Cecil USX A01-65-01HN (426897)

Director Objective Criteria

1) Oil and Gas Locations within 1,500' of a Building Unit or High Occupancy Building, which include Urban Mitigation Area ("UMA") and Large UMA Facility ("LUMAF") locations.

Yes. There are two Building Units within 1,500' of the proposed pad locations. All required COGCC notices have been sent. In addition to the required notice, Noble had phone conversations with both Building Unit Owners regarding the oil and gas operations. Neither Building Unit Owner had any concerns regarding Noble's operations at the location.

2) Oil and Gas Locations within a municipality.

No

3) Oil and Gas Locations within 1,500' of a municipal boundary, platted subdivision, or county boundary.

No

4) Oil and Gas Locations within 2,000' of a school property line.

No

5) Oil and Gas Locations within:

a) a Floodplain or a Floodway;
b) an identified public drinking water supply area (e.g., Rule 317B buffer zone, or the Brighton Public Water System); or
c) a Sensitive Area for water resources.

Yes. The location is considered within a Sensitive Area for water resources. Noble will adhere to all BMPs in the Form 2A for protection of water resources.

6) Oil and Gas Locations within a Colorado Parks and Wildlife ("CPW") mapped Restricted Surface Occupancy Area ("RSO") or Sensitive Wildlife Habitat ("SWH"), or locations receiving site- or species-specific CPW comments.

No

7) Oil and Gas Locations within 1,000' of a Designated Outdoor Activity Area.

No

8) Oil and Gas Locations with storage of hydrocarbon or produced liquid in more than 18 tanks or in excess of 5,200 barrels.

No

9) Oil and Gas Locations where the operator is using a surface owner protection bond pursuant to Rule 703 to access the surface.

No

10) Oil and Gas Locations where the Relevant Local Government, or state or federal agency requests additional consultation.

No

11) Oil and Gas Locations where the operator requests the Director grant a Rule 502.b Variance for an associated permit application.

No

12) Oil and Gas Locations with an access road (the road constructed from the public road to the Oil and Gas Location) within a RSO, SWH, 317B buffer zone, or within 200' feet of a Building Unit on lands not subject to a Surface Use Agreement.

No

13) A proposed Centralized Exploration and Production Waste Management Facility.

No

14) A Request to Vent or Flare (Form 4) from a location within 1,500' of a Building Unit or High Occupancy Building Unit or within the Denver Metro/North Front Range 8- Hour Ozone Nonattainment Area.

No

15) An Intent to Plug (Form 6) for a well that is associated with a stray gas investigation.

No

16) Oil and Gas Locations proposed by an Operator who is subject to additional individual or blanket financial assurance requirements pursuant to Rule 702.a.

No

BMPs:

Objective Criteria 1:

COGCC Rule 803 Lighting
Planning
Lighting on the drill pad location is considered temporary and will be used during drilling/recompletion activities. Permanent lighting may be installed and utilized at the production facility during normal production operations. Lighting will be directed downward, inward, and shielded towards location to avoid glare on public roads and Building Units within 1,500 feet. Lighting will be on timers or turned off when practical, i.e., no operations being conducted.

COGCC Rule 604.c.(2)D. Traffic Plan.
Traffic Control:
Speed limits will be enforced. The traffic plan and route will include mitigation of impacts from temporary operations by applying water or magnesium chloride as dust suppression within 1000' of occupied residences on Weld County Road 61, and on lease roads as necessary in cooperation with the county.

COGCC Rule 805.c Fugitive Dust
Planning:
Noble shall employ practices for control of fugitive dust caused by their operations. Such practices shall include but are not limited to the use of speed restrictions, regular road maintenance, restriction of construction activity during high- wind days, and silica dust controls when handling sand used in hydraulic fracturing operations. Additional management practices such as road surfacing, wind breaks and barriers, or automation of wells to reduce truck traffic may also be used to minimize fugitive dust emissions.

COGCC Rule 604.c.(2)S. Access roads.
Construction:
At the time of construction, all leasehold roads were constructed to accommodate local emergency vehicle access requirements and are maintained in a reasonable condition. The access road was constructed from WCR 61.

COGCC Rule 604.c.(2)A. Noise.
Noise Mitigation:
Permanent facility – Sound walls are to be utilized around compressors if they should be located at the Cecil USX A Production Facility. These sound walls will be utilized to block sound to the residence located southwest of the facility.

Objective Criteria 5:

Type: Sensitive Area for Water Resources
Grading and drainage of the facility-pad were engineered with structural controls to ensure flow away from sensitive surface water resources to ensure surficial flow runs to the pad's perimeter diversion channel and then directly into the sediment-trap structure to protect irrigation borrow-ditches in proximity to the multi-pad.

COGCC Rule 604.c.(2)F. Leak Detection Plan
Material Handling and Spill Prevention:
Noble Energy Inc. designed well heads and supporting infrastructure on the well pad to avoid releases and to be compliant with all regulations specific to leak detection and control (i.e. SPCC 40CFR112). Daily, monthly and annual inspections are performed at each well pad to confirm operational integrity and regulatory compliance. Noble will perform maintenance if it is deemed necessary through any of the scheduled inspections. Automation technology is utilized to monitor any variations in pressures and fluid gauges which could indicate a leak at the well head or flow lines to the production facility. In addition, automation provides remote shut-in capabilities in the event of an emergency.

COGCC Rule 604.c.(2)G. Berm construction.
Construction:
Berms or other secondary containment devices in Designated Setback Locations have been constructed around crude oil, condensate, and produced water storage tanks and shall enclose an area sufficient to contain and provide secondary containment for one-hundred fifty percent (150%) of the largest single tank. Secondary-containment construction includes the installation of a contiguous spray liner installed and underlaying the entire tank battery, then anchored into the steel-walled containment berms. Berms, liner or other secondary containment devices shall be sufficiently impervious to contain any spilled or released material. All berms and containment devices are currently inspected at regular intervals and maintained in good condition. No potential ignition sources shall be installed inside the secondary containment area unless the containment area encloses a fired vessel. Refer to American Petroleum Institute Recommended Practices, API RP - D16.

Standard Produced Water Vault Construction
Type: Construction
1. A contiguous spray liner was installed and underlays 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 is utilized to collect excess produced water from oil tanks. Produced water in the vault is 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 has been installed above a spray in liner.
4. A sized steel secondary containment ring is 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.