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February 22, 2016

Mr. Matt Lepore  
Director  
Colorado Oil and Gas Conservation Commission  
The Chancery Building  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**RE: Request to the Director for Topsoil Reclamation  
Rule 1002.b Exception  
Location: Wells Ranch  
Weld County, Colorado**

Dear Director:

Noble Energy, Inc. (Noble) is actively developing oil and gas from Mr. Steve Wells' ranch (Wells Ranch). As part of this oil and gas development, Noble excavates topsoil when building oil and gas locations. Rule 1002.b states that when excavated, topsoil must be segregated and protected.

Mr. Wells has requested that Noble not store or stockpile excavated topsoil but rather simply build the oil and gas location over the topsoil. Due to this request from the landowner and the fact that there is a minimal amount of topsoil layer in the Wells Ranch area, Noble respectfully requests a variance from COGCC Rule 1002.b per Rules 1001.c and 502.b.

Noble has consulted with the landowner on multiple occasions discussing the possibility of a storing excavated topsoil on and around the pad locations, which he did not approve. Noble then tried to an alternative idea where excavated topsoil from the Wells Ranch would be stored at a central location on his ranch, which he also did not approve. Noble has discussed this issue with the landowner in depth, but his desire remains for Noble to build the oil and gas location over his topsoil.

The following is Noble's process for pad construction on Wells Ranch:

- Drilling and facility pads are designed and cut/fill areas are identified based on elevation.
- Structural fill material is imported according to the engineered cut/fill diagram to produce a level working surface for all drilling and production activities.
- A minimum 4" layer of road base or all weather surface material is placed over the impacted structural fill material.

In order to comply with Mr. Wells' desire to build the oil and gas location over his topsoil, Noble will follow the process outlined below for reclamation related to topsoil on Wells Ranch:

- After activities are completed, the applicable areas of the location are stripped of all road base or all weather surface.
- Re-contouring is performed per COGCC reclamation rules.
- After the re-contouring is completed, the disturbed area is then ripped or scarified to loosen the original topsoil layer and blend organic matter.
- Additional topsoil may be imported from approved offsite sources to supplement or replace areas of unacceptable topsoil layers.
- Re-vegetation will then occur per COGCC reclamation rules.

Please do not hesitate to contact me at [scott.park@nblenergy.com](mailto:scott.park@nblenergy.com) or 970-415-0778 should you have any questions or concerns.

Noble respectfully requests that the COGCC approved the requested exception. Thank you for your time and attention to this very important matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott R. Park". The signature is stylized and cursive.

Scott R. Park  
DJBU EHSR Manager