

FORM
2A

Rev
08/19

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:

402152355

(RESUBMITTED)

Date Received:

11/19/2019

Oil and Gas Location Assessment

☐ New Location ☐ Refile ☒ Amend Existing Location Location#: 426897

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at <http://cogcc.state.co.us/> for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

426897

Expiration Date:

☐ This location assessment is included as part of a permit application.

CONSULTATION

- ☐ This location is included in a Comprehensive Drilling Plan. CDP # _____
- ☐ This location is in a sensitive wildlife habitat area.
- ☐ This location is in a wildlife restricted surface occupancy area.
- ☐ This location includes a Rule 306.d.(1)A.ii. variance request.

Operator

Operator Number: 100322

Name: NOBLE ENERGY INC

Address: 1001 NOBLE ENERGY WAY

City: HOUSTON State: TX Zip: 77070

Contact Information

Name: Craig Richardson

Phone: (303) 224-4232

Fax: ()

email: Denverregulatory@nblenergy.com

FINANCIAL ASSURANCE

- ☒ Plugging and Abandonment Bond Surety ID (Rule 706): 20030009 ☐ Gas Facility Surety ID (Rule 711): _____
- ☐ Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: Cecil USX A

Number: 01-65-1HN

County: WELD

Quarter: SENE Section: 1 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4737

Define a single point as a location reference for the facility location. When the location is to be used as a well site then the point shall be a well location.

Footage at surface: 2120 feet FNL from North or South section line

246 feet FEL from East or West section line

Latitude: 40.516880 Longitude: -104.489670

PDOP Reading: 2.1 Date of Measurement: 09/12/2011

Instrument Operator's Name: Brian Brinkman

LOCAL GOVERNMENT INFORMATION

County: WELD

Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "local government with jurisdiction to approve the siting of the proposed oil and gas location."

The local government with jurisdiction is: County _____

Does the local government with jurisdiction regulate the siting of Oil and Gas Locations, with respect to this location? If the local government does regulate the siting, but has waived its right to precede the COGCC in siting determination, indicate by selecting "YES" here and selecting "Waived" for the disposition below.

☐ Yes ☒ No

If yes, in checking this box, I hereby certify that an application has been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas location. ☐

The local government siting permit type is: _____

The local government siting permit was filed on: _____

The disposition of the application filed with the local government is: Other _____

Additional explanation of local process:

Location was constructed prior to the WOGLA permit process.

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is: LOCATION ID # FORM 2A DOC #

☐

FACILITIES

Indicate the number of each type of oil and gas facility planned on location

Wells	3	Oil Tanks*	9	Condensate Tanks*		Water Tanks*	3	Buried Produced Water Vaults*	3
Drilling Pits		Production Pits*		Special Purpose Pits		Multi-Well Pits*		Modular Large Volume Tanks	
Pump Jacks	3	Separators*	6	Injection Pumps*		Cavity Pumps*		Gas Compressors*	1
Gas or Diesel Motors*		Electric Motors		Electric Generators*		Fuel Tanks*		LACT Unit*	
Dehydrator Units*		Vapor Recovery Unit*		VOC Combustor*	3	Flare*		Pigging Station*	

OTHER FACILITIES*

Other Facility Type

Number

Meter Building	1
Vertical Separator	1

Those facilities indicated by an asterisk () shall be used to determine the distance from the Production Facility to the nearest cultural feature on the Cultural Setbacks Tab.

Per Rule 303.b.(3)C, description of all oil, gas, and/or water pipelines:

Three (3) 2-4" Three Phase Flowline
Three (3) 2-4" Steel Gas Lift Lines
One (1) 12"-16" Steel Gas Gathering Line
Two (2) 8" Steel Gathering Line (for oil and produced water)
Three (3) 12" Temporary Poly Line to supply fresh water to site

CONSTRUCTION

Date planned to commence construction: 01/01/2012 Size of disturbed area during construction in acres: 5.00
Estimated date that interim reclamation will begin: 01/01/2020 Size of location after interim reclamation in acres: 1.90
Estimated post-construction ground elevation: 4737

DRILLING PROGRAM

Will a closed loop system be used for drilling fluids: Yes

Is H₂S anticipated? No

Will salt sections be encountered during drilling: No

Will salt based mud (>15,000 ppm Cl) be used? No

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

SURFACE & MINERALS & RIGHT TO CONSTRUCT

Name: Weldco Farms, LLC

Phone:

