

Objective Criteria Review Memo – Noble Energy Inc's Cecil USX A 01-65-1HN Form 2A #402152355

This summary explains how COGCC staff conducted its technical review of the Noble Energy Cecil USX A 01-65-1HN location, Amended Form 2A #402152355 within the context of SB 19-181 and for the required Objective Criteria. This Amended Form 2A permit application was submitted as part of the required Corrective Action for a Notice of Alleged Violation issued against Noble Energy due to an overbuild of the permitted location. This location has already been constructed, the wells have all been drilled, and no new oil and gas activity is being proposed by this Amended Form 2A. This Oil and Gas Location meets the following Objective Criteria -

1. (Criteria 1) The Location lies within 1,500 feet of a Building Unit (two Building Units are within 1,500 feet).
2. (Criteria 5c) The Location lies within a Sensitive Area for water resources (a borrow ditch is 12 feet to the east).

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 two Building Units within 1,500 feet of the Oil and Gas Location. The closest Building Unit is approximately 575 feet to the southwest of the Oil and Gas Location. The second Building Unit is approximately 800 feet to the southeast of the Oil and Gas Location.

Site Specific Measures to Address Criteria 1: As this location has already been constructed, the wells have all been drilled, and no new oil and gas activity is being proposed, only those site specific measures related to ongoing production operations are included on this Amended Form 2A. These include BMPs to address Lighting impacts, Noise mitigation, and Odor mitigation.

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

Site Specific Description of Applicability of Criteria 5c: The Amended Form 2A indicates a borrow ditch is 12 feet east of the proposed Oil and Gas Location.

Site Specific Measures to Address Criteria 5c: As this location has already been constructed, the wells have all been drilled, and no new oil and gas activity is being proposed, only those site specific measures related to ongoing production operations are included on this Amended Form 2A. These include BMPs to address Storm Water/Erosion Control, Leak Detection, Berm Construction, and buried produced water vault construction.

Determination: The Director determined that following the application of the additional analysis from the Objective Criteria, the permit application meets the standard for protection of public health, safety, welfare, the environment and wildlife resources set by SB 19-181.