COLORADO
Oil & Gas Conservation Commission
Department of Natural Resources

DIRECTOR'S RECOMMENDATION

Noble Energy, Inc (Noble); Operator Number 100322. OGDP #1, OGDP ID #481728. Form 2C #402575855. Form 2As #402099017, #402118763, #402118768, #402118769, and #402121126. Form 2B #402653887, Docket #210900156

Pursuant to Rule 306, the Director submits to the Commission this recommendation for the Noble OGDP#1 located in Weld County.

BACKGROUND

On September 28, 2021, Noble filed a Form 2C, Oil and Gas Development Plan Certification, and all required components for an Oil and Gas Development Plan (OGDP) application with the Colorado Oil and Gas Conservation Commission (COGCC). Staff returned the five related Form 2As and the Form 2B to DRAFT status twice for the applicant to make corrections prior to the Director determining the application was complete on March 9, 2022. Revisions were coordinated between Staff and the applicant throughout the technical review process. This Director's Recommendation is based on information finalized in the five Form 2As, the Form 2B, and the hearing application as of June 10, 2022. No additional revisions will be made to the application prior to the Commission Hearing scheduled for June 20, 2022.

Background:
Noble submitted an application (Docket #191000612) for the "Wells Ranch" Comprehensive Development Plan (CDP) under the Commission's prior Rule 216 for consideration by the Commission in 2019. The Commission approved the CDP and issued Order 1-241 on March 25, 2020. Of note, Order 1-241 directed Noble to withdraw all pending Form 2As and 2s for the CDP lands, and submit oil and gas development applications after the Commission promulgated the SB19-181 "Mission Change" rules. Noble submitted this OGDP #1 application as the first of multiple OGDPs to be submitted subject to the approved CDP. Because of this unique permitting timeline, Staff has summarized relevant line items from the Order, and provided a brief explanation of our approach to reviewing the proposed OGDP:

- The CDP is effective for 10 years. Staff considers the CDP's expiration date to be March 24, 2030 unless otherwise ordered by the Commission. OGDP #1, if approved, will expire on March 24, 2030, unless otherwise ordered by the Commission.
- Noble was required to submit a plan for electrification of the Application Lands by September 25, 2021. This updated Plan and progress report was submitted to COGCC on May 12, 2021, and describes the difficulty Noble faces in establishing a CDP-wide electrification program. Specifically, Noble has not yet been successful in brokering an agreement between the two local service providers, Xcel Energy and the Poudre Valley Rural Electric Association (PVREA), that would likely be necessary to extend service into the Wells Ranch CDP lands. Currently, CDP-wide electrification has not been established, although Noble affirms that the A07-08 Production Facility proposed in this

OGDP application will be electrified. Noble is continuing to work with the two individual utility companies in the Wells Ranch CDP area.

- The Commission conceptually approved the siting of 50 Oil and Gas Locations proposed within the Wells Ranch CDP. Staff considers this to be equivalent to current Rule 314.e.(11)'s "preliminary siting approval". However, the Order clearly states that there is no right or guarantee that any such Location will be approved by the Commission upon Staff's technical review of the Form 2A(s).

Noble OGDP #1 Proposed Development:

Noble's proposed OGDP #1 includes Application Lands in unincorporated Weld County of approximately 5,643 acres in Township 6 North, Range 64 West: portions of sections 5, 6, 7, 8, 9, 16, 17, 18, and Township 7 North Range 64 West, portions of sections 31 and 32. The setting is rural with mixed residential and agricultural land uses. The City of Greeley is approximately 2.5 miles to the southeast of the Application Lands. The OGDP includes the construction of five new oil and gas locations, four of which are well pads with a combined total of 36 new horizontal wells, and the fifth is a production facility that supports those four well pads. All fluids will be piped via three-phase flowlines from the well pads to the production location, where fluids will be separated and transported off location via a combined oil/water (combined liquids) pipeline and a gas pipeline. No liquids will be stored on the well pads or the production facility. The 36 proposed wells will develop approximately 5,643 acres of the 41,000-acre Wells Ranch CDP, or about 14% of the total CDP mineral area. Noble anticipates construction will start in the third quarter of 2024, drilling will start in the first quarter of 2025, and completions will start in the third quarter of 2025.

Surface Lands:

The proposed Oil and Gas Locations are on FEE surface and inside the mineral development area. The Operator's right to construct is granted through Surface Use Agreements (SUA). The OGDP locations require approximately 52.3 acres of total new surface disturbance as follows:

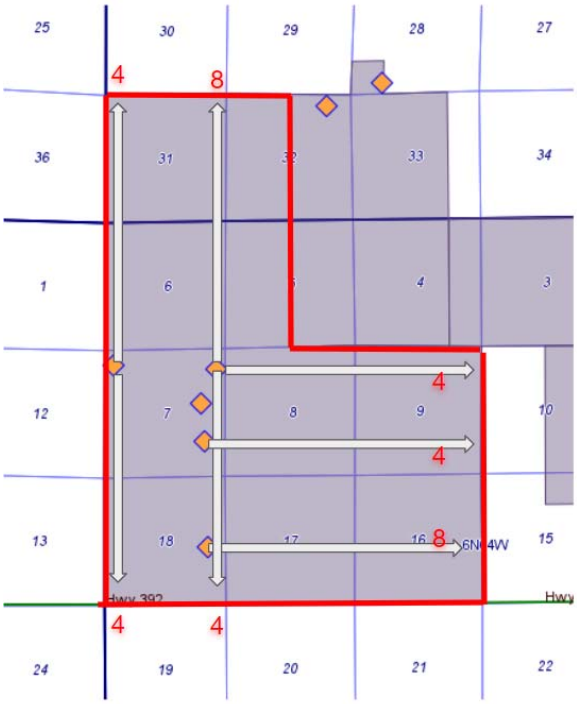
- Oil and Gas Location disturbance:
    - A18-09 well pad: 10.4 acres (approximately 7.0 acres for the Working Pad Surface (WPS)); interim reclamation will reduce the operational pad down to 3.0 acres. The access road is 0.8 acres of existing access road.
    - A07-04 well pad: 10.4 acres (approximately 7.5 acres for the WPS); interim reclamation will reduce the operational pad down to 2.2 acres. The access road is 0.07 acres of pavement making the total disturbed area 10.5 acres.
    - A07-01 well pad: 13.0 acres (approximately 8.9 acres for the WPS); interim reclamation will reduce the operational pad down to 5.9 acres. An additional 0.8 acres of new disturbed area for an access road in addition to the 0.5 acres of existing access road for a total disturbed area of 13.8 acres.
    - A07-23 well pad: 8.4 acres (approximately 5.1 acres for the WPS); interim reclamation will reduce the operational pad down to 2.0 acres. The access road will be 1.18 acres of additional disturbed area for a total of 9.5 acres.
    - A07-08 Production Facility: 6.2 acres (approximately 3.3 acres of WPS); the pad will not be reduced for interim reclamation as it is production only. An additional

disturbance of 0.8 acres for the access road for a total of 7 acres of new disturbance.

Mineral Development:

Noble is requesting the development of FEE and STATE minerals from the Niobrara, Fort Hays, Codell, and Carlile formations as follows:

- The modification of four existing drilling and spacing units (DSUs) covering approximately 5,643 total acres;
    - Order 407-2958, (all of sections 7 and 18, 6N64W), approximately 1,222.8 acres for the development of up to 16 horizontal wells, with no more than 9 from the Codell formation. Four wells from the A07-04 pad and four wells from the A07-01 pad will produce this DSU.
    - Order 407-2959, (all of sections 8 and 9, 6N64W), approximately 1,280 acres for the development of up to 16 horizontal wells, with no more than 10 from the Codell formation. Four wells from the A07-01 pad and four wells from the A07-23 pad will produce this DSU.
    - Order 407-2960, (all of sections 16 and 17, 6N64W), approximately 1,280 acres for the development of up to 16 horizontal wells, with no more than 10 from the Codell formation. Eight wells on the A18-09 pad will produce this DSU.
    - Order 407-2963, (all of section 6 and W½ of section 5, 6N64W AND all of section 31 and W½ of section 32, 7N64W), approximately 1,864.52 acres for the development of up to 16 horizontal wells, with no more than 14 from the Codell formation. Four wells on the A07-04 pad and eight wells from the A07-01 pad will produce this DSU.



- The existing approved DSUs allow for more wells than what Noble is seeking in this OGDP. If Noble wishes to develop any of these DSUs to their full well count, an amended OGDP and amended Form 2A will be required to increase the allowable well count in the OGDP/Form 2A.
- These DSUs are part of the Noble Wells Ranch CDP. Each of these DSUs contemplated the following setbacks within the interior boundaries of the Wells Ranch CDP such that the treated interval of any well drilled within a DSU or wellbore spacing unit within the interior boundaries of the Wells Ranch CDP shall be:

    - no closer than 200 feet from the unit boundary at the heel and toe of each well;
    - no closer than 300 feet from the unit boundary on each lateral side of a well;
    - an inter-well setback of not less than 150 feet from the treated interval of a well producing from the Niobrara and Codell Formations.
- The setbacks and interwell boundaries were not finalized at the time of the CDP approval, only contemplated. This application seeks to modify the established DSUs to finalize the initially contemplated setbacks and interwell boundaries.
- There are numerous existing (mostly vertical and directional) wells producing or permitted to produce the Niobrara, Fort Hays, Codell, and Carlile formations, or portions thereof, within the application lands and within the proposed DSUs boundaries; those wells will remain subject to their originally permitted spacing, and are not included in the proposed DSU modifications or this OGDP.
- STATE minerals within the application lands are all of Section 16 6N64W.

This spacing complies with applicable COGCC rules.

COGCC Staff Analysis of Timing and Mineral Development: Staff appreciates that Noble is utilizing existing DSUs for this OGDP rather than requesting the creation of additional overlapping DSUs. The unit setbacks that are requested to be established in the hearing application are appropriate and supported by Engineering testimony, and eliminate the need for individual wellbore spacing units.

Financial Assurance:
Staff confirmed that Noble has a valid blanket plugging bond on record consistent with Rule 702.

LOCAL GOVERNMENT PERMITTING AND PRE-APPLICATION CONSULTATIONS

Relevant Local and Proximate Governments:
Weld County is the Relevant Local Government (RLG) for all five proposed Locations. There are no other local governments within 2,000 feet of the five proposed Locations.

Pre-Application Consultation and Permitting with Weld County:
Noble submitted a WOGLA application for a Weld County Comprehensive Drilling Plan (CDP) on October 29, 2019. The CDP hearing took place on December 12, 2019 and Weld County subsequently approved the CDP on January 8, 2020. The approved WOGLA (#1041WOGLA19-0042 CDP) included forty-four (44) separate oil and gas locations within the CDP lands. Noble will submit a Location-specific WOGLA application for each proposed Location no less than 45 days and no more than 6 months prior to operations of the individual locations.

Consultation with Colorado Parks and Wildlife:
While no formal Colorado Parks and Wildlife (CPW) consultation was required by rule, Noble engaged an informal consultation with CPW staff to discuss potential operational or resource-related concerns that CPW may have with the five locations within OGDP #1. Four locations (A18-09, A07-04, A07-23, and A07-08) are within proximity of wetlands or immediately upgradient of wetland/riparian corridors. In addition, four locations provide for the possibility of chemical storage sited within 500 feet of wetlands [Rule 1202.a.(3)]. The CPW consultation process resulted in the following actions:

1. At CPW's request, Noble conducted a formal wetland delineation by a Professional Wetland Scientist, and received a wetlands assessment map for the five locations to understand the site context as attached to the Wildlife Plan;
2. CPW staff reviewed Noble's proposed stormwater BMPs and found the measures adequate to protect against potential adverse impacts as they relate to wildlife;
3. During the wetlands delineation, it was determined the Location A07-01 was greater than 500 feet from a wetland or riparian area and did not require a waiver;
4. CPW provided a waiver for Rule 1202.a.(3) for locations A07-04, A07-08, A07-23, and A18-09, to allow Noble to store chemical totes within 500' of a wetland; this waiver is not formally granted unless the Commission approves the Form 2A documenting this relief. (Please see CPW Waiver attachment on Form 2As.)

Consultation with Colorado Department of Public Health and Environment:
The Colorado Department of Public Health and the Environment (CDPHE) initiated consultation with the Director on March 10, 2022 pursuant to Rule 309.f.(1).C. CDPHE provided their Consultation to the COGCC on March 30, 2022. For all five locations, CDPHE provided two recommendations for Conditions of Approval: 1) the requirement that Noble use electric drilling rigs; and 2) the requirement that Noble use group III drilling fluid and a chiller to cool drilling fluid as it is piped through the recirculation system. In response to CDPHE's recommendation and Noble's response, Staff offered modified COAs (please see the "Administrative Considerations/Conditions of Approval" section below). See the CDPHE Consultation attachment on the Form 2As, Noble's response to the CDPHE Consultation (attached as "Other" on the Form 2As), and COGCC's Response to CDPHE Consultation (included in the Director's Recommendation and also attached to each Form 2A).

PUBLIC COMMENTS

Pursuant to Rule 303.d.(1).A.ii, the public comment period was open for 30 days from March 10, 2022 through April 9, 2022. No public comments were received for this OGDP.

ADMINISTRATIVE CONSIDERATIONS

Lesser Impact Area Exemption Request Summary:
Noble initially did not provide a Geologic Hazard Plan although the Geologic Hazard Maps attached to the five 2As identified a floodplain and collapsible soils within the one-mile radius of the WPS of each Location. Staff requested Noble submit for each Location either a Geologic

Hazard Plan or a Lesser Impact Area Exemption pursuant to Rule 304.d. In response to Staff's request, Noble provided a Lesser Impact Area (LIA) exemption request for the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed Locations, as well as a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA exemption request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property. The LIA exemption request remains attached to the Form 2A, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.

Conditions of Approval:

COA Topic #1 - Based on the two recommendations from CDPHE, and in consideration of Noble's responses to CDPHE's consultation, staff placed the following COAs on the four well pad Form 2As:

1) *Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig.*
2) *Operator will use group III drilling mud.*

See the "COGCC Response to CDPHE Consultation Recommendations" included in this Director Recommendation for details.

COA Topic #2 - Staff found that the well pad Form 2A Noise Mitigation Plans were insufficient to determine compliance with allowable noise levels at the proximal RBUs. Staff applied the following COAs to the four well pad Form 2As:

> *Prior to commencing construction, Operator will submit via Form 4 Sundry Notice, and obtain approval of, an updated Noise Mitigation Plan that includes: 1) a third Noise Point of Compliance to represent the RBUs that are SSW of the location; 2) the ambient noise survey used to modify allowable noise levels through Rule 423.d; 3) a BMP that specifies the noise limits that are adjusted based on ambient noise levels through Rule 423.d. This is to be provided for any individual Noise Point of Compliance with an adjusted noise limit.*

In addition, on the A07-04 wellpad Location, staff had concerns that Noble's sound wall BMP was insufficient to provide adequate noise mitigation to the RBUs within 2,000 feet of the WPS. Staff added the following COA:

> *Operator will extend the sound wall, of at least 32 ft. height, from the northeast corner of the working pad surface south so that it runs along the northern 3/4 of the eastern side of the working pad surface. Gaps for egress, airflow, etc. are allowable.*

COA Topic #3 - The A07-08 Facility is situated in proximity (approximately 46 feet upgradient) to a mapped floodplain. In the event the Location is inadvertently overbuilt or otherwise

encroaches into the floodplain, additional Commission Rules will apply that require possible equipment changes, additional BMPs, construction or operational changes. To ensure the Location is built consist with Noble's proposed plan, Staff applied the following COA to the A07-08 Form 2A:

> *Upon completion of construction of this Location, operator will submit via Form 4 Sundry a professional field-surveyed diagram of the constructed Location, to include annotation of the shortest measured distance between the floodplain and the disturbed area of the Location.*

Colorado Parks and Wildlife (CPW) Waiver of Rule 1202.a.(3):
CPW staff provided a waiver of Rule 1202.a.(3) for four of the five proposed Locations (see CPW Waiver attached to the Form 2As). The waiver allows Noble to situate staging, refueling, and chemical storage areas within 500 feet of the Ordinary High Water Mark (OHWM) of any river, stream, lake, pond, or wetland. CPW's waiver is effective only upon Commission approval of the Form 2A. Please note that Staff is in agreement with CPW's waiver on three of the four proposed Locations, but opposes the waiver on the A07-08 Production Facility Location. Please see the Wildlife Resources Consideration section of this Recommendation for Staff's discussion of the CPW waivers.

COGCC STAFF'S TECHNICAL REVIEW HIGHLIGHTS

This section addresses issues related to siting, public health, safety, welfare, the environment, and wildlife resources, within the context of SB 19-181 for the Noble OGDP#1.

Alternative Location Analysis (ALA)

The A07-04, A07-01, A07-23 Well Pads, and A07-08 Facility Pad meet the following Rule 304.b.(2).B ALA Criteria:

- 304.b.(2).B.i - within 2,000 feet of an RBU
- 304.b.(2).B.vii - upgradient of a wetland or riparian corridor

The A18-09 Well Pad meets the following 304.b.(2)B. ALA Criteria

- 304.b.(2).B.i - within 2,000 feet of an RBU

More substantive ALAs that looked at additional technically feasible alternative locations would have been preferred by Staff. Although the ALAs only explored the minimum required technically feasible alternative locations, Staff accepted the ALAs for the following reasons:

- The proposed locations are within the Wells Ranch Comprehensive Drilling Plan (CDP) which was approved by the Commission under Order #1-241 on March 25, 2020;
- The proposed locations are considered to have "preliminary siting approval" as described in the Order;

- Weld County conceptually approved some or all of the proposed locations during its local permitting process for the CDP;
- The location siting is only one component of the comprehensive plan which includes the infrastructure (oil and gas pipelines and production facilities), transportation/traffic plans and sequencing/timing of construction and operations;
- Noble obtained either an SUA or informed consent from all RBU owners/tenants within 500 feet of the A07-01, A07-04, A07-23, and A18-09 locations;
- The siting of these locations will be considered under Rule 604.b.(2) rather than 604.b.(4).

COGCC Staff Analysis of the ALAs: The unusual permitting timeline and "preliminary siting approval" of this OGDP makes the ALA review somewhat difficult for staff. Staff would have liked to see the four wells proposed on the A07-23 pad moved to the A07-01 pad, thus eliminating the need for the A07-23 Location. Staff would prefer future Wells Ranch CDP OGDPs have more robust ALAs that provide greater detail and thorough analyses.

Public Health, Safety, and Welfare Considerations

Noble's OGDP #1 consists of four well pads and one production facility. There are a total of 32 RBUs within 2,000 feet of the five locations; seven of those RBUs are within 2,000 feet of two Locations, and one of those RBUs is within 2,000 feet of three Locations. Noble held community meetings in the area and conducted outreach with the RBU occupants, including attempting to obtain informed consent from at least some of the RBU owners/tenants. Noble provided BMPs to address public health, safety and welfare considerations specific to the RBUs. Staff has reviewed those BMPs and included them on the Form 2As.

A summary of Noble's relevant minimization and mitigation measures for the proposed Locations includes:

1. The Locations will have remote monitoring and shut in capability.
2. Emissions: Noble is committed to a low odor VOC drilling fluid and closed loop system. The wellpad locations will not have separators or hydrocarbon storage on Location.
3. Noise: Noble will install 32-foot-high engineered sound walls partially around the well pads and will conduct sound surveys and monitoring during drilling and completions.
4. Lights: Lights will be pointed downward and angled away from off-site buildings. Sound walls will reduce off-site lighting trespass during pre-production phase. There will not be any permanent lighting at the Location
5. Dust: Noble will use speed restrictions, restriction of construction activity during high-wind days, silica dust controls, regular road maintenance, and the use of fresh water or magnesium chloride for dust suppressant.
6. Modular large volume tanks (MLVT) will be used for completions on each well Location to reduce truck traffic.

Since CDP-wide electrification has not yet been achieved, and in consideration of CDPHE's recommendations, Staff has added COAs to require Noble to use electric rigs or natural gas powered rigs in lieu of diesel, and to require the use of Group III drilling mud (please see the "Administrative Considerations/Conditions of Approval" section above).

The applicant is requesting approval of the A07-01, A07-04, A07-23 and A18-09 Well Pad Locations and the A07-08 Facility pursuant to Rule 604.b.(2).

Rule 604.b requires that no WPS will be located between 501 and 2,000 feet from a RBU unless one of four conditions are satisfied. Rule 604.b.(2) allows for a WPS to be located within 501 and 2,000 feet from an RBU if the location is within an approved Comprehensive Development Plan that includes preliminary siting approval. Noble seeks approval of four well pad Locations (A07-01, A07-04, A07-23, and A18-09) and the A07-08 Facility per Rule 604.b.(2). As described below, Noble has obtained signed letters of informed consent from several, but not all RBU owners/tenants, consenting to the location of the WPS less than 2,000 feet from the RBUs. Since Noble was unable to secure signed informed consent from all RBU owners/tenants, it is seeking approval of the five Locations pursuant to Rule 604.b.(2).

A07-01 Well Pad Form 2A Doc # 402118763

The proposed Location A07-01 is for 16 wells on dry land cropland. There are 13 RBUs within 2,000 feet of theWPS, with two RBUs being within 500 feet of the WPS (one Surface Owner RBU is 266 feet from the WPS and another, non-surface owner RBU is 374 feet from the WPS). The Surface Owner signed an SUA, and the non-surface owner consented to the proposed location of the WPS through a signed Informed Consent letter; this Location complies with Rule 604.a.(4).

Although Noble obtained signed consent for the proposed Location from two RBU owners via Informed Consent Letters, Noble did not obtain signed letters of informed consent from all 13 RBUs within 2,000 feet of the Location, and is seeking approval of this Location pursuant to 604.b.(2).

A07-04 Well Pad Form 2A Doc # 402121126

Proposed Location A07-04 is for eight wells on irrigated cropland. There are seven RBUs within 2,000 feet of the WPS. Two RBUs are within 500 feet of the WPS, the closest RBU being 297 feet from the WPS, and the other RBU being approximately 440 feet from the WPS. Both RBU owners provided their consent for the Location via signed Informed Consent letters which are attached to the Form 2A; this Location complies with Rule 604.a.(4).

Staff was concerned that Noble's sound wall BMP was insufficient, so Staff added an additional COA for the soundwall to be extended to the northeast, beyond what is depicted on Layout Drawings and the Noise Mitigation Plan. Please see the "Administrative Considerations/Conditions of Approval" section above.

Noble has obtained consent for the A07-04 well pad via signed letters of informed consent from two RBU owners, but did not obtain signed letters of informed consent for all seven RBUs within 2,000 feet of the Location. Noble seeks approval of this Location pursuant to Rule 604.b.(2).

A07-23 Well Pad Form 2A Doc # 402118769

Proposed Location A07-23 is for four wells on irrigated cropland. There are six RBUs within the 2,000 feet of the WPS, one of which is less than 500 feet from the WPS. This nearest RBU (491 feet from WPS) is owned by the surface owner and is vacant, with no plans to lease the RBU. Because this RBU is covered under the surface owner's signed SUA, this Location complies with Rule 604.a.(4).

The one RBU within 500 feet of the WPS belongs to the Surface Owner and is subject to an SUA; none of the remaining five RBU owners provided informed consent. Noble seeks approval of this Location pursuant to Rule 604.b.(2).

A18-09 Well Pad Form 2A Doc # 402099017

Proposed Location A18-09 is for eight wells on irrigated cropland. There are 11 RBUs within the 2,000 feet of the WPS, one of which is within 500 feet. This nearest RBU (at 360 feet) is owned by the surface owner, who has a signed SUA, but is leased to a tenant/family member. The tenant consents to this Location and provided a signed informed consent letter; this Location complies with Rule 604.a.(4).

Noble did not obtain Informed Consent letters from 10 of RBUs owners/tenants, and is seeking approval of this Location pursuant to Rule 604.b.(2).

A07-08 Facility 2A Doc # 402118768

Location A07-08 is the proposed production facility that will serve the four well pad locations. The Location will consist of 36 separators, one maintenance tank, three gas compressors, two VOC Combustors, one Vapor Recovery Unit, four Gas or Diesel Motors, four Electric Motors, and other related production equipment. No drilling or completion activities will be performed on this location. The proposed Location is on Irrigated Cropland. The nearest RBU is 860 feet from the WPS with a total of six RBUs within 2,000 feet of the location. As the nearest RBU is greater than 500 feet away, and no drilling or completions operators will take place, Noble does not plan to install sound walls. Additional BMPs specific to production have been provided by Noble, including a SCADA remote monitoring system, lined containment with 150 percent capacity, downward pointed lighting on motion sensors, and limiting work to daylight hours for noise and light nuisance.

Noble did not obtain informed consent from the six RBU owners within 2,000 feet, and is seeking approval of this Location pursuant to Rule 604.b.(2).

COGCC Staff Analysis of Public Health, Safety and Welfare Considerations:

COGCC Staff conducted a technical/desktop review of the application materials related to the proposed Locations' siting and proximity to RBUs. Staff has concerns about the close proximity to a number of RBUs, particularly those within 500 feet of the WPS, and those within 2,000 feet of more than one of the Locations' WPS. Although those closest RBU

owners/tenants either signed an SUA or provided signed informed consent, the likelihood of impacts to public health, safety, and welfare are notable at such short distances. Staff concludes that the proposed site-specific BMPs, if successfully implemented, will reduce, but will not eliminate, potential adverse impacts to local residents.

Staff also found deficiencies in Noble's Noise Mitigation Plan that resulted in the addition of a COA on each of the four well pad Form 2As. In addition, staff added a COA to the A07-04 Form 2A requiring Noble to extend the sound walls to further protect RBUs from noise impacts. See the "Administrative Considerations/Conditions of Approval" section above for full COA text.

Regarding the applicant's request for Commission finding pursuant to Rule 604.b.(2), Staff finds that this OGDP application meets all siting requirements of Rule 604.

Environmental Resource Considerations

Water Resources:
Four of the five locations met the ALA criteria for the WPS within or immediately upgradient of a wetland or riparian corridor; these locations lie within Sensitive Areas for water resources as defined in the 100-series and noted on the Form 2As.

A Summary of the mitigation measures Noble provided for the protection of Surface and Groundwater includes:

1. Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite.
2. Pad construction – Noble will construct the location with 4-6" of clay and 3-5" of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features.
3. Liners - A minimum 30-mil poly liner will be utilized under the drilling rig, mud tanks, shakers and drill cuttings bins. During completions, most equipment associated with hydraulic fracturing will be underlain by a minimum 30-mil poly liner with drive-over foam berms. Bulk liquids used during drilling and completion activities, including chemical injection skids, acid and chlorine tanks, and fuel tanks will be containerized in

appropriate sealed vessels and underlain by an impervious liner and/or secondary containment system capable of containing any spill or leak from that vessel.

4. Operator will use SCADA during drilling and completions to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary.
5. New flowlines will be hydrotested to manufacturer's recommended levels before placed into use. Pressure testing of the flowlines is conducted on an annual basis. Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conducted monthly by a third-party specialist.
6. Noble will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks, and fittings.
7. Stormwater controls will include grading, sediment traps, and barriers including ditch and berm, hydro-mulch, riprap or other control measures. Inspections will occur on a routine basis.

A07-01

Noble checked the ALA criterion box indicating the proposed Location is immediately upgradient of a wetland/riparian corridor. The proposed Location is 660 feet upgradient of a wetland (750 feet upgradient of the wetland as measured from the WPS). Staff believes this distance is significant enough that the proposed Location need not be considered “immediately” upgradient of a wetland/riparian corridor. However, since Noble prepared their ALA Narrative with this criterion in mind, staff elected to retain this designation on the Form 2A. The depth to groundwater is 28 feet below ground surface. Noble considers this location sensitive for water resources. Staff agrees with this determination and finds the proposed mitigation measures protective of groundwater.

A07-04

A seasonal, intermittent stream bed was identified 132 feet southwest of the WPS. The Location is 150 feet north and upgradient of the Greeley Number 2 Ditch. Depth to groundwater is estimated at 29 feet below ground surface. Noble considers this location sensitive for water resources. Staff agrees with this determination and finds the proposed mitigation measures protective of surface and groundwater.

