

1625 Broadway
Suite 2200
Denver, CO 80202

Tel: 303.228.4000
Fax: 303.228.4280
www.nobleenergyinc.com



February 22, 2010

Sent via electronic attachment to **Dave.Kubeczko@state.co.us**

David A. Kubeczko, PG
Oil and Gas Location Assessment Specialist

Colorado Oil & Gas Conservation Commission
Northwest Area Office
707 Wapiti Court, Suite 204
Rifle, CO 81650

RE: CDOW General BMPs for 34O Pad and those Specific to Elk Production

Specific to Elk Production:

In a good faith effort Noble Energy or subcontractor will conduct post-development well site visitations between the hours of 9:00 a.m. and 4:00 p.m. and reduce well site visitations between May 15 and June 15 in elk production areas. On the occasion that well conditions are not stabilized Noble can to continue to work past 4:00 p.m. (This is not a timing restriction for activities between May 15-June 15)

Control weeds in areas surrounding reclamation areas in order to reduce weed competition.

Avoid aggressive non-native grasses and shrubs in elk habitat restoration.

Reclaim elk habitats with native shrubs, grasses, and forbs appropriate to the ecological site disturbed when possible and available.

General Areawide BMPs for all wildlife:

- Attempt Phased Development emphasizing the following operational highlights for maximum wildlife mitigation for the life of the project:
 - ☐ Multi-well pads on sectional drilling for one-time surface disturbance and interim reclamation
 - ☐ No more than 3-4 drill rigs in the area at any given time (average 1-2)
 - ☐ Semi-closed and/or closed mud loop system
 - ☐ Gathering lines buried adjacent to or in the road, where possible
 - ☐ Engineered pads with erosion control measures taking into account nearby wildlife and riparian habitat
 - ☐ Initiate interim reclamation as soon as possible

- Educate employees and contractors about specific wildlife issues:
 - ☐ No fishing in Battlement Creek
 - ☐ Use bear-proof containers for all human-related trash
 - ☐ Pay close attention to vehicle traffic and speeds during the three critical hours surrounding the dusk and dawn hours
 - ☐ Maintaining a single use/ clean hose for drawing water from local sources to prevent cross-contamination with diseases and bacteria. (Noble does not have any water rights of their own and relies on contractor water rights for fresh water. 99% of this water comes from a single extraction point of the Colorado River.)
- Continue conversations with private landowners to:
 - ☐ Restrict access with gates and/or incorporate speed limit signs
 - ☐ Control hunting and over-grazing
 - ☐ Suggest overgrowth vegetation control with chippers/ hydro-axing (if convenient while clearing a pipeline anyway)
- Add CDOW to SPCC Notification List
- Maintain a Land Management Prescription for the Noble Surface Area
 - ☐ Controlled Access – locked gates at four locations (or more):
 - SWSE of Section 26 of T7S, R95W
 - SENE Section 25 of T7S, R95W
 - SWSE of Section 25 of T7S, R95W
 - NWNE of Section 36 of T7S, R95W
 - ☐ Possible mobile guard shack depending on situation

Thank you and please do not hesitate to call with any questions,

Yours truly,



Judi Kohn
Environmental Compliance Coordinator