

**Objective Criteria Review Memo ADDENDUM - Noble Energy Inc
Roth A32-790 -- Form 2 Application for Permit to Drill (APD) Doc# 402406002**

**Approved Form 2A Oil & Gas Location Assessment (A30-01 Pad Doc# 402354497, approved 7/24/2020)
Location ID# 477361**

The Form 2A for this Oil & Gas Location was reviewed for all six wells proposed for this Location. COGCC's technical review of the 2A and all six APDs included review within the context of SB 19-181 and the required Objective Criteria. Objective Criteria Review Memo, Doc# 2479397, is in the Location's file in COGCC's database. This Addendum provides additional information regarding the delayed approvals of the six APDs permitted at this Location.

Delayed Approval of APDS:

The Form 2A was approved on 7/24/2020. These APDs did not pass Completeness until 9/16/2020.

The Objective Criteria Review Memo for this location (Doc# 2479397) identified that this location met Criteria #1 for being located within 1500' of seven building units & Criteria #5c for being located 26' from an irrigation ditch. The Objective Criteria Review Memo identified BMPs on the Form 2A that should successfully mitigate against the impacts identified by meeting Criteria #1 & #5c, including:

Criteria 1

Noble provided BMPs to mitigate being located within 1500' of seven building units: fugitive dust control measures; lighting will be directed downward, inward, and shielded; permanent lighting will not be installed; a sound survey to determine sound wall construction on western, northern, southern and eastern sides of the well pad; lower BTEX oil-based mud; and freshwater MLVT to reduce truck trips.

Criteria 5c

Noble provided BMPs to mitigate being located in a sensitive area for water resources: stormwater management controls, a leak detection plan, no drilling pits, pad constructed from clay and road base, and the use of geosynthetic liner under the drilling rig and within tank containment. Additionally, notification letters, which included a fact sheet on the CDPHE Oil & Gas Health Study, were sent to all Building Unit owners within 2,000 feet of the location.

Based on this analysis, the Operator is complying with the existing BMP's and COA's on the approved Form 2A to address the Objective Criteria that were met during the original review of the Form 2A and no further Sundry or Memo is necessary at this time. The APD's IN PROCESS should be passed and sent to Final Approval with the following comment:

COGCC conducted the technical review for the related Oil and Gas Location Assessment permit, Form 2A document #402354497 under the statutory authority provided through SB 19-181, including the Objective Criteria. The Director approved the Form 2A on 7/24/2020, establishing Location ID #477361 subject to conditions included in the permit. The well proposed by this related Form 2 was

contemplated during COGCC's review of the Form 2A. The Objective Criteria Review Memo (Doc# 2479397) can be found in the document file for this Location.