A07-23

The proposed Location is 120 feet upgradient from a freshwater emergent wetland and intermittent streambed. A floodplain is approximately 812 feet to the west of the proposed Location. Depth to groundwater is estimated at 28 feet below ground surface. Noble considers this location sensitive for water resources. Staff agrees with this determination and finds the proposed mitigation measures protective of surface and groundwater.

A18-09

The nearest surface water body (a semipermanent flooded freshwater pond located 261 feet to the north) is upgradient from the proposed Location. The nearest downgradient surface water

body is 1,500 feet south of the proposed Location. While the nearest surface water body is technically upgradient from the Location, based on the proximity of the pond to the WPS, Staff considers this location sensitive for water resources. Depth to water is estimated at 85 feet below ground surface based on nearby water wells. There is a potential of groundwater being shallower, but the mitigation measures proposed by Noble are protective of groundwater.

A07-08
The proposed Facility will include the above mitigation measures (less those related to drilling and completions), as well as 150 percent lined secondary containment around all storage tanks and permanent equipment. The Facility Location is situated approximately 46 feet east of the Willow Creek/Greeley #2 Canal floodplain. Staff has placed a COA on the Form 2A for the Location to be surveyed at the completion of construction to verify the Location is outside of the mapped floodplain. Please see the "Administrative Considerations/Conditions of Approval" section above for full COA text. Staff has additional surface water concerns related to wildlife at the A07-08 Location; please see the Wildlife Resources Consideration section below.

COGCC Staff Analysis of Water Resource Considerations:

COGCC Staff conducted a technical review to evaluate the potential for impact to the nearest surface water features. Noble provided BMPs that, if successfully implemented and maintained, will reduce, minimize, or mitigate impacts to groundwater and surface water resources and the environment. The BMPs include engineering controls (construction and containment) and administrative controls (inspections and a leak detection plan).

Staff appreciates that there will be no fluids stored onsite at either the well pad locations or at the production facility; all fluids will be piped off location. However, Staff has concerns about the A07-08 production facility's close proximity to a mapped floodplain and felt it necessary to add a COA for Noble to provide an as-built survey of the Location to confirm it did not encroach into the floodplain.

Based on this information, Staff concludes that risk of contamination from these Oil and Gas Locations to groundwater and downgradient surface waters will be minimized by the successful implementation of the proposed BMPs.

Wildlife Resource Considerations

Four of the five proposed locations met the conditions of Rule 1202.a.(3), "[a]t new and existing Oil and Gas Locations, Operators will not situate new staging, refueling, or Chemical storage areas within 500 feet of the Ordinary High Water Mark ("OHWM") of any river, perennial or intermittent stream, lake, pond, or wetland." Noble requested, and received from CPW, a waiver to Rule 1202.a.(3) for those four locations. Based on the wetland delineation conducted (see the Wildlife Plan for details) and the placement of equipment, Location A07-01 would not store chemicals or refuel within 500 feet of an OHWM. CPW granted the waivers for Location

A07-04, A18-09, A07-08, and A07-23 based on their review of a wetlands delineation conducted by a third party on behalf of Noble, and detailed stormwater and erosion control measures listed in Noble's Stormwater Management Plans. This waiver is conditioned upon Commission approval of the Form 2A.

The professional wetland survey conducted at the A07-08 Facility determined that the OHWM of the Greeley #2 Canal is 174 feet west of the location, the OHWM of a freshwater pond and associated wetlands is ~75 feet northwest of the location, and the OHWM of an outfall ditch structure is ~177 feet west of the location. Additionally, the survey identified intermittent streambed wetlands that were inundated at the time of the survey (November 2021) approximately ~177 feet west of the location. Staff concludes that the number of visible surface water features with visible OHWMs immediately downgradient from the Location is sufficient such that the risk of potential adverse impacts from operations on this Location warrants denying the CPW waiver of Rule 1202.a.(3).

COGCC Staff Analysis of Wildlife Resource Considerations:

CPW has waived Rule 1202.a.(3) (no staging, refueling, or chemical storage areas within 500 feet of surface waters or wetlands). Staff generally agrees with this waiver on the A07-04, A07-23, and A18-09 Locations, but does not support granting the waiver on the A07-08 Production Facility due to its proximity to potential wetlands and the 100-year floodplain. The A07-08 application describes permanent chemical storage (a maintenance tank) less than 100 feet from a floodplain and additional permanent equipment upgradient and less than 500 feet from the floodplain (see page 6 of the Layout Drawing and pages 3-4 of the Wildlife Plan attached to the Form 2A). Staff is concerned about the placement of this production facility adjacent to this floodplain and its associated wetlands and asks that the Commissioners not grant the CPW waiver on the A07-08 Production Facility Location, and instead require that Noble adhere to Rule 1202.a.(3).

Based on the proposed BMPs in the Stormwater Management Plan that address wildlife protections, COGCC and CPW believe that other potential impacts to wildlife resources or wildlife habitat will be mitigated sufficiently for the remaining well pad Locations.

DIRECTOR'S RECOMMENDATION:

The Director has obtained and fully reviewed all required and supplemental information necessary to evaluate the OGDP's proposed operation and its potential impacts on public health, safety, welfare, the environment and wildlife resources. Through this review, the Director has determined that this OGDP complies with all applicable requirements of the Commission's Rules and recommends approval by the Commission.

COGCC Response to CDPHE Consultation Recommendations
Noble Energy, Inc (Noble) - OGDP #1 (OGDP ID# *481728*)

The Director made her Completeness Determination on the OGDP #1 on March 10, 2022. The Colorado Department of Public Health and Environment (CDPHE) consulted with the Director and Noble pursuant to Rule 309.f, and provided their written consultation summary and recommendations to Noble and COGCC electronically on March 30, 2022.

CDPHE Staff reviewed the A07-01, A07-04, A07-23, A18-09 well pads, and A07-08 Facility Form 2As and associated Form 2B for the OGDP #1 with a primary focus on minimizing or mitigating potential adverse impacts to air resources, water resources, and public health. CDPHE recommends two conditions of approval (COAs), to be applied at all five OGDP #1 Locations. This Memo summarizes CDPHE's recommendations and Noble's responses; please see CDPHE's full consultation summary document and Noble's full response document, attached to the OGDP #1 Form 2As, for full text and details. This Memo also includes COGCC Staff's responses to CDPHE's recommendations. Staff incorporated CDPHE's recommendations where appropriate, and declined others, in order to make a more sound recommendation to the Commission.

COA #1 - ELECTRIFICATION: Operator will use electric Drill Rigs.

Noble's Response to COA #1: Noble is planning to use available grid power to run one electric rig in the CDP area. Noble plans to run two rigs at the same time, which might be an overdraw of power in the area. If electricity is not available, Noble plans to use natural gas-powered engines (as opposed to diesel engines) to minimize emissions from the drilling rigs.

COGCC Response to COA #1: While Staff appreciates CDPHE's recommendation for Noble to use electric drill rigs, COGCC cannot compel third party electricity vendors to provide enough overhead power to run two drilling rigs. In addition, Staff understands that running two rigs in the same area off the same power grid can tax the electrical system and may not always be feasible. Therefore, Staff does not support CDPHE's suggested COA as written. However, Noble indicated in their response to CDPHE that they will attempt to use one electric rig, and will otherwise use a natural-gas rig. Since Noble did not provide staff with a "rig" BMP to add to the Form 2As, staff would like to suggest a modified COA based on CDPHE's initial language: *Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig.* Staff supports this modified COA as a reasonable alternative to CDPHE's initial COA and to memorialize Noble's intent as an enforceable and reasonable operational practice.

COA #2 - ODOR MITIGATION: 1) Operator will use group III drilling mud; and 2) Operator will use a chiller to cool drilling fluid as it is piped through the recirculation system before routing to the suction tanks.

Noble Response to COA #2: Noble plans to use a drilling fluid (D822), which is a middle run distillate with minimal traces of Benzene, Toluene, Ethylbenzene, and Xylene (BTEX). Noble feels the D822 and group III drilling fluids are comparable for BTEX composition and with an odor neutralizer, the D822 odor will not impact RBU occupants. Noble has offered to use Group III mud for Locations with occupied RBUs 500 feet or closer.

Noble declines to use a chiller to cool drilling fluids. According to Noble, there is not any evidence that cooling drilling fluids in the DJ basin reduces odors or emissions. The average temperature of drilling fluids in the recirculation system is 140 degrees fahrenheit (F), which is lower than other basins that use mud chillers for equipment protection. The benefit of using chillers in the DJ basin is minimal and does not reduce odors or emissions is outweighed by the energy required for the chillers.

COGCC Response to COA #2: Noble is planning to use a low aromatic/low VOC base fluid in its drilling mud in lieu of Group III mud, but has offered to use Group III mud for Locations within 500 feet of a RBU. Since Noble has not provided Staff with a BMP to specifically address this, Staff supports the "Group III" portion of CDPHE's recommended COA on each of the four well pad Locations in this OGDP, which are all within 500 feet of at least one RBU.

Although COGCC Staff supports the voluntary use of chillers to reduce odors from drilling fluids, COGCC Staff does not support the recommended COA for this OGDP application because implementation could create unintended operational or safety concerns.

COGCC CONCLUSION

COGCC appreciates the consultation provided by CDPHE for the proposed Noble OGDP #1 and the five associated proposed Locations. COGCC Staff's finding in its Director's Recommendation – that this OGDP application complies with the Commission's Rules and should be considered for approval by the Commission – is unchanged after reviewing CDPHE's consultation. Staff does acknowledge that the implemented recommendations do make the permit more protective, and we recognize and value the contribution CDPHE's consultation and expertise provides.

COLORADO
Department of Public Health & Environment

March 30, 2022

Julie Murphy, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

Re: Colorado Department of Public Health and Environment's (CDPHE) Rule 309.f. Consultation Recommendations for Noble Energy Inc. (Noble) Wells Ranch Oil and Gas Development Plan (WR OGDP) 1-4

Dear Director Murphy:

CDPHE appreciates the opportunity to consult on Noble's WR OGDPs 1-4 as well as the ongoing collaboration with the Colorado Oil and Gas Conservation Commission (COGCC) to fulfill our shared mission to protect public health and the environment. While CDPHE commends Noble for pursuing a more holistic approach to developing minerals and evaluating and addressing cumulative impacts through a Comprehensive Area Plan (formerly referred to as Comprehensive Drilling Plan), because all but one of the pads associated with these OGDPs are within 2,000 feet of several Residential Building Units (RBUs or homes) with the closest RBU just 237 feet away, CDPHE is providing these recommendations to enhance the best management practices (BMPs) and Conditions of Approval (COA) COGCC staff is considering in order to avoid, minimize or mitigate adverse impacts.

CDPHE recommendations to minimize impacts

Because there are relatively few homes near each of these pads, impacts can be more easily minimized and mitigated. CDPHE appreciates that Noble has provided the attached BMP list identifying which of CDPHE's recommended BMPs they will implement at these locations. *See* Appendix A: Noble WR ODGPS 1-4 BMPs for CDPHE-COGCC Consultations. Because Noble's WR OGDPs 1-4 facility designs already include many of CDPHE's recommended BMPs, the relative risk is lower than a proposed well pad within close proximity to a larger number of homes or a proposed facility design which does not include the BMPs that are included in Noble's WR OGDPs 1-4 applications.

Notwithstanding the important commitments made by Noble, we note that the proposed WR OGDP 1-4 locations present ongoing risks that we would highlight:

- First, CDPHE appreciates that Noble is currently negotiating with electric utilities to explore whether drill rigs can be powered by electricity. However, as of today, there is no guarantee that electricity will be available. CDPHE acknowledges there may be logistical constraints with respect to using electric drill rigs in this rural landscape, and we acknowledge that natural gas rigs result in fewer emissions compared to diesel rigs. However, if electric drill rigs are not used, the risk to nearby residents from potential exposure to emissions from the natural gas rigs remains. To further reduce the relative risk, CDPHE recommends that Noble implement the following BMP:

    - Electrification: Operator will use electric drilling rigs
- Second, although CDPHE acknowledges that Noble employs an odor-neutralizing compound to mitigate odors from drilling fluid, they have not committed to using group III drilling mud or a chiller to cool drilling fluid. Because there is precedent from the Denver Julesburg Basin that operators are capable of using both group III muds and a chiller to cool drilling fluids in order to minimize impacts to nearby residents (e.g. Crestone's Lone Tree North OGDP and Kerr McGee's Nelson Family OGDP), to further reduce the relative risk, CDPHE recommends that Noble implement the following BMPs:
    - Odor mitigation: Operator will use group III drilling mud
    - Operator will use a chiller to cool drilling fluid as it is piped through the recirculation system before routing to the suction tanks

Conclusion

In light of the important commitments made by Noble, but tempered by the ongoing concerns of the remaining issues identified above, CDPHE is mindful that COGCC is tasked with making the ultimate decision on whether to approve or deny the permit and which conditions to impose, if any. We respect and defer to COGCC's discretion in making that decision.

CDPHE appreciates this opportunity to consult and looks forward to continued collaboration with COGCC. Please send any follow up questions and the Director's Recommendation to CDPHE's consultation email: cdphe_cogcc_consultations@state.co.us.

Sincerely,

Sean Hackett
Energy Liaison
Colorado Department of Public Health and Environment

AIR

BMP	Notes
Operator will implement ambient air quality monitoring on site	Yes
Operator will appropriately time activities associated with high emissions to reduce the potential for exposure (e.g. if development is occurring near a high occupancy building unit, such as a school, then hydraulic fracturing, flowback or hydrocarbon liquids loadout will only occur when school is not in session)	N/A - no schools, high-occupancy building units, etc. near these locations
Operator will properly maintain vehicles and equipment	Yes
Operator will use non-emitting pneumatic controllers	Yes with the exception of 1 single intermittent bleed plunger lift control valve on each wellhead
Electrification: Operator will use electric drilling rigs	If utility is able to provide necessary electrical power and based on other considerations (e.g., surface-owner approval), electrification is Noble's goal and currently negotiating with utilities.
Electrification: Operator will use electric pumps for hydraulic fracturing	The utility backbone that services these locations is not strong enough to support the significant load that electric pumps entail. We will however be using Dual Fuel Diesel/Natural gas during frac.
Electrification: Operator will use electric equipment and devices (e.g. vapor recovery units or VRUs, fans, etc.) to minimize combustion sources on site (if yes, operator will provide a list outlining which equipment and devices will be electrified)	If utility is able to provide necessary electrical power and based on other considerations (e.g., surface-owner approval), electrification is Noble's goal
Tankless design: Operator will not store produced water or hydrocarbon liquids in storage tanks on site (other than a maintenance tank possibly used for well unloading or other maintenance activities)	Yes
Operator will implement a "hybrid production floback method" or "modern production flowback method" (unlike the conventional or legacy flowback method, which uses temporary equipment to separate the oil, natural gas and water, the "hybrid-production flowback method" or "modern production flowback method" eliminates tanks by routing the oil, natural gas and water directly to permanent production equipment)	Yes
Venting/Flaring: Operator will not flare or vent gas during completion or flowback, except in upset or emergency conditions, or with prior written approval from the Director for necessary maintenance operations	Yes
Venting/Flaring: Operator will control emergency flaring with an enclosed combustor with a destruction efficiency of 98% or better	Yes
Venting/Flaring: Operator will control bradenhead/casinghead venting	Yes
Pipelines: Operator will use pipelines to transport water for hydraulic fracturing to and from location	Yes
Pipelines: Operator will have adequate and committed pipeline take away capacity for all produced gas and oil	Yes
Pipelines: Operator will shut in the facility to reduce the need for flaring if the pipeline is unavailable	Yes
Pipelines: Operator will incorporate options for recycling produced gas onsite during pipeline downtime, such as: using the gas for gas lift systems, routing it to the facility fuel system, or installing a natural gas liquid (NGL) skid to process the gas onsite	Yes

Engines: Operator will use tier IV or better engines for drilling	Yes, when possible.
Engines: Operator will use tier IV or better engines for hydraulic fracturing	Yes, when possible.
Engines: Operator will use tier IV or better engines for nonroad construction equipment	Yes, when possible. Noble has agreed that pump trucks used during hydraulic fracturing will be Tier IV/dual fuel.
Engines: Operator will use tier IV or better engines for fleets accessing site (service vehicles, sand delivery, haul, produced water, etc.)	Yes, when possible.
Operator will use vapor recovery units (VRUs) to capture and route storage vessel gas to pipeline	Yes
Operator will use zero-emission desiccant dehydrators or 98% control of hydrocarbon emissions from glycol dehydrators	Yes
Operator will use compressors equipped with dry seals	Yes
Operator will collect emissions from rod packing on reciprocating compressors and rout them through a closed vent system to a process or emissions control device	No. Rod packing is replaced on all reciprocating compressors on a 3-year or 26,000 hour interval.
Operator will use lease automated custody transfer (LACT) system to remove/reduce the need for truck loadout	Yes
Odor mitigation: operator will use group III drilling mud	No. Noble also employs a odor-neutralizing compound to mitigate odors from drilling fluids. Please see https://www.benzaco.com/solutions_direct for information on the type of compound Noble is utilizing
Odor mitigation: operator will use a chiller to cool drilling fluid as it is piped through the recirculation system before routing to the suction tanks	No
Odor mitigation: operator will cover trucks transporting drill cuttings	Yes
Odor mitigation: operator will use a squeegee or other device to remove drilling fluids from pipes as they exit the wellbore	Yes
Odor mitigation: Operator will ensure that all drilling fluid is removed from pipes before storage	Yes
Ozone mitigation on forecasted high ozone days: operator will eliminate use of VOC paints and solvents	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: operator will minimize vehicle and engine idling	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.

Ozone mitigation on forecasted high ozone days: operator will reduce truck traffic and worker traffic	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: operator will postpone the refueling of vehicles	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: operator will suspend or delay the use of fossil fuel powered ancillary equipment	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: operator will postpone construction activities	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: operator will reschedule non-essential operational activities such as pigging, well unloading and tank cleaning	In the event of an ozone action alert, Noble sends notifications company wide, instructing employees that activities such as refueling, vehicle idling, driving, painting, venting and flaring should be delayed or minimized, if they are not considered essential or critical to safe operations. Those actives are either rescheduled to non-ozone days or performed In the early hours of the day or later In the evening.
Ozone mitigation on forecasted high ozone days: Operator will postpone flowback if emissions cannot be adequately captured with a vapor recovery unit (VRU)	Yes

WATER

BMP	Notes
Stormwater inspections: Operator will conduct stormwater inspections immediately after storm event	Yes
Stormwater inspections: Operator will conduct weekly stormwater inspections during normal operations	Yes
Operator will use Modular Large Volume Storage Tanks	Yes
Secondary containment: Operator will install perimeter controls to control potential sediment-laden runoff in the event of spill or release from Modular Large Volume Storage Tank	Yes
Operator will recycle or beneficially reuse flowback and produced water for use downhole	Yes, to the extent possible
Vehicle fueling: Operator will refuel vehicles only on impervious surfaces and never during storm events	Yes
Vehicle fueling: Operator will ensure that a fueling contractor is present during the entire fueling process to prevent overfilling, leaks and drips from improper connections	Yes
Dust suppression: Operator will not use produced water or other process fluids for dust suppression	Yes
CPGCC permit will incorporate other agency water quality protection plans by reference as applicable (e.g. stormwater management plan)	Yes
Down gradient controls: Operator will install adequate down gradient controls if they can not have a control at the source	Yes
Outfall locations: Outlet protection should be used when a conveyance discharges onto a disturbed area where there is potential for accelerated erosion due to concentrated flow. Outlet protection should be provided where the velocity at the culvert outlet exceeds the maximum permissible velocity of the material in the receiving channel.	Yes
Stream crossing and Road Construction: Operator will ensure that control measures are designed, installed and adequately sized in accordance with good engineering, hydrologic and pollution control practices	Yes
Documentation / stormwater management plan: If it is infeasible to install or repair a control measure immediately after discovering a deficiency, operator will document and keep on record in the stormwater management plan: (a) a description of why it is infeasible to initiate the installation or repair immediately; and (b) a schedule for installing or repairing the control measure and returning it to an effective operating condition as soon as possible.	Yes

WASTE		
BMP	**Notes**	
Operator will properly characterize and dispose of all waste (i.e. the specific landfill/waste disposal location allows for acceptance of the waste stream)	Yes	
Operator will properly test for and dispose of TENORM	Yes	

PFAS	
BMP	**Notes**
Operator will not use fracturing fluids which contain PFAS compounds	Yes
Operator will provide funding for nearby fire district(s) to support transition away from PFAS-containing foam	Yes - participating in Colorado Preparedness & Response Network (CPRN), which has been working with Weld County fire districts on PFAS alternatives. Chevron/Noble provided funding to Briggsdale, SE Weld and Platte Valley Fire Protection Districts in 2021 to be used toward the PFAS transition or other projects.
Operator will coordinate with nearby fire district (s) to evaluate whether PFAS-free foam can provide the required performance for the specific hazard	Yes - participating in Colorado Preparedness & Response Network (CPRN) which assisted fire districts in developing data used for evaluating PFAS alternatives. Chevron/Noble also participated with Galeton Fire Protection District in performing an evaluation of a PFAS-free foam at one of our facilities.
If PFAS-containing foam is used at a location: operator will properly characterize the site to determine the level, nature and exent of contamination	Yes
If PFAS-containing foam is used at a location: operator will perform appropriate soil and water sampling to determine whether additional characterization is necessary and inform the need for and extent of interim or permanent remedial actions	Yes
If PFAS-containing foam is used at a location: operator will properly capture and dispose of PFAS-contaminated soil and fire and flush water	Yes

2001 16th Street, Suite 900
Denver, CO 80202
Tel: 303.228.4160

noble energy

April 28, 2022

Julie Murphy, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

CC: Energy Liaison Colorado Department of Public Health and Environment
4300 Cherry Creek Drive S.,
Denver, CO 80246-1530

Re: Response to Colorado Department of Public Health and Environment's (CDPHE) Rule 309.f. Consultation Recommendations for Noble Energy, Inc. (Noble) Wells Ranch Oil and Gas Development Plan (WR OGDP) 1-4

Director Murphy:

Noble Energy, Inc. ("Noble") appreciates the CDPHE's feedback and input on our Wells Ranch Development Plans outlined in our OGDP 1-4 submissions. We would like to address Mr. Hackett's comments by providing the following responses and clarifications.

In his March 30, 2022, letter Mr. Hackett writes, ***"First, CDPHE appreciates that Noble is currently negotiating with electric utilities to explore whether drill rigs can be powered by electricity. However, as of today, there is no guarantee that electricity will be available."***

We are currently planning to use the available grid power to run one of our electric rigs planned in these areas. Outside of Noble's control is the amount of electricity that utility providers can supply in the area. While we are planning to use this technology, one of the two rigs may not be able to draw on the available power provided by vendors in the area. If overhead power is unavailable for one of our rigs, we will use our Natural Gas-Powered engines to eliminate potentially harmful emissions and further protect Residential Building Units ("RBU(s)") from potential exposure to engine emissions. The only exception to this would be a temporary spot-market drilling rig.

Mr. Hackett's second recommendation states: "***Because there is precedent from the Denver Julesburg Basin that operators are capable of using both group III muds and a chiller to cool drilling fluids in order to minimize impacts to nearby residents (e.g. Crestone's Lone Tree North OGDP and Kerr McGee's Nelson Family OGDP), to further reduce the relative risk, CDPHE recommends that Noble implement the following BMPs:***

- ***Odor mitigation: Operator will use group III drilling mud***
- ***Operator will use a chiller to cool drilling fluid as it is piped through the recirculation system before routing to the suction tanks***"

While there is a precedent for using type III drilling fluids by a few operators in the basin, Noble has employed a different technology to achieve the same odor mitigation effect to Residential Building Unit occupants. Noble's drilling practices employs D822 fluid that is a middle run distillate, defined as a strict class II fluid with minimal traces of BTEX. When comparing the data for D822 and the EDC (environmental drilling compound) base oils from Total classified as group III fluids, the D822 is comparable with 0.05vol% BTEX vs one of the EDC fluids has 0.03vol% BTEX. The difference is that there

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Denver, CO 80202
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are more general aromatics in D822, than in the EDC fluids, which is why it is still designated a Group II fluid as opposed to a Group III fluid. The total volume fraction of BTEX content is minimal and comparable to a Group III fluid. This fluid is paired with an odor neutralizer to reduce the odor impact to residences near our operations. This Best Management Practice has been approved and deployed in our Wells Ranch Mini Row Development, and to date we are unaware of drilling odor complaints.

In an abundance of caution Noble Energy will agree to you type III drilling fluids when we are operating within 500' of an occupied residential building unit. However, Noble Energy would like the opportunity to review and vet the current D822 base fluid as an approved alternative for the Group III fluid.

Mr. Hackett's second suggestion is to use a chiller to cool drilling fluids to reduce impacts to nearby residents. Noble Energy respectfully declines to agree to this recommendation. There is no basis that mud chillers provide any benefit to potential receptors. In other basins chillers are used in drilling operations to cool mud primarily to protect drilling tools, manage drilling fluid flash point in HPHT (high pressure / high temperature) environments, and reduce risk of high temperature fluids to onsite personnel. Because our flowline discharge temperature is only approximately 140 degrees F, and the DJ Basin is not a high temperature environment, we see little operational benefit from using mud chillers. Our drilling team has investigated deploying this technology as a mitigation for emissions; however, their conclusion is that potential emissions from the additional energy needed onsite to power the chillers outweigh any benefits to emissions the chillers might provide.

Thank you for the opportunity to respond to Mr. Hackett's comments.

Regards,

Mosiah Montoya

Regulatory Compliance Manager
mo.montoya@chevron.com

Chevron Rockies Business Unit
Noble Energy
1625 Broadway
Denver, CO, 80202
Tel 303 249 2425

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Oil and Gas Location Assessment

Document Number: 402118763

Date Received: 09/28/2021

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at https://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

OGDP ID: **481728**

Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210900156		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
481728	WR OGDP 1

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____

[ ] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.

[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).

[ ] This Location includes a Rule 309.e.(2).E variance request.

[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 100322

Name: NOBLE ENERGY INC

Address: 2001 16TH STREET SUITE 900

City: DENVER State: CO Zip: 80202

Contact Information

Name: Mosiah Montoya

Phone: (303) 249 2425

Fax: ( )

email: mo.montoya@chevron.com

FINANCIAL ASSURANCE

[X] Plugging and Abandonment Bond Surety ID (Rule 706): 20030009

[ ] Gas Facility Surety ID (Rule 711): _____

[ ] Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: A07-01 Number: Pad

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NENE Section: 7 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4742

Latitude: 40.505380 Longitude: -104.585200

GPS Quality Value: 1.4 Type of GPS Quality Value: PDOP Date of Measurement: 06/03/2019

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Well Site is served by Production Facilities		402118768

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970 400 3579

Contact Email: oged@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

A 1041 WOGLA was filed for the CDP as 1041WOGLA19-0042 on 12/10/2019 and recorded at reception #4556398 on 1/8/2020. Site-specific supplemental information will be filed prior to commencement of operations.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- [X] i. WPS < 2,000 feet from RBU/HOBU
- [ ] ii. WPS < 2,000 feet from School/Child Care Center
- [ ] iii. WPS < 1,500 feet from DOAA
- [ ] iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- [ ] v. WPS within a Floodplain
- [ ] vi.aa. WPS within a surface water supply area
- [ ] vi.bb. WPS < 2,640 feet from Type III or GUDI well
- [X] vii. WPS within/immediately upgradient of wetland/riparian corridor
- [ ] viii. WPS within HPH and CPW did not waive
- [ ] ix. Operator using Surface bond
- [ ] x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: [ ]

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
1	40.509499	-104.594002	x											Tier III-B; Alternate Location 1 on Narrative and Map.
2	40.505798	-104.582001	x											Tier III-A; Alternate Location 2 on Narrative and Map.
3	40.501099	-104.547997	x											Tier III-B; Alternate Location 6 on Narrative and Map.

