

Objective Criteria Review Memo – Noble Energy Inc's A 35-13 Pad Form 2A #402092805

This summary explains how COGCC staff conducted its technical review of the Noble Energy A 35-13 Pad location, Form 2A #402092805 within the context of SB 19-181 and for the required Objective Criteria. This Form 2A permit application met the following Objective Criteria:

OBJECTIVE CRITERIA MET

1. (Criteria #1) The Location lies within 1,500 feet of a Building Unit (nine Building Units are within 1,500 feet).
2. (Criteria #5.c) The Location lies within a Sensitive Area for water resources (the location is within an area of potential shallow groundwater).

COGCC staff met with the Director to discuss whether the Objective Criteria were sufficiently addressed and whether the Form 2A could be approved with the proposed Best Management Practices (BMPs) and applied Conditions of Approval (COAs). The following sections provide details regarding the evaluation of each criterion.

Criteria #1: Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area ("UMA") and Large UMA Facility ("LUMAF") locations

Site Specific Description of Applicability of Criteria #1: Based on the technical review and desktop evaluation, staff identified nine Building Units within 1,500 feet of the Oil and Gas Location. Two Building Units to the north, two to the south, and five to the southwest. The nearest Building Unit is approximately 330 feet to the south of the proposed Oil and Gas Location, across Weld County Road 62.

Site Specific Measures to Address Criteria #1: Noble Energy has indicated that they have contacted all nine Building Unit owners within 1,500 feet. Noble Energy has indicated on the Form 2A that the concerns expressed by the Building Unit owners included dust, light and noise. Noble Energy has indicated they plan to work with Weld County to ensure dust mitigation along County Road 62 east and west of County Road 57 prior to construction and throughout the drilling and completion process. Noble Energy will construct sound walls no less than sixteen feet tall to mitigate light and noise from operations. Noble Energy has included dust, light, noise, and odor mitigation BMPs on the Form 2A. Noble Energy has also included a BMP indicating they will send out the COGCC Fact Sheet that summarizes the recent CDPHE Health Study to all Building Unit occupants within 2,000 feet of the location.

Criteria #1 Summary: Noble Energy has sent out notices to all Building Unit owners and residents within 2,000 feet of the location. KMG has also provided BMPs for avoiding or minimizing impacts to the public health, safety, and welfare of nearby residents from nuisance conditions.

Criteria #5.c: Oil and Gas Locations within a Sensitive Area for water resources

Site Specific Description of Applicability of Criteria #5.c: The Form 2A indicates the estimated depth to groundwater is 12 feet.

Site Specific Measures to Address Criteria #5.c: Noble Energy provided a BMP indicating they will use liners and containment berms to mitigate any spills during drilling and completion activities and a Leak Detection Plan BMP once the wells are producing. There are no tanks or separators proposed for this location.

Criteria #5.c Summary: Noble Energy has provided BMPs for minimizing impacts to shallow groundwater.

Director Determination: Based on the Objective Criteria review, the Director has determined that this permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.