

## **Response to August 5, 2020 Inspection Document Number 697501850**

COGCC conducted an inspection of the Centralized Land Treatment Facility location (Location ID 287848) on August 5, 2020 (Document 697501850). During that inspection, COGCC made the following observations:

1. Signs/Marker: Inaccurate Operator signs were observed. Refer to the attached inspection photos. Install/remove signs to comply with Rule 210.c.

Response: Noble removed inaccurate operator signs and installed correct signage.

2. Good Housekeeping: A portion of the western perimeter fence has a breach and an open gate entry which is not controlling public access. Per Rule 908.b.(5)C., the facility shall be designed to control public access, prevent unauthorized vehicular traffic, provide for site security both during and after operating hours, and prevent illegal dumping of wastes. Appropriate measures shall also be implemented to prevent access to the centralized facility by wildlife or domestic animals. Comply with Rule 908.b.(5)C.

Response: Noble repaired the breach in the western perimeter fence and installed a chain link and lock on the gate to control public access.

3. Interim Reclamation: At the time of this inspection, the facility is not in compliance with noxious weed management. Three (3) observed List B Colorado noxious weed species were observed- Leafy spurge, Scotch thistle and Musk thistle. Scotch and Musk thistle have already flowered. Seeds start to propagate two weeks after flowering. Operator shall use BMPs to properly remove all the senescent thistles. Mowing would not be considered a proper BMP as that would likely aid in the dispersal of seeds. Leafy spurge appears to be nearing the seed set growth stage. Note: Operator will have to conduct additional reclamation activities the next favorable season, as a weedy, annual List C noxious weed, cheatgrass, dominates the majority of the vegetated facility. Comply with Rule 1003.f.

Response: Noble sprayed the facility to manage the noxious weeds. Additional reclamation activities have been proposed to be scheduled for the next favorable season.

4. Storm Water: Unmanaged stormwater run-on was observed at the main point of access to the facility and unmanaged stormwater run-off was observed along the southern facility. Comply with Rule 908.b.(5)E and Rule 1002.f.(2)C.

Response: Noble installed a cattle guard with riprap on the endpoints at the main point of access for the facility. Additionally, Noble re-cut and increased location ditch size to restore stormwater control.

Name: Centralized Land Treatment Facility

Location ID: 287848

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1. Signs/Marker: Inaccurate Operator signs were observed. Refer to the attached inspection photos. Install/remove signs to comply with Rule 210.c.

**COGCC – 08/05/2020**



Photo 2. Photo taken from the main point of access to the facility, facing South. Photo illustrates an inaccurate sign. Other inaccurate signs were observed.

**Noble Energy – 08/21/2020**



Photo NBL1. Inaccurate signage removed and proper signage installed, facing South.

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**COGCC – 08/05/2020**



Photo 3. Photo taken from the main point of access to the facility, facing West. Photo illustrates unmanaged stormwater run-on onto the facility. Note: There was stormwater run-off from the southern facility.

**Noble Energy – 08/21/2020**



Photo NBL2. Main point of access to the facility, facing West, shown with lock, cattle guard, and riprap on endpoints of cattle guard.



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**COGCC – 08/05/2020**



Photo 4. Photo taken from the western facility, facing West. Photo illustrates the perimeter fence has a breach to control public access.

**Noble Energy – 08/21/2020**



Photo NBL3. Breach in perimeter fence has been repaired to control public access, facing West.



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**COGCC – 08/05/2020**



Photo 5. Photo taken from the western facility, facing West. Photo illustrates the perimeter fence entry is open.

**Noble Energy – 08/21/2020**



Photo NBL4. Perimeter fence chain linked and locked to control public access, facing West.



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**COGCC – 08/05/2020**



Photo 6. Photo taken from the northeastern detention pond located along the western boundary of the facility, facing North. Photo illustrates a List B Colorado noxious weed, Leafy spurge.

**Noble Energy – 08/21/2020**



Photo NBL5. The northeastern detention pond along the western boundary of the facility, facing North, shown with noxious weeds that have been sprayed/killed.