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Cheryl Bishop Phone:
Address: 34707 County Road 51 Fax:
Address: Email: ryan.antonio@chevron.com
City: Eaton State: CO Zip: 80615-9527

Name: Gary Bishop Phone:
Address: 34707 County Road 51 Fax:
Address: Email: ryan.antonio@chevron.com
City: Eaton State: CO Zip: 80615-9527

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[ ] The Operator/Applicant is the surface owner.

[X] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	16	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	1
Pump Jacks	0	Separators	0	Injection Pumps	8	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	Electric Motors	0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	4	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Solar Skid	7
Multi-Phase Flowmeters	16
Manifold	3
Communication Tower	3

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Sixteen (16): 2"-4" Steel Three Phase Flowlines
Twenty (20): 2"-4" Steel Gas Lift Lines
Three (3): 3"-8" Temporary Fresh Water Poly Lines

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	166	Feet	S					
Residential Building Unit (RBU):	266	Feet	S	☐	☒	☐	Location is in approved CDP: Order 1-241	☐
High Occupancy Building Unit(HOBU)	4816	Feet	N	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	99	Feet	E					
Above Ground Utility:	82	Feet	E					
Railroad:	5280	Feet	W					
Property Line:	108	Feet	E					
School Facility:	4816	Feet	N					
Child Care Center:	4803	Feet	N					
Disproportionately Impacted (DI) Community:	5280	Feet	W					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	SW	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	2	5	6
Residential Building Units	2	5	6
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 13.00

Size of location after interim reclamation in acres: 5.90

Estimated post-construction ground elevation: 4742

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☒ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☐ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

dry land crop - farming

Describe the Relevant Local Government's land use or zoning designation:

Agricultural, Near-Urban Planning Area

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☐ Irrigated ☒ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☐ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):

Reference Area Latitude: Reference Area Latitude:

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 37 - Nelson fine sandy loam, 0 to 3 percent slopes

NRCS Map Unit Name: 51 - Otero sandy loam, 1 to 3 percent slopes

NRCS Map Unit Name: 52 - Otero sandy loam, 3 to 5 percent slopes

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 756 Feet NE

Spring or Seep: 5280 Feet E

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 28 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Location is sensitive due to proximity to surface water and floodplain.
Depth to groundwater taken from water well permit #267-WCB

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 77 Feet N

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 746 Feet W

Provide a description of the nearest downgradient surface Waters of the State:

Nearest surface water is ditch that wraps east, north, and west around the location. Nearest downgradient wetland is permanently flooded riverine wetland.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

- [X] Federal (FEMA)
- [ ] State
- [ ] County
- [ ] Local
- [ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- [ ] This location is included in a Wildlife Mitigation Plan
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- [ ] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: _____

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- [ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- [ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- [ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- [ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- [ ] The applicant has obtained a Rule 1202.a CPW waiver.
- [ ] The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 15

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [X] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [X] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [X] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [X] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- [ ] 304.b.(1). Local Government Siting Information
- [ ] 304.b.(2). Alternative Location Analysis
- [ ] 304.b.(3). Cultural Distances
- [ ] 304.b.(4). Location Pictures
- [ ] 304.b.(5). Site Equipment List
- [ ] 304.b.(6). Flowline Descriptions
- [ ] 304.b.(7). Drawings
- [ ] 304.b.(8). Geographic Information System (GIS) Data
- [ ] 304.b.(9). Land Use Description
- [ ] 304.b.(10). NRCS Map Unit Description
- [ ] 304.b.(11). Best Management Practices
- [ ] 304.b.(12). Surface Owner Information
- [ ] 304.b.(13). Proximate Local Government
- [ ] 304.b.(14). Wetlands
- [ ] 304.b.(15). Schools and Child Care Centers
- [ ] 304.c.(1). Emergency Spill Response Program
- [ ] 304.c.(2). Noise Mitigation Plan
- [ ] 304.c.(3). Light Mitigation Plan
- [ ] 304.c.(4). Odor Mitigation Plan
- [ ] 304.c.(5). Dust Mitigation Plan
- [ ] 304.c.(6). Transportation Plan
- [ ] 304.c.(7). Operations Safety Management Program
- [ ] 304.c.(8). Emergency Response Plan
- [ ] 304.c.(9). Flood Shut-In Plan
- [ ] 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- [ ] 304.c.(11). Waste Management Plan
- [ ] 304.c.(12). Gas Capture Plan
- [ ] 304.c.(13). Fluid Leak Detection Plan
- [ ] 304.c.(14). Topsoil Protection Plan
- [ ] 304.c.(15). Stormwater Management Plan
- [ ] 304.c.(16). Interim Reclamation Plan
- [ ] 304.c.(17). Wildlife Plan
- [ ] 304.c.(18). Water Plan
- [ ] 304.c.(19). Cumulative Impacts Plan
- [ ] 304.c.(20). Community Outreach Plan
- [ ] 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments

Operator is committed to connecting to a gathering system by the Commencement of Production Operations.

The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner and Noble will ensure that the surface owner(s) promptly receive notice of the Recommendation.

One (1) 67' diameter, 20,000 bbl Minion Tank will be on location for 4 months. This is a MLVT labeled as a Minion tank on the drawings.

Pad Soil type(s): 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 51 - Otero sandy loam, 1 to 3 percent slopes; 52 - Otero sandy loam, 3 to 5 percent slopes

Access Soil type(s): 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 51 - Otero sandy loam, 1 to 3 percent slopes; 52 - Otero sandy loam, 3 to 5 percent slopes

Pipeline Corridor Soil type(s): 4 Aquolls and Aquepts, flooded; 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 52 - Otero sandy loam, 3 to 5 percent slopes

NRCS data is not accurate at scale for access roads and pipeline corridor.

The following 304.c Plans are Not required for this submittal:
• Emergency Spill Response Program; not near Type III or GUDI well.
• Flood Shut-In Plan; not in floodplain
• Hydrogen Sulfide Drilling Plan; no H2S in area
• Gas Capture Plan; Operator is committed to a gathering system connection
• Community Outreach Plan; no DIC within 2,000'

Informed Consent Letter attachment contains three (3) signed letters for Residential Building Unit owners within 500’ of the Oil and Gas Location Disturbance not subject to an SUA. 2 of these RBU are greater than 500' from the Working Pad Surface.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 09/28/2021 Email: regulatory@ascentgeomatics.com

Print Name: Ann Feldman Title: Regulatory Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ **Director of COGCC** Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type	Description
Drilling/Completion Operations	Operator will use group III drilling mud.
Drilling/Completion Operations	Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig
	Prior to commencing construction, Operator will submit via Form 4 Sundry Notice, and obtain approval of, an updated Noise Mitigation Plan that includes: 1) the ambient noise survey used to modify allowable noise levels through Rule 423.d; 2) a BMP that specifies the noise limits that are adjusted based on ambient noise levels through Rule 423.d. This is to be provided for any individual Noise Point of Compliance with an adjusted noise limit.
3 COAs	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	Lighting on well pad locations is considered temporary and will be used during drilling, completion and construction activities. Temporary lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and building units within 1,500 feet. Lighting will be turned off when practical, i.e., no operations being conducted.
2	Planning	Noble shall consolidate wells to create multi-well pads. Multi-well production facilities shall be located as far as possible from Building Units. • The pad shall be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping. • Pads shall have all weather access roads to allow for operator and emergency response.
3	Planning	Noble shall identify the location of the wellbore with a permanent monument as specified in Rule 603.n. The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument.
4	Planning	Per Rule 603.e, Noble shall provide for the development of multiple reservoirs by drilling on existing pads or by multiple completions or commingling in existing wellbores. Nobles Wells Ranch CDP development is confined to a specific disturbance corridor, per landowner requirements. Noble does not plan to drill any development areas from an existing disturbance.
5	Community Outreach and Notification	The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner. Noble will ensure that the surface owner(s) promptly receive notice of the Director's Recommendation.
6	Traffic control	Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000' of occupied residences on Weld County Road 51, and on lease roads as necessary in cooperation with the county.
7	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
8	General Housekeeping	All surface trash, debris, scrap or discarded material connected with the operations of the property shall be removed from the premises or disposed of in a legal manner.
9	General Housekeeping	Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.
10	Wildlife	Noble initiates multiple levels of Environmental Site Screening efforts for the protection of sensitive wildlife, vegetation, groundwater and surface water resources at every Wells Ranch CDP project area. Prior to construction, a comprehensive desktop survey and field-based wildlife clearance survey will be performed to determine the presence of seasonally protected raptor and migratory bird species. • In-season, raptor nesting clearance surveys will be performed by a certified biologist no more than one-week prior to construction. • In-season, migratory bird nesting (MBTA Compliance) will be cleared within 50-feet of the proposed disturbance 2-3 days prior to ground clearing activities. • Although Bald and Golden Eagle are included in the raptor nesting survey-suite, eagle habitat is not delineated within the Wells Ranch CDP.

11	Storm Water/Erosion Control	BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. Specific BMP's used will include stockpile stabilization, grading, sediment traps, and perimeter barriers based on final construction design and will remain in place until the pad reaches final reclamation.
12	Storm Water/Erosion Control	• A sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practices. A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap to prevent offsite migration of sediment/contaminant into the nearby surface water features. If necessary, check dams will be constructed within the swale.
13	Storm Water/Erosion Control	. Structural Control measure practices specific to the A07-01 Pad located within the Wells Ranch proper area will include the following: • Compost filter socks (Filtrexx or similar) sediment control logs (CFS); • Culvert (C); • Hydro-mulch (HM); • Rock socks (RS); • Seeding (S); • Soil roughening (SR); and • Vehicle tracking control (VTC). Inspections during construction include: At least one inspection every 7 calendar days; OR 2. At least one inspection every 14 calendar days, if post-storm event inspections are conducted within 24 hours following precipitation which causes surface erosion. Once the Pad enters the Completed Stage, it will be inspected a minimum of once every 30 days. Post-precipitation inspections are not required once the Pad is in the Completed Stage. However, more frequent inspections may be directed by Noble to confirm adequate maintenance or repairs.
14	Material Handling and Spill Prevention	Noble Energy Inc. designs well heads and supporting infrastructure on the well pad to avoid releases and to be compliant with all regulations specific to leak detection and control (i.e. SPCC 40CFR112). Daily, monthly and annual inspections are performed at each well pad to confirm operational integrity and regulatory compliance. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
15	Material Handling and Spill Prevention	Due to using a closed loop system, pits will not be used.
16	Material Handling and Spill Prevention	Any material not in use that might constitute a fire hazard shall be removed a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area shall comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado. • Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, additional equivalent safety measures will be taken.

17	Material Handling and Spill Prevention	Water-based Bentonitic Drilling: Water-based bentonitic drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities. Oil-Based Drilling Fluids: Oil-based drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. All oil and water loadouts that are commonly used have a load bucket and isolation valve. Since they are used often, there is not a bull plug installed. Any loadouts (water on back of tanks for example) that are rarely used, are bull plugged without a load bucket. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities. Frac sand will be periodically drained via vacuum truck and will be transported by licensed third-party trucks. There will be no produced water storage at the Location. Oily waste and tank bottoms will be periodically drained via vacuum truck. Impacted or Contaminated Soil will be containerized as needed either in storage bins or directly into dump trucks, depending on the volume needed.
18	Material Handling and Spill Prevention	• There will be no tanks or separators at the A07-01 Pad. Facilities will be located on A07-08 Facility. • A closed–loop system will be used for drilling operations as required by Rule 408.a. • Operator will use SCADA during drilling and completions to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary. New flowlines will be hydrotested to manufactures recommended levels before placed into use. • Pressure testing of the flowlines is conducted on an annual basis. • Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conduced monthly by a third-party specialist. • No pits will be used on location, therefore pit level Indicators will not be used on location. • During drilling and completions operations a temporary impermeable synthetic or geosynthetic liner will be utilized under equipment. This liner will be installed on top of the plated surface and will provide an additional layer of protection against spills. Secondary containment devices, such as duck ponds or equivalent type products, will be used to protect any pipe connections or equipment that carry, mix, or could possibly leak fluids or chemicals. A 40 ml poly liner with foam type berms will be utilized under the drilling rig, mud tanks, shakers, and drill cuttings bins • All flowlines are designed/constructed/tested to ASME B31.4 and API 1104 standards. Only materials with Material Test Reports (MTRs) provided by the pipeline supplier are used in the construction of the flowlines. • Location will be equipped with remote monitoring capability. The surface of the location will be plated with 3-5 inches of road base aggregate compacted that will deter releases from easily seeping into the soil. Operator will install an earthen berm and ditch system around the perimeter of location that would keep a release from moving out onto un-plated soil.
19	Material Handling and Spill Prevention	Noble will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks, and fittings. Annual SPCC inspections will be conducted and documented. Flowline integrity will be maintained through implementation of Rule 1104 management practices. Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.

20	Material Handling and Spill Prevention	Pad construction – Noble will construct the location with 4-6” of clay and 3-5” of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features. Liners - A minimum 30-mil poly liner will be utilized under the drilling rig, mud tanks, shakers and drill cuttings bins. During completions, most equipment associated with hydraulic fracturing will be underlain by a minimum 30-mil poly liner with drive-over foam berms. Bulk liquids used during D&C activities, including chemical injection skids, acid and chlorine tanks, and fuel tanks will be containerized in appropriate sealed vessels
21	Material Handling and Spill Prevention	Noble will not situate new staging, refueling, or chemical storage areas within 500 feet of the Ordinary High-Water Mark (OHWM) of any river, perennial or intermittent stream, lake, pond or wetland.
22	Dust control	Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions. (For locations with BUs within 1500’): Engineered sound walls no less than 16’ tall will be used along the North, East and South sides to mitigate dust impacts to these residences.

23	Dust control	When Noble Energy is required to suppress dust, o Use only fresh water sources (non-potable) when watering areas within 300 feet of the ordinary high-water mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (Hazard Communication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.) • All soil piles created by construction activities will be managed utilizing Hydro-mulch, straw crimping, and/or tracking methods to prevent dust from exiting location and creating a hazard during pre-production activities. Soil piles will be graded and/or seeded to prevent erosion and the generation of dust post-production. • Noble Energy will minimize the amount of fugitive dust using speed restrictions. All vehicles will be subject to a speed limit of 20 MPH on all lease roads to minimize dust. • Noble Energy will mitigate the creation of fugitive dust through regular road maintenance as coordinated through agreements with Relevant Local Governments or Agencies with road jurisdiction. • Noble Energy will use methods including wind breaks and barriers, road or facility surfacing, and soil stockpile stabilization measures to suppress fugitive dust caused solely by wind. • Noble Energy will avoid the creation of fugitive dust by restricting or limiting construction activity during high wind days. • Noble Energy will not use any of the following fluids for dust suppression: Produced water; E&P waste or hazardous waste; Crude oil or any oil specifically designed for road maintenance; Chemical solvents; Process fluids • Access road(s) will be watered or treated with one of the following commercial Magnesium Chloride dust suppressants, as needed: Roadsaver; Roadsaver Compaction Aid; DuraBlend • Prior to the application of dust suppressant to any county or public roads, coordination will be conducted with Weld County Department of Public Works by Noble Energy and any relevant vendors. • Noble Energy will maintain safety data sheets (“SDS”) for any chemical-based dust suppressant and make the SDS immediately available upon request to the COGCC Director and to the Local Government. Safety Data Sheet(s) for any chemical-based dust suppressant will be archived and maintained until the site passes final site Reclamation and transfer the records upon transfer of property ownership. • All secondary roads created for this project (non-public roadways) will be finished with ½” – ¾” crushed stone road base. Silica dust from handling sand used in hydraulic fracturing operations will be mitigated by utilization of the enclosed Sand Box type sand delivery method.
24	Construction	At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements and shall be maintained in a reasonable condition. Noble Energy plans on building the access road off Weld County Road 51 for Drilling and Completion activities. Local government will not require coordination of a traffic plan with the local jurisdiction for this location.
25	Construction	All surficial activities performed by Noble during facility construction and production will be protective of the environment. Bulk liquids used or stored will be containerized in appropriate vessels and underlain by an impervious liner and containment berm capable of containing any spill or leak from that vessel. Valves and temporary flow lines associated with facility site activities will be inspected daily while in service. Any spills identified on location will be immediately contained, recovered, disposed of, remediated and reported per COGCC Series 900 Rules (912 Spills and Releases).
26	Construction	Grading and drainage of the pad will be designed with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad’s perimeter diversion channel and then directly into the sediment-trap structure. Add site specific controls
27	Construction	Unless otherwise requested by the Surface Owner, well sites constructed within the Designated Setback location will be fenced to restrict access by unauthorized persons.

28	Construction	All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with applicable regulations. The operator shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director.
29	Construction	Per the June 13, 2014 COGCC Policy on the use of Modular Large Volume Tanks- Noble will have a 3rd-Party Operator construct, operate and monitor the freshwater Minion Tank structure. The Operator will have an Minion Tank Design Package, certified and sealed by a licensed PE, on file and available on request. The Operator will comply with all siting, construction, inspection and testing requirements specified in the Design Package and meeting COGCC Policy.
30	Construction	• Noble Energy will conduct construction, flowback, and interim reclamation activities only during daylight hours to maximize the use of natural lighting. On occasion, the use of additional or alternative lighting sources may be required for site security or when field conditions experience a significant alteration. If such changes occur, light measurements may be conducted at the nearest RBU(s) to ensure compliance. If it is determined that the measured light level exceeds standards, additional BMPs will be implemented to the site lighting to achieve compliance. These changes may include removing or replacing light sources, repositioning equipment on location, or installing additional sound walls. • Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Whenever feasible, Noble Energy will schedule regular production activities during daylight hours to maximize the use of natural lighting. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned. • When present, Noble Energy will locate all light sources inside and beneath the temporary sound walls bordering the location. • Adjusting the lighting sources to point downward and towards the interior of location.
31	Construction	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located on the proposed Oil and Gas Location.

32	Noise mitigation	• Temporary operations – Baseline surveys will be completed at the residences to the north and south. Engineered sound walls no less than 16' tall will be used along the (appropriate sides for well pad) to mitigate noise impacts to these residences. Sound wall gaps will be strategically placed to adequately protect residences yet allow proper airflow across the drill pad. The use of equipment specific sound walls will be used as necessary around rig generators in the event of sound impacts during operations. The rig will be oriented on the location so that the pieces of equipment that generate the highest noise levels will face away from the closest building unit owners. Additional noise mitigation technology will be used with the completion equipment. Water will be piped into location to reduce the noise associated with heavy-duty trucks.
33	Noise mitigation	Sound walls will be 32' tall at a minimum and will reduce cumulative noise levels, on average 7-10 decibels. Wall height may be increased if it is determined additional height is necessary to control sound. Sound walls will be constructed with sound dampening material on the sides and double layer sound dampening material may be used if needed. Sound walls will be on the north, south, and east sides of the applicable area, with gaps for access, egress, and airflow across the applicable area. The sound walls will remain in place until the applicable noise sources have been removed. Additional sound barriers may also be placed around equipment, such as frac pumps or generators, as needed. The sound wall will be extended on the west-northwest side of the well pad beyond what is on the figure. Noble Energy will take continuous sound measurements from each noise point of compliance during pre-production activities and ongoing operations lasting longer than 24 consecutive hours such as drilling, completion, recompletion, stimulation, and well maintenance, in areas zoned residential or within 2,000 feet of a Building Unit. If compliance is not confirmed, Operator will employ additional mitigation to ensure compliance with COGCC and Weld County rules, such as exhaust mufflers, hay bales, additional sound walls, or replacement of offending noisy equipment with quieter systems.
34	Emissions mitigation	Noble shall employ sand traps, surge vessels, separators, and tanks during flowback and cleanout operations to safely maximize resource recovery and minimize releases to accommodate green completions techniques. Noble will use an enclosed combustion device with a 98% design destruction efficiency for hydrocarbons. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to the sales line or wells will be shut in and gas conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Noble will comply with the prohibition of venting or flaring produced gas emissions or seek relief under Rule 903.d. The Rule 903.a notice and approval requirements apply regardless of relief sought under 903.a.

35	Emissions mitigation	Flow lines, separators, and sand traps capable of supporting green completions. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to the sales line or wells will be shut in and gas conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Noble will comply with the prohibition of venting or flaring produced gas emissions or seek relief under Rule 903.d. The Rule 903.a notice and approval requirements apply regardless of relief sought under 903.a. • Temporary flowback flaring and oxidizing equipment shall include the following: Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases. • Environmental Control Devices that are 98% efficient will be operational at the start of first production. • Instrument air systems to drive pneumatic controllers, in lieu of natural gas, will be installed. • Ultra-lean burning natural gas electrical generators or line power, in lieu of diesel generators, will be installed. • LACT units for oil and produced water to pump liquids into gathering pipelines will be utilized in lieu of trucking. • All surface pipe will be stringently tested to ensure system integrity. • Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. • During ozone action season (May 1-September 30), on action alert days, Noble will reschedule non-essential operational activities such as pigging; well uploading, tank cleanings; minimizing vehicle mileage and idle time; fueling after sunset; and properly maintaining vehicles.
36	Odor mitigation	If odors are detected from removed drill piping, production tubing or sucker rods, operator will cover or enclose, or equivalent screening from wind or heat sources while storing such equipment for removal. To reduce odors during drilling and completion, the rig will be washed of oily debris before moving in. Operator will utilize drying shakers to minimize residual oil on cuttings prior to transport and will promptly remove cuttings during drilling operations. Cuttings will not be stored on site. Trucks will be prohibited from idling on location when not in use to prevent to accumulation of odors from exhaust.
37	Drilling/Completion Operations	All loadlines will be bullplugged or capped.
38	Drilling/Completion Operations	All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.
39	Interim Reclamation	During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds. All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be returned to farmland in the first favorable season following rig demobilization. Noble Energy will be responsible for segregating the topsoil, backfilling, re-compacting any backfill, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and will reclaim such area to be returned to preexisting conditions as best as possible with control of all weeds. seed/mulch application functions as erosion control during initial reclamation efforts until adequate vegetation establishment on areas not returned to farming, at which point the reclamation will be deemed final stabilized. The interim working pad will be stabilized against potential erosion for the long-term with surface armoring.

Total: 39 comment(s)

Attachment List

Att Doc Num	Name
2316726	CDPHE CONSULTATION
2316727	OTHER
2316730	GEOLOGIC HAZARD MAP
2316735	CDPHE CONSULTATION APPENDIX A
2316736	COGCC RESPONSE TO CDPHE CONSULTATION
2316737	DIRECTOR'S RECOMMENDATION
402118763	FORM 2A SUBMITTED
402931706	ACCESS ROAD MAP
402931708	DIRECTIONAL WELL PLAT
402931709	CULTURAL FEATURES MAP
402931713	HYDROLOGY MAP
402931721	LOCATION DRAWING
402931724	LOCATION PICTURES
402931726	WILDLIFE HABITAT DRAWING
402931729	ALA DATASHEET
402931732	ALA NARRATIVE SUMMARY
402931733	LOCATION AND WORKING PAD GIS GDB
402931734	INFORMED CONSENT LETTER
402931736	LAYOUT DRAWING
402931739	NRCS MAP UNIT DESC
402931742	SURFACE AGRMT/SURETY
402931746	RELATED LOCATION AND FLOWLINE MAP
402931751	LOCAL/FED FINAL PERMIT DECISION
402931756	PRELIMINARY PROCESS FLOW DIAGRAMS
402931758	LESSER IMPACT AREA EXEMPTION REQUEST

Total Attach: 25 Files

General Comments

User Group	Comment	Comment Date
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	06/10/2022
OGLA	Noble requested a Lesser Impact Area (LIA) exemption from the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed location. Noble provided a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property. The LIA request remains attached, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.	06/07/2022
OGLA	Per conversation with the Operator on 6/7, the Minion tank is actually a MLVT. Appropriate BMPs are on the Form 2A. Removed Minion tank and added MLVT to the equipment list. Operator provided a revised Geo Haz Map with geologist name (replaced). Added a statement provided by the Operator that the Surface Owner authorizes Noble to receive the Director Recommendation information.	06/07/2022
OGLA	Operator provided revised Noise, Light, and Emergency response plans- replaced and added Noise and Light BMPs to the 2A.	06/06/2022

OGLA	COGCC Staff Technical review: BMPs listed on Form 2A reference old rules, Dust BMP and Plan do not have the same suppressants listed, Inconstancies between liner listed in the Waste Management Plan, Wildlife plan, and Leak Detection plan. Requested information on 5/11. Lighting plan and Emergency response plan need to be revised. Specific questions on the Noise plan were sent 3/29 Attached CDPHE Consultation provided by CDPHE and Operator's response to CDPHE Consultation as "Other"	05/20/2022
OGLA	Weld County Comment from LGD: The Weld County Oil and Gas Energy Department (Weld County or OGED) submits the following comments: Case number 1041WOGLA19-0042 has been assigned to the Wells Ranch CDP Application made up of forty-four (44) Oil & Gas Locations including the A07-01 Pad. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://accela-aca.co.weld.co.us/citizenaccess/Default.aspx. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. Prior to submittal of the 1041WOGLA Application, Weld County attended the community meeting regarding the proposed Wells Ranch CDP, held by Noble Energy, Inc. (Noble) at the Eaton Community Center on June 13, 2019. The Wells Ranch CDP was reviewed and processed under Weld County Code Ordinance 2019-10. The 1041 WOGLA CDP Application was received on October 29, 2019, and the 1041 WOGLA Hearing was held on December 12, 2019. The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA19-0042. Pursuant to Code requirements in place at the time of processing the Wells Ranch CDP Application, Weld County provided notice of the 1041WOGLA hearing to all Building Unit owners with one thousand three hundred twenty (1, 320) feet of each individual Oil and Gas Location. In addition to those Code required notice parties OGED also provided notice to all parcel owners within one thousand five hundred (1,500) feet of the proposed Oil and Gas Locations as well as those parcels impacted by the proposed Haul Route. A total of two hundred fifty (250) parties were noticed by Weld County. Weld County received public comment from two (2) noticed individuals, the first regarding mineral development associated with the Wells Ranch CDP and the second regarding concerns related to road conditions and traffic. Communication with OGED alleviated those concerns and no public comments were made during the 1041WOGLA hearing. The final order was recorded with the Weld County Clerk Recorder on January 8, 2020, at reception number 4556398, and was noticed in the Greeley Tribune on April 8, 2020. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S. At least 45 days prior to construction of the A07-01 Pad Location, Noble will submit site-specific 1041 WOGLA information detailing elements specific to the A07-01 Pad Location. Noble has not submitted the site-specific 1041WOGLA information to OGED for determination on the A07-01 Pad Location Construction of each Oil and Gas Location within the CDP shall not commence until OGED has issued a determination that, based on the site-specific information submitted by Noble, the proposed Oil and Gas Location and site-specific BMPs are consistent with the information provided in the CDP Application and compliant with the requirements of the Weld County Code in effect at the time of construction. Site-specific conditions of approval may be included with the OGED determination when necessitated by changes in the Code or the surrounding Land Use. Execution of operations on the individual Oil & Gas Locations authorized by 1041WOGLA19-0042 shall be commenced within ten (10) years from the date the 1041 WOGLA CDP Permit was placed on record with the Weld County Clerk and Recorder and published in the Greeley Tribune. Construction must commence on all individual Locations within that timeframe, or an extension must be requested and approved. If any Location within the Wells Ranch 1041 WOGLA CDP is not constructed within the approved timeframe, that Location will expire, and the Operator will be required to submit a new 1041 WOGLA permit for the impacted Location. While Weld County has no concerns with the pending COGCC permit and would recommend approval, Weld County reserves the right to review the site-specific details for determination of compliance with Development Standards and applicable Weld County Code at the time of submittal.	04/11/2022

OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	03/09/2022

Total: 7 comment(s)

Public Comments

No public comments were received on this application during the comment period.