Address: 1919 14th Street, Suite 300

Fax:

Address: C/O Lindsay Carpenter

Email:

City: Boulder State: CO Zip: 80302

Surface Owner: ☒ Fee ☐ State ☐ Federal ☐ Indian

Check all that apply. The Surface Owner: ☐ is the mineral owner

☐ is committed to an oil and Gas Lease

☐ has signed the Oil and Gas Lease

☐ is the applicant

The Mineral Owner beneath this Oil and Gas Location is: ☒ Fee ☐ State ☐ Federal ☐ Indian

The Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

The right to construct this Oil and Gas Location is granted by: Surface Use Agreement

Surface damage assurance if no agreement is in place: Surface Surety ID:

Date of Rule 306 surface owner consultation

If this Form 2A is associated with Drilling and Spacing Unit applications, list docket number(s):

CURRENT AND FUTURE LAND USE

Current Land Use (Check all that apply):

Crop Land: ☒ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe):

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Future Land Use (Check all that apply):

Crop Land: ☒ Irrigated ☐ Dry land ☐ Improved Pasture ☐ Hay Meadow ☐ CRP

Non-Crop Land: ☐ Rangeland ☐ Timber ☐ Recreational ☐ Other (describe): _____

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

RE-SUBMITTED

CULTURAL DISTANCE INFORMATION

Provide the distance to the nearest cultural feature as measured from Wells or Production Facilities onsite.

	From WELL	From PRODUCTION FACILITY
Building:	772 Feet	472 Feet
Building Unit:	810 Feet	598 Feet
High Occupancy Building Unit:	5280 Feet	5280 Feet
Designated Outside Activity Area:	5280 Feet	5280 Feet
Public Road:	226 Feet	73 Feet
Above Ground Utility:	548 Feet	61 Feet
Railroad:	5280 Feet	5280 Feet
Property Line:	1 Feet	66 Feet
School Facility::	5280 Feet	5280 Feet
School Property Line:	5280 Feet	5280 Feet
Child Care Center:	5280 Feet	5280 Feet

INSTRUCTIONS:

- All measurements shall be provided from center of nearest Well or edge of nearest Production Facility to nearest of each cultural feature as described in Rule 303.b.(3)A.
- Enter 5280 for distance greater than 1 mile.
- Building - nearest building of any type. If nearest Building is a Building Unit, enter same distance for both.
- Building Unit, High Occupancy Building Unit, Designated Outside Activity Area, School Facility, and Child Care Center – as defined in 100 Series Rules.
- For measurement purposes only, Production Facilities should only include those items with an asterisk(*) on the Facilities Tab.

SCHOOL SETBACK INFORMATION

Was Notice required under Rule 305.a.(4)? ☐ Yes ☒ No

DESIGNATED SETBACK LOCATION INFORMATION

Check all that apply. This location is within a:

- ☒ Buffer Zone
- ☐ Exception Zone
- ☐ Urban Mitigation Area

- Buffer Zone - as described in Rule 604.a.(2), within 1,000' of a Building Unit.
- Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit.
- Urban Mitigation Area - as defined in 100-Series Rules.
- Large UMA Facility – as defined in 100-Series Rules.

Pre-application Notifications (required if location is within 1,000 feet of a building unit):

Date of Rule 305.a.(1) Urban Mitigation Area Notification to Local Government: _____

Date of Rule 305.a.(2) Buffer Zone Notification to Building Unit Owners: 08/08/2019

FOR MULTI-WELL PADS AND PRODUCTION FACILITIES WITHIN DESIGNATED SETBACK LOCATIONS ONLY:

☒ Check this box if this Oil and Gas Location has or will have Production Facilities that serve multiple wells (on or offsite) and the Production Facilities are proposed to be located less than 1,000 feet from a Building Unit. *(Pursuant to Rule 604.c.(2)E.i., the operator must evaluate alternative locations for the Production Facilities that are farther from the Building Unit, and determine whether those alternative locations were technically feasible and economically practicable for the same proposed development.)*

☒ By checking this box, I certify that no alternative placements for the Production Facilities, farther from the nearest Building Unit, were available based on the analysis conducted pursuant to Rule 604.c.(2)E.i.

In the space below, explain rationale for siting the multi-well Production Facility(ies) that supports your Rule 604.c.(2)E.i determination. Attach documentation that supports your determination to this Form 2A.

Please see attached "Other" document for full siting rationale.

