

Response to September 7, 2018 Inspection

COGCC conducted an inspection of the LG 09-03 pad (Location ID 456690) on September 7, 2018 (Document 682503854).

During that inspection, COGCC made the following observations:

Stormwater comment: Surface roughening along perimeter of location. This is a temporary erosion control BMP that needs to be used in conjunction with other BMPs. Alternative BMPs should be considered and installed once pad construction has been completed.

Response: As noted in the photo log submitted by COGCC, Noble has installed Filtrexx around the perimeter to use in conjunction with the ripping. During the pad construction process, Noble will install additional BMPs, such as ditches, sediment traps, and mulching.

Stormwater comment: Stormwater engineering guidance indicates that "Surface roughening should create depressions 2 to 6 inches deep and approximately 6 inches apart". Surface roughening appears to have been implemented using 3-pronged rippers

Response: Noble installed a second set of rip marks that was offset from the existing ripping, to bring the rip marks closer together. Noble is unaware of a specification, engineering document, or other guidance that indicates rip marks must be 6 inches apart and does not believe the ripping was ineffective or improperly installed. If COGCC would be willing to provide the engineering guidance quoted in their comment above, Noble would like to review it in order to achieve continuous improvement of their BMPs.

Stormwater comment: Wattles along perimeter of the location have not been installed in accordance with good engineering practices; BMP is not in proper functioning condition. Perimeter stormwater and erosion control BMPs need to be installed prior to or during construction activities. A CA date of 9/6/2018 is being used as this is the date construction activities began according to operator.

Response: Based on the comments under Photo 8 in COGCC's photos log, the COGCC inspector believes that wattles were not properly installed because they were not trenched into the ground. Noble has installed Filtrexx around the perimeter of this location, which is a product that was designed to be installed in locations where trenching is not practicable. The manufacturer's specification indicates that placing the Filtrexx directly on the ground without trenching is an acceptable practice, and one of the main benefits of this product. Noble believe the Filtrexx was correctly installed per the manufacturer's specification for this product and that it is functioning properly.

Stormwater Corrective Action: Install or repair required BMPs per Rule 1002.f.

Response: Noble installed BMPs prior to construction and believes these BMPs are properly installed, as described in the responses above. Noble has also made modifications to the BMPs, based on the COGCC's comments, including installing additional ripping. Noble looks to continually improve their stormwater program, including the design and implementation of BMPs and we welcome further discussion or information regarding these BMPs.