

STATE OF
COLORADO

Andrews - DNR, Doug <doug.andrews@state.co.us>

COGCC Form 2A review of Noble Energy's A 35-13 Pad location - Doc #402092805

7 messages

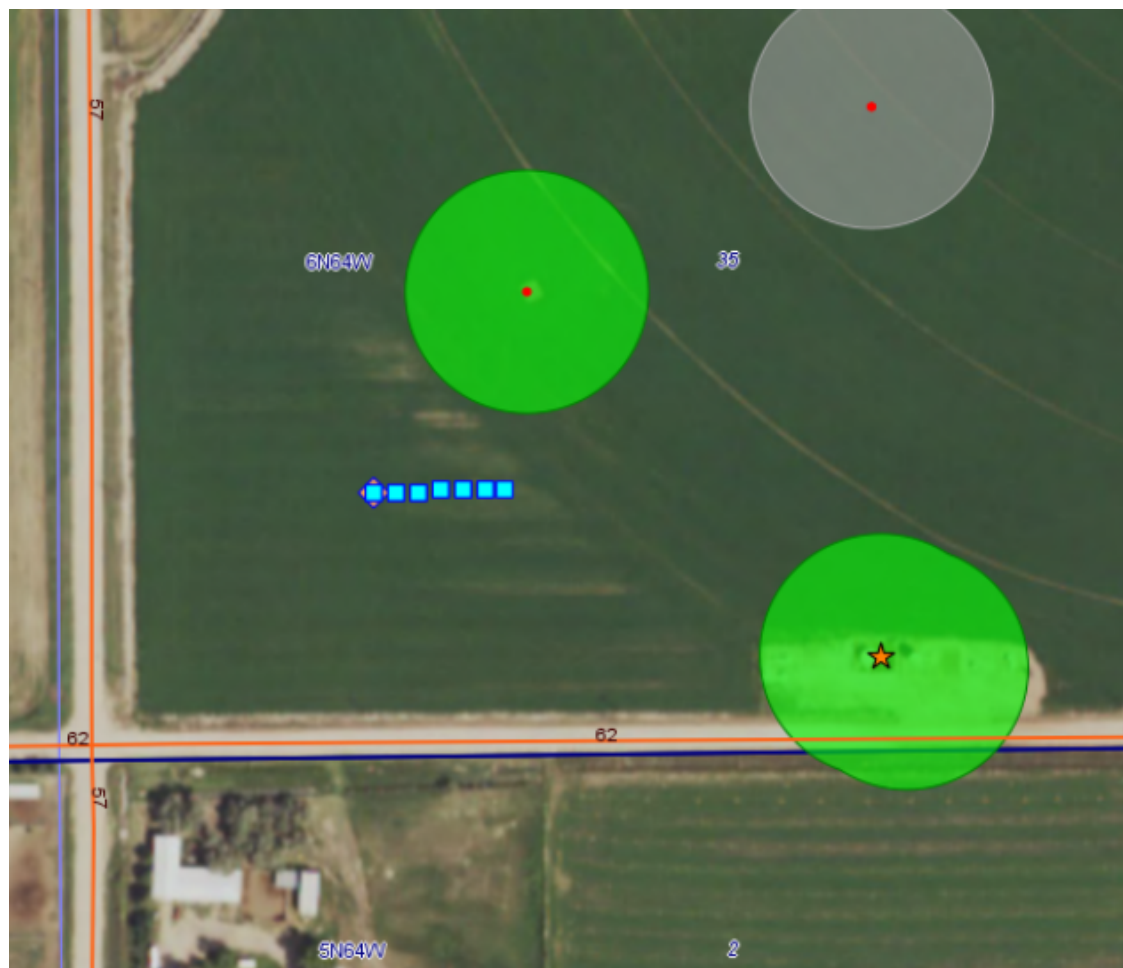
Andrews - DNR, Doug <doug.andrews@state.co.us>

Fri, Aug 23, 2019 at 10:43 AM

To: Noble Regulatory <regulatorynotification@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Julie,