SOIL

List all soil map units that occur within the proposed location. attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" report listing the soil typical vertical profile. This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS web site at <http://soildatamart.nrcs.usda.org/> or from the COGCC web site GIS Online map page found at <http://colorado.gov/cogcc>. Instructions are provided within the COGCC web site help section.

NRCS Map Unit Name: 47 - OLNEY FINE SANDY LOAM, 1-3% SLOPES

NRCS Map Unit Name: 74 - VONA SANDY LOAM, 5-9% SLOPES

NRCS Map Unit Name: _____

PLANT COMMUNITY:

Complete this section only if any portion of the disturbed area of the location's current land use is on non-crop land.

Are noxious weeds present: Yes ☐ No ☒

Plant species from: ☐ NRCS or, ☐ field observation Date of observation: _____

List individual species:

Check all plant communities that exist in the disturbed area.

- ☐ Disturbed Grassland (Cactus, Yucca, Cheatgrass, Rye)
- ☐ Native Grassland (Bluestem, Grama, Wheatgrass, Buffalograss, Fescue, Oatgrass, Brome)
- ☐ Shrub Land (Mahogany, Oak, Sage, Serviceberry, Chokecherry)
- ☐ Plains Riparian (Cottonwood, Willow, Aspen, Maple, Poplar, Russian Olive, Tamarisk)
- ☐ Mountain Riparian (Cottonwood, Willow, Blue Spruce)
- ☐ Forest Land (Spruce, Fir, Ponderosa Pine, Lodgepole Pine, Juniper, Pinyon, Aspen)
- ☐ Wetlands Aquatic (Bullrush, Sedge, Cattail, Arrowhead)
- ☐ Alpine (above timberline)
- ☐ Other (describe): _____

WATER RESOURCES

Is this a sensitive area: ☐ No ☒ Yes

Distance to nearest

downgradient surface water feature: 12 Feet

water well: 121 Feet

Estimated depth to ground water at Oil and Gas Location 48 Feet

Basis for depth to groundwater and sensitive area determination:

Basis for Sensitive Area Determination: Shallow groundwater, nearest water well distance, building unit in buffer zone
Nearest Down-gradient surface water: ditch 12' NE
Nearest Water Well: Permit 93970: 121' SW
Estimated depth to ground water: 48' Permit 93970: 121' SW

Is the location in a riparian area: ☒ No ☐ Yes

Was an Army Corps of Engineers Section 404 permit filed ☒ No ☐ Yes If yes attach permit.

Is the location within a Rule 317B Surface Water Supply Area buffer No zone:

If the location is within a Rule 317B Surface Water Supply Area buffer have all public water supply systems within 15 miles been notified: _____

Is the Location within a Floodplain? ☒ No ☐ Yes Floodplain Data Sources Reviewed (check all that apply)

☒ Federal (FEMA)

☐ State

☐ County

☐ Local

☐ Other

GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING

Water well sampling required per Rule 318A

WILDLIFE

☐ This location is included in a Wildlife Mitigation Plan

☐ This location was subject to a pre-consultation meeting with CPW held on _____

Operator Proposed Wildlife BMPs

No BMP

DESIGNATED SETBACK LOCATION EXCEPTIONS

Check all that apply:

☐ Rule 604.a.(1)A. Exception Zone (within 500' of a Building Unit) and is in an Urban Mitigation Area

☐ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)

☐ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)

☐ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)

☐ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)

RULE 502.b VARIANCE REQUEST

☐ Rule 502.b. Variance Request from COGCC Rule or Spacing Order Number _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

OPERATOR COMMENTS AND SUBMITTAL

Comments Noble provided written remarks in response to this issue to Commission Staff on September 3, 2019, and the location is included in the AOC for Docket No. 190600392.
Noble Energy in submitting this application to Amend Location ID: 426897 due to the pad being constructed larger than the approved area of disturbance. This location is already constructed, and the wells have been drilled and completed. Existing Wells producing to the CECIL USA A 01-65-1HN Multi Location (within the Disturbance Area): CECIL USX A01-66-1HN (API # 05-123-34810), CECIL USX A01-65HN (API # 05-123-34808), CECIL USX A01-65-1HN (API # 05-123-34806)
Interim reclamation began on 4/1/2012 and has been completed.
The Exception Location and Twinning Waiver language is in the SUA.
There are no Schools, School Facilities, School Properties or Child Care Centers within 1,320' of the Oil and Gas location and therefore a Rule 305.a.(4) certification has not been provided with the submittal of this application.
Property Line 1' S of the Cecil USX A01-65-1HN well is the same surface owner.
Property Line 66' S of the closest piece of equipment (Oil Tanks).

