

STATE OF
COLORADO

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

Requesting Additional Information: Noble Energy's A30-01 Pad (Form 2A Doc #402354497)

2 messages

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

Fri, Jun 5, 2020 at 2:33 PM

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

Cc: John Noto - DNR <john.noto@state.co.us>, "Garrison - DNR, Penny" <penny.garrison@state.co.us>, Missti Mason - DNR <missti.mason@state.co.us>

Julie & Craig,

ON HOLD: This application has been reviewed by COGCC staff and cannot be approved based on the information submitted; therefore, the COGCC is placing this form ON HOLD until additional information is received from the applicant.

In compliance with § 24-65.1-108(1), C.R.S., the COGCC is providing this written request for all additional information necessary for the COGCC to respond to this application. The applicant may provide all requested additional information to COGCC via email. Upon receipt of all requested information, the COGCC will have 60 days in which to approve, deny, or request all additional information necessary to complete the regulatory review. If the applicant no longer requires this application be approved, the applicant may request to withdraw the application.

In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:

- 1) The right to construct this location is indicated to be granted by a Surface Use Agreement. However, a copy of the executed SUA is not attached to the Form 2A. Please provide me with it and I will attach it to the Form 2A.
- 2) Noble Energy has indicated the distance to the nearest Building Unit is closer to both a well and production facility than the distance to the nearest Building. When this is the case, the distance to the nearest Building should be the same as the nearest Building Unit. Therefore, I will change the distance to the nearest Building to match the distance to the nearest Building Unit.
- 3) The Location Drawing indicates there is an Above Ground Utility 243 feet east of the nearest well and nearest production facility. However, the Cultural Setback Distance tab indicates the nearest well is 234 feet from a well and production facility. I suspect the Location Drawing is correct and the Cultural Setback Distance tab entry is a keystroke error. Please confirm the distance to the nearest Above Ground Utility.
- 4) In the Water Resources section Noble Energy has indicated the nearest water well (Permit #3631646A) is 436 feet from the proposed location. However, the Hydrology Map indicates no water wells were found within 1,000 feet of the location. If the Hydrology Map is correct it appears the water well used for the estimated depth to groundwater (Permit #293023-A) is the nearest water well. Please confirm the distance to the nearest existing water well.
- 5) Please confirm that the Health Study notices were sent out to all Building Unit owner/occupants within 2,000 feet. Also, please indicate if Noble received any responses from the Health Study notices.
- 6) Noble Energy has provided a Dust mitigation BMP that states "*Engineered sound walls no less than 16' tall will be used along the western, northern, southern and eastern sides for well pad A30-01 to mitigate dust impacts to these residences.*" Noble Energy has provided a Noise mitigation BMP that states "*Engineered sound walls no less than 16' tall will be used along the northern, eastern and eastern sides for well pad A30-01 to mitigate noise impacts to these residences.*" These two statements do not agree. Looking at where nearby Building Units are relative to this proposed location, it would seem that placing the engineered sound walls on all four sides (as indicated in the Dust mitigation BMP) would be most

prudent. Please revise the Noise mitigation BMP to be more protective of the nearby homes and agrees with what is stated in the Dust mitigation BMP.

This request for additional information stops the statutory 1041 60-day clock for the COGCC's review. The COGCC will resume review of the Form 2A upon receipt of all required information and the COGCC review will be conducted within 60 days. Noble Energy is under no obligation to respond to this email; the Form 2A will remain ON HOLD, with all data and attachments intact, until Noble Energy provides COGCC with all necessary requested information. Noble Energy may request the Form 2A be withdrawn if that is preferred.

Please direct all questions or responses to me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



COLORADO
Oil & Gas Conservation
Commission
Department of Natural Resources

303.894.2100 Ext. 5180
1120 Lincoln St., Suite 801, Denver, CO 80203
doug.andrews@state.co.us | <http://cogcc.state.co.us/>

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

Mon, Jun 8, 2020 at 1:13 PM

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

Cc: John Noto - DNR <john.noto@state.co.us>, "Garrison - DNR, Penny" <penny.garrison@state.co.us>, Missti Mason - DNR <missti.mason@state.co.us>

Good afternoon Doug,

Please see my reply to your questions below. Please let me know if you have any additional questions.