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number: 402121126

Date Received: 09/28/2021

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at https://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:
OGDP ID:
Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210900156		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
481728	WR OGDP 1

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
[ ] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
[ ] This Location includes a Rule 309.e.(2).E variance request.
[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 100322
Name: NOBLE ENERGY INC
Address: 2001 16TH STREET SUITE 900
City: DENVER State: CO Zip: 80202

Contact Information

Name: Mosiah Montoya
Phone: (303) 249 2425
Fax: ( )
email: mo.montoya@chevron.com

FINANCIAL ASSURANCE

[X] Plugging and Abandonment Bond Surety ID (Rule 706): 20030009
[ ] Gas Facility Surety ID (Rule 711): _____
[ ] Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: A07-04 Number: Pad

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NWNW Section: 7 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4723

Latitude: 40.505860 Longitude: -104.600490

GPS Quality Value: 1.4 Type of GPS Quality Value: PDOP Date of Measurement: 06/01/2019

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Well Site is served by Production Facilities		402118768

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970 400 3579

Contact Email: oged@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

A 1041 WOGLA was filed for the CDP as 1041WOGLA19-0042 on 12/10/2019 and recorded at reception #4556398 on 1/8/2020. Site-specific supplemental information will be filed prior to commencement of operations.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- [X] i. WPS < 2,000 feet from RBU/HOBU
- [ ] ii. WPS < 2,000 feet from School/Child Care Center
- [ ] iii. WPS < 1,500 feet from DOAA
- [ ] iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- [ ] v. WPS within a Floodplain
- [ ] vi.aa. WPS within a surface water supply area
- [ ] vi.bb. WPS < 2,640 feet from Type III or GUDI well
- [X] vii. WPS within/immediately upgradient of wetland/riparian corridor
- [ ] viii. WPS within HPH and CPW did not waive
- [ ] ix. Operator using Surface bond
- [ ] x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: [ ]

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
	40.501099	-104.547997	x											Tier III-B: Alternate Location 6 on Narrative and Map.
1	40.509499	-104.594002	x											Tier III-B: Alternate Location 1 on Narrative and Map.

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Braskaland LLC Phone:

Address: P.O. Box 479 Fax:

Address: Email: ryan.antonio@chevron.com

City: Sidney State: NE Zip: 69162-0479

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[ ] The Operator/Applicant is the surface owner.

[X] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	8	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	1
Pump Jacks	0	Separators	0	Injection Pumps	6	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	Electric Motors	0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	2	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Manifolds	2
Multi-Phase Flowmeters	8
Communication Towers	2
Solar Skids	5

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Eight (8): 2"-4" Steel Three Phase Flowlines
Ten (10): 2"-4" Steel Gas Lift Lines
Three (3): 3"-8" Temporary Fresh Water Poly Lines

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	297	Feet	N					
Residential Building Unit (RBU):	297	Feet	N	☐	☒	☐	Location is in approved CDP: Order 1-241	☐
High Occupancy Building Unit(HOBU)	5280	Feet	NE	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	101	Feet	W					
Above Ground Utility:	250	Feet	SW					
Railroad:	5280	Feet	SW					
Property Line:	112	Feet	W					
School Facility:	5280	Feet	NE					
Child Care Center:	5280	Feet	NE					
Disproportionately Impacted (DI) Community:	5280	Feet	NE					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	NE	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	2	1	4
Residential Building Units	2	1	4
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 10.40

Size of location after interim reclamation in acres: 2.20

Estimated post-construction ground elevation: 4723

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

Describe the current land use:

Irrigated crop - farming

Describe the Relevant Local Government's land use or zoning designation:

Agricultural - Near-Urban

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):

Reference Area Latitude: Reference Area Latitude:

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 32 - Kim loam, 1 to 3 percent slopes

NRCS Map Unit Name: 47 - Olney fine sandy loam, 1 to 3 percent slopes

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 460 Feet SW

Spring or Seep: 5280 Feet E

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 29 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Location is sensitive due to proximity to ditches, Greeley #2 canal, and residential water well.
Depth to groundwater taken from water well permit #254883-

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 89 Feet W in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 132 Feet SW

Provide a description of the nearest downgradient surface Waters of the State:

Nearest surface water is ditch west and south of pad north of Greeley No. 2 Canal.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

- [X] Federal (FEMA)
- [ ] State
- [ ] County
- [ ] Local
- [ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- [ ] This location is included in a Wildlife Mitigation Plan
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- [ ] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: _____

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- [ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- [ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- [ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- [ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- [X] The applicant has obtained a Rule 1202.a CPW waiver.
- [ ] The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 15

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [X] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [X] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [X] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [X] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- ☐ 304.b.(1). Local Government Siting Information
- ☐ 304.b.(2). Alternative Location Analysis
- ☐ 304.b.(3). Cultural Distances
- ☐ 304.b.(4). Location Pictures
- ☐ 304.b.(5). Site Equipment List
- ☐ 304.b.(6). Flowline Descriptions
- ☐ 304.b.(7). Drawings
- ☐ 304.b.(8). Geographic Information System (GIS) Data
- ☐ 304.b.(9). Land Use Description
- ☐ 304.b.(10). NRCS Map Unit Description
- ☐ 304.b.(11). Best Management Practices
- ☐ 304.b.(12). Surface Owner Information
- ☐ 304.b.(13). Proximate Local Government
- ☐ 304.b.(14). Wetlands
- ☐ 304.b.(15). Schools and Child Care Centers
- ☐ 304.c.(1). Emergency Spill Response Program
- ☐ 304.c.(2). Noise Mitigation Plan
- ☐ 304.c.(3). Light Mitigation Plan
- ☐ 304.c.(4). Odor Mitigation Plan
- ☐ 304.c.(5). Dust Mitigation Plan
- ☐ 304.c.(6). Transportation Plan
- ☐ 304.c.(7). Operations Safety Management Program
- ☐ 304.c.(8). Emergency Response Plan
- ☐ 304.c.(9). Flood Shut-In Plan
- ☐ 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- ☐ 304.c.(11). Waste Management Plan
- ☐ 304.c.(12). Gas Capture Plan
- ☐ 304.c.(13). Fluid Leak Detection Plan
- ☐ 304.c.(14). Topsoil Protection Plan
- ☐ 304.c.(15). Stormwater Management Plan
- ☐ 304.c.(16). Interim Reclamation Plan
- ☐ 304.c.(17). Wildlife Plan
- ☐ 304.c.(18). Water Plan
- ☐ 304.c.(19). Cumulative Impacts Plan
- ☐ 304.c.(20). Community Outreach Plan
- ☐ 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments

Location ID 327105 is a previously permitted PDC Energy location. This location has been traded and the well locations have been abandoned by Noble. The new A07-04 pad overlaps the existing location's disturbance area and the Kreps 11-7 well as well as the associated tank battery. Noble will assume final reclamation responsibilities for the Kreps 11-7 tank battery location once the A07-04 wells are drilled and interim reclamation has commenced.
The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner and Noble will ensure that the surface owner(s) promptly receive notice of the Recommendation.
Operator is committed to connecting to a gathering system by the Commencement of Production Operations.

One (1) 67' diameter, 20,000 bbl Minion Tank will be on location for 4 months. The Minion Tank is a MLVT but labeled Minion Tank on the drawings.

Pad Soil type(s): 32 - Kim loam, 1 to 3 percent slopes; 47 - Olney fine sandy loam, 1 to 3 percent slopes
Access Soil type(s): 32 - Kim loam, 1 to 3 percent slopes; 47 - Olney fine sandy loam, 1 to 3 percent slopes
Flowline Corridor Soil type(s): 4 - Aquolls and Aquepts, flooded; 47 - Olney fine sandy loam, 1 to 3 percent slopes; 51 - Otero sandy loam, 1 to 3 percent slopes

NRCS data is not accurate at scale for access roads and flowline corridor.

The following 304.c Plans are not required for this submittal:
• Emergency Spill Response Program; not near Type III or GUDI well.
• Flood Shut-In Plan; not in floodplain
• Hydrogen Sulfide Drilling Plan; no H2S in area
• Gas Capture Plan; Operator is committed to a gathering system connection
• Community Outreach Plan; no DIC within 2,000'

Informed Consent Letter attachment contains two (2) signed letters for Residential Building Unit owners within 500' of the Working Pad Surface.

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 09/28/2021 Email: regulatory@ascentgeomatics.com

Print Name: Ann Feldman Title: Regulatory Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ **Director of COGCC** Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type	Description
Drilling/Completion Operations	Operator will use group III drilling mud.
Drilling/Completion Operations	Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig
Noise mitigation	Operator will extend the sound wall, of at least 32 ft. height, from the northeast corner of the working pad surface south so that it runs along the northern 3/4 of the eastern side of the working pad surface. Gaps for egress, airflow, etc. are allowable.
Noise mitigation	Prior to commencing construction, Operator will submit via Form 4 Sundry Notice, and obtain approval of, an updated Noise Mitigation Plan that includes: 1) the ambient noise survey used to modify allowable noise levels through Rule 423.d; 2) a BMP that specifies the noise limits that are adjusted based on ambient noise levels through Rule 423.d. This is to be provided for any individual Noise Point of Compliance with an adjusted noise limit.
4 COAs	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	Lighting on well pad locations is considered temporary and will be used during drilling, completion and construction activities. Temporary lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and building units within 1,500 feet. Lighting will be turned off when practical, i.e., no operations being conducted.
2	Planning	Noble shall identify the location of the wellbore with a permanent monument as specified in Rule 603.n. The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument.
3	Planning	Per Rule 603.e, Noble shall provide for the development of multiple reservoirs by drilling on existing pads or by multiple completions or commingling in existing wellbores. Nobles Wells Ranch CDP development is confined to a specific disturbance corridor, per landowner requirements. Noble does not plan to drill any development areas from an existing disturbance.
4	Planning	Noble shall consolidate wells to create multi-well pads. Multi-well production facilities shall be located as far as possible from Building Units. • The pad shall be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping. • Pads shall have all weather access roads to allow for operator and emergency response.
5	Community Outreach and Notification	The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner. Noble will ensure that the surface owner(s) promptly receive notice of the Director's Recommendation.
6	Traffic control	Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000’ of occupied residences on Weld County Road 49 and on lease roads as necessary in cooperation with the county.
7	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
8	General Housekeeping	Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.
9	General Housekeeping	During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds.
10	General Housekeeping	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located on the proposed Oil and Gas Location. The maximum height of topsoil stockpiles will be 12 feet.

11	Wildlife	Noble initiates multiple levels of Environmental Site Screening efforts for the protection of sensitive wildlife, vegetation, groundwater and surface water resources at every Wells Ranch CDP project area. Prior to construction, a comprehensive desktop survey and field-based wildlife clearance survey will be performed to determine the presence of seasonally protected raptor and migratory bird species. • In-season, raptor nesting clearance surveys will be performed by a certified biologist no more than one-week prior to construction. • In-season, migratory bird nesting (MBTA Compliance) will be cleared within 50-feet of the proposed disturbance 2-3 days prior to ground clearing activities. • Although Bald and Golden Eagle are included in the raptor nesting survey-suite, eagle habitat is not delineated within the Wells Ranch CDP.
12	Storm Water/Erosion Control	BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. Specific BMP's used will include stockpile stabilization, grading, sediment traps, and perimeter barriers based on final construction design and will remain in place until the pad reaches final reclamation. Prior to interim reclamation of the location, the topsoil stockpiles will be utilized as raised earthen berms along the eastern, northern and southern edges of the pad.
13	Storm Water/Erosion Control	. Structural Control measure practices specific to the A07-04 Pad located within the Wells Ranch proper area will include the following: • Compost filter socks (Filtrexx or similar) sediment control logs (CFS); • Culvert (C); • Hydro-mulch (HM); • Rock socks (RS); • Seeding (S); • Soil roughening (SR); and • Vehicle tracking control (VTC). Inspections during construction include: At least one inspection every 7 calendar days; OR 2. At least one inspection every 14 calendar days, if post-storm event inspections are conducted within 24 hours following precipitation which causes surface erosion. Once the Pad enters the Completed Stage, it will be inspected a minimum of once every 30 days. Post-precipitation inspections are not required once the Pad is in the Completed Stage. However, more frequent inspections may be directed by Noble to confirm adequate maintenance or repairs.
14	Storm Water/Erosion Control	• A sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practices. A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap to prevent offsite migration of sediment/contaminant into the nearby surface water features. If necessary, check dams will be constructed within the swale.
15	Storm Water/Erosion Control	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located on the proposed Oil and Gas Location.
16	Material Handling and Spill Prevention	Any material not in use that might constitute a fire hazard shall be removed a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area shall comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado. • Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, additional equivalent safety measures will be taken.
17	Material Handling and Spill Prevention	Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. The sales line is in-place and during any emergency where the sales line is not operational, Noble would shut-in production.

18	Material Handling and Spill Prevention	Noble Energy Inc. designs well heads and supporting infrastructure on the well pad to avoid releases and to be compliant with all regulations specific to leak detection and control (i.e. SPCC 40CFR112). Daily, monthly and annual inspections are performed at each well pad to confirm operational integrity and regulatory compliance. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
19	Material Handling and Spill Prevention	Noble will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks, and fittings. Annual SPCC inspections will be conducted and documented. Flowline integrity will be maintained through implementation of Rule 1104 management practices. Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
20	Material Handling and Spill Prevention	Due to using a closed loop system, pits will not be used.
21	Material Handling and Spill Prevention	There will be no tanks or separators at the A07-04 Pad. Facilities will be located on A07-08 Facility. • A closed–loop system will be used for drilling operations as required by Rule 408.a. • Operator will use SCADA during drilling and completions to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary
22	Material Handling and Spill Prevention	Inspection • All facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. Infrared surveys will be used to identify any leaks coming from the flowlines on a regular basis Testing • Volumetric Testing Involves measurement of liquid volume which must be added or removed from system to maintain constant pressure; volume changes indicate either leaks or thermal expansion/contraction of liquid. New flowlines will be hydrotested to manufactures recommended levels before placed into use. • Pressure testing of the flowlines is conducted on an annual basis. • Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conduced monthly by a third-party specialist.

23	Material Handling and Spill Prevention	• Daily site visits are made by lease operators (aka pumpers) to the well pad for maintenance issues including leaks and spill potential. Periodic site inspections will be conducted by 3rd party environmental contractors to look for any signs of leaks and or potential leaks. Infrared surveys will be used to identify any leaks coming from the flowlines on a regular basis. New flowlines will be hydrotested to manufacturer's recommended levels before placed into use. • The location will utilize a SCADA (remote monitoring) system to monitor facility pressures and flows during drilling and completions. Sensors are placed on multiple points throughout the facility and are designed to measure the system for irregularities that would indicate a leak in the system or change in production of oil, water, or gas. The SCADA system is designed with alarms that are triggered by irregularities and will activate automatic shut-in of the well and facility.
24	Material Handling and Spill Prevention	• During drilling and completions operations a temporary impermeable synthetic or geosynthetic liner will be utilized under equipment. This liner will be installed on top of the plated surface and will provide an additional layer of protection against spills. Secondary containment devices, such as duck ponds or equivalent type products, will be used to protect any pipe connections or equipment that carry, mix, or could possibly leak fluids or chemicals.
25	Material Handling and Spill Prevention	Pad construction – Noble will construct the location with 4-6" of clay and 3-5" of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features. Liners - A minimum 30-mil poly liner will be utilized under the drilling rig, mud tanks, shakers and drill cuttings bins. During completions, most equipment associated with hydraulic fracturing will be underlain by a minimum 30-mil poly liner with drive-over foam berms. Bulk liquids used during D&C activities, including chemical injection skids, acid and chlorine tanks, and fuel tanks will be containerized in appropriate sealed vessels and underlain by an impervious liner and/or secondary containment system capable of containing any spill or leak from that vessel.
26	Material Handling and Spill Prevention	Noble will not situate new staging, refueling, or chemical storage areas within 500 feet of the Ordinary High-Water Mark (OHWM) of any river, perennial or intermittent stream, lake, pond or wetland
27	Dust control	Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions. Engineered sound walls no less than 16' tall will be used along the North, West, and South sides to mitigate dust impacts to these residences.

28	Dust control	DUST BMPs o Use only fresh water sources (non-potable) when watering areas within 300 feet of the ordinary high-water mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (Hazard Communication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.) • All soil piles created by construction activities will be managed utilizing Hydro-mulch, straw crimping, and/or tracking methods to prevent dust from exiting location and creating a hazard during pre-production activities. Soil piles will be graded and/or seeded to prevent erosion and the generation of dust post-production. • Noble Energy will minimize the amount of fugitive dust using speed restrictions. All vehicles will be subject to a speed limit of 20 MPH on all lease roads to minimize dust. • Noble Energy will mitigate the creation of fugitive dust through regular road maintenance as coordinated through agreements with Relevant Local Governments or Agencies with road jurisdiction. • Noble Energy will use methods including wind breaks and barriers, road or facility surfacing, and soil stockpile stabilization measures to suppress fugitive dust caused solely by wind. • Noble Energy will avoid the creation of fugitive dust by restricting or limiting construction activity during high wind days. • Noble Energy will not use any of the following fluids for dust suppression: o Produced water o E&P waste or hazardous waste o Crude oil or any oil specifically designed for road maintenance o Chemical solvents o Process fluids • Access road(s) will be watered or treated with one of the following commercial Magnesium Chloride dust suppressants, as needed: o Roadsaver o Roadsaver Compaction Aid o DuraBlend • Prior to the application of dust suppressant to any county or public roads, coordination will be conducted with Weld County Department of Public Works by Noble Energy and any relevant vendors. • Noble Energy will maintain safety data sheets (“SDS”) for any chemical-based dust suppressant and make the SDS immediately available upon request to the COGCC Director and to the Local Government. Safety Data Sheet(s) for any chemical-based dust suppressant will be archived and maintained until the site passes final site Reclamation and transfer the records upon transfer of property ownership. • All secondary roads created for this project (non-public roadways) will be finished with ½” – ¾” crushed stone road base. -Silica dust from handling sand used in hydraulic fracturing operations will be mitigated by utilization of the enclosed Sand Box type sand delivery method.

29	Construction	At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements and shall be maintained in a reasonable condition. Noble Energy plans on building the access road off Weld County Road 49 for Drilling and Completion activities. Local government will not require coordination of a traffic plan with the local jurisdiction for this location.
30	Construction	Grading and drainage of the pad will be designed with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad's perimeter diversion channel and then directly into the sediment-trap structure.
31	Construction	Unless otherwise requested by the Surface Owner, well sites constructed within the Designated Setback location will be fenced to restrict access by unauthorized persons.
32	Construction	Per the June 13, 2014 COGCC Policy on the use of Modular Large Volume Tanks- Noble will have a 3rd-Party Operator construct, operate and monitor the freshwater Minion Tank structure. The Operator will have an Minion Tank Design Package, certified and sealed by a licensed PE, on file and available on request. The Operator will comply with all siting, construction, inspection and testing requirements specified in the Design Package and meeting COGCC Policy.
33	Construction	Noble Energy will direct site lighting downward and inward, such that no light shines above a horizontal plane passing through the center point light source. • Noble Energy will use dampening and focusing technology within fixtures that obscures, blocks, or diffuses the light to reduce light intensity outside the boundaries of the Oil and Gas Location. • When installed, Noble Energy will locate lighting inside and beneath the 32' noise barrier and take precautions to ensure that lights do not shine outside of openings in the barrier. • Noble Energy will conduct construction, flowback, and interim reclamation activities only during daylight hours to maximize the use of natural lighting. • On occasion, the use of additional or alternative lighting sources may be required for site security or when field conditions experience a significant alteration. If such changes occur, light measurements may be conducted at the nearest RBU(s) to ensure compliance. If it is determined that the measured light level exceeds standards, additional BMPs will be implemented to the site lighting to achieve compliance. These changes may include removing or replacing light sources, repositioning equipment on location, or installing additional sound walls. Drilling and Completions • Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned.
34	Noise mitigation	Temporary operations – Baseline surveys will be completed at the residences to the North and south Engineered sound walls no less than 16' tall will be used along the (appropriate sides for well pad) to mitigate noise impacts to these residences. Sound wall gaps will be strategically placed to adequately protect residences yet allow proper air-flow across the drill pad. The use of equipment specific sound walls will be used as necessary around rig generators in the event of sound impacts during operations. The rig will be oriented on the location so that the pieces of equipment that generate the highest noise levels will face away from the closest building unit owners. Additional noise mitigation technology will be used with the completion equipment. Water will be piped into location to reduce the noise associated with heavy-duty trucks.

35	Noise mitigation	Mitigation measures will be completed prior to the commencement of the noise generating activity. Temporary barriers will be installed during daylight hours within the disturbance area, as shown on the attached location figure, and will remain in place for the duration of drilling and completion activities on the site. Sound walls will be 32' tall at a minimum and will reduce cumulative noise levels, on average 7-10 decibels. Wall height may be increased if it is determined additional height is necessary to control sound. Sound walls will be constructed with sound dampening material on the sides and double layer sound dampening material may be used if needed. Sound walls will be on the northeast corner along the north and west sides to the southwest corner of the applicable area, with gaps for access, egress, and airflow across the applicable area. The sound walls will remain in place until the applicable noise sources have been removed. Additional sound barriers may also be placed around equipment, such as frac pumps or generators, as needed. Noble Energy will take continuous sound measurements from each noise point of compliance during pre-production activities and ongoing operations lasting longer than 24 consecutive hours such as drilling, completion, recompletion, stimulation, and well maintenance, in areas zoned residential or within 2,000 feet of a Building Unit. If compliance is not confirmed, Operator will employ additional mitigation to ensure compliance with COGCC and Weld County rules, such as exhaust mufflers, hay bales, additional sound walls, or replacement of offending noisy equipment with quieter systems
36	Emissions mitigation	Noble shall employ sand traps, surge vessels, separators, and tanks during flowback and cleanout operations to safely maximize resource recovery and minimize releases to accommodate green completions techniques. Noble will use an enclosed combustion device with a 98% design destruction efficiency for hydrocarbons. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to the sales line or wells will be shut in and gas conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Noble will comply with the prohibition of venting or flaring produced gas emissions or seek relief under Rule 903.d. The Rule 903.a notice and approval requirements apply regardless of relief sought under 903.a.
37	Emissions mitigation	• Flow lines, separators, and sand traps capable of supporting green completions as described in Rule 805 shall be installed at any Oil and Gas Location at which commercial quantities of gas are reasonably expected to be produced based on existing adjacent wells within 1 mile. . • Temporary flowback flaring and oxidizing equipment shall include the following: Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases. • Environmental Control Devices that are 98% efficient will be operational at the start of first production. • Instrument air systems to drive pneumatic controllers, in lieu of natural gas, will be installed. • Ultra-lean burning natural gas electrical generators or line power, in lieu of diesel generators, will be installed. • LACT units for oil and produced water to pump liquids into gathering pipelines will be utilized in lieu of trucking. • All surface pipe will be stringently tested to ensure system integrity. • Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. • During ozone action season (May 1-September 30), on action alert days, Noble will reschedule non-essential operational activities such as pigging; well uploading, tank cleanings; minimizing vehicle mileage and idle time; fueling after sunset; and properly maintaining vehicles.

38	Odor mitigation	If odors are detected from removed drill piping, production tubing or sucker rods, operator will cover or enclose, or equivalent screening from wind or heat sources while storing such equipment for removal. To reduce odors during drilling and completion, the rig will be washed of oily debris before moving in. Operator will utilize drying shakers to minimize residual oil on cuttings prior to transport and will promptly remove cuttings during drilling operations. Cuttings will not be stored on site. Trucks will be prohibited from idling on location when not in use to prevent to accumulation of odors from exhaust.
39	Drilling/Completion Operations	All surficial activities performed by Noble during well drilling and completion activities will be protective of the environment. Bulk liquids used during D&C activities will be containerized in appropriate sealed vessels and underlain by an impervious liner and containment berm capable of containing any spill or leak from that vessel. Valves and temporary flow lines associated with D&C activities will be inspected daily for leaks while in service. Any spills identified on location will be immediately contained, recovered, disposed of, remediated and reported per COGCC Series 900 Rules (906. Spills and Releases).
40	Drilling/Completion Operations	All loadlines will be bullplugged or capped.
41	Drilling/Completion Operations	All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.
42	Interim Reclamation	During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds. All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be returned to farmland in the first favorable season following rig demobilization. Noble Energy will be responsible for segregating the topsoil, backfilling, re-compacting any backfill, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and will reclaim such area to be returned to preexisting conditions as best as possible with control of all weeds.

Total: 42 comment(s)

Attachment List

Att Doc Num	Name
2316726	CDPHE CONSULTATION
2316727	OTHER
2316729	GEOLOGIC HAZARD MAP
2316735	CDPHE CONSULTATION APPENDIX A
2316736	COGCC RESPONSE TO CDPHE CONSULTATION
2316737	DIRECTOR'S RECOMMENDATION
402121126	FORM 2A SUBMITTED
402931583	ACCESS ROAD MAP
402931584	CULTURAL FEATURES MAP
402931586	DIRECTIONAL WELL PLAT
402931588	HYDROLOGY MAP
402931589	LOCATION DRAWING
402931592	LOCATION PICTURES
402931599	WILDLIFE HABITAT DRAWING
402931601	ALA DATASHEET
402931602	LOCATION AND WORKING PAD GIS GDB
402931620	INFORMED CONSENT LETTER
402931622	NRCS MAP UNIT DESC
402931625	LAYOUT DRAWING
402931626	SURFACE AGRMT/SURETY
402931636	ALA NARRATIVE SUMMARY
402931637	RELATED LOCATION AND FLOWLINE MAP
402931638	LOCAL/FED FINAL PERMIT DECISION
402931639	PRELIMINARY PROCESS FLOW DIAGRAMS
402931640	CPW WAIVER
402931641	LESSER IMPACT AREA EXEMPTION REQUEST

Total Attach: 26 Files

General Comments

User Group	Comment	Comment Date
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	06/10/2022
OGLA	Noble requested a Lesser Impact Area (LIA) exemption from the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed location. Noble provided a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property. The LIA request remains attached, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.	06/07/2022
OGLA	Operator provided a statement for Noble to receive email notifications on behalf of the Surface owner. Per phone conversation on 6/7, the Minion tank labeled on the drawings is actually a MLVT. Updated equipment list with a MLVT and removed the Minion Tank. Operator confirmed there is a topsoil stockpile on the south side of the pad. Replaced Geologic Hazard Map with revised version provided by Operator.	06/07/2022

OGLA	COGCC Staff Technical review: BMPs listed on Form 2A reference old rules or was incomplete. Location overlaps an existing, but closed location – location owned Noble but well is by another Operator. Dust plan BMP does not match BMP on the Form 2A. Request information on existing location status. Lighting plan and Emergency response plan need to be revised. Specific questions on the Noise plan were sent 3/29 Attached CDPHE Consultation provided by CDPHE and Operator's response to CDPHE Consultation as "Other"	05/20/2022
OGLA	Weld County LGD email the following to COGCC: The Weld County Oil and Gas Energy Department (Weld County or OGED) submits the following comments: Case number 1041WOGLA19-0042 has been assigned to the Wells Ranch CDP Application made up of forty-four (44) Oil & Gas Locations including the A07-04 Pad. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://accela-aca.co.weld.co.us/citizenaccess/Default.aspx. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. Prior to submittal of the 1041WOGLA Application, Weld County attended the community meeting regarding the proposed Wells Ranch CDP, held by Noble Energy, Inc. (Noble) at the Eaton Community Center on June 13, 2019. The Wells Ranch CDP was reviewed and processed under Weld County Code Ordinance 2019-10. The 1041 WOGLA CDP Application was received on October 29, 2019, and the 1041 WOGLA Hearing was held on December 12, 2019. The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA19-0042. Pursuant to Code requirements in place at the time of processing the Wells Ranch CDP Application, Weld County provided notice of the 1041WOGLA hearing to all Building Unit owners with one thousand three hundred twenty (1, 320) feet of each individual Oil and Gas Location. In addition to those Code required notice parties OGED also provided notice to all parcel owners within one thousand five hundred (1,500) feet of the proposed Oil and Gas Locations as well as those parcels impacted by the proposed Haul Route. A total of two hundred fifty (250) parties were noticed by Weld County. Weld County received public comment from two (2) noticed individuals, the first regarding mineral development associated with the Wells Ranch CDP and the second regarding concerns related to road conditions and traffic. Communication with OGED alleviated those concerns and no public comments were made during the 1041WOGLA hearing. The final order was recorded with the Weld County Clerk Recorder on January 8, 2020, at reception number 4556398, and was noticed in the Greeley Tribune on April 8, 2020. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S. At least 45 days prior to construction of the A07-04 Pad Location, Noble will submit site-specific 1041 WOGLA information detailing elements specific to the A07-04 Pad Location. Noble has not submitted the site-specific 1041WOGLA information to OGED for determination on the A07-04 Pad Location Construction of each Oil and Gas Location within the CDP shall not commence until OGED has issued a determination that, based on the site-specific information submitted by Noble, the proposed Oil and Gas Location and site-specific BMPs are consistent with the information provided in the CDP Application and compliant with the requirements of the Weld County Code in effect at the time of construction. Site-specific conditions of approval may be included with the OGED determination when necessitated by changes in the Code or the surrounding Land Use. Execution of operations on the individual Oil & Gas Locations authorized by 1041WOGLA19-0042 shall be commenced within ten (10) years from the date the 1041 WOGLA CDP Permit was placed on record with the Weld County Clerk and Recorder and published in the Greeley Tribune. Construction must commence on all individual Locations within that timeframe, or an extension must be requested and approved. If any Location within the Wells Ranch 1041 WOGLA CDP is not constructed within the approved timeframe, that Location will expire, and the Operator will be required to submit a new 1041 WOGLA permit for the impacted Location. While Weld County has no concerns with the pending COGCC permit and would recommend approval, Weld County reserves the right to review the site-specific details for	04/12/2022

	determination of compliance with Development Standards and applicable Weld County Code at the time of submittal.	
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	03/09/2022

Total: 6 comment(s)

Public Comments

No public comments were received on this application during the comment period.

