

February 28, 2022

Ms. Julie Murphy, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

**RE: COGCC Rule 304.d.(2) Lesser Impact Area Exemption
WR OGD 1 - Oil and Gas Development Plan Application
A18-09 Pad - Section 18, Township 7 North, Range 64 West
Weld County, Colorado**

Dear Director Murphy,

Noble Energy, Inc. (Noble) has filed a Form 2A to the Colorado Oil and Gas Conservation Commission (COGCC) for the above referenced location. COGCC Rule 304.d. stipulates that the Director may exempt an Operator from submitting any of the information required by Rule 304.b or any plan required by Rule 304.c. Noble requests an exemption from the Director based on evidence showing the information or plan is unnecessary because (A) the impacted resource or resource concern is not present in the area; or (B) impacts to the resource will be so minimal as to pose no concern.

Form 2A Element	Geologic Hazard Plan
Resource Concern	Operator will submit a Geologic Hazard plan describing proposed mitigation measures if operator identifies any Geologic Hazards within a one-mile radius of the proposed Working Pad Surface.
Rule	304.b.(7)l., 304.b.(21)
Exemption Circumstance	Impacts to the resource will be so minimal as to pose no concern.
Description	Per the Colorado Geologic Survey (CGS), EG-14 Collapsible soils are present in the vicinity of the location. These soil types are prone to both water erosion and soil blowing. Noble will deploy dust mitigation measures provided in the Dust Mitigation Plan that will mitigate and minimize wind erosion. The grading and drainage design of the location, in addition to implementation of stormwater controls per Noble's Stormwater Management Plan, will mitigate and minimize water erosion. During pad construction, collapsible soils (if present) will be over excavated and throughout construction all soil will be moisture conditioned and compacted. Proper sloping and benching techniques will be adhered to in accordance with OSHA regulations and steep embankments will be avoided. Permanent facility equipment will be installed on deep-foundation elements consisting of helical piles. None of the identified soils within the area surrounding

the A18-09 well pad are considered a significant hazard to public health, safety, wildlife, or the environment.

Noble Energy contracted with SWCA Environmental Consultants to conduct an aquatic resources inventory for the A18-09 well pad location and the full report of this inventory is included in the Wildlife Protection Plan submitted as part of this OGD. As noted in this report, the well pad is not located within a 100-year floodplain and the nearest 100-year floodplain is associated with Lone Tree Creek, approximately 1,065' west of the proposed pad. Due to this distance and the fact that very limited equipment (e.g., no production equipment or tanks) will be located on the pad once the wells go into production, the risk from flooding at this location is expected to be very low.

Pursuant to COGCC Rule 304.d.(2), Operators may request an exemption from the Director in writing, without proceeding through the ordinary Rule 502 variance process. A request for an exemption will be provided with the Form 2A at the time the Form is submitted. This letter serves as the required exemption request.

If you should have any questions or require additional information, please do not hesitate to contact me at your earliest convenience at (303) 288-4232, or CDPNBLPermitting@nblenergy.com

Regards,
NOBLE ENERGY, INC.



Mosiah Montoya
Regulatory Compliance Manager