Thank you,

Julie Webb

Senior Regulatory Analyst

Progressive Consulting

c: (616) 813-5063

e: jwebb@progressivepcs.net

e: Julie.webb@nblenergy.com

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From: Andrews - DNR, Doug <doug.andrews@state.co.us>
Sent: Friday, June 5, 2020 2:34 PM
To: Regulatory Notification <RegulatoryNotification@nblenergy.com>; Denver Regulatory <DenverRegulatory@Nblenergy.com>
Cc: John Noto - DNR <john.noto@state.co.us>; Garrison - DNR, Penny <penny.garrison@state.co.us>; Missti Mason - DNR <missti.mason@state.co.us>
Subject: EXTERNAL: Requesting Additional Information: Noble Energy's A30-01 Pad (Form 2A Doc #402354497)

Julie & Craig,

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In addition to all standard required information and attachments, the COGCC hereby confirms the following information is necessary for review:

1) The right to construct this location is indicated to be granted by a Surface Use Agreement. However, a copy of the executed SUA is not attached to the Form 2A. Please provide me with it and I will attach it to the Form 2A.

[Attached is the SUA.](#)

2) Noble Energy has indicated the distance to the nearest Building Unit is closer to both a well and production facility than the distance to the nearest Building. When this is the case, the distance to the nearest Building should be the same as the nearest Building Unit. Therefore, I will change the distance to the nearest Building to match the distance to the nearest Building Unit.

[Thank you for making this update.](#)

3) The Location Drawing indicates there is an Above Ground Utility 243 feet east of the nearest well and nearest production facility. However, the Cultural Setback Distance tab indicates the nearest well is 234 feet from a well and production facility. I suspect the Location Drawing is correct and the Cultural Setback Distance tab entry is a keystroke error. Please confirm the distance to the nearest Above Ground Utility.

[The correct distance is 243'. Thank you for making this update.](#)

4) In the Water Resources section Noble Energy has indicated the nearest water well (Permit #3631646A) is 436 feet from the proposed location. However, the Hydrology Map indicates no water wells were found within 1,000 feet of the location. If the Hydrology Map is correct it appears the water well used for the estimated depth to groundwater (Permit #293023-A) is the nearest water well. Please confirm the distance to the nearest existing water well.

Well receipt #3631646A appears to be for a well construction application that was never drilled and never assigned a well Permit# by the DWR, and shows the unlikely well location in the middle of the landowner irrigated field. Noble confirmed that Permit #293023-A is the nearest water well (Domestic) located 885' NW of the edge of pad disturbance. The Hydrology Map is correct; the distance to Well Permit #293023-A is greater than the 1000' buffer, as measured from the reference well for the A30-01 pad.

5) Please confirm that the Health Study notices were sent out to all Building Unit owner/occupants within 2,000 feet. Also, please indicate if Noble received any responses from the Health Study notices.

The health study notice was sent to all building units within 2000'. We have not received any comments.

6) Noble Energy has provided a Dust mitigation BMP that states "*Engineered sound walls no less than 16' tall will be used along the western, northern, southern and eastern sides for well pad A30-01 to mitigate dust impacts to these residences.*" Noble Energy has provided a Noise mitigation BMP that states "*Engineered sound walls no less than 16' tall will be used along the northern, eastern and eastern sides for well pad A30-01 to mitigate noise impacts to these residences.*" These two statements do not agree. Looking at where nearby Building Units are relative to this proposed location, it would seem that placing the engineered sound walls on all four sides (as indicated in the Dust mitigation BMP) would be most prudent. Please revise the Noise mitigation BMP to be more protective of the nearby homes and agrees with what is stated in the Dust mitigation BMP.

Noble concurs, please correct Noise Mitigation language to the following: *Engineered sound walls no less than 16' tall will be used along the western, northern, southern and eastern sides for well pad A30-01 to mitigate noise impacts to these residences.*

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Please direct all questions or responses to me. Thank you.

Doug Andrews

Oil & Gas Location Assessment Specialist - Northeast Colorado



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Commission
Department of Natural Resources

[Quoted text hidden]

 **205271_A.DUCK_AMENDMENT TO SUA AND GRANT OF EASEMENT_GERALD LEE**
ROTH_Amendment_20200210.pdf
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