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number: 402118769

Date Received: 09/28/2021

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at https://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:
OGDP ID:
Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210900156		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
481728	WR OGDP 1

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
[ ] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
[ ] This Location includes a Rule 309.e.(2).E variance request.
[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 100322
Name: NOBLE ENERGY INC
Address: 2001 16TH STREET SUITE 900
City: DENVER State: CO Zip: 80202

Contact Information

Name: Mosiah Montoya
Phone: (303) 249 2425
Fax: ( )
email: mo.montoya@chevron.com

FINANCIAL ASSURANCE

[X] Plugging and Abandonment Bond Surety ID (Rule 706): 20030009
[ ] Gas Facility Surety ID (Rule 711): _____
[ ] Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: A07-23 Number: Pad

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NESE Section: 7 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4725

Latitude: 40.497180 Longitude: -104.587000

GPS Quality Value: 1.4 Type of GPS Quality Value: PDOP Date of Measurement: 06/25/2019

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Well Site is served by Production Facilities		402118768

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970 400 3579

Contact Email: oged@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

A 1041 WOGLA was filed for the CDP as 1041WOGLA19-0042 on 12/10/2019 and recorded at reception #4556398 on 1/8/2020. Site-specific supplemental information will be filed prior to commencement of operations.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- [X] i. WPS < 2,000 feet from RBU/HOBU
- [ ] ii. WPS < 2,000 feet from School/Child Care Center
- [ ] iii. WPS < 1,500 feet from DOAA
- [ ] iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- [ ] v. WPS within a Floodplain
- [ ] vi.aa. WPS within a surface water supply area
- [ ] vi.bb. WPS < 2,640 feet from Type III or GUDI well
- [X] vii. WPS within/immediately upgradient of wetland/riparian corridor
- [ ] viii. WPS within HPH and CPW did not waive
- [ ] ix. Operator using Surface bond
- [ ] x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: [ ]

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
1	40.498501	-104.582001	x											Tier III-A; Alternate Location 3 on Narrative and Map.
2	40.501099	-104.547997	x											Tier III-B; Alternate Location 6 on Narrative and Map.

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Robert L Carlson Phone:

Address: 24643 County Road 70 Fax:

Address: Email: ryan.antonio@chevron.com

City: Eaton State: CO Zip: 80615-9570

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[ ] The Operator/Applicant is the surface owner.

[X] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	4	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	1
Pump Jacks	0	Separators	0	Injection Pumps	4	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	Electric Motors	0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	1	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Manifold	1
Multi-Phase Flowmeter	4
Communication tower	1
Soalr Skid	3

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Four (4): 2"-4" Steel Three Phase Flowlines
Five (5): 2"-4" Steel Gas Lift Lines
Three (3): 3"-8" Temporary Fresh Water Poly Lines

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	296	Feet	NE					
Residential Building Unit (RBU):	491	Feet	E	☐	☒	☐	Location is in approved CDP: Order 1-241	☐
High Occupancy Building Unit(HOBU)	5280	Feet	W	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	606	Feet	N					
Above Ground Utility:	590	Feet	E					
Railroad:	5280	Feet	W					
Property Line:	615	Feet	E					
School Facility:	5280	Feet	N					
Child Care Center:	5280	Feet	N					
Disproportionately Impacted (DI) Community:	5280	Feet	NW					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	SW	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	1	2	3
Residential Building Units	1	2	3
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 8.40

Size of location after interim reclamation in acres: 2.00

Estimated post-construction ground elevation: 4725

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

Describe the current land use:

Irrigated Crop - farming

Describe the Relevant Local Government's land use or zoning designation:

Agricultural, Near-Urban Planning Area

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):

Reference Area Latitude: Reference Area Latitude:

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 37 - Nelson fine sandy loam, 0 to 3 percent slopes

NRCS Map Unit Name: 52 - Otero sandy loam, 3 to 5 percent

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 1192 Feet SW

Spring or Seep: 5280 Feet E

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 28 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Location is sensitive due to proximity to pond, low lying area, Greeley #2 Canal, concrete ditch, and mapped wetland.
Depth to groundwater taken from water well permit #267-WCB

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 256 Feet NW

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 120 Feet W

Provide a description of the nearest downgradient surface Waters of the State:

Greeley No. 2 Canal

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

- [X] Federal (FEMA)
- [ ] State
- [ ] County
- [ ] Local
- [ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- [ ] This location is included in a Wildlife Mitigation Plan
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- [ ] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: _____

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- [ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- [ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- [ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- [ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- [X] The applicant has obtained a Rule 1202.a CPW waiver.
- [ ] The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 15

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [X] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [X] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [X] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [X] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- [ ] 304.b.(1). Local Government Siting Information
- [ ] 304.b.(2). Alternative Location Analysis
- [ ] 304.b.(3). Cultural Distances
- [ ] 304.b.(4). Location Pictures
- [ ] 304.b.(5). Site Equipment List
- [ ] 304.b.(6). Flowline Descriptions
- [ ] 304.b.(7). Drawings
- [ ] 304.b.(8). Geographic Information System (GIS) Data
- [ ] 304.b.(9). Land Use Description
- [ ] 304.b.(10). NRCS Map Unit Description
- [ ] 304.b.(11). Best Management Practices
- [ ] 304.b.(12). Surface Owner Information
- [ ] 304.b.(13). Proximate Local Government
- [ ] 304.b.(14). Wetlands
- [ ] 304.b.(15). Schools and Child Care Centers
- [ ] 304.c.(1). Emergency Spill Response Program
- [ ] 304.c.(2). Noise Mitigation Plan
- [ ] 304.c.(3). Light Mitigation Plan
- [ ] 304.c.(4). Odor Mitigation Plan
- [ ] 304.c.(5). Dust Mitigation Plan
- [ ] 304.c.(6). Transportation Plan
- [ ] 304.c.(7). Operations Safety Management Program
- [ ] 304.c.(8). Emergency Response Plan
- [ ] 304.c.(9). Flood Shut-In Plan
- [ ] 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- [ ] 304.c.(11). Waste Management Plan
- [ ] 304.c.(12). Gas Capture Plan
- [ ] 304.c.(13). Fluid Leak Detection Plan
- [ ] 304.c.(14). Topsoil Protection Plan
- [ ] 304.c.(15). Stormwater Management Plan
- [ ] 304.c.(16). Interim Reclamation Plan
- [ ] 304.c.(17). Wildlife Plan
- [ ] 304.c.(18). Water Plan
- [ ] 304.c.(19). Cumulative Impacts Plan
- [ ] 304.c.(20). Community Outreach Plan
- [ ] 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments	Operator is committed to connecting to a gathering system by the Commencement of Production Operations. The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner and Noble will ensure that the surface owner(s) promptly receive notice of the Recommendation. One (1) 67' diameter, 20,000 bbl Minion Tank will be on location for 4 months. This tank is labeled as a Minion tank on the drawings but is actually a MLVT. Pad Soil type(s): 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 52 -Otero sandy loam, 3 to 5 percent slopes Access Soil type(s): 4 - Aquolls and Aquepts, flooded; 47 - Olney fine sandy loam, 1 to 3 percent slopes Flowline Corridor Soil type(s): 4 - Aquolls and Aquepts, flooded; 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 38 - Nelson fine sandy loam, 3 to 9 percent slopes; 47 - Olney fine sandy loam, 1 to 3 percent slopes; 52 -Otero sandy loam, 3 to 5 percent slopes NRCS data is not accurate at scale for access roads and flowline corridor. The following 304.c Plans are not required for this submittal: • Emergency Spill Response Program; not near Type III or GUDI well. • Flood Shut-In Plan; not in floodplain • Hydrogen Sulfide Drilling Plan; no H2S in area • Gas Capture Plan; Operator is committed to a gathering system connection • Community Outreach Plan; no DIC within 2,000'

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 09/28/2021 Email: regulatory@ascentgeomatics.com

Print Name: Ann Feldman Title: Regulatory Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ **Director of COGCC** Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type	Description
Drilling/Completion Operations	Operator will use group III drilling mud.
Drilling/Completion Operations	Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig.
Noise mitigation	Prior to commencing construction, Operator will submit via Form 4 Sundry Notice, and obtain approval of, an updated Noise Mitigation Plan that includes: 1) the ambient noise survey used to modify allowable noise levels through Rule 423.d; 2) a BMP that specifies the noise limits that are adjusted based on ambient noise levels through Rule 423.d. This is to be provided for any individual Noise Point of Compliance with an adjusted noise limit.
3 COAs	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	Noble shall consolidate wells to create multi-well pads. Multi-well production facilities shall be located as far as possible from Building Units. • The pad shall be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping. • Pads shall have all weather access roads to allow for operator and emergency response.
2	Planning	Lighting on well pad locations is considered temporary and will be used during drilling, completion and construction activities. Temporary lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and building units within 1,500 feet. Lighting will be turned off when practical, i.e., no operations being conducted.
3	Community Outreach and Notification	The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner. Noble will ensure that the surface owner(s) promptly receive notice of the Director's Recommendation.
4	Traffic control	Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000' of occupied residences on Weld County Road 51, and on lease roads as necessary in cooperation with the county.
5	General Housekeeping	All surface trash, debris, scrap or discarded material connected with the operations of the property shall be removed from the premises or disposed of in a legal manner.
6	General Housekeeping	Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.

7	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
8	General Housekeeping	WASTE: Water-based Bentonitic Drilling: Water-based bentonitic drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities Oil-Based Drilling Fluids: Oil-based drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. All oil and water loadouts that are commonly used have a load bucket and isolation valve. Since they are used often, there is not a bull plug installed. Any loadouts (water on back of tanks for example) that are rarely used, are bull plugged without a load bucket. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities Frac sand will be periodically drained via vacuum truck and will be transported by licensed third-party trucks There will be no produced water storage at the Location Oily waste and tank bottoms will be periodically drained via vacuum truck. Impacted or Contaminated Soil will be containerized as needed either in storage bins or directly into dump trucks, depending on the volume needed. A trash bin will be located on site to accumulate waste by the personnel drilling the wells. Site will have unused equipment, trash and junk removed immediately as the bin is filled Operator will not bury or burn trash or other waste materials at an oil and gas location. Trash receptacles will be designed, maintained, and operated to exclude wildlife, and to protect public safety, the environment, and wildlife from exposure to overflowing, leak prone, or insecure trash receptacles. General trash and other non-hazardous waste will be hauled off site Waste Management, a licensed third-party transporter. Waste is transported to one of the permitted Waste Management disposal facilities.
9	General Housekeeping	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located along the west side of the proposed Oil and Gas Location. The maximum height of topsoil stockpiles will be 12 feet.
10	Wildlife	Per Rule 603.e, Noble shall provide for the development of multiple reservoirs by drilling on existing pads or by multiple completions or commingling in existing wellbores. Nobles Wells Ranch CDP development is confined to a specific disturbance corridor, per landowner requirements. Noble does not plan to drill any development areas from an existing disturbance.

11	Wildlife	Noble initiates multiple levels of Environmental Site Screening efforts for the protection of sensitive wildlife, vegetation, groundwater and surface water resources at every Wells Ranch CDP project area. Prior to construction, a comprehensive desktop survey and field-based wildlife clearance survey will be performed to determine the presence of seasonally protected raptor and migratory bird species. • In-season, raptor nesting clearance surveys will be performed by a certified biologist no more than one-week prior to construction. • In-season, migratory bird nesting (MBTA Compliance) will be cleared within 50-feet of the proposed disturbance 2-3 days prior to ground clearing activities. • Although Bald and Golden Eagle are included in the raptor nesting survey-suite, eagle habitat is not delineated within the Wells Ranch CDP.
12	Storm Water/Erosion Control	BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. Specific BMP's used will include stockpile stabilization, grading, sediment traps, and perimeter barriers based on final construction design and will remain in place until the pad reaches final reclamation.
13	Storm Water/Erosion Control	The Wells Ranch estate has instituted specific Control Measures (CM) practices within ranch boundaries. Accordingly, structural CM implementation within Wells Ranch itself may differ from other locations within the permitted area. As with other locations, structural CMs will implemented based on good hydraulic and engineering practices. Structural CM practices specific to the A07- 23 Pad located within the Wells Ranch proper area will include the following: • Compost filter socks (Filtrexx or similar) sediment control logs (CFS); • Culvert (C); • Ditch/channel (D); • Hydro-mulch (HM); • Riprap (R); • Rock socks (RS); • Sediment basins/detention ponds (SB); • Seeding (S); • Soil roughening (SR); • Trash rack (TR); and • Vehicle tracking control (VTC). Preferred structural CMs on the Wells Ranch estate are those that limit vegetative disturbance, including hydro-mulch, crimping, vegetative stabilization, slope drains, and berms. In order to be effective, structural CMs must be properly installed/constructed and routinely maintained. • A sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practices. A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap to prevent offsite migration of sediment/contaminant into the nearby surface water features. If necessary, check dams will be constructed within the swale.
14	Material Handling and Spill Prevention	Due to using a closed loop system, pits will not be used.
15	Material Handling and Spill Prevention	Any material not in use that might constitute a fire hazard shall be removed a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area shall comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado. • Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, additional equivalent safety measures will be taken.
16	Material Handling and Spill Prevention	Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. The sales line is in-place and during any emergency where the sales line is not operational, Noble would shut-in production.
17	Material Handling and Spill Prevention	Noble Energy Inc. designs well heads and supporting infrastructure on the well pad to avoid releases and to be compliant with all regulations specific to leak detection and control (i.e. SPCC 40CFR112). Daily, monthly and annual inspections are performed at each well pad to confirm operational integrity and regulatory compliance. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.

18	Material Handling and Spill Prevention	There will be no tanks or separators at the A07-23 Pad. Facilities will be located on A07-08 Facility. • A closed–loop system will be used for drilling operations as required by Rule 408.a. • Operator will use SCADA during drilling and completions to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary. The location will utilize a SCADA (remote monitoring) system to monitor facility pressures and flows during drilling and completions. Sensors are placed on multiple points throughout the facility and are designed to measure the system for irregularities that would indicate a leak in the system or change in production of oil, water, or gas. The SCADA system is designed with alarms that are triggered by irregularities and will activate automatic shut-in of the well and facility. • New flowlines will be hydrotested to manufactures recommended levels before placed into use. • Pressure testing of the flowlines is conducted on an annual basis. • Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conduced monthly by a third-party specialist. The surface of the location will be plated with 3-5 inches of road base aggregate compacted that will deter releases from easily seeping into the soil. Operator will install an earthen berm and ditch system around the perimeter of location that would keep a release from moving out onto un-plated soil. • No pits will be used on location, therefore pit level Indicators will not be used on location. • During drilling and completions operations a temporary impermeable synthetic or geosynthetic liner will be utilized under equipment. This liner will be installed on top of the plated surface and will provide an additional layer of protection against spills. Secondary containment devices, such as duck ponds or equivalent type products, will be used to protect any pipe connections or equipment that carry, mix, or could possibly leak fluids or chemicals. All flowlines are designed/constructed/tested to ASME B31.4 and API 1104 standards. Only materials with Material Test Reports (MTRs) provided by the pipeline supplier are used in the construction of the flowlines.
19	Material Handling and Spill Prevention	Pad construction – Noble will construct the location with 4-6” of clay and 3-5” of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features. Liners - A minimum 30-mil poly liner will be utilized under the drilling rig, mud tanks, shakers and drill cuttings bins. During completions, most equipment associated with hydraulic fracturing will be underlain by a minimum 30-mil poly liner with drive-over foam berms. Bulk liquids used during D&C activities, including chemical injection skids, acid and chlorine tanks, and fuel tanks will be containerized in appropriate sealed vessels and underlain by an impervious liner and/or secondary containment system capable of containing any spill or leak from that vessel.
20	Material Handling and Spill Prevention	Noble will not situate new staging, refueling, or chemical storage areas within 500 feet of the Ordinary High-Water Mark (OHWM) of any river, perennial or intermittent stream, lake, pond or wetland.

21	Dust control	Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions. Engineered sound walls no less than 16' tall will be used along the east and south sides to mitigate dust impacts to these residences.
22	Dust control	o Use only fresh water sources (non-potable) when watering areas within 300 feet of the ordinary high-water mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (Hazard Communication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.) • All soil piles created by construction activities will be managed utilizing Hydro-mulch, straw crimping, and/or tracking methods to prevent dust from exiting location and creating a hazard during pre-production activities. Soil piles will be graded and/or seeded to prevent erosion and the generation of dust post-production. • Noble Energy will minimize the amount of fugitive dust using speed restrictions. All vehicles will be subject to a speed limit of 20 MPH on all lease roads to minimize dust. • Noble Energy will mitigate the creation of fugitive dust through regular road maintenance as coordinated through agreements with Relevant Local Governments or Agencies with road jurisdiction. • Noble Energy will use methods including wind breaks and barriers, road or facility surfacing, and soil stockpile stabilization measures to suppress fugitive dust caused solely by wind. • Noble Energy will avoid the creation of fugitive dust by restricting or limiting construction activity during high wind days. • Noble Energy will not use any of the following fluids for dust suppression: o Produced water o E&P waste or hazardous waste o Crude oil or any oil specifically designed for road maintenance o Chemical solvents o Process fluids • Access road(s) will be watered or treated with one of the following commercial magnesium chloride dust suppressants, as needed: o Roadsaver o Roadsaver Compaction Aid o DuraBlend • Prior to the application of dust suppressant to any county or public roads, coordination will be conducted with Weld County Department of Public Works by Noble Energy and any relevant vendors. • Noble Energy will maintain safety data sheets ("SDS") for any chemical-based dust suppressant and make the SDS immediately available upon request to the COGCC Director and to the Local Government. Safety Data Sheet(s) for any chemical-based dust suppressant will be archived and maintained until the site passes final site Reclamation and transfer the records upon transfer of property ownership. • All secondary roads created for this project (non-public roadways) will be finished with ½" – ¾" crushed stone road base. Silica dust from handling sand used in hydraulic fracturing operations will be mitigated by utilization of the enclosed Sand Box type sand delivery method.
23	Construction	Unless otherwise requested by the Surface Owner, well sites constructed within the Designated Setback location will be fenced to restrict access by unauthorized persons.

24	Construction	At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements and shall be maintained in a reasonable condition. Noble Energy plans on building the access road off Weld County Road 51 for Drilling and Completion activities. Local government will not require coordination of a traffic plan with the local jurisdiction for this location.
25	Construction	Per the June 13, 2014 COGCC Policy on the use of Modular Large Volume Tanks- Noble will have a 3rd-Party Operator construct, operate and monitor the freshwater Tank structure. The Operator will have an MLVT Design Package, certified and sealed by a licensed PE, on file and available on request. The Operator will comply with all siting, construction, inspection and testing requirements specified in the Design Package and meeting COGCC Policy.
26	Construction	Grading and drainage of the pad will be designed with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad's perimeter diversion channel and then directly into the sediment-trap structure.
27	Construction	Noble Energy will conduct construction, flowback, and interim reclamation activities only during daylight hours to maximize the use of natural lighting. • On occasion, the use of additional or alternative lighting sources may be required for site security or when field conditions experience a significant alteration. If such changes occur, light measurements may be conducted at the nearest RBU(s) to ensure compliance. If it is determined that the measured light level exceeds standards, additional BMPs will be implemented to the site lighting to achieve compliance. These changes may include removing or replacing light sources, repositioning equipment on location, or installing additional sound walls. • Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Whenever feasible, Noble Energy will schedule regular production activities during daylight hours to maximize the use of natural lighting. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned.
28	Noise mitigation	Sound walls will be 32' tall at a minimum and will reduce cumulative noise levels, on average 7-10 decibels. Wall height may be increased if it is determined additional height is necessary to control sound. Sound walls will be constructed with sound dampening material on the sides and double layer sound dampening material may be used if needed. Sound walls will be on the east and south sides of the applicable area, with gaps for access, egress, and airflow across the applicable area. The sound walls will remain in place until the applicable noise sources have been removed. Additional sound barriers may also be placed around equipment, such as frac pumps or generators, as needed. Noble Energy will take continuous sound measurements from each noise point of compliance during pre-production activities and ongoing operations lasting longer than 24 consecutive hours such as drilling, completion, recompletion, stimulation, and well maintenance, in areas zoned residential or within 2,000 feet of a Building Unit. If compliance is not confirmed, Operator will employ additional mitigation to ensure compliance with COGCC and Weld County rules, such as exhaust mufflers, hay bales, additional sound walls, or replacement of offending noisy equipment with quieter systems. The sound wall will be extended to situate it between the working pad surface and the RBU that is 1300 ft NE to mitigate noise from operations.

29	Emissions mitigation	• Flow lines, separators, and sand traps capable of supporting green completions shall be installed at any Oil and Gas Location at which commercial quantities of gas are reasonably expected to be produced based on existing adjacent wells within 1 mile. • Temporary flowback flaring and oxidizing equipment shall include the following: Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases. • Environmental Control Devices that are 98% efficient will be operational at the start of first production. • Instrument air systems to drive pneumatic controllers, in lieu of natural gas, will be installed. • Ultra-lean burning natural gas electrical generators or line power, in lieu of diesel generators, will be installed. • LACT units for oil and produced water to pump liquids into gathering pipelines will be utilized in lieu of trucking. • All surface pipe will be stringently tested to ensure system integrity. • Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. • During ozone action season (May 1-September 30), on action alert days, Noble will reschedule non-essential operational activities such as pigging; well uploading, tank cleanings; minimizing vehicle mileage and idle time; fueling after sunset; and properly maintaining vehicles.
30	Emissions mitigation	Noble shall employ sand traps, surge vessels, separators, and tanks during flowback and cleanout operations to safely maximize resource recovery and minimize releases to accommodate green completions techniques. Noble will use an enclosed combustion device with a 98% design destruction efficiency for hydrocarbons. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to the sales line or wells will be shut in and gas conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Noble will comply with the prohibition of venting or flaring produced gas emissions or seek relief under Rule 903.d. The Rule 903.a notice and approval requirements apply regardless of relief sought under 903.a.
31	Odor mitigation	To reduce odors during drilling and completion, the rig will be washed of oily debris before moving in. Operator will utilize drying shakers to minimize residual oil on cuttings prior to transport and will promptly remove cuttings during drilling operations. Cuttings will not be stored on site. Trucks will be prohibited from idling on location when not in use to prevent to accumulation of odors from exhaust. If odors are detected from removed drill piping, production tubing or sucker rods, operator will cover or enclose, or equivalent screening from wind or heat sources while storing such equipment for removal.
32	Drilling/Completion Operations	All loadlines will be bullplugged or capped.
33	Drilling/Completion Operations	All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.
34	Drilling/Completion Operations	All surficial activities performed by Noble during well drilling and completion activities will be protective of the environment. Bulk liquids used during D&C activities will be containerized in appropriate sealed vessels and underlain by an impervious liner and containment berm capable of containing any spill or leak from that vessel. Valves and temporary flow lines associated with D&C activities will be inspected daily for leaks while in service. Any spills identified on location will be immediately contained, recovered, disposed of, remediated and reported per COGCC Series 900 Rules (906. Spills and Releases).

35	Interim Reclamation	During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds. All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be returned to farmland in the first favorable season following rig demobilization. Noble Energy will be responsible for segregating the topsoil, backfilling, re-compacting any backfill, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and will reclaim such area to be returned to preexisting conditions as best as possible with control of all weeds. seed/mulch application functions as erosion control during initial reclamation efforts until adequate vegetation establishment on areas not returned to farming, at which point the reclamation will be deemed final stabilized. The interim working pad will be stabilized against potential erosion for the long-term with surface armoring
36	Interim Reclamation	During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds. All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be returned to farmland in the first favorable season following rig demobilization. Noble Energy will be responsible for segregating the topsoil, backfilling, re-compacting any backfill, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and will reclaim such area to be returned to preexisting conditions as best as possible with control of all weeds.

Total: 36 comment(s)

Attachment List

Att Doc Num	Name
2316726	CDPHE CONSULTATION
2316727	OTHER
2316731	GEOLOGIC HAZARD MAP
2316735	CDPHE CONSULTATION APPENDIX A
2316736	COGCC RESPONSE TO CDPHE CONSULTATION
2316737	DIRECTOR'S RECOMMENDATION
402118769	FORM 2A SUBMITTED
402932251	ACCESS ROAD MAP
402932252	CULTURAL FEATURES MAP
402932254	HYDROLOGY MAP
402932260	LOCATION DRAWING
402932264	LOCATION PICTURES
402932267	DIRECTIONAL WELL PLAT
402932275	WILDLIFE HABITAT DRAWING
402932276	ALA DATASHEET
402932277	ALA NARRATIVE SUMMARY
402932279	LOCATION AND WORKING PAD GIS GDB
402932286	LAYOUT DRAWING
402932296	NRCS MAP UNIT DESC
402932302	SURFACE AGRMT/SURETY
402932307	RELATED LOCATION AND FLOWLINE MAP
402932310	LOCAL/FED FINAL PERMIT DECISION
402932315	PRELIMINARY PROCESS FLOW DIAGRAMS
402932317	CPW WAIVER
402932318	LESSER IMPACT AREA EXEMPTION REQUEST

Total Attach: 25 Files

General Comments

User Group	Comment	Comment Date
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director's Recommendation has been attached to the Form 2A.	06/10/2022
OGLA	Noble requested a Lesser Impact Area (LIA) exemption from the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed location. Noble provided a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property.The LIA request remains attached, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.	06/07/2022
OGLA	Per conversation with Operator on 6/7 - added information regarding Noble receiving notification for the Director Recommendation on the Surface Owners behalf. Minion tank is actually a MLVT - updated equipment list and comment on submit tab. Closest Building Unit is owned by the Surface Owner and is currently vacant with no plans to have occupancy in the future. Noble will confirm occupancy prior to operations.	06/07/2022
OGLA	Operator provided revised Noise, Light, and Emergency response plans. Replaced and added Noise and Light BMPs to the Form 2A	06/06/2022

OGLA	COGCC Staff Technical review: BMPs listed on Form 2A reference old rules or was incomplete. Dust BMP and Plan do not have the same suppressants listed, Inconstancies between liner listed in the Waste Management Plan, Wildlife plan, and Leak Detection plan. Dust plan BMP does not match BMP on the form 2A Lighting plan and Emergency response plan need to be revised. Specific questions on the Noise plan were sent 3/29 Attached CDPHE Consultation provided by CDPHE and Operator's response to CDPHE Consultation as "Other"	05/20/2022
OGLA	Weld County LGD emailed the following to COGCC: he Weld County Oil and Gas Energy Department (Weld County or OGED) submits the following comments: Case number 1041WOGLA19-0042 has been assigned to the Wells Ranch CDP Application made up of forty-four (44) Oil & Gas Locations including the A07-23 Pad. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://accela-aca.co.weld.co.us/citizenaccess/Default.aspx. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. Prior to submittal of the 1041WOGLA Application, Weld County attended the community meeting regarding the proposed Wells Ranch CDP, held by Noble Energy, Inc. (Noble) at the Eaton Community Center on June 13, 2019. The Wells Ranch CDP was reviewed and processed under Weld County Code Ordinance 2019-10. The 1041 WOGLA CDP Application was received on October 29, 2019, and the 1041 WOGLA Hearing was held on December 12, 2019. The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA19-0042. Pursuant to Code requirements in place at the time of processing the Wells Ranch CDP Application, Weld County provided notice of the 1041WOGLA hearing to all Building Unit owners with one thousand three hundred twenty (1, 320) feet of each individual Oil and Gas Location. In addition to those Code required notice parties OGED also provided notice to all parcel owners within one thousand five hundred (1,500) feet of the proposed Oil and Gas Locations as well as those parcels impacted by the proposed Haul Route. A total of two hundred fifty (250) parties were noticed by Weld County. Weld County received public comment from two (2) noticed individuals, the first regarding mineral development associated with the Wells Ranch CDP and the second regarding concerns related to road conditions and traffic. Communication with OGED alleviated those concerns and no public comments were made during the 1041WOGLA hearing. The final order was recorded with the Weld County Clerk Recorder on January 8, 2020, at reception number 4556398, and was noticed in the Greeley Tribune on April 8, 2020. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S. At least 45 days prior to construction of the A07-23 Pad Location, Noble will submit site-specific 1041 WOGLA information detailing elements specific to the A07-23 Pad Location. Noble has not submitted the site-specific 1041WOGLA information to OGED for determination on the A07-23 Pad Location Construction of each Oil and Gas Location within the CDP shall not commence until OGED has issued a determination that, based on the site-specific information submitted by Noble, the proposed Oil and Gas Location and site-specific BMPs are consistent with the information provided in the CDP Application and compliant with the requirements of the Weld County Code in effect at the time of construction. Site-specific conditions of approval may be included with the OGED determination when necessitated by changes in the Code or the surrounding Land Use. Execution of operations on the individual Oil & Gas Locations authorized by 1041WOGLA19-0042 shall be commenced within ten (10) years from the date the 1041 WOGLA CDP Permit was placed on record with the Weld County Clerk and Recorder and published in the Greeley Tribune. Construction must commence on all individual Locations within that timeframe, or an extension must be requested and approved. If any Location within the Wells Ranch 1041 WOGLA CDP is not constructed within the approved timeframe, that Location will expire, and the Operator will be required to submit a new 1041 WOGLA permit for the impacted Location. While Weld County has no concerns with the pending COGCC permit and would recommend approval, Weld County reserves the right to review the site-specific details for determination of compliance with Development Standards and applicable Weld County	04/12/2022

	Code at the time of submittal.	
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	03/09/2022

Total: 7 comment(s)

Public Comments

No public comments were received on this application during the comment period.