I need some clarification from Noble Energy regarding this proposed Oil & Gas Location before it can be processed. A review of the Location Drawing on this Form 2A indicates the proposed disturbance area will include two other existing Noble Energy locations. The HOFFNER-66N64W #35SWSW (Location ID #305342 for the Hoffner 14-35 well) and the Hoffner 13, 24-35 tank battery (Location ID #433955 for the Hoffner 13-35 & 14-35 wells). If the location names are unfamiliar, this well and tank battery were existing prior to our 2009 Rules requiring a Form 2A, so their location names are something we created in our database when we created their Location ID #s. Noble Energy has indicated this will be a New Location, but we are not keen on creating a New Location when the operator already has existing locations that will be part of a new disturbance area. What are Noble Energy's intentions in regards to this existing well and tank battery that will be overlapped by this proposed disturbance area. Your answer will have bearing on how this Form 2A is to be reviewed by the OGLA staff.

**Doug Andrews**

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Oil & Gas Conservation
Commission
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303.894.2100 Ext. 5180
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Craig Richardson <Craig.Richardson@nblenergy.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>
Cc: "Julie Webb (Contractor)" <Julie.Webb@nblenergy.com>

Fri, Aug 23, 2019 at 10:51 AM

Doug,

I've reached out to the extended teams for clarifications. We will get you the details as soon as we hear back from them.

Thank you,

Craig

Craig Richardson

Regulatory Analyst III, Colorado

1625 Broadway, Suite 2200, Denver, CO 80202

Direct: 303.228.4232 | Cell: 970.462.6989

craig.richardson@nblenergy.com | www.nblenergy.com



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Julie Webb (Contractor) <Julie.Webb@nblenergy.com>
To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>, Regulatory Notification <RegulatoryNotification@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Fri, Sep 6, 2019 at 9:36 AM

Doug,

Noble will P&A the Hoffner 14-35 well prior to construction of the A35-13 pad. The facility has already been decommission for this well. The Hoffner 24-35 operated by PDC also produced to this facility and will be P&A'd prior to the construction of the pad.

Please let me know if you need any additional information on this pad.

