



## WARNING LETTER # 401609424

04/27/2018

NOBLE ENERGY INC (# 100322)

Scott Park

scott.park@nblenergy.com

1001 NOBLE ENERGY WAY

HOUSTON, TX 77070

Jan Kulmann (jan.kulmann@nblenergy.com)

Kummer LE23-615 (API# 123-36943)

SWSW, 23, 8N, 61W, WELD

**This Warning Letter is to inform you that NOBLE ENERGY INC (“Operator”) may be in violation of the rules and regulations of the Colorado Oil and Gas Conservation Commission (“COGCC”) and corrective action is required.**

The COGCC has reasonable cause to believe that the Operator has committed one or more violations of the Oil and Gas Conservation Act, or of a rule, regulation, or order of the Commission, or of a permit issued by the Commission. The Operator is required to comply with this Warning Letter by the **Corrective Action Deadline Date(s)** to resolve the alleged violation(s). Failure to do so will result in the issuance of a Notice of Alleged Violation and initiation of enforcement proceedings in which COGCC will seek monetary penalties for the alleged violations pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

### **Alleged Violation(s) and Required Corrective Action(s):**

34-60-121(1) C.R.S. Statutory violation

Violation Discovery Date: 04/12/2018

Description of Alleged Violation: Noble Energy, Inc. (Operator) has reported that the Kummer LE 23-615, API 123-36943, (Well) was completed with the top of productive interval at 586' FWL of S. 23-T8N-R61W. This completion is beyond the unit setback of 600' FWL required by Order 535-259; it is an encroachment of 16'. On June 22, 2017, the COGCC approved Operator's Form 2, Application for Permit to Drill, (Document #401223978) for the Well subject to Commission Spacing Order Number 535-259 (Document #2298892) regarding development of the 640 acre unit comprised of Section 23-T8N-R61W. The approved top of productive zone footages of 630' from the south line and 600' from the west line of Section 23 were compliant with the 600' setback from the unit boundary required by Order 535-259. The Form 5, Drilling Completion Report, (Document #401426761) submitted by Operator on April 9, 2018 reported the Well was spud August 10, 2017; the rig was released on August 14, 2017; and the top of productive zone is 648' from the south line and 586' from the west line of Section 23. The Form 5A,





Completed Interval Report (Document #401553314) submitted by Operator on April 9, 2018 reported the Well was fracture stimulated from October 17, 2017 through October 24, 2017 and first produced on November 21, 2017. This Form 5A also reported the top of productive zone is at 6565' measured depth, 648' from the south line and 586' from the west line of Section 23 8N 61W. Operator failed to comply with the conditions of a COGCC permit and Commission Spacing Order Number 535-259, violating 34-60-121(1), C.R.S.

Required Corrective Action: Operator shall obtain waivers of the 600' unit boundary setback from the offsetting mineral interest owners. Operator shall request approval of an exception location per Rule 318.c by submitting a Form 4, Sundry Notice, with an exception location request letter and the waivers attached.

Corrective Action Deadline Date: 05/11/2018

### **How to Comply with Warning Letter:**

Operator shall complete the Required Corrective Action(s) above within the deadline(s) provided. Upon completion of the Corrective Action(s), Operator shall provide notice and evidence of completion to the COGCC staff identified below by the Corrective Action Deadline Date(s):

COGCC Enforcement: Kira Gillette  
Email: [kira.gillette@state.co.us](mailto:kira.gillette@state.co.us)

Title: NOAV Specialist  
Phone Num: (303) 894-2100 x5165

COGCC Representative: Barbara Westerdale  
Email: [barbara.westerdale@state.co.us](mailto:barbara.westerdale@state.co.us)

Title: Permit Supervisor  
Phone Num: (303)894-2100x5159

If you have any procedural questions about this Warning Letter, please contact Kira Gillette.

If you have any technical questions about this Warning Letter, please contact the COGCC Representative identified above.

### **Failure to Comply with Warning Letter:**

If the Operator fails to perform Required Corrective Action(s) on or before the Corrective Action Deadline Date(s) stated above the COGCC will issue a Notice of Alleged Violation and seek penalties pursuant to § 34-60-121, C.R.S. and Rule 523, COGCC Rules of Practice and Procedure, 2 CCR 404-1.

All well data, rules and forms are available on our website at [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc).

Sincerely,

Barbara Westerdale  
Permit Supervisor  
(303)894-2100x5159  
[barbara.westerdale@state.co.us](mailto:barbara.westerdale@state.co.us)





**COLORADO**  
Oil & Gas Conservation  
Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

### Attachments

View Attachments in Imaged Documents on COGCC website <http://ogccweblink.state.co.us/> Search by Document Number.

| <u>Document Number</u> | <u>Description</u> |
|------------------------|--------------------|
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| 401613864 | WARNING LETTER CERTIFIED MAIL RECEIPT |
| 401614464 | WARNING LETTER ISSUED                 |

Total Attach: 2 Files