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Document Number: 402099017

Date Received: 09/28/2021

Oil and Gas Location Assessment

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at https://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:
OGDP ID:
Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210900156		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
481728	WR OGDP 1

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____
[ ] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.
[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).
[ ] This Location includes a Rule 309.e.(2).E variance request.
[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 100322
Name: NOBLE ENERGY INC
Address: 2001 16TH STREET SUITE 900
City: DENVER State: CO Zip: 80202

Contact Information

Name: Mosiah Montoya
Phone: (303) 249 2425
Fax: ( )
email: mo.montoya@chevron.com

FINANCIAL ASSURANCE

[X] Plugging and Abandonment Bond Surety ID (Rule 706): 20030009
[ ] Gas Facility Surety ID (Rule 711): _____
[ ] Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: A18-09 Number: Pad

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: NESE Section: 18 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4704

Latitude: 40.485160 Longitude: -104.586590

GPS Quality Value: 1.5 Type of GPS Quality Value: PDOP Date of Measurement: 06/03/2019

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Well Site is served by Production Facilities		402118768

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970 400 3579

Contact Email: oged@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

A 1041 WOGLA was filed for the CDP as 1041WOGLA19-0042 on 12/10/2019 and recorded at reception #4556398 on 1/8/2020. Site-specific supplemental information will be filed prior to commencement of operations.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation: _____

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation: _____

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- [X] i. WPS < 2,000 feet from RBU/HOBU
- [ ] ii. WPS < 2,000 feet from School/Child Care Center
- [ ] iii. WPS < 1,500 feet from DOAA
- [ ] iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- [ ] v. WPS within a Floodplain
- [ ] vi.aa. WPS within a surface water supply area
- [ ] vi.bb. WPS < 2,640 feet from Type III or GUDI well
- [ ] vii. WPS within/immediately upgradient of wetland/riparian corridor
- [ ] viii. WPS within HPH and CPW did not waive
- [ ] ix. Operator using Surface bond
- [ ] x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: [ ]

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
1	40.483898	-104.582001	x						x					Tier IV-A; Alternate Location 4 on Narrative and Map.
2	40.486599	-104.546997	x											Tier III-B; Alternate Location 5 on Narrative and Map.

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Richard L Foose Phone:

Address: 30157 County Road 68 Fax:

Address: Email: ryan.antonio@chevron.com

City: Gill State: CO Zip: 80624-9332

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[ ] The Operator/Applicant is the surface owner.

[X] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: No

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	8	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	1
Pump Jacks	0	Separators	0	Injection Pumps	4	Heater-Treaters	0	Gas Compressors	0
Gas or Diesel Motors	0	Electric Motors	0	Electric Generators	0	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	0	VOC Combustor	0	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	2	Pigging Station	0			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Multi-Phase Flowmeters	8
Communication Tower	1
Manifold	1
Solar Skids	3

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Eight (8): 2"-4" Steel Three Phase Flowlines
Nine (9): 2"-4" Steel Gas Lift Lines
Three (3): 3"-8" Temporary Fresh Water Poly Lines

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	168	Feet	E					
Residential Building Unit (RBU):	360	Feet	E	☐	☒	☐	Location is in approved CDP: Order 1-241	☐
High Occupancy Building Unit(HOBU)	5280	Feet	W	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	499	Feet	E					
Above Ground Utility:	449	Feet	NE					
Railroad:	5280	Feet	W					
Property Line:	85	Feet	N					
School Facility:	5280	Feet	W					
Child Care Center:	5280	Feet	W					
Disproportionately Impacted (DI) Community:	5280	Feet	W					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	SW	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	1	3	7
Residential Building Units	1	3	7
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 10.40

Size of location after interim reclamation in acres: 3.00

Estimated post-construction ground elevation: 4704

DRILLING PROGRAM

Will a closed-loop drilling system be used? Yes

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? Yes

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted?

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

Describe the current land use:

Irrigated crop - farming

Describe the Relevant Local Government's land use or zoning designation:

Agricultural, Near-Urban Planning Area

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land: [X] Irrigated [ ] Non-Irrigated [ ] Conservation Reserve Program (CRP)

Non-Crop Land: [ ] Rangeland [ ] Forestry [ ] Recreation [ ] Other

Subdivided: [ ] Industrial [ ] Commercial [ ] Residential

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:
Describe landowner's designated final land use(s):

Reference Area Latitude: Reference Area Latitude:

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 39 - Nunn loam, 0 to 1 percent slopes

NRCS Map Unit Name: 51 - Otero sandy loam, 1 to 3 percent slopes

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 1456 Feet SW

Spring or Seep: 5280 Feet E

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 85 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Location is not sensitive due to adequate distance to downgradient surface water and depth to groundwater.
Nearest surface water features - Pond located 261' N and Greeley #2 Canal 318' E - are upgradient from location.
Floodplain associated with Willow Creek is downgradient 1064' W.
Depth to groundwater taken from water well permit #183323.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined 1064 Feet W

in the 100-Series Rules, measured from the Working Pad Surface:

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 1521 Feet W

Provide a description of the nearest downgradient surface Waters of the State:

Nearest downgradient surface water is Willow Creek, with associated wetland and floodplain.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name _____ Email _____

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type: _____

Public Water System Administrator - Contact Name _____ Email _____

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

- [X] Federal (FEMA)
- [ ] State
- [ ] County
- [ ] Local
- [ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- [ ] This location is included in a Wildlife Mitigation Plan
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- [ ] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on: _____

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- [ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- [ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- [ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- [ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- [X] The applicant has obtained a Rule 1202.a CPW waiver.

☐ The applicant has obtained a Rule 1202.b CPW waiver.

☐ In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 15

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [X] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [X] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [X] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [X] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ] (21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

- [ ] This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- [ ] 304.b.(1). Local Government Siting Information
- [ ] 304.b.(2). Alternative Location Analysis
- [ ] 304.b.(3). Cultural Distances
- [ ] 304.b.(4). Location Pictures
- [ ] 304.b.(5). Site Equipment List
- [ ] 304.b.(6). Flowline Descriptions
- [ ] 304.b.(7). Drawings
- [ ] 304.b.(8). Geographic Information System (GIS) Data
- [ ] 304.b.(9). Land Use Description
- [ ] 304.b.(10). NRCS Map Unit Description
- [ ] 304.b.(11). Best Management Practices
- [ ] 304.b.(12). Surface Owner Information
- [ ] 304.b.(13). Proximate Local Government
- [ ] 304.b.(14). Wetlands
- [ ] 304.b.(15). Schools and Child Care Centers
- [ ] 304.c.(1). Emergency Spill Response Program
- [ ] 304.c.(2). Noise Mitigation Plan
- [ ] 304.c.(3). Light Mitigation Plan
- [ ] 304.c.(4). Odor Mitigation Plan
- [ ] 304.c.(5). Dust Mitigation Plan
- [ ] 304.c.(6). Transportation Plan
- [ ] 304.c.(7). Operations Safety Management Program
- [ ] 304.c.(8). Emergency Response Plan
- [ ] 304.c.(9). Flood Shut-In Plan
- [ ] 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- [ ] 304.c.(11). Waste Management Plan
- [ ] 304.c.(12). Gas Capture Plan
- [ ] 304.c.(13). Fluid Leak Detection Plan
- [ ] 304.c.(14). Topsoil Protection Plan
- [ ] 304.c.(15). Stormwater Management Plan
- [ ] 304.c.(16). Interim Reclamation Plan
- [ ] 304.c.(17). Wildlife Plan
- [ ] 304.c.(18). Water Plan
- [ ] 304.c.(19). Cumulative Impacts Plan
- [ ] 304.c.(20). Community Outreach Plan
- [ ] 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments	Operator is committed to connecting to a gathering system by the Commencement of Production Operations. The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner and Noble will ensure that the surface owner(s) promptly receive notice of the Recommendation. One (1) 67' diameter, 20,000 bbl Minion Tank will be on location for 4 months. - The MLVT is labeled as a Minion tank on the drawings. Pad Soil type(s): 39 - Nelson fine sandy loam, 0 to 3 percent slopes; 51 - Otero sandy loam, 1 to 3 percent slopes Access Soil type(s): 4 - Aquolls and Aquepts, flooded; 47 - Olney fine sandy loam, 1 to 3 percent slopes Flowline Corridor Soil type(s): 4 - Aquolls and Aquepts, flooded; 37 - Nelson fine sandy loam, 0 to 3 percent slopes; 38 - Nelson fine sandy loam, 3 to 9 percent slopes; 47 - Olney fine sandy loam, 1 to 3 percent slopes; 52 -Otero sandy loam, 3 to 5 percent slopes NRCS data is not accurate at scale for access roads and flowline corridor. The following 304.c Plans are Not required for this submittal: • Emergency Spill Response Program; not near Type III or GUDI well. • Flood Shut-In Plan; not in floodplain • Hydrogen Sulfide Drilling Plan; no H2S in area • Gas Capture Plan; Operator is committed to a gathering system connection • Community Outreach Plan; no DIC within 2,000'

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 09/28/2021 Email: regulatory@ascentgeomatics.com

Print Name: Ann Feldman Title: Regulatory Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ **Director of COGCC** Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type	Description
Drilling/Completion Operations	Operator will use group III drilling mud.
Drilling/Completion Operations	Operator will use an electric rig where and when adequate line power exists. Where electric power is unavailable, operator will use a natural-gas powered rig.
Noise mitigation	Prior to commencing construction, Operator will submit via Form 4 Sundry Notice, and obtain approval of, an updated Noise Mitigation Plan that includes: 1) a third Noise Point of Compliance to represent the RBUs that are SSW of the location; 2) the ambient noise survey used to modify allowable noise levels through Rule 423.d; 3) a BMP that specifies the noise limits that are adjusted based on ambient noise levels through Rule 423.d. This is to be provided for any individual Noise Point of Compliance with an adjusted noise limit.
3 COAs	

Best Management Practices

No	BMP/COA Type	Description
1	Planning	Lighting on well pad locations is considered temporary and will be used during drilling, completion and construction activities. Temporary lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and building units within 1,500 feet. Lighting will be turned off when practical, i.e., no operations being conducted.
2	Planning	Noble shall consolidate wells to create multi-well pads. Multi-well production facilities shall be located as far as possible from Building Units. • The pad shall be constructed in such a manner that noise mitigation may be installed and removed without disturbing the site or landscaping. • Pads shall have all weather access roads to allow for operator and emergency response.
3	Planning	Noble shall identify the location of the wellbore with a permanent monument as specified in Rule 603.n. The operator shall also inscribe or imbed the well number and date of plugging upon the permanent monument.
4	Planning	Per Rule 603.e, Noble shall provide for the development of multiple reservoirs by drilling on existing pads or by multiple completions or commingling in existing wellbores. Nobles Wells Ranch CDP development is confined to a specific disturbance corridor, per landowner requirements. Noble does not plan to drill any development areas from an existing disturbance.
5	Community Outreach and Notification	The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner. Noble will ensure that the surface owner(s) promptly receive notice of the Director's Recommendation.

6	Traffic control	Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000' of occupied residences on Weld County Road 51, and on lease roads as necessary in cooperation with the county.
7	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
8	General Housekeeping	All surface trash, debris, scrap or discarded material connected with the operations of the property shall be removed from the premises or disposed of in a legal manner.
9	General Housekeeping	Within ninety (90) days after a well is plugged and abandoned, the well site shall be cleared of all non-essential equipment, trash, and debris.
10	General Housekeeping	Water-based Bentonitic Drilling: Water-based bentonitic drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities Oil-Based Drilling Fluids: Oil-based drilling fluids returning up the annulus will be filtered to remove solids through the closed loop system, cuttings shaken out into impervious bins above a mat and hauled off for off-site disposal while fluids will be routed through a suction tank and mud pump, remixed and recirculated. All oil and water loadouts that are commonly used have a load bucket and isolation valve. Since they are used often, there is not a bull plug installed. Any loadouts (water on back of tanks for example) that are rarely used, are bull plugged without a load bucket. Waste Management is contracted to transport this waste stream to one of the permitted commercial waste disposal facilities Frac sand will be periodically drained via vacuum truck and will be transported by licensed third-party trucks There will be no produced water storage at the Location Oily waste and tank bottoms will be periodically drained via vacuum truck. Impacted or Contaminated Soil will be containerized as needed either in storage bins or directly into dump trucks, depending on the volume needed.
11	Wildlife	Noble initiates multiple levels of Environmental Site Screening efforts for the protection of sensitive wildlife, vegetation, groundwater and surface water resources at every Wells Ranch CDP project area. Prior to construction, a comprehensive desktop survey and field-based wildlife clearance survey will be performed to determine the presence of seasonally protected raptor and migratory bird species. • In-season, raptor nesting clearance surveys will be performed by a certified biologist no more than one-week prior to construction. • In-season, migratory bird nesting (MBTA Compliance) will be cleared within 50-feet of the proposed disturbance 2-3 days prior to ground clearing activities. • Although Bald and Golden Eagle are included in the raptor nesting survey-suite, eagle habitat is not delineated within the Wells Ranch CDP.

12	Storm Water/Erosion Control	BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. Specific BMP's used will include stockpile stabilization, grading, sediment traps, and perimeter barriers based on final construction design and will remain in place until the pad reaches final reclamation. To prevent tracking of sediment off site, vehicle tracking controls should be installed at the start of work. • Stormwater leaving the site will encounter at least one treatment (sedimentation) control measure prior to discharge. • Erosion and sediment control measures will be installed in conjunction. CDPHE and COGCC consider site erosion a violation of effluent limits, even if sediment is not transported of site. • A sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practices. A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap to prevent offsite migration of sediment/contaminant into the nearby surface water features. If necessary, check dams will be constructed within the swale.
13	Storm Water/Erosion Control	. Structural Control Measures (CM) practices specific to the A18-09 Pad located within the Wells Ranch proper area will include the following: • Compost filter socks (Filtrexx or similar) sediment control logs (CFS); • Culvert (C): • Ditch/channel (D); • Hydro-mulch (HM); • Riprap (R); • Sediment basins/detention ponds (SB); • Seeding (S); • Soil roughening (SR); • Trash rack (TR); and • Vehicle tracking control (VTC). Preferred structural CMs on the Wells Ranch estate are those that limit vegetative disturbance, including hydro-mulch, crimping, vegetative stabilization, slope drains, and berms. In order to be effective, structural CMs must be properly installed/constructed and routinely maintained. When the A18-09 Pad is being actively constructed, it is considered to be in the Construction Stage. During active construction, CDPHE allows permittees to select one of the follow two inspection frequencies: 1. At least one inspection every 7 calendar days; OR 2. At least one inspection every 14 calendar days, if post-storm event inspections are conducted within 24 hours following precipitation which causes surface erosion. Under scenario 2, an additional reduced inspection frequency provision exists. If no construction activities will occur following a storm event at a temporarily idle site, post-storm event inspections will be conducted prior to re-commencing construction activities, but no later than 72 hours following the storm event. Routine inspections will still be conducted at least every 14 calendar days. The selected inspection frequency will be noted on inspection forms. Completed Stage Inspections The A18-09 Pad will enter the Completed Stage once disturbance activities have ceased and all of the interim reclamation work has been completed, except that the site has not yet been revegetated. For example, this may occur if a site cannot be re-seeded due to weather or seasonal conditions, but all other construction and reclamation is complete. Once the Pad enters the Completed Stage, it will be inspected a minimum of once every 30 days. Post-precipitation inspections are not required once the Pad is in the Completed Stage. However, more frequent inspections may be directed by Noble to confirm adequate maintenance or repairs.

14	Material Handling and Spill Prevention	Noble will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks, and fittings. Annual SPCC inspections will be conducted and documented. Flowline integrity will be maintained through implementation of Rule 1104 management practices. Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
15	Material Handling and Spill Prevention	Due to using a closed loop system, pits will not be used.
16	Material Handling and Spill Prevention	Any material not in use that might constitute a fire hazard shall be removed a minimum of twenty-five (25) feet from the wellhead, tanks and separator. Any electrical equipment installations inside the bermed area shall comply with API RP 500 classifications and comply with the current national electrical code as adopted by the State of Colorado. • Flammable liquids shall not be stored within fifty (50) feet of the wellbore, except for the fuel in the tanks of operating equipment or supply for injection pumps. Where terrain and location configuration do not permit maintaining this distance, additional equivalent safety measures will be taken.
17	Material Handling and Spill Prevention	Pad construction – Noble will construct the location with 4-6” of clay and 3-5” of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features. Liners - A minimum 30-mil poly liner will be utilized under the drilling rig, mud tanks, shakers and drill cuttings bins. During completions, most equipment associated with hydraulic fracturing will be underlain by a minimum 30-mil poly liner with drive-over foam berms. Bulk liquids used during D&C activities, including chemical injection skids, acid and chlorine tanks, and fuel tanks will be containerized in appropriate sealed vessels and underlain by an impervious liner and/or secondary containment system capable of containing any spill or leak from that vessel. • There will be no tanks or separators at the A18-09 Pad. Facilities will be located on A07-08 Facility. • A closed–loop system will be used for drilling operations as required by Rule 408.a. • Operator will use SCADA during drilling and completions to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary. New flowlines will be hydrotested to manufactures recommended levels before placed into use. • Pressure testing of the flowlines is conducted on an annual basis. • Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conduced monthly by a third-party specialist. • No pits will be used on location, therefore pit level Indicators will not be used on location. • All flowlines are designed/constructed/tested to ASME B31.4 and API 1104 standards. Only materials with Material Test Reports (MTRs) provided by the pipeline supplier are used in the construction of the flowlines. • Audible, Visual, and Olfactory (AVO) inspections are of the facility are conduced daily by the Operator. Any valve or fitting that is found to be ineffective is either repaired immediately or well shut-in procedures are implemented. • Location will be equipped with remote monitoring capability.
18	Dust control	Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions. Engineered sound walls no less than 16’ tall will be used along the east sides to mitigate dust impacts to these residences.

19	Dust control	When Noble Energy is required to suppress dust, its selected vendor will be reminded of the following: o Use only fresh water sources (non-potable) when watering areas within 300 feet of the ordinary high-water mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (Hazard Communication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.) • All soil piles created by construction activities will be managed utilizing Hydro-mulch, straw crimping, and/or tracking methods to prevent dust from exiting location and creating a hazard during pre-production activities. Soil piles will be graded and/or seeded to prevent erosion and the generation of dust post-production. • Noble Energy will minimize the amount of fugitive dust using speed restrictions. All vehicles will be subject to a speed limit of 20 MPH on all lease roads to minimize dust. • Noble Energy will mitigate the creation of fugitive dust through regular road maintenance as coordinated through agreements with Relevant Local Governments or Agencies with road jurisdiction. • Noble Energy will use methods including wind breaks and barriers, road or facility surfacing, and soil stockpile stabilization measures to suppress fugitive dust caused solely by wind. • Noble Energy will avoid the creation of fugitive dust by restricting or limiting construction activity during high wind days. • Noble Energy will not use any of the following fluids for dust suppression: o Produced water o E&P waste or hazardous waste o Crude oil or any oil specifically designed for road maintenance o Chemical solvents o Process fluids • Access road(s) will be watered or treated with one of the following commercial magnesium chloride dust suppressants, as needed: o Roadsaver o Roadsaver Compaction Aid o DuraBlend • Prior to the application of dust suppressant to any county or public roads, coordination will be conducted with Weld County Department of Public Works by Noble Energy and any relevant vendors. • Noble Energy will maintain safety data sheets (“SDS”) for any chemical-based dust suppressant and make the SDS immediately available upon request to the COGCC Director and to the Local Government. Safety Data Sheet(s) for any chemical-based dust suppressant will be archived and maintained until the site passes final site Reclamation and transfer the records upon transfer of property ownership. • All secondary roads created for this project (non-public roadways) will be finished with ½” – ¾” crushed stone road base. Silica dust from handling sand used in hydraulic fracturing operations will be mitigated by utilization of the enclosed Sand Box type sand delivery method.
20	Construction	Unless otherwise requested by the Surface Owner, well sites constructed within the Designated Setback location will be fenced to restrict access by unauthorized persons.
21	Construction	At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements and shall be maintained in a reasonable condition. Noble Energy plans on building the access road off Weld County Road 51 for Drilling and Completion activities. Local government will not require coordination of a traffic plan with the local jurisdiction for this location.
22	Construction	Per the June 13, 2014 COGCC Policy on the use of Modular Large Volume Tanks- Noble will have a 3rd-Party Operator construct, operate and monitor the freshwater Minion Tank structure. The Operator will have an Minion Tank Design Package, certified and sealed by a licensed PE, on file and available on request. The Operator will comply with all siting, construction, inspection and testing requirements specified in the Design Package and meeting COGCC Policy.

23	Construction	Noble Energy will conduct construction, flowback, and interim reclamation activities only during daylight hours to maximize the use of natural lighting Drilling and Completions • Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Whenever feasible, Noble Energy will schedule regular production activities during daylight hours to maximize the use of natural lighting. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned.

24	Construction	Noble Energy will conduct construction, flowback, and interim reclamation activities only during daylight hours to maximize the use of natural lighting. • On occasion, the use of additional or alternative lighting sources may be required for site security or when field conditions experience a significant alteration. If such changes occur, light measurements may be conducted at the nearest RBU(s) to ensure compliance. If it is determined that the measured light level exceeds standards, additional BMPs will be implemented to the site lighting to achieve compliance. These changes may include removing or replacing light sources, repositioning equipment on location, or installing additional sound walls. • Should a change in lighting equipment occur, Noble Energy will ensure the modification does not lead to the location surpassing the Weld County 12.0 lumens per square foot standard. Drilling and Completions • Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Whenever feasible, Noble Energy will schedule regular production activities during daylight hours to maximize the use of natural lighting. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned. • When present, Noble Energy will locate all light sources inside and beneath the temporary sound walls bordering the location. • Adjusting the lighting sources to point downward and towards the interior of location.
25	Noise mitigation	• Temporary operations – Baseline surveys will be completed at the residences to the east. Engineered sound walls no less than 16' tall will be used along the (appropriate sides for well pad) to mitigate noise impacts to these residences. Sound wall gaps will be strategically placed to adequately protect residences yet allow proper airflow across the drill pad. The use of equipment specific sound walls will be used as necessary around rig generators in the event of sound impacts during operations. The rig will be oriented on the location so that the pieces of equipment that generate the highest noise levels will face away from the closest building unit owners. Additional noise mitigation technology will be used with the completion equipment. Water will be piped into location to reduce the noise associated with heavy-duty trucks.

26	Noise mitigation	Mitigation measures will be completed prior to the commencement of the noise generating activity. Temporary barriers will be installed during daylight hours within the disturbance area, as shown on the attached location figure, and will remain in place for the duration of drilling and completion activities on the site. Sound walls will be 32' tall at a minimum and will reduce cumulative noise levels, on average 7-10 decibels. Wall height may be increased if it is determined additional height is necessary to control sound. Sound walls will be constructed with sound dampening material on the sides and double layer sound dampening material may be used if needed. Sound walls will be on the east and south sides of the applicable area, with gaps for access, egress, and airflow across the applicable area. The sound walls will remain in place until the applicable noise sources have been removed. Additional sound barriers may also be placed around equipment, such as frac pumps or generators, as needed. The sound wall to the north will be extended beyond what is shown in the drawing
27	Emissions mitigation	Noble shall employ sand traps, surge vessels, separators, and tanks during flowback and cleanout operations to safely maximize resource recovery and minimize releases to accommodate green completions techniques. Noble will use an enclosed combustion device with a 98% design destruction efficiency for hydrocarbons. When commercial quantities of salable quality gas are achieved at each well, the gas shall be immediately directed to the sales line or wells will be shut in and gas conserved. If a sales line is unavailable or other conditions prevent placing the gas into a sales line, Noble will comply with the prohibition of venting or flaring produced gas emissions or seek relief under Rule 903.d. The Rule 903.a notice and approval requirements apply regardless of relief sought under 903.a.
28	Emissions mitigation	Per natural gas produced from the well pad; Noble Energy intends to connect to a gas sales line at the first indication of salable quality gas. The sales line is in-place and during any emergency where the sales line is not operational, Noble would shut-in production.
29	Emissions mitigation	Flow lines, separators, and sand traps capable of supporting green completions shall be installed at any Oil and Gas Location at which commercial quantities of gas are reasonably expected to be produced based on existing adjacent wells within 1 mile. • Temporary flowback flaring and oxidizing equipment shall include the following: Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases. • Environmental Control Devices that are 98% efficient will be operational at the start of first production. • Instrument air systems to drive pneumatic controllers, in lieu of natural gas, will be installed. • Ultra-lean burning natural gas electrical generators or line power, in lieu of diesel generators, will be installed. • LACT units for oil and produced water to pump liquids into gathering pipelines will be utilized in lieu of trucking. • All surface pipe will be stringently tested to ensure system integrity. • Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. • During ozone action season (May 1-September 30), on action alert days, Noble will reschedule non-essential operational activities such as pigging; well uploading, tank cleanings; minimizing vehicle mileage and idle time; fueling after sunset; and properly maintaining vehicles.
30	Emissions mitigation	Trucks will be prohibited from idling on location when not in use to prevent to accumulation of odors from exhaust.
31	Odor mitigation	Operator will utilize drying shakers to minimize residual oil on cuttings prior to transport and will promptly remove cuttings during drilling operations. Cuttings will not be stored on site.