Thank you,

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

c: (616) 813-5063

e: jwebb@progressivepcs.net

e: Julie.webb@nbleenergy.com

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>

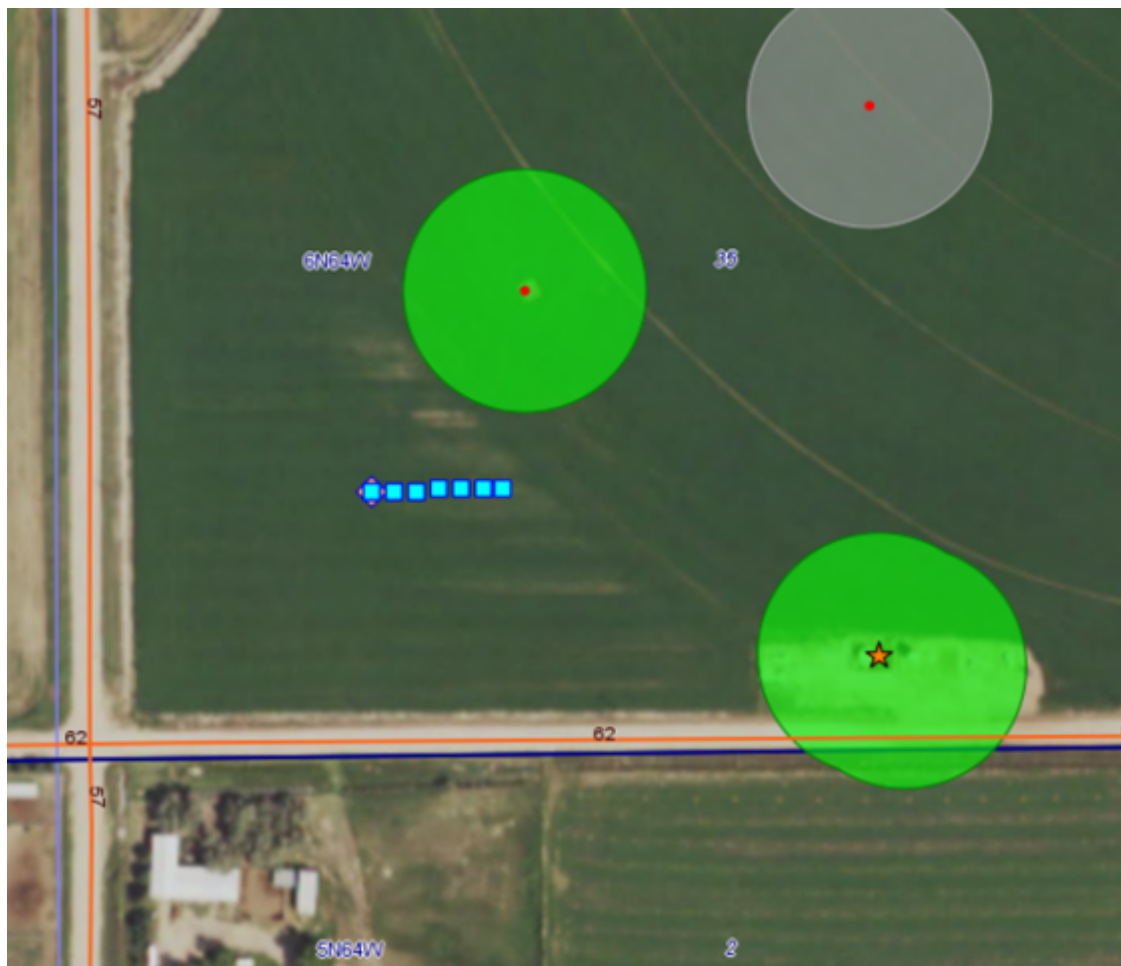
Sent: Friday, August 23, 2019 10:43 AM

To: Regulatory Notification <RegulatoryNotification@nbleenergy.com>; Denver Regulatory <DenverRegulatory@Nbleenergy.com>

Subject: EXTERNAL: COGCC Form 2A review of Noble Energy's A 35-13 Pad location - Doc #402092805

Julie,

I need some clarification from Noble Energy regarding this proposed Oil & Gas Location before it can be processed. A review of the Location Drawing on this Form 2A indicates the proposed disturbance area will include two other existing Noble Energy locations. The HOFFNER-66N64W #35SWSW (Location ID #305342 for the Hoffner 14-35 well) and the Hoffner 13, 24-35 tank battery (Location ID #433955 for the Hoffner 13-35 & 14-35 wells). If the location names are unfamiliar, this well and tank battery were existing prior to our 2009 Rules requiring a Form 2A, so their location names are something we created in our database when we created their Location ID #s. Noble Energy has indicated this will be a New Location, but we are not keen on creating a New Location when the operator already has existing locations that will be part of a new disturbance area. What are Noble Energy's intentions in regards to this existing well and tank battery that will be overlapped by this proposed disturbance area. Your answer will have bearing on how this Form 2A is to be reviewed by the OGLA staff.



Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Andrews - DNR, Doug <doug.andrews@state.co.us>

Tue, Sep 10, 2019 at 11:03 AM

To: "Julie Webb (Contractor)" <Julie.Webb@nblenergy.com>

Cc: Regulatory Notification <RegulatoryNotification@nblenergy.com>, Denver Regulatory
<DenverRegulatory@nblenergy.com>

Julie,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Noble has included a comment in the Cultural Setbacks section indicating a siting rationale is included in the submittal comment section. Siting rationale's are only required for production facilities when they are in a Buffer Zone. The production facilities for these wells are not in a Buffer Zone; therefore, I would like to remove this statement from the Form 2A.

2) In the Water Resources section Noble Energy has indicated the closest water well is Permit #226957. A review of this permit indicates the well has been abandoned. The next nearest existing water well

appears to be Permit #227186 located approximately 2,150 feet to the east-southeast. Therefore I would like to update the Water Resources section to reflect this.

