

STATE OF  
COLORADO

Andrews - DNR, Doug &lt;doug.andrews@state.co.us&gt;

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**COGCC Form 2A review of Noble Energy's Little State LD11-75-1BHN PAD - Doc #400548991**

1 message

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**JKajiwara@nobleenergyinc.com** <JKajiwara@nobleenergyinc.com>  
To: doug.andrews@state.co.us

Wed, Jul 9, 2014 at 10:28 AM

Doug

Thank you for your email. Below, in blue, I've responded to your questions. Please let me know if there is anything else I can do.

Jan

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From: "Andrews - DNR, Doug" <doug.andrews@state.co.us>  
To: jkajiwara@nobleenergyinc.com, srobbins@nobleenergyinc.com  
Date: 06/20/2014 02:52 PM  
Subject: EXTERNAL: COGCC Form 2A review of Noble Energy's Little State LD11-75-1BHN PAD - Doc #400548991

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Jan,

I have reviewed the referenced Form 2A Oil and Gas Location Assessment and have the following comments.

1) In the Facilities section you have indicated there will be six buried produced water vaults. Please provide me with Noble's BMP on constructing these vaults that is protective of groundwater.

**Water Vault BMP:**

1. A contiguous spray liner will be installed and will underlay the entire tank battery. The location of a partially buried cement water vault will be excavated prior to liner install.
2. A 60 bbl cement water vault will be utilized to collect excess produced water from oil tanks. Produced water in the vault will be removed as needed and disposed of in an approved UIC disposal well. The cement water vault is one piece with no seams designed to minimize potential for leaks. All piping associated with the use of the water vault will be aboveground and visually inspected on a regular basis.
3. The partially buried cement water vault will be installed above the spray in liner.
4. A sized steel secondary containment ring will be installed surrounding the entire tank battery. Sand and gravel bedding will be installed to protect the liner prior to placing equipment in the containment area.

2) In the Cultural Distance section you have indicated the nearest Building is 515 feet. I assume this is the same building (Noble meter house) you mention in the Operator Comments box. Although the instructions for the Cultural Distance section indicate the nearest Building of any type, we don't wish operators to include any existing buildings from the proposed oil and gas

location or nearby oil and gas locations when making this determination.

Given that, I'm guessing the nearest Building Unit at 4,083 feet is probably the nearest Building as well. If so, please let me know and I will change this on the 2A. I apologize if this interpretation of a Cultural Distance was not made known to Noble regulatory permitting staff.

**Please change Building Unit distance to 4,083'.**

3) In the Water Resources section you have indicated the nearest downgradient surface water feature is 20 feet away, yet on the Location Drawing and Hydrology Map, the only surface water feature shown is 473 feet away. I assume this is the same surface water feature, measured from a well on the Location Drawing and Hydrology Map but the edge of the disturbance for the Water Resources section. Please confirm.

**Confirmed by Greeley Field staff, this is the same surface water feature.**

4) During my review the nearest water well (Permit #283726) was measured to be approximately 4,200 feet from the proposed oil and gas location. I assume the distance of 3,500 feet in the Water Resources section was measured from the edge of the disturbance. Please confirm.

**Confirmed by Greeley Field staff, the distance to water well (Permit #283726) was measured from the edge of disturbance.**

5) In the Construction section you have indicated the date planned to commence construction is 6/8/14. As this Form 2A has not yet been approved, please provide me with a revised date that construction will commence.

**11/1/14**

Please respond to the correspondence by July 20, 2014. If you have questions, please contact me. Thank you.

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*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Area



1120 Lincoln St., Suite 801  
Denver, CO 80203  
[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)  
303-894-2100 Ext. 5180

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