32	Drilling/Completion Operations	All loadlines will be bullplugged or capped.
33	Drilling/Completion Operations	All guy line anchors left buried for future use shall be identified by a marker of bright color not less than four (4) feet in height and not greater than one (1) foot east of the guy line anchor.
34	Interim Reclamation	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located along the south and east side(s) of the proposed Oil and Gas Location. The maximum height of topsoil stockpiles will be 12 feet.
35	Interim Reclamation	Interim reclamation: During drilling, production, and reclamation operations, all disturbed areas shall be kept as free of all undesirable plant species designated to be noxious weeds as practicable. Noble Energy or contractor will conduct daily visual inspections for weeds. All segregated soil horizons removed from non-crop lands shall be replaced to their original relative positions and contour as near as practicable to achieve erosion control and long-term stability and shall be tilled adequately in order to establish a proper seedbed. The disturbed area then shall be returned to farmland in the first favorable season following rig demobilization. Noble Energy will be responsible for segregating the topsoil, backfilling, re-compacting any backfill, reseeding, and re-contouring the surface of any disturbed area so as not to interfere with Owner's operations and will reclaim such area to be returned to preexisting conditions as best as possible with control of all weeds. Erosion control – seed/mulch application functions as erosion control during initial reclamation efforts until adequate vegetation establishment on areas not returned to farming, at which point the reclamation will be deemed final stabilized. The interim working pad will be stabilized against potential erosion for the long-term with surface armoring

Total: 35 comment(s)

Attachment List

Att Doc Num	Name
2316710	LESSER IMPACT AREA EXEMPTION REQUEST
2316726	CDPHE CONSULTATION
2316727	OTHER
2316732	GEOLOGIC HAZARD MAP
2316733	INFORMED CONSENT LETTER
2316735	CDPHE CONSULTATION APPENDIX A
2316736	COGCC RESPONSE TO CDPHE CONSULTATION
2316737	DIRECTOR'S RECOMMENDATION
402099017	FORM 2A SUBMITTED
402933296	ACCESS ROAD MAP
402933297	CULTURAL FEATURES MAP
402933298	DIRECTIONAL WELL PLAT
402933304	HYDROLOGY MAP
402933305	LOCATION DRAWING
402933306	LOCATION PICTURES
402933308	WILDLIFE HABITAT DRAWING
402933312	ALA DATASHEET
402933315	ALA NARRATIVE SUMMARY
402933316	LOCATION AND WORKING PAD GIS GDB
402933317	LAYOUT DRAWING
402933319	NRCS MAP UNIT DESC
402933321	SURFACE AGRMT/SURETY
402933322	RELATED LOCATION AND FLOWLINE MAP
402933323	LOCAL/FED FINAL PERMIT DECISION
402933326	PRELIMINARY PROCESS FLOW DIAGRAMS
402933327	CPW WAIVER

Total Attach: 26 Files

General Comments

User Group	Comment	Comment Date
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director’s Recommendation has been attached to the Form 2A.	06/10/2022
OGLA	The depth to water is based on a water well west of the location with a static water level of 85 feet. Based on other recorded water depths in the area, it is possible groundwater is shallower than 85 feet. Noble has provided mitigation measures to protect shallow groundwater.	06/10/2022
OGLA	Changed water to be within a sensitive area. A pond is 292 feet and mapped wetland at 304 feet upgradient from the location, this is within the 500 foot buffer for a 1202.a.(3) waiver to be required. Delineation of the wetlands is part of the Wildlife plan and CPW provided a 1202.a.(3) waiver. For the ALA section of the Form 2A, the nearest downgradient surface water is approximately 1500 feet from the WPS	06/10/2022

OGLA	Noble requested a Lesser Impact Area (LIA) exemption from the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed location. Noble provided a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property.The LIA request remains attached, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.	06/07/2022
OGLA	Phone discussion with Operator that "Minion" tank is actually a MLVT, updated on equipment list and the Minion tank is mislabeled on the layout drawings. Added comment regarding Noble receiving emails on behalf of surface owner. Operator provided a signed consent (attached) for the RBU closest to the location. While the RBU is owned by the surface owner, it is leased and occupied by a tenant. Replaced the Geologic Hazard Map with the revised map provided by the Operator with the name of the geologist.	06/07/2022
OGLA	Operator provided revised Noise, Light, and Emergency response plan. Added BMPs from Noise and light accordingly.	06/06/2022
OGLA	COGCC Staff Technical review: BMPs listed on Form 2A reference old rules, Storm water plan needs specific BMPs, Dust BMP and Plan do not have the same suppressants listed, Inconstancies between liner listed in the Waste Management Plan, Wildlife plan, and Leak Detection plan. Requested information on 5/10. Specific questions on the Noise plan were sent 3/29 Attached CDPHE Consultation provided by CDPHE and Operator's response to CDPHE Consultation as "Other"	05/20/2022
OGLA	Email from Weld County LGD: The Weld County Oil and Gas Energy Department (Weld County or OGED) submits the following comments: Case number 1041WOGLA19-0042 has been assigned to the Wells Ranch CDP Application made up of forty-four (44) Oil & Gas Locations including the A18-09 Pad. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://accela-aca.co.weld.co.us/citizenaccess/Default.aspx. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. Prior to submittal of the 1041WOGLA Application, Weld County attended the community meeting regarding the proposed Wells Ranch CDP, held by Noble Energy, Inc. (Noble) at the Eaton Community Center on June 13, 2019. The Wells Ranch CDP was reviewed and processed under Weld County Code Ordinance 2019-10. The 1041 WOGLA CDP Application was received on October 29, 2019, and the 1041 WOGLA Hearing was held on December 12, 2019. The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA19-0042. Pursuant to Code requirements in place at the time of processing the Wells Ranch CDP Application, Weld County provided notice of the 1041WOGLA hearing to all Building Unit owners with one thousand three hundred twenty (1, 320) feet of each individual Oil and Gas Location. In addition to those Code required notice parties OGED also provided notice to all parcel owners within one thousand five hundred (1,500) feet of the proposed Oil and Gas Locations as well as those parcels impacted by the proposed Haul Route. A total of two hundred fifty (250) parties were noticed by Weld County. Weld County received public comment from two (2) noticed individuals, the first regarding mineral development associated with the Wells Ranch CDP and the second regarding concerns related to road conditions and traffic. Communication with OGED alleviated those concerns and no public comments were made during the 1041WOGLA hearing. The final order was recorded with the Weld County Clerk Recorder on January 8, 2020, at reception number 4556398, and was noticed in the Greeley Tribune on April 8, 2020. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S. At least 45 days prior to construction of the A18-09 Pad Location, Noble will submit site-specific 1041 WOGLA information detailing elements specific to the A18-09 Pad Location. Noble has not submitted the site-specific 1041WOGLA information to OGED for determination on the A18-09 Pad Location Construction of each Oil and Gas Location within the CDP shall not commence until	04/11/2022

	OGED has issued a determination that, based on the site-specific information submitted by Noble, the proposed Oil and Gas Location and site-specific BMPs are consistent with the information provided in the CDP Application and compliant with the requirements of the Weld County Code in effect at the time of construction. Site-specific conditions of approval may be included with the OGED determination when necessitated by changes in the Code or the surrounding Land Use. Execution of operations on the individual Oil & Gas Locations authorized by 1041WOGLA19-0042 shall be commenced within ten (10) years from the date the 1041 WOGLA CDP Permit was placed on record with the Weld County Clerk and Recorder and published in the Greeley Tribune. Construction must commence on all individual Locations within that timeframe, or an extension must be requested and approved. If any Location within the Wells Ranch 1041 WOGLA CDP is not constructed within the approved timeframe, that Location will expire, and the Operator will be required to submit a new 1041 WOGLA permit for the impacted Location. While Weld County has no concerns with the pending COGCC permit and would recommend approval, Weld County reserves the right to review the site-specific details for determination of compliance with Development Standards and applicable Weld County Code at the time of submittal.	
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	03/09/2022

Total: 9 comment(s)

Public Comments

No public comments were received on this application during the comment period.

FORM 2A Rev 01/21

State of Colorado
Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109

Oil and Gas Location Assessment

Document Number: 402118768

Date Received: 09/28/2021

This Oil and Gas Location Assessment is to be submitted to the COGCC for approval prior to any ground disturbance activity associated with oil and gas operations. Approval of this Oil and Gas Location Assessment will allow for the construction of the below specified Location; however, it does not supersede any land use rules applied by the local land use authority. Please see the COGCC website at https://cogcc.state.co.us/ for all accompanying information pertinent this Oil and Gas Location Assessment.

Location ID:

OGDP ID: **481728**

Expiration Date:

[X] New Location [ ] Refile [ ] Amend Existing Location # _____

If this Location assessment is a component of an Oil and Gas Development Plan (OGDP) application, enter the OGDP docket number(s).

Docket Number	OGDP ID	OGDP Name
210900156		

If this Location assessment is part of an approved Oil and Gas Development Plan, enter the OGDP ID number(s).

OGDP ID Number	OGDP Name
481728	WR OGDP 1

CONSULTATION

[ ] This location is included in a Comprehensive Area Plan (CAP). CAP ID # _____

[ ] This Location or its associated new access road, utility, or Pipeline corridor meets Rule 309.e.(2).A, B, or C.

[ ] This Location is within 2,640 feet of a GUDI or Type III Well per Rule 411.b.(4).

[ ] This Location includes a Rule 309.e.(2).E variance request.

[ ] This location includes a Rule 309.f.(1).A.ii. variance request.

Operator

Operator Number: 100322

Name: NOBLE ENERGY INC

Address: 2001 16TH STREET SUITE 900

City: DENVER State: CO Zip: 80202

Contact Information

Name: Mosiah Montoya

Phone: (303) 249 2425

Fax: ( )

email: mo.montoya@chevron.com

FINANCIAL ASSURANCE

[X] Plugging and Abandonment Bond Surety ID (Rule 706): 20030009

[ ] Gas Facility Surety ID (Rule 711): _____

[ ] Waste Management Surety ID (Rule 704): _____

LOCATION IDENTIFICATION

Name: A07-08 Number: Facility

Provide the location description and the latitude and longitude of a single point near the center of the Working Pad Surface as a reference for this Location.

QuarterQuarter: SENE Section: 7 Township: 6N Range: 64W Meridian: 6 Ground Elevation: 4731

Latitude: 40.501490 Longitude: -104.587500

GPS Quality Value: 1.3 Type of GPS Quality Value: PDOP Date of Measurement: 06/03/2019

RELATED REMOTE LOCATIONS

(Enter as many Related Locations as necessary. Enter the Form 2A document # only if there is no established COGCC Location ID#)

This proposed Oil and Gas Location is:	LOCATION ID #	FORM 2A DOC #
Production Facilities Location serves Well(s)		402121126
Production Facilities Location serves Well(s)		402118769
Production Facilities Location serves Well(s)		402099017
Production Facilities Location serves Well(s)		402118763

RELEVANT LOCAL GOVERNMENT SITING INFORMATION

County: WELD Municipality: N/A

Per § 34-60-106 (1)(f)(I)(A), the following questions pertain to the "Relevant Local Government approval of the siting of the proposed oil and gas location."

This proposed Oil and Gas Location is in an area designated as one of State interest and subject to the requirements of § 24-65.1-108, C.R.S. Yes

Does the Relevant Local Government regulate the siting of Oil and Gas Locations, with respect to this location? Yes

A siting permit application has been submitted to the Relevant Local Government for this proposed Oil and Gas Location: No

Date Relevant Local Government permit application submitted:

Current status or disposition of the Relevant Local Government permit application for this proposed Oil and Gas Location: Other

Status/disposition date:

If Relevant Local Government permit has been approved or denied, attach final decision document(s).
Provide the contact information for the Relevant Local Government point of contact for the local permit associated with this proposed Oil and Gas Location:

Contact Name: Jason Maxey Contact Phone: 970 400 3579

Contact Email: oged@weldgov.com

PROXIMATE LOCAL GOVERNMENT INFORMATION

For every Proximate Local Government (PLG) associated with this proposed Oil and Gas Location, provide the PLG's point of contact and their contact information.

< No row provided >

FEDERAL PERMIT INFORMATION

A Federal drilling permit (or related siting application) has been submitted for this proposed Oil and Gas Location: No

Date submitted:

Current status or disposition of the Federal drilling permit (or related siting application) for this proposed Oil and Gas Location:

Status/disposition Date:

If Federal agency permit has been approved or denied, attach the final decision document(s).
Provide the contact information of the Federal point of contact for the Federal permit associated with this proposed Oil and Gas Location.

Contact Name: Contact Phone:

Contact Email: Field Office:

Additional explanation of local and/or federal process:

A 1041 WOGLA was filed for the CDP as 1041WOGLA19-0042 on 12/10/2019 and recorded at reception #4556398 on 1/8/2020. Site-specific supplemental information will be filed prior to commencement of operations.

RELEVANT LOCAL GOVERNMENT OR FEDERAL PRE-APPLICATION CONSULTATION

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Did a pre-application Formal Consultation Process occur with the Relevant Local Government per Rule 301.f.(3)? No

Date of local government consultation:

Did a pre-application Formal Consultation Process occur with the Federal land manager per Rule 301.f.(3)? No

Date of federal consultation:

Was an ALA that satisfies Rule 304.b.(2).C (or substantially equivalent information per Rule 304.e) developed during a federal or local government permit application process? If yes, attach the ALA to the Form 2A. No

ALA APPLICABILITY AND CRITERIA

Complete this section for any pre-application consultation related to this proposed Oil and Gas Location that occurred prior to the submission of this Form 2A. If a pre-application Formal Consultation Process occurred, attach a Consultation Summary.

Does the proposed Oil and Gas Location meet any of the criteria listed in Rule 304.b.(2)B? Yes

If YES, indicate by checking the box for every Rule 304.b.(2).B criterion met by this proposed Location, and attach an ALA. See Rule 304.b.(2).B.i-x for full text of criteria.

- [X] i. WPS < 2,000 feet from RBU/HOBU
- [ ] ii. WPS < 2,000 feet from School/Child Care Center
- [ ] iii. WPS < 1,500 feet from DOAA
- [ ] iv. WPS < 2,000 feet from jurisdictional boundary and PLG objects/requests ALA
- [ ] v. WPS within a Floodplain
- [ ] vi.aa. WPS within a surface water supply area
- [ ] vi.bb. WPS < 2,640 feet from Type III or GUDI well
- [X] vii. WPS within/immediately upgradient of wetland/riparian corridor
- [ ] viii. WPS within HPH and CPW did not waive
- [ ] ix. Operator using Surface bond
- [ ] x. WPS < 2,000 feet from RBU/HOBU/School within a DIC

Is the proposed Oil and Gas Location within the exterior boundaries of the Southern Ute Indian Reservation, and the Tribe objects to the Location or requests an ALA? If YES, attach an ALA to the Form 2A. No

Operator requests the Director waive the ALA requirement per Rule 304.b.(2).A.i: [ ]

Provide an explanation for the waiver request, and attach supporting information (if necessary).

ALTERNATIVE LOCATIONS DASHBOARD

List every alternative location reviewed and included in the ALA. Provide a latitude and longitude for the approximate center of the alternative location, all Rule 304.b.(2).B Criteria met, if a variance would be required to permit the location, and a brief comment on the key points of the alternative location.

304.b.(2).B.i-x Criteria Met:

#	latitude	longitude	i	ii	iii	iv	v	vi	vii	viii	ix	x	Variance Required?	Comments
1	40.509499	-104.594002	x											Tier III-B; Alternate Location 1 on Narrative and Map.
2	40.505798	-104.582001	x											Tier III-A; Alternate Location 2 on Narrative and Map.
3	40.498501	-104.582001	x											Tier III-A; Alternate Location 3 on Narrative and Map.

SURFACE & MINERAL OWNERSHIP

Surface Owner Info:

Name: Cheryl Bishop Phone:
Address: 34707 County Road 51 Fax:
Address: Email: ryan.antonio@chevron.com
City: Eaton State: CO Zip: 80615-9527

Name: Gary Bishop Phone:
Address: 34707 County Road 51 Fax:
Address: Email: ryan.antonio@chevron.com
City: Eaton State: CO Zip: 80615-9527

Surface Owner at this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Check only one:

[ ] The Operator/Applicant is the surface owner.

[X] The Operator has a signed Surface Use Agreement for this Location – attach SUA.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the surface owner owns the minerals beneath this Location and is committed to an oil and gas lease – attach lease map or provide lease description.

[ ] All operations on this Oil & Gas Location will develop the minerals beneath the Location, and the Operator intends to use a surface bond per Rule 703 to secure access to this Location – attach lease map or provide lease description.

Surface Owner protection Financial Assurance type: N/A Surety ID Number:

Mineral Owner beneath this Oil and Gas Location: [X] Fee [ ] State [ ] Federal [ ] Indian

Minerals beneath this Oil and Gas Location will be developed from or produced to this Oil and Gas Location: Yes

Lease description if necessary:

SITE EQUIPMENT LIST

Indicate the number and type of major equipment components planned for use on this Oil and Gas Location:

Wells	0	Oil Tanks	0	Condensate Tanks	0	Water Tanks	0	Buried Produced Water Vaults	0
Drilling Pits	0	Production Pits	0	Special Purpose Pits	0	Multi-Well Pits	0	Modular Large Volume Tank	0
Pump Jacks	0	Separators	36	Injection Pumps	4	Heater-Treaters	0	Gas Compressors	3
Gas or Diesel Motors	4	Electric Motors	4	Electric Generators	3	Fuel Tanks	0	LACT Unit	0
Dehydrator Units	0	Vapor Recovery Unit	1	VOC Combustor	2	Flare	0	Enclosed Combustion Devices	0
Meter/Sales Building	3	Pigging Station	2			Vapor Recovery Towers	0		

OTHER PERMANENT EQUIPMENT

Permanent Equipment Type	Number
Scrubbers	12
Battery Box	1
Maintenance Tank	1
Skid Drain Vaults	6
Power Distribution Center	1
Electric Heat Trace Switchracks	2
Instrument Air Skid	1
Surge Vessel	1
Condensate KO	1
Transformer	1
Pump Skids	2

OTHER TEMPORARY EQUIPMENT

< No Row Provided >

GAS GATHERING COMMITMENT

Operator commits to connecting to a gathering system by the Commencement of Production Operations? Yes

If the answer is NO, a Gas Capture Plan consistent with the requirements of Rule 903.e MUST be attached on the Plans tab.

FLOWLINE DESCRIPTION

Per Rule 304.b.(6), provide a description of all onsite and off-location oil, gas, and/or water flowlines.

Two (2): 8-16” Steel Oil Lines
Two (2): 4-8” Steel Produced Water Lines
Two (2): 8-16” Steel Gas Gathering Line
Thrty-two (32): 2-4” Steel Three Phase Flowlines
Three (3): 2-4” Steel Gas Lift Lines

CULTURAL DISTANCE AND DIRECTION

Provide the distance and direction to the nearest cultural feature as measured from the edge of the Working Pad Surface.

	Distance		Direction	Rule 604.b Conditions Satisfied (check all that apply): 604.b. (1)	604.b. (2)	604.b. (3)	Details of Condition(s)	604.b. (4)
Building:	851	Feet	NE					
Residential Building Unit (RBU):	860	Feet	NE	☐	☒	☐	Location is in approved CDP: Order 1-241	☐
High Occupancy Building Unit(HOBU)	5280	Feet	N	☐	☐	☐		☐
Designated Outside Activity Area:	5280	Feet	SW					
Public Road:	859	Feet	E					
Above Ground Utility:	847	Feet	E					
Railroad:	5280	Feet	SW					
Property Line:	126	Feet	S					
School Facility:	5280	Feet	N					
Child Care Center:	5280	Feet	N					
Disproportionately Impacted (DI) Community:	5280	Feet	N					
RBU, HOBU, or School Facility within a DI Community.	5280	Feet	S	☐	☐	☐		☐

RULE 604.a.(2). EXCEPTION LOCATION REQUEST

☐ Operator requests an Exception Location Request from Rule 604.a.(2) [well is less than 150 feet from a property line]. Exception Location Request Letter and Waiver signed by offset Surface Owner(s) must be attached.

CULTURAL FEATURE INFORMATION REQUIRED BY RULE 304.b.(3).B.

Provide the number of each Cultural feature identified within the following distances, as measured from the Working Pad Surface:

	0-500 feet	501-1,000 feet	1,001-2,000 feet
Building Units	0	1	5
Residential Building Units	0	1	5
High Occupancy Building Units	0	0	0
School Properties	0	0	0
School Facilities	0	0	0
Designated Outside Activity Areas	0	0	0

CONSTRUCTION

Size of disturbed area during construction in acres: 6.20

Size of location after interim reclamation in acres: 6.20

Estimated post-construction ground elevation: 4731

DRILLING PROGRAM

Will a closed-loop drilling system be used? No

Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than or equal to 100 ppm? No If YES, attach H2S Drilling Operations Plan.

Will salt sections be encountered during drilling: No

Will salt based (>15,000 ppm Cl) drilling fluids be used? No

Will oil based drilling fluids be used? No

DRILLING WASTE MANAGEMENT PROGRAM

Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Method: Commercial Disposal

Cutting Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal

Other Disposal Description:

Beneficial reuse or land application plan submitted? No

Reuse Facility ID: or Document Number:

Centralized E&P Waste Management Facility ID, if applicable:

CURRENT LAND USE

Current Land Use: check all that apply per Rule 304.b.(9).

Crop Land: ☒ Irrigated ☐ Non-Irrigated ☐ Conservation Reserve Program (CRP)

Non-Crop Land: ☐ Rangeland ☐ Forestry ☐ Recreation ☐ Other

Subdivided: ☐ Industrial ☐ Commercial ☐ Residential

Describe the current land use:

Irrigated Crop

Describe the Relevant Local Government's land use or zoning designation:

Agricultural; Near-Urban Planning Area

Describe any applicable Federal land use designation:

N/A

FINAL LAND USE

Final Land Use: check all that apply per Rule 304.b.(9).

Crop Land:	[X] Irrigated	[ ] Non-Irrigated	[ ] Conservation Reserve Program (CRP)	
Non-Crop Land:	[ ] Rangeland	[ ] Forestry	[ ] Recreation	[ ] Other
Subdivided:	[ ] Industrial	[ ] Commercial	[ ] Residential	

REFERENCE AREA INFORMATION

If Final Land Use includes Non-Crop Land (as checked above), the following information is required:

Describe landowner's designated final land use(s):

Reference Area Latitude: _____ Reference Area Latitude: _____

Provide a list of plant communities and dominant vegetation found in the Reference Area.

< No row provided >

Noxious weeds present: No

SOILS

List all soil map units that occur within the maximum extent of the proposed Oil and Gas Location. Attach the National Resource Conservation Service (NRCS) report showing the "Map Unit Description" listing the typical vertical soil profile(s). This data is to be used when segregating topsoil.

The required information can be obtained from the NRCS website at https://www.nrcs.usda.gov/wps/portal/nrcs/surveylist/soils/survey/state/ or from the COGCC website GIS Online map page. Instructions are provided within the COGCC website help section.

NRCS Map Unit Name: 4 Aquolls and Aquepts, flooded

NRCS Map Unit Name: 38 Nelson fine sandy loam, 3 to 9 percent slopes

NRCS Map Unit Name:

GROUNDWATER AND WATER WELL INFORMATION

Provide the distance and direction, as measured from the Working Pad Surface, to the nearest:

water well: 1390 Feet W

Spring or Seep: 5280 Feet E

Estimated depth to shallowest groundwater that can be encountered at this Oil and Gas Location: 28 Feet

Basis for estimated depth to and description of shallowest groundwater occurrence:

Location is sensitive due to proximity to floodplain, ditch, Greeley #2 Canal, Willow Creek, and associated wetlands.
Depth to groundwater taken from water well permit #267-WCB
OGL is adjacent to but not within floodplain.

SURFACE WATER AND WETLANDS

Provide the distance and direction to the nearest downgradient surface Waters of the State, as defined in the 100-Series Rules, measured from the Working Pad Surface: 75 Feet W

If less than 2,640 feet, is the Waters of the State identified above within 15 stream miles upstream of a Public Water System intake? No

Provide the distance and direction to the nearest downgradient wetland, measured from the Working Pad Surface: 75 Feet W

Provide a description of the nearest downgradient surface Waters of the State:

Nearest downgradient waters of the state is pond, which is also listed as a wetland per NWI.

If the proposed Oil and Gas Location is within a Rule 411.a Surface Water Supply Area buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

If the proposed Oil and Gas Location is within a Rule 411.b GUDI/Type III buffer zone, select the buffer zone type:

Public Water System Administrator - Contact Name Email

Is a U.S. Army Corps of Engineers Section 404 permit required for the proposed Oil and Gas Location, access road, or associated pipeline corridor? No

If a U.S. Army Corps of Engineers Section 404 permit is required, provide the permit status, and permit number if available:

Is the Location within a Floodplain? No Floodplain Data Sources Reviewed (check all that apply):

- [X] Federal (FEMA)
- [ ] State
- [ ] County
- [ ] Local
- [ ] Other

Does this proposed Oil and Gas Location lie within a Sensitive Area for water resources, as defined in the 100-Series Rules? Yes

CONSULTATION, WAIVERS, AND EXCEPTIONS

When Rule 309.e.(2) Consultation must occur, check all that apply:

- [ ] This location is included in a Wildlife Mitigation Plan
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within federally designated critical habitat or an area with a known occurrence for a federal or Colorado threatened or endangered species. Provide description in Comments section of Submit tab.
- [ ] This Oil and Gas Location or associated new access road, utility, or pipeline corridor falls within an existing conservation easement established wholly or partly for wildlife habitat. Provide description in Comments section of Submit tab.

When Rule 309.e.(3) Consultation is not required, check all that apply:

- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Protection Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable Wildlife Mitigation Plan.
- [ ] This Oil and Gas Location has been included in a previously approved, applicable conservation plan.

Pre-application Consultation:

- [ ] A pre-application consultation with CPW, regarding this Oil and Gas Location, occurred on:

CPW Waivers and Exceptions (check all that apply and attach all CPW waivers to this Form 2A):

- [ ] The applicant has obtained a Rule 304.b.(2).B.viii CPW waiver for the requirement to complete an ALA.
- [ ] The applicant has obtained a Rule 309.e.(2).G CPW waiver and consultation is not required.
- [ ] The applicant has obtained a Rule 309.e.(5).D.i CPW waiver and is requesting an exception from Rule 1202.c.(1).R.
- [ ] The applicant has obtained a Rule 309.e.(5).D.ii CPW waiver and is requesting an exception from Rule 1202.c.(1).S.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iii CPW waiver of Rule 1202.c.(1).T.
- [ ] The applicant has obtained a Rule 309.e.(5).D.iv CPW waiver and is requesting an exception from Rule 1202.c.(1) in accordance with an approved CAP.
- [X] The applicant has obtained a Rule 1202.a CPW waiver.
- [ ] The applicant has obtained a Rule 1202.b CPW waiver.
- [ ] In accordance with Rule 1203.a.(3), the applicant requests an exception from compensatory mitigation

Rule(s): _____

HIGH PRIORITY HABITAT AND COMPENSATORY MITIGATION

This Oil and Gas Location, associated access roads, utility, or Pipeline corridor falls wholly or partially within the following High Priority Habitats (Note: dropdown options are abbreviated - see Rule 1202 for full rule text):

< No row provided >

The following questions are for Oil and Gas Locations that cause the density to exceed one Oil and Gas Location per square mile in Rule 1202.d High Priority Habitat:

Direct Impacts:

Is Compensatory Mitigation required per Rule 1203.a for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address direct impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Direct impact habitat mitigation fee amount: $ _____

Indirect Impacts:

Is Compensatory Mitigation required per Rule 1203.d for this Oil and Gas Location? No

Is a Compensatory Mitigation Plan proposed to address indirect impacts for this Oil and Gas Location? No

Have all Compensatory Mitigation Plans been approved for this Location? No

If not, what is the current status of each Plan?