3) Noble Energy has included a BMP that discusses mitigation of fugitive dust. The last sentence in this BMP is problematic as it doesn't comply with SB19-181. *"Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used if technologically feasible and economically reasonable to minimize fugitive dust emissions."* The additional management practices listed are not the problem, its the *"if technologically feasible and economically reasonable"* phrasing. That is no longer an acceptable qualifier for mitigating potential impacts from Oil & Gas operations. Will Noble Energy revise this last sentence to eliminate this qualifier?

4) Noble Energy has included an Objective Review Criteria BMP that includes a Siting Analysis and BU Concerns. These are not BMPs and are more appropriate to be included in the Operator Comment section. Please let me know if you concur with moving them to that section of the Form 2A.

5) Noble Energy has provided a Noise mitigation BMP that indicates *"Baseline surveys will be completed at the residences within 560 feet and 662 feet to the Southwest. Engineered sound walls no less than 16' tall will be used along the southern and western sides for well pad A35-13 to mitigate noise impacts to these residences..."* While the majority of Building Units, including the closest are to the south and west of this proposed Oil & Gas Location, there appears to be two Building Units within 1,500 feet to the north. Will Noble Energy revise the Noise mitigation BMP to also indicate sound walls will be used along the northern sides of this well pad?

6) Noble Energy has included a BMP that discusses how natural gas produced from the wells will be handled. It states *"Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. Flaring would only be necessary after this point in emergency situations."* Will Noble Energy revise this BMP to indicate what they intend to do if a gas sales line is not available to connect to at the first indication of salable quality gas? Also, the Facilities section does not list a flare. Given the location of this pad, the COGCC will require Noble comply with Rule 805.c. (3)B.v when it comes to the handling of salable quality gas.

7) Now that the Public Comment period has ended, please provide a letter certifying compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Please respond to this correspondence by October 1, 2019. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Department of Natural Resources

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Julie Webb (Contractor) <Julie.Webb@nblenergy.com>

Thu, Sep 12, 2019 at 4:26 PM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Cc: Regulatory Notification <RegulatoryNotification@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Good afternoon Doug,

Please see Noble's comments and updated BMPs below.

Thank you,

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

c: (616) 813-5063

e: jwebb@progressivepcs.nete: Julie.webb@nbleenergy.com

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>**Sent:** Tuesday, September 10, 2019 11:03 AM**To:** Julie Webb (Contractor) <Julie.Webb@nbleenergy.com>**Cc:** Regulatory Notification <RegulatoryNotification@nbleenergy.com>; Denver Regulatory <DenverRegulatory@Nbleenergy.com>**Subject:** EXTERNAL: Re: COGCC Form 2A review of Noble Energy's A 35-13 Pad location - Doc #402092805

Julie,

I have reviewed the referenced Form 2A Oil & Gas Location Assessment and have the following comments.

1) Noble has included a comment in the Cultural Setbacks section indicating a siting rationale is included in the submittal comment section. Siting rationale's are only required for production facilities when they are in a Buffer Zone. The production facilities for these wells are not in a Buffer Zone; therefore, I would like to remove this statement from the Form 2A.

Doug, would you please remove the statement from the 2A?

2) In the Water Resources section Noble Energy has indicated the closest water well is Permit #226957. A review of this permit indicates the well has been abandoned. The next nearest existing water well appears to be Permit #227186 located approximately 2,150 feet to the east-southeast. Therefore I would like to update the Water Resources section to reflect this.

Yes Doug, please update the Water Resources Section to include well Permit #227186.

3) Noble Energy has included a BMP that discusses mitigation of fugitive dust. The last sentence in this BMP is problematic as it doesn't comply with SB19-181.

"Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used if technologically feasible and economically reasonable to minimize fugitive dust emissions." The additional management practices listed are not the problem, its the *"if technologically feasible and economically reasonable"* phrasing. That is no longer an acceptable qualifier for mitigating potential impacts from Oil & Gas operations. Will Noble Energy revise this last sentence to eliminate this qualifier?