Objective Criteria memo attached.

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

Signed: _____ Date: 11/19/2019 Email: stephany.olsen@nblenergy.com

Print Name: Stephany Olsen Title: Regulatory Analyst

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ Director of COGCC Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

COA Type

Description

Best Management Practices

No	BMP/COA Type	Description
1	Planning	COGCC Rule 803 Lighting Planning: • Lighting on the drill pad location is considered temporary and will be used during drilling/recompletion activities. Permanent lighting may be installed and utilized at the production facility during normal production operations. Lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and Building Units within 1,500 feet. Lighting will be on timers or turned off when practical, i.e., no operations being conducted.
2	Traffic control	COGCC Rule 604.c.(2)D. Traffic Plan. Traffic Control: Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000' of occupied residences on Weld County Road 61, and on lease roads as necessary in cooperation with the county.

3	General Housekeeping	<p>Type: General Housekeeping</p> <p>Housekeeping consists of neat and orderly storage of materials and fluids. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance is limited to fueling and lubrication of equipment. Drip pans are used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials is conducted at the end of each work day. Cleanup consists of patrolling the roadway, access areas, and other work areas to pickup trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.</p>
4	Storm Water/Erosion Control	<p>Type: Sensitive Area for Water Resources</p> <p>Grading and drainage of the facility-pad were engineered with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad's perimeter diversion channel and then directly into the sediment-trap structure to protect irrigation borrow-ditches in proximity to the multi-pad.</p>
5	Material Handling and Spill Prevention	<p>COGCC Rule 604.c.(2)F. Leak Detection Plan</p> <p>Material Handling and Spill Prevention:</p> <ul style="list-style-type: none"> • Noble Energy Inc. designed well heads and supporting infrastructure on the well pad to avoid releases and to be compliant with all regulations specific to leak detection and control (i.e. SPCC 40CFR112). Daily, monthly and annual inspections are performed at each well pad to confirm operational integrity and regulatory compliance. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
6	Dust control	<p>COGCC Rule 805.c Fugitive Dust Planning:</p> <p>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.</p>
7	Construction	<p>COGCC Rule 604.c.(2)G. Berm construction.</p> <p>Construction:</p> <ul style="list-style-type: none"> • Berms or other secondary containment devices in Designated Setback Locations have been constructed around crude oil, condensate, and produced water storage tanks and shall enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Secondary-containment construction includes the installation of a contiguous spray liner installed and underlaying the entire tank battery, then anchored into the steel-walled containment berms. Berms, liner or other secondary containment devices shall be sufficiently impervious to contain any spilled or released material. All berms and containment devices are currently inspected at regular intervals and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel. Refer to American Petroleum Institute Recommended Practices, API RP - D16.
8	Construction	<p>COGCC Rule 604.c.(2)S. Access roads.</p> <p>Construction:</p> <ul style="list-style-type: none"> • At the time of construction, all leasehold roads were constructed to accommodate local emergency vehicle access requirements and are maintained in a reasonable condition. The access road was constructed from WCR 61.

9	Construction	<p>Standard Produced Water Vault Construction</p> <p>Type: Construction</p> <p>1. A contiguous spray liner was installed and underlays the entire tank battery. The location of a partially buried cement water vault will be excavated prior to liner install.</p> <p>2. A 60 bbl cement water vault is utilized to collect excess produced water from oil tanks. Produced water in the vault is removed as needed and disposed of in an approved UIC disposal well. The cement water vault is one piece with no seams designed to minimize potential for leaks. All piping associated with the use of the water vault will be aboveground and visually inspected on a regular basis.</p> <p>3. The partially buried cement water vault has been installed above a spray in liner.</p> <p>4. A sized steel secondary containment ring is installed surrounding the entire tank battery. Sand and gravel bedding will be installed to protect the liner prior to placing equipment in the containment area.</p>
10	Noise mitigation	<p>COGCC Rule 604.c.(2)A. Noise.</p> <p>Noise Mitigation:</p> <ul style="list-style-type: none"> • Permanent facility – Sound walls are to be utilized around compressors if they should be located at the Cecil USX A Production Facility. These sound walls will be utilized to block sound to the residence located southwest of the facility.

