002.f.(2). Operator does not appear to have implemented BMPs in accordance with good engineering practices per Rule 1002.f.(2). Sediment discharge was observed along the southern perimeter of the location. See attached inspection photos for more details.
5. General: Per this inspection, stormwater controls were inadequate and the Operator has not installed sediment traps or other BMPs in accordance to their own BMP Manual. The Operator has failed to implement their suggested BMP specifications. For example, the two sediment traps installed for this location (totaling 6.4 acres of disturbance) have a sediment trap volume capacity for both dry and wet storage that equals approximately 144 ft³. Based off Noble's own BMP Manual, the required sediment trap volume for one acre is 3,600 ft³. Therefore, based off Nobles BMP Manual, the sediment trap volume for the entire location would require approximately 23,040 ft³ of sediment trap volume.

COGCC Decision: **Not Approved**

COGCC Representative: Operator comment restated COGCC's own comment from the inspection. Operator needs to make sure their response is addressing the corrective action. 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. It only appears the embankment berms have been constructed to a larger extent. Operator 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 3:28:05 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>
401357234	FIR RESOLUTION SUBMITTED
401358211	Response to a Follow-Up Inspection

Total Attach: 2 Files