Doug, please replace the BMP with the below language.

COGCC Rule 805.c Fugitive Dust

Planning:

Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high- wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions.

4) Noble Energy has included an Objective Review Criteria BMP that includes a Siting Analysis and BU Concerns. These are not BMPs and are more appropriate to be included in the Operator Comment section. Please let me know if you concur with moving them to that section of the Form 2A.

Doug, would you please remove the statement from the BMPs to the Comments.

5) Noble Energy has provided a Noise mitigation BMP that indicates *"Baseline surveys will be completed at the residences within 560 feet and 662 feet to the Southwest. Engineered sound walls no less than 16' tall will be used along the southern and western sides for well pad A35-13 to mitigate noise impacts to these residences..."*

While the majority of Building Units, including the closest are to the south and west of this proposed Oil & Gas Location, there appears to be two Building Units within 1,500 feet to the north. Will Noble Energy revise the Noise mitigation BMP to also indicate sound walls will be used along the northern sides of this well pad?

Doug, please replace the BMP with the below language.

COGCC Rule 604.c.(2)A. Noise.

Noise Mitigation:

- *Temporary Drilling and Completion operations* – Baseline surveys will be completed at the residences within 560 feet and 662 feet to the Southwest, and 930 feet to the North. Engineered sound walls no less than 16' tall will be used along the southern, western and northern sides for well pad A35-13 to mitigate noise impacts to these residences. Sound wall gaps will be strategically placed to adequately protect residences yet allow proper air-flow across the drill pad. The use of equipment specific sound walls will be used as necessary around rig generators in the event of sound impacts during operations.

6) Noble Energy has included a BMP that discusses how natural gas produced from the wells will be handled. It states "*Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. Flaring would only be necessary after this point in emergency situations.*" Will Noble Energy revise this BMP to indicate what they intend to do if a gas sales line is not available to connect to at the first indication of salable quality gas? Also, the Facilities section does not list a flare. Given the location of this pad, the COGCC will require Noble comply with Rule 805.c.(3)B.v when it comes to the handling of salable quality gas.

Doug, please include the revised BMP below.

Type: Produced Natural Gas

Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. The sales line is in-place and during any emergency situation where the sales line is not operational, Noble would shut-in production.

7) Now that the Public Comment period has ended, please provide a letter certifying compliance with COGCC Rule 306.e. If any meetings/consultations were requested, please also indicate their outcome.

Attached

Please respond to this correspondence by October 1, 2019. If you have any questions, please contact me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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A35-13 PAD_Operator Certification_Meetings.pdf
127K

Andrews - DNR, Doug <doug.andrews@state.co.us>
To: "Julie Webb (Contractor)" <Julie.Webb@nblenergy.com>
Cc: Regulatory Notification <RegulatoryNotification@nblenergy.com>, Denver Regulatory <DenverRegulatory@nblenergy.com>

Fri, Sep 13, 2019 at 2:22 PM

Julie,

Has Noble reached out to the two Building Unit owners to the north that are within 1,500 feet of the location? If yes, did they have any concerns and how is Noble addressing them?

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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303.894.2100 Ext. 5180

1120 Lincoln St., Suite 801, Denver, CO 80203

doug.andrews@state.co.us | <http://cogcc.state.co.us/>

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Julie Webb (Contractor) <Julie.Webb@nblenergy.com>

Mon, Sep 16, 2019 at 9:22 AM

To: "Andrews - DNR, Doug" <doug.andrews@state.co.us>

Cc: Regulatory Notification <RegulatoryNotification@nblenergy.com>, Denver Regulatory
<DenverRegulatory@nblenergy.com>

Good morning Doug,

The concerns from the building unit owners were the following:

Road Dust – Noble will work with Weld County Public Works to control dust through the use of magnesium chloride or watering.

Noise and lights during drilling – Noble will erect sound walls between building units and drilling & completions locations.

Irrigation ditch interference – Noble will bore under all irrigation ditches and will not interfere with irrigation water flow.

Thanks,

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