

**Response to December 31, 2018 Inspection
Document Number: 674902382**

COGCC conducted an inspection of the D21-13 pad (Location ID 458904) on December 31, 2018 (Document 674902382).

During that inspection, COGCC made the following observations:

Stormwater comment: 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). See attached inspection photos for more details.

Stormwater Corrective Action: Install, repair, or replace required BMPs per Rule 1002.f. in accordance with good engineering practices.

Response: Noble completed a comprehensive overhaul on the referenced site to improve stormwater BMPs. BMPs are properly installed, as described in the photo log below. Additionally, Noble has used this opportunity to reinforce stormwater compliance requirements with field staff. Noble looks to continually improve their stormwater program, including the design and implementation of BMPs and we welcome further discussion or information regarding these activities.

Name: D21-13 Pad
Location ID: 458904

COGCC – 12/31/18



Photo 1. Photo taken from the southern perimeter of the location, facing East. Photo illustrates a filtrex BMP that has been installed around the perimeter of the location.

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Photo NBL1. Perimeter ripping has been implemented and Filtrexx properly reinstalled.

Name: D21-13 Pad
Location ID: 458904

COGCC – 12/31/18



Photo 2. Photo taken from the southeastern perimeter of the location, facing West. See comments from Photo 1.

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Photo NBL2. South perimeter ripping has been implemented and Filtrexx properly reinstalled.

Name: D21-13 Pad
Location ID: 458904

COGCC – 12/31/18



Photo 3. Photo taken from the southeastern perimeter of the location, facing North. Photo depicts breaks in the perimeter of the filtrex BMP.

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Photo NBL3. Additional Filtrex has been installed to the east perimeter to fill breaks.

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Location ID: 458904

COGCC – 12/31/18



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Photo 4. Photo taken from the Eastern perimeter of the location, facing North. Photo depicts breaks in the perimeter of the filtrex BMP adjacent to open fenced pothole.

Photo NBL4. Photo displays restoration of gap in Filtrex perimeter.

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Location ID: 458904

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Photo 5. Photo taken from the Eastern perimeter of the location, facing North. See comments from Photo 4.

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Photo NBL5. Photo displays restoration of gap in Filtrexx perimeter.

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Location ID: 458904

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Photo 6. Photo taken from the Eastern perimeter of the location, adjacent to the fenced pothole. The unfenced hole appeared to be greater than 3 feet depth.

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Photo NBL6. Photo displays former pothole location. Pothole backfilled to grade.

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Location ID: 458904

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Photo 7. Photo taken from the northeastern perimeter of the location, facing West. See comments under Photos 3.

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Photo NBL7. Filtrexx installed to close north perimeter break.

Name: D21-13 Pad
Location ID: 458904

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Photo 8. Photo taken from the northeastern perimeter of the location, facing South. See comments under Photos 3.

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Photo NBL8. Filtrexx installed to close east perimeter break.

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Location ID: 458904

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Photo 9. Photo taken from the northwestern perimeter of the location, facing East. See comments under Photos 3.

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Photo NBL9. Filtrexx installed to enclose northern perimeter. A sediment trap is under construction in the foreground.

Name: D21-13 Pad
Location ID: 458904

COGCC – 12/31/18



Photo 10. Photo taken from the northeastern perimeter of the location, facing South.

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Photo NBL10. Ripping and Filtrexx installed along eastern perimeter. Note: photo includes a sediment trap that is under construction.

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Location ID: 458904

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Photo 11. Photo taken from the Western perimeter of the location, facing South. Photo depicts soil placed over Filtrexx BMPs.

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Photo NBL11. Ripping and Filtrexx BMPs installed along western perimeter.

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Location ID: 458904

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Photo 12. Photo taken from the Western perimeter of the location, facing South. Photo depicts soil Filtrexx BMPs apparently ran over by equipment.

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Photo NBL12. Damaged Filtrexx along western perimeter replaced.

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Location ID: 458904

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Photo 13. Photo taken from the southwestern perimeter of the location, facing East. See comments from Photo 1.

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Photo NBL13. Perimeter ripping and Filtrexx installed along southern perimeter.

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Location ID: 458904

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Photo 14. Photo taken from the southwestern perimeter of the location, facing North. See comments from Photo 1.

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Photo NBL14. Ripping was added to the southwestern perimeter. Filtrex remains and is properly maintained.