Total: 10 comment(s)

Attachment Check List

<u>Att Doc Num</u>	<u>Name</u>
402152355	FORM 2A RESUBMITTED
402235776	FORM 2A REJECTED
402242476	FACILITY LAYOUT DRAWING
402250975	OBJECTIVE CRITERIA REVIEW MEMO

Total Attach: 4 Files

General Comments

<u>User Group</u>	<u>Comment</u>	<u>Comment Date</u>
OGLA	<p>This Form 2A was returned to Draft for the following reasons:</p> <p>1) Location was constructed prior to the WOGLA permit Process, but check box was marked indicating that an application had been filed with the local government with jurisdiction to approve the siting of the proposed oil and gas Location.</p> <p>2) The Form 2A meets one or more Objective Criteria. The application will not be determined to be complete until the applicant provides a stand-alone attachment that lists the applicable Objective Criteria and all Best Management Practices included in the permit to address the Objective Criteria and demonstrate that the approval of this application is protective of public health, safety, and welfare and the environment, including wildlife resources. An attachment was provided; however, the attachment did not include all of the specific BMPs to address the Objective Criteria.</p> <p>Updated Information was provided on 11/25/2019.</p>	11/27/2019

<p>OGLA (Rejected)</p>	<p>This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is rejecting this application consistent with the Rejection Process – Form 2 and 2A (May 21, 2019) posted in the Form 2 and Form 2A Instructions section of our website. In compliance with § 24-65.1-108(1), C.R.S., the COGCC is returning this application to the applicant to remedy the deficiencies. The applicant may resubmit this application for COGCC review; upon determination of completeness for any resubmitted application, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review.</p> <p>In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary prior to determination of completeness:</p> <ol style="list-style-type: none"> 1.The Local Government Information is incorrect. Noble Energy has indicated Weld County does not regulate the siting of this Oil and Gas Location as it was constructed prior to the WOGLA process, yet have also indicated a 1041 WOGLA application has been filed and the disposition of the WOGLA is waived. Please correct the Local Government Information. 2.The Noise mitigation BMP and Siting Rationale indicates there is a sound wall around compressors. The Facility Layout Drawing identifies this sound wall; however, the compressor is not identified on the Facility Layout Drawing nor in the Facilities section of the Form 2A. If this compressor is still present, it should be identified on both the Facility Layout Drawing and in the Facilities section. 3.As this oil and gas location is on irrigated cropland, the Plant Community section of the Form 2A should not be filled out. 4.Noble has provided numerous BMPs that are written as if this is a new location, no construction has occurred, wells are still to be drilled, and production facilities are still to be constructed. This is not the case. The location has been constructed and the wells have been drilled. Therefore, only BMPs that address the current ongoing production operations should be included on this Form 2A. At a minimum, BMPs to address nuisance noise, dust, light, and odor mitigation for the currently ongoing production phase of operations, a Leak Detection Plan BMP, a Berm Construction BMP, a Traffic Plan/Access Road BMP, a General Housekeeping BMP, a BMP that describes how the buried produced water vaults was installed, and a Storm water/Erosion Control BMP should be provided. 5.Noble Energy has included an Operator Comment on the Submit tab that states “Noble provided written remarks in response to this issue to Commission Staff on September 3, 2019, and the location is included in the AOC for Docket No. 190600392. Noble Energy in submitting this application to Amend Location ID: 426897. This location is already constructed and the wells have been drilled and completed.” This does not adequately describe why this Form 2A is being submitted. Anyone reviewing this Form 2A will be confused as to why this Form 2A is being submitted if it has already been constructed and the wells have been drilled and completed. Please provide additional detail in the Operator Comment as to why this location is being Amended and also indicate no new wells or construction is being proposed as part of this Amended Form 2A. 6.This Form 2A application meets one or more Objective Criteria. This application will not be determined to be complete until the applicant provides a stand-alone attachment that lists the applicable Objective Criteria and all Best Management Practices included in the permit which address the Objective Criteria and demonstrate that the approval of this application is protective of public health, safety, and welfare and the environment, including wildlife resources. 	<p>11/11/2019</p>
<p>OGLA</p>	<p>This form has passed completeness.</p>	<p>10/07/2019</p>

Total: 3 comment(s)

Public Comments

The following comments were provided by members of the public and were considered during the technical review of this application.

<u>No.</u>	<u>Comment</u>	<u>Comment Date</u>
1	https://climateinvestigations.org/shell-oil-climate-documents/	10/27/2019

Total: 1 comment(s)

RE-SUBMITTED