N/A

Is a Compensatory Mitigation Fee proposed for this Oil and Gas Location? No

Indirect impact habitat mitigation fee amount: $ _____

Operator Proposed Wildlife BMPs

No BMP

CPW Proposed Wildlife BMPs

No BMP

AIR QUALITY MONITORING PROGRAM

Will the Operator install and administer an air quality monitoring program at this Location? Yes

Operator Proposed BMPs

No BMP

CDPHE Proposed COAs OR BMPs

No BMP

PLANS

Total Plans Uploaded: 15

- [ ] (1) Emergency Spill Response Program consistent with the requirements of Rules 411.a.(4).B, 411.b.(5).B, & 602.j
- [X] (2) Noise Mitigation Plan consistent with the requirements of Rule 423.a
- [X] (3) Light Mitigation Plan consistent with the requirements of Rule 424.a
- [X] (4) Odor Mitigation Plan consistent with the requirements of Rule 426.a
- [X] (5) Dust Mitigation Plan consistent with the requirements of Rule 427.a
- [X] (6) Transportation Plan
- [X] (7) Operations Safety Management Program consistent with the requirements of Rule 602.d
- [X] (8) Emergency Response Plan consistent with the requirements of Rule 602.j
- [ ] (9) Flood Shut-In Plan consistent with the requirements of Rule 421.b.(1)
- [ ] (10) Hydrogen Sulfide Drilling Operations Plan consistent with the requirements of Rule 612.d
- [X] (11) Waste Management Plan consistent with the requirements of Rule 905.a.(4)
- [ ] (12) Gas Capture Plan consistent with the requirements of Rule 903.e
- [X] (13) Fluid Leak Detection Plan
- [X] (14) Topsoil Protection Plan consistent with the requirements of Rule 1002.c
- [X] (15) Stormwater Management Plan consistent with the requirements of Rule 1002.f
- [X] (16) Interim Reclamation Plan consistent with the requirements of Rule 1003
- [X] (17) Wildlife Plan consistent with the requirements of Rule 1201
- [X] (18) Water Plan
- [X] (19) Cumulative Impacts Plan
- [ ] (20) Community Outreach Plan
- [ ]

(21) Geologic Hazard Plan

VARIANCE REQUESTS

Check all that apply:

☐ This proposed Oil and Gas Location requires the approval of a Rule 502.a variance from COGCC Rule or Commission Order number: _____

ALL exceptions and variances require attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g. waivers, certifications, SUAs).

RULE 304.d LESSER IMPACT AREA EXEMPTION REQUESTS

Check the boxes below for all Exemptions being requested. Lesser Impact Area Exemption Request must be attached, and will include all requested exemptions.

- ☐ 304.b.(1). Local Government Siting Information
- ☐ 304.b.(2). Alternative Location Analysis
- ☐ 304.b.(3). Cultural Distances
- ☐ 304.b.(4). Location Pictures
- ☐ 304.b.(5). Site Equipment List
- ☐ 304.b.(6). Flowline Descriptions
- ☐ 304.b.(7). Drawings
- ☐ 304.b.(8). Geographic Information System (GIS) Data
- ☐ 304.b.(9). Land Use Description
- ☐ 304.b.(10). NRCS Map Unit Description
- ☐ 304.b.(11). Best Management Practices
- ☐ 304.b.(12). Surface Owner Information
- ☐ 304.b.(13). Proximate Local Government
- ☐ 304.b.(14). Wetlands
- ☐ 304.b.(15). Schools and Child Care Centers
- ☐ 304.c.(1). Emergency Spill Response Program
- ☐ 304.c.(2). Noise Mitigation Plan
- ☐ 304.c.(3). Light Mitigation Plan
- ☐ 304.c.(4). Odor Mitigation Plan
- ☐ 304.c.(5). Dust Mitigation Plan
- ☐ 304.c.(6). Transportation Plan
- ☐ 304.c.(7). Operations Safety Management Program
- ☐ 304.c.(8). Emergency Response Plan
- ☐ 304.c.(9). Flood Shut-In Plan
- ☐ 304.c.(10). Hydrogen Sulfide Drilling Operations Plan
- ☐ 304.c.(11). Waste Management Plan
- ☐ 304.c.(12). Gas Capture Plan
- ☐ 304.c.(13). Fluid Leak Detection Plan
- ☐ 304.c.(14). Topsoil Protection Plan
- ☐ 304.c.(15). Stormwater Management Plan
- ☐ 304.c.(16). Interim Reclamation Plan
- ☐ 304.c.(17). Wildlife Plan
- ☐ 304.c.(18). Water Plan
- ☐ 304.c.(19). Cumulative Impacts Plan
- ☐ 304.c.(20). Community Outreach Plan
- ☐ 304.c.(21). Geologic Hazard Plan

OPERATOR COMMENTS AND SUBMITTAL

Comments

Operator is committed to connecting to a gathering system by the Commencement of Production Operations.
The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner and Noble will ensure that the surface owner(s) promptly receive notice of the Recommendation.

Correction to the Odor plan - equipment listed on the 2A is present on the Location.

Completion activities including flowback are occurring on the well pads related to this production facility; no drilling or completions will occur at this location.

Facility Soil type(s): 4 - Aquolls and Aquepts, flooded; 38 - Nelson fine sandy loam, 3% - 9% slopes

Access Soil type(s): 38 - Nelson fine sandy loam, 3 to 9 percent slopes; 51 - Otero sandy loam, 1 to 3 percent slopes; 52 - Otero sandy loam, 3 to 5 percent slopes

Pipeline Corridor Soil type(s): 4 - Aquolls and Aquepts, flooded; 38 - Nelson fine sandy loam, 3 to 9 percent slopes; 52 - Otero sandy loam, 3 to 5 percent slopes

NRCS data is not accurate at scale for access roads and pipeline corridor.

The following 304.c Plans are Not required for this submittal:
• Emergency Spill Response Program; not near Type III or GUDI well.
• Hydrogen Sulfide Drilling Plan; no H2S in area
• Flood Shut-In Plan; location is not within floodplain
• Gas Capture Plan; Operator is committed to a gathering system connection
• Community Outreach Plan; no DIC within 2,000'

I hereby certify that the statements made in this form are, to the best of my knowledge, true, correct and complete.
Signed: _____ Date: 09/28/2021 Email: regulatory@ascentgeomatics.com

Print Name: Ann Feldman Title: Regulatory Manager

Based on the information provided herein, this Oil and Gas Location Assessment complies with COGCC Rules, applicable orders, and SB 19-181 and is hereby approved.

COGCC Approved: _____ **Director of COGCC** Date: _____

Conditions Of Approval

All representations, stipulations and conditions of approval stated in this Form 2A for this location shall constitute representations, stipulations and conditions of approval for any and all subsequent operations on the location unless this Form 2A is modified by Sundry Notice, Form 4 or an Amended Form 2A.

Condition of Approval

COA Type	Description
Construction	Upon completion of construction of this Location, operator will submit via Form 4 Sundry a professional field-surveyed diagram of the constructed Location, to include annotation of the shortest measured distance between the floodplain and the disturbed area of the Location.
1 COA	

Best Management Practices

No	BMP/COA Type	Description
1	Community Outreach and Notification	The SUA Noble has executed with each of these surface owners authorizes Noble to receive this notification on behalf of the surface owner. Noble will ensure that the surface owner(s) promptly receive notice of the Director's Recommendation.
2	Pre-Construction	Noble Energy will be obtaining a Flood Hazard Development Permit from Weld County for this location and will submit to COGCC upon approval.
3	Traffic control	Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000’ of occupied residences on Weld County Road 51 and on lease roads as necessary in cooperation with the county.

4	General Housekeeping	Housekeeping will consist of neat and orderly storage of materials and fluids. Wastes will be temporarily stored in sealed containers and regularly collected and disposed of at offsite, suitable facilities. If spills occur prompt cleanup is required to minimize any commingling of waste materials with stormwater runoff. Routine maintenance will be limited to fueling and lubrication of equipment. Drip pans will be used during routine fueling and maintenance to contain spills or leaks. Any waste product from maintenance will be containerized and transported offsite for disposal or recycling. There will be no major equipment overhauls conducted onsite. Equipment will be transported offsite for major overhauls. Cleanup of trash and discarded materials will be conducted at the end of each work day. Cleanup will consist of patrolling the roadway, access areas, and other work areas to pick up trash, scrap debris, other discarded materials, and any contaminated soil. These materials will be disposed of properly.
5	General Housekeeping	A trash bin will be located on site to accumulate waste by the personnel drilling the wells. Site will have unused equipment, trash and junk removed immediately as the bin is filled Operator will not bury or burn trash or other waste materials at an oil and gas location. Trash receptacles will be designed, maintained, and operated to exclude wildlife, and to protect public safety, the environment, and wildlife from exposure to overflowing, leak prone, or insecure trash receptacles. General trash and other non-hazardous waste will be hauled off site Waste Management, a licensed third-party transporter. Waste is transported to one of the permitted Waste Management disposal facilities.
6	Wildlife	Noble initiates multiple levels of Environmental Site Screening efforts for the protection of sensitive wildlife, vegetation, groundwater and surface water resources at every Wells Ranch CDP project area. Prior to construction, a comprehensive desktop survey and field-based wildlife clearance survey will be performed to determine the presence of seasonally protected raptor and migratory bird species. • In-season, raptor nesting clearance surveys will be performed by a certified biologist no more than one-week prior to construction. • In-season, migratory bird nesting (MBTA Compliance) will be cleared within 50-feet of the proposed disturbance 2-3 days prior to ground clearing activities. • Although Bald and Golden Eagle are included in the raptor nesting survey-suite, eagle habitat is not delineated within the Wells Ranch CDP.
7	Storm Water/Erosion Control	BMP's will be constructed around the perimeter of the site prior to, or at the beginning of construction. Specific BMP's used will include stockpile stabilization, grading, sediment traps, and perimeter barriers based on final construction design and will remain in place until the pad reaches final reclamation.
8	Storm Water/Erosion Control	A sediment trap will be constructed to capture any sediment prior to leaving the location. The sediment trap has been sized in accordance with good engineering practices. A temporary diversion, consisting of a cut swale and compacted earthen berm, will be constructed along the pad edge and routed to the sediment trap to prevent offsite migration of sediment/contaminant into the nearby surface water features. If necessary, check dams will be constructed within the swale.
9	Storm Water/Erosion Control	All stockpiled soils shall be protected from degradation due to contamination, compaction and, to the extent practicable, from wind and water erosion during drilling and production operations. Seed mix, a fiber matrix, straw, as examples of control measures that could be used on Topsoil piles for protection. Topsoil stockpiles will be located along the south and west side(s) of the proposed Oil and Gas Location. The maximum height of topsoil stockpiles will be 12 feet.

10	Storm Water/Erosion Control	Structural CM practices specific to the A07-08 Facility located within the Wells Ranch proper area will include the following: • Compost filter socks (Filtrexx or similar) sediment control logs (CFS); • Culvert (C); • Ditch/channel (D); • Hydro-mulch (HM); • Riprap (R); • Rock socks (RS); • Sediment basins/detention ponds (SB); • Seeding (S); • Soil roughening (SR); • Trash rack (TR); and • Vehicle tracking control (VTC). Preferred structural CMs on the Wells Ranch estate are those that limit vegetative disturbance, including hydro-mulch, crimping, vegetative stabilization, slope drains, and berms. In order to be effective, structural CMs must be properly installed/constructed and routinely maintained. Noble's CM Manual provides detailed specifications regarding CM construction and maintenance.
11	Material Handling and Spill Prevention	Noble will monitor production facilities on a regular schedule to identify fluid leaks, including, but not limited to, visually inspecting all wellheads, tanks, and fittings. Annual SPCC inspections will be conducted and documented. Flowline integrity will be maintained through implementation of Rule 1104 management practices. Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.
12	Material Handling and Spill Prevention	Impacted or Contaminated Soil will be containerized as needed either in storage bins or directly into dump trucks, depending on the volume needed. Impacted or Contaminated Soil will be transported by licensed third-party vacuum trucks Produced water: Minimal operational storage for produced water will be place on the A07-08 Facility. Pump skid(s) and ancillary equipment will convey produced water into the connected gathering system for conveyance to approved disposal facilities. Tank bottoms: Oily waste and tank bottoms will be periodically drained via vacuum truck

13	Material Handling and Spill Prevention	• Operator will use SCADA to continuously monitor line pressures, flow rates, temperature, and whether valves are open or closed. Any fluctuations will be closely monitored and will trigger immediate action including shutting in and scheduling repair or replacement as necessary. All facilities onsite shall be subjected to an instrument-based leak detection and repair (LDAR) inspection at least monthly during drilling and completion and quarterly during production. • There will be one Maintenance Tank located on site. • Daily site visits are made by lease operators (aka pumpers) to the facility pad for maintenance issues including leaks and spill potential. Periodic site inspections will be conducted by 3rd party environmental contractors to look for any signs of leaks and or potential leaks. Infrared surveys will be used to identify any leaks coming from the flowlines on a regular basis. New flowlines will be hydrotested to manufacturer's recommended levels before placed into use. • The location will utilize a SCADA (remote monitoring) system to monitor facility pressures and flows. Sensors are placed on multiple points throughout the facility and are designed to measure the system for irregularities that would indicate a leak in the system or change in production of oil, water, or gas. The SCADA system is designed with alarms that are triggered by irregularities and will activate automatic shut-in of the well and facility. Infrared surveys will be used to identify any leaks coming from the flowlines on a regular basis. • New flowlines will be hydrotested to manufactures recommended levels before placed into use. • Pressure testing of the flowlines is conducted on an annual basis. • Documented Audible, Visual, and Olfactory (AVO) inspections and optical gas imaging surveys are conduced monthly by a third-party specialist. If a leak is discovered or suspected, the well will be shut in and the line will be hydrotested. If a leak is determined, the well remains shut in while the leak is located and repaired. Not until the line has passed hydrotesting, will the well be brought back online.
14	Material Handling and Spill Prevention	Noble will construct the location with 4-6" of clay and 3-5" of road-based cuttings. The well pad will be engineered with a raised earthen berm along the appropriate edges of the pad to protect the applicable surface waters from any fluid-upset condition. Structural controls within the remainder of the perimeter will ensure flow off the pad to the perimeter channel and into a detention-pond structure, further protecting downgradient surface water features.
15	Dust control	Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions. Engineered sound walls no less than 16' tall will be used along the north and east sides to mitigate dust impacts to these residences.

16	Dust control	• When Noble Energy is required to suppress dust, o Only use fresh water source (non-potable) when watering areas within 300 feet of the ordinary high water mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (HazardCommunication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.)
17	Dust control	o Only use fresh water source (non-potable) when watering areas within 300 feet of the ordinaryhighwater mark of any water body. o Maintain a current Safety Data Sheet (SDS) in their company vehicle when using a dust suppressor containing chemicals, in accordance with OSHA Standard 29 CFR 1910.1200 (HazardCommunication) as well as local and State requirements. o Ensure watering practices are not creating additional hazards on access roads (slick roads, muddy conditions, etc.) • All soil piles created by construction activities will be managed utilizing Hydro-mulch, straw crimping, and/or tracking methods to prevent dust from exiting location and creating a hazard during pre-production activities. Soil piles will be graded and/or seeded to prevent erosion and the generation of dust post-production. • Noble Energy will minimize the amount of fugitive dust using speed restrictions. All vehicles will be subject to a speed limit of 20 MPH on all lease roads to minimize dust. • Noble Energy will mitigate the creation of fugitive dust through regular road maintenance as coordinated through agreements with Relevant Local Governments or Agencies with road jurisdiction. • Noble Energy will use methods including wind breaks and barriers, road or facility surfacing, and soil stockpile stabilization measures to suppress fugitive dust caused solely by wind. • Noble Energy will avoid the creation of fugitive dust by restricting or limiting construction activity during high wind days. • Noble Energy will minimize fugitive dust caused by their operations, or dust originating from areas disturbed by their Oil and Gas Operations that becomes windborne by utilizing the dust suppression methods mentioned above. • Noble Energy will not use any of the following fluids for dust suppression: o Produced water o E&P waste or hazardous waste o Crude oil or any oil specifically designed for road maintenance o Chemicalsolvents o Process fluids • Access road will be watered or treated with one of the following commercial magnesium chloride dust suppressants, as needed: o Roadsaver o Roadsaver Compaction Aid o DuraBlend • Prior to the application of dust suppressant to any county or public roads, coordination will be conducted with Weld County Department of Public Works by Noble Energy and any relevant vendors. • Noble Energy will maintain safety data sheets (“SDS”) for any chemical-based dust suppressant and make the SDS available immediately upon request to the COGCC Director and to the Local Government. Operators will maintain SDS for any chemical-based dust suppressant until the site passes final site Reclamation and transfer the records upon transfer of property ownership. • All secondary roads created for this project (non-public roadways) will be finished with ½” – ¾” crushed stone road base.
18	Construction	At the time of construction, all leasehold roads shall be constructed to accommodate local emergency vehicle access requirements and shall be maintained in a reasonable condition. Noble Energy plans on building the access road off Weld County Road 51 for Drilling and Completion activities. Local government will not require coordination of a traffic plan with the local jurisdiction for this location.

19	Construction	Berms or other secondary containment devices shall be constructed around crude oil, condensate, and produced water storage tanks and shall enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Standard secondary-containment construction includes the installation of a contiguous spray liner installed and underlaying the entire tank battery, then anchored into the steel-walled containment berms. Berms, liner or other secondary containment devices shall be sufficiently impervious to contain any spilled or released material. All berms and containment devices shall be inspected at regular intervals and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel. Tertiary containment, such as an earthen berm, will be installed as required for production facilities within 500 feet of a down-gradient surface water feature. All berms will be visually checked periodically to ensure proper working conditions.
20	Construction	All newly installed or replaced crude oil and condensate storage tanks shall be designed, constructed, and maintained in accordance with applicable regulations. Noble shall maintain written records verifying proper design, construction, and maintenance, and shall make these records available for inspection by the Director.
21	Construction	All surficial activities performed by Noble during facility construction and production will be protective of the environment. Bulk liquids used or stored will be containerized in appropriate vessels and underlain by an impervious liner and containment berm capable of containing any spill or leak from that vessel. Valves and temporary flow lines associated with facility site activities will be inspected daily while in service. Any spills identified on location will be immediately contained, recovered, disposed of, remediated, and reported per COGCC Series 900 Rules (912. Spills and Releases).
22	Construction	Grading and drainage of the pad will be designed with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad's perimeter diversion channel and then directly into the sediment-trap structure.
23	Construction	Unless otherwise requested by the Surface Owner, well sites constructed within the Designated Setback location will be fenced to restrict access by unauthorized persons.
24	Construction	• Noble Energy will direct site lighting downward and inward, such that no light shines above a horizontal plane passing through the center point light source. • Noble Energy will use dampening and focusing technology within fixtures that obscures, blocks, or diffuses the light to reduce light intensity outside the boundaries of the Oil and Location Noble Energy will minimize lighting when not needed using timers or motion sensors. • Noble Energy will use full cut-off lighting to minimize light pollution and obtrusive lighting. • Noble Energy will use lighting colors that reduce light intensity, including using neutral white lights. • Noble Energy will use low-glare or no-glare lighting that utilizes high-mount/narrow-beam angle settings. • When Noble Energy has active operations involving personnel at an oil and gas location, Noble Energy will provide sufficient lighting to ensure the safety of all persons on or near the site. • Whenever feasible, Noble Energy will schedule regular production activities during daylight hours to maximize the use of natural lighting. • Noble Energy will regularly identify permanent and temporary housing of resident wildlife and ensure locations are recorded in wildlife reports kept in-house. • During pre-production activities, Noble Energy will conduct daily walkthroughs of the location to ensure no wildlife have built nests in or around lighting sources. If nests are found, direction will be issued to either remove the nest or temporarily disable the lighting source until nest is abandoned. • Adjusting the lighting sources to point downward and towards the interior of location.
25	Noise mitigation	Temporary operations - Baseline surveys will be completed at the designated points of compliance prior to construction activities commencing. Construction activities at this location will be conducted during daylight hours only. Noise monitoring will be conducted at the points of compliance during the construction phase. Once the facility goes into production, active sound level readings may be collected upon request to ensure accurate conditions anticipated by the sound models.

26	Emissions mitigation	• Flow lines, separators, and sand traps capable of supporting green completions shall be installed at any Oil and Gas Location at which commercial quantities of gas are reasonably expected to be produced based on existing adjacent wells within 1 mile. . • Temporary flowback flaring and oxidizing equipment shall include the following: Adequately sized equipment to handle 1.5 times the largest flowback volume of gas experienced in a ten (10) mile radius; Valves and porting available to divert gas to temporary equipment or to permanent flaring and oxidizing equipment; and Auxiliary fuel with sufficient supply and heat to sustain combustion or oxidation of the gas mixture when the mixture includes non-combustible gases. • Environmental Control Devices that are 98% efficient will be operational at the start of first production. • Instrument air systems to drive pneumatic controllers, in lieu of natural gas, will be installed. • Ultra-lean burning natural gas electrical generators or line power, in lieu of diesel generators, will be installed. • LACT units for oil and produced water to pump liquids into gathering pipelines will be utilized in lieu of trucking. • All surface pipe will be stringently tested to ensure system integrity. • Full site FLIR camera will be used at initial start-up and during regularly scheduled leak testing. • During ozone action season (May 1-September 30), on action alert days, Noble will reschedule non-essential operational activities such as pigging; well uploading, tank cleanings; minimizing vehicle mileage and idle time; fueling after sunset; and properly maintaining vehicles.
27	Drilling/Completion Operations	All loadlines will be bullplugged or capped.

Total: 27 comment(s)

Attachment List

Att Doc Num	Name
2316726	CDPHE CONSULTATION
2316727	OTHER
2316734	GEOLOGIC HAZARD MAP
2316735	CDPHE CONSULTATION APPENDIX A
2316736	COGCC RESPONSE TO CDPHE CONSULTATION
2316737	DIRECTOR'S RECOMMENDATION
402118768	FORM 2A SUBMITTED
402932004	ACCESS ROAD MAP
402932011	CULTURAL FEATURES MAP
402932028	HYDROLOGY MAP
402932030	LOCATION DRAWING
402932032	LOCATION PICTURES
402932034	WILDLIFE HABITAT DRAWING
402932038	NRCS MAP UNIT DESC
402932044	ALA DATASHEET
402932045	ALA NARRATIVE SUMMARY
402932049	LOCATION AND WORKING PAD GIS GDB
402932055	LAYOUT DRAWING
402932066	SURFACE AGRMT/SURETY
402932077	RELATED LOCATION AND FLOWLINE MAP
402932082	LOCAL/FED FINAL PERMIT DECISION
402932083	PRELIMINARY PROCESS FLOW DIAGRAMS
402932090	CPW WAIVER
402932093	LESSER IMPACT AREA EXEMPTION REQUEST

Total Attach: 24 Files

General Comments

User Group	Comment	Comment Date
OGLA	Operator provided information that this production facility will have electricity	06/10/2022
OGLA	The Director has determined that the OGDP application that this Form is a component of meets all requirements of Rule 306.a. The Director’s Recommendation has been attached to the Form 2A.	06/10/2022
OGLA	Operator responded with updated BMPs, updated Noise, Light and Emergency Response plan (replaced) added appropriate BMPs, Operator confirmed 60 bbl water vault is not on location - removed BMPs, Odor plan was incorrect regarding equipment on location - added comment. Replace Geohazard map with revised map with geologists printed name. Added comment regarding Noble receiving information on behalf of the Surface owner.	06/07/2022
OGLA	Noble requested a Lesser Impact Area (LIA) exemption from the Geologic Hazard Plan due to the collapsible soils and a floodplain within one mile of the proposed location. Noble provided a statement by a professional geologist on the Geologic Hazard Map that describes the potential hazards and the mitigation measures to address the potential hazards. Staff determined that the LIA request was not necessary because the potential identified hazards do not meet the statutory definition of a Geologic Hazard defined in § 24-65.1-103(8), C.R.S; the identified hazards are not so adverse as to constitute a significant hazard to health, safety or property.The LIA request remains attached, but the Geologic Hazard Plan is not required and there is no need to grant the exemption.	06/07/2022

OGLA	COGCC Staff Technical review: BMPs listed on Form 2A reference old rules or equipment that was not listed on the 2A or on the drawings, Dust BMP and Plan do not have the same suppressants listed, Inconstancies between liner listed in the Waste Management Plan, Wildlife plan, and Leak Detection plan. Requested information on 5/13. Odor plan states equipment listed on the Form 2A will not be on location, Topsoil Plan BMPs did not match drawings for topsoil pile locations on the drawing, Lighting plan and Emergency response plan need to be revised. BMPs reference a 60 bbl water vault not on the drawings or equipment list, confirm if 60 bbl water vault is missing or BMPs are incorrect. Specific questions on the Noise plan were sent 3/29 Attached CDPHE Consultation provided by CDPHE and Operator's response to CDPHE Consultation as "Other"	05/20/2022
OGLA	Weld County LGD comments Email to COGCC: The Weld County Oil and Gas Energy Department (Weld County or OGED) submits the following comments: Case number 1041WOGLA19-0042 has been assigned to the Wells Ranch CDP Application made up of forty-four (44) Oil & Gas Locations including the A07-08 Facility. All files associated with the processing and review of this permit are accessible through the Weld County E-Permit Center at https://accela-aca.co.weld.co.us/citizenaccess/Default.aspx. If there are any questions relating to the ability to access these files, please call the OGED office at 970-400-3580. Prior to submittal of the 1041WOGLA Application, Weld County attended the community meeting regarding the proposed Wells Ranch CDP, held by Noble Energy, Inc. (Noble) at the Eaton Community Center on June 13, 2019. The Wells Ranch CDP was reviewed and processed under Weld County Code Ordinance 2019-10. The 1041 WOGLA CDP Application was received on October 29, 2019, and the 1041 WOGLA Hearing was held on December 12, 2019. The Hearing Officer considered testimony at the hearing and subsequently approved 1041WOGLA19-0042. Pursuant to Code requirements in place at the time of processing the Wells Ranch CDP Application, Weld County provided notice of the 1041WOGLA hearing to all Building Unit owners with one thousand three hundred twenty (1, 320) feet of each individual Oil and Gas Location. In addition to those Code required notice parties OGED also provided notice to all parcel owners within one thousand five hundred (1,500) feet of the proposed Oil and Gas Locations as well as those parcels impacted by the proposed Haul Route. A total of two hundred fifty (250) parties were noticed by Weld County. Weld County received public comment from two (2) noticed individuals, the first regarding mineral development associated with the Wells Ranch CDP and the second regarding concerns related to road conditions and traffic. Communication with OGED alleviated those concerns and no public comments were made during the 1041WOGLA hearing. The final order was recorded with the Weld County Clerk Recorder on January 8, 2020, at reception number 4556398, and was noticed in the Greeley Tribune on April 8, 2020. Approval and publication of the final order creates a vested property right pursuant to Article 68 of Title 24, C.R.S. At least 45 days prior to construction of the A07-08 Facility Location, Noble will submit site-specific 1041 WOGLA information detailing elements specific to the A07-08 Facility Location. Noble has not submitted the site-specific 1041WOGLA information to OGED for determination on the A07-08 Facility Location Construction of each Oil and Gas Location within the CDP shall not commence until OGED has issued a determination that, based on the site-specific information submitted by Noble, the proposed Oil and Gas Location and site-specific BMPs are consistent with the information provided in the CDP Application and compliant with the requirements of the Weld County Code in effect at the time of construction. Site-specific conditions of approval may be included with the OGED determination when necessitated by changes in the Code or the surrounding Land Use. Execution of operations on the individual Oil & Gas Locations authorized by 1041WOGLA19-0042 shall be commenced within ten (10) years from the date the 1041 WOGLA CDP Permit was placed on record with the Weld County Clerk and Recorder and published in the Greeley Tribune. Construction must commence on all individual Locations within that timeframe, or an extension must be requested and approved. If any Location within the Wells Ranch 1041 WOGLA CDP is not constructed within the approved timeframe, that Location will expire, and the Operator will be required to submit a new 1041 WOGLA permit for the impacted Location.	04/12/2022

	While Weld County has no concerns with the pending COGCC permit and would recommend approval, Weld County reserves the right to review the site-specific details for determination of compliance with Development Standards and applicable Weld County Code at the time of submittal.	
OGLA	The Director has determined this OGDP application is complete. Form pushed to IN PROCESS.	03/09/2022

Total: 7 comment(s)

Public Comments

No public comments were received on this application during the comment period.