

STATE OF  
COLORADO

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

**COGCC Amended Form 2A review of Noble Energy's Cecil USX A 01-65-1HN location - Form 2A Doc #402152355**

3 messages

**Andrews - DNR, Doug** <doug.andrews@state.co.us>

Fri, Jan 3, 2020 at 3:08 PM

To: Denver Regulatory &lt;DenverRegulatory@nblenergy.com&gt;, stephany.olsen@nblenergy.com

Craig &amp; Stephany,

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

- 1) As this Form 2A is being Amended due to an overbuild of the approved disturbance area, please provide an updated Location Drawing and updated Hydrology Map.
- 2) In the Facilities section Noble Energy has indicated there are three (3) VOC Combustors on this Oil & Gas Location. However, the Facility Layout Drawing does not depict any VOC Combustors on this Oil & Gas Location. Please confirm the count of VOC Combustors and, if necessary, revise the Facility Layout Drawing to show them.
- 3) In the Other Facilities section Noble Energy has indicated there are three (3) 12" temporary poly lines to supply fresh water to the site. Typically we see temporary fresh water supply lines used for well completions. However, the wells on this Oil & Gas Location have already been drilled and completed. What are these temporary fresh water supply lines for?
- 4) In the Construction section Noble Energy has indicated interim reclamation will begin 1/1/20. However, there is an operator comment indicating interim reclamation began on 4/1/12 and has been completed. Therefore, I will change that date from 1/1/20 to 4/1/12.
- 5) In the Drilling Waste Management Program section Noble Energy has indicated drilling fluids and cuttings will be disposed of Offsite at a Commercial Disposal facility. As these wells have already been drilled, no more drilling waste disposal is anticipated. Therefore, I will change the disposal designation to N/A.
- 6) Noble Energy has provided Rule 803 Lighting BMP that states "*Lighting on the drill pad location is considered temporary and will be used during drilling/recompletion activities.*" As these activities have already been completed, I would like to remove this statement from the Lighting BMP.
- 7) Noble Energy has provided a Rule 604.c.(2)A Noise BMP that states "*Sound walls are to be utilized around compressors if they should be located at the Cecil USX A Production Facility.*" As Noble Energy has indicated there are sound walls around the gas compressor, I'd like to remove the phrase "*...if they should be located at the Cecil USX A Production Facility.*" from this BMP.
- 8) As this is a Buffer Zone location, please provide an Odor mitigation BMP that addresses mitigation of nuisance odors related to the current ongoing production operations.
- 9) As this is a Buffer Zone location, please send me the Rule 305.a. Pre-Application Notification Certification attachment and the Rule 306.e. Certification letter that indicates if any meetings/consultations were requested and I will add them to the Form 2A.

Please respond to this correspondence by January 24, 2020. If you have any questions, please contact me. Thank you.

*Doug Andrews*

## Oil &amp; Gas Location Assessment Specialist - Northeast Colorado



**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

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**Craig Richardson** <[Craig.Richardson@nblenergy.com](mailto:Craig.Richardson@nblenergy.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>  
Cc: "Julie Webb (Contractor)" <[Julie.Webb@nblenergy.com](mailto:Julie.Webb@nblenergy.com)>

Tue, Jan 7, 2020 at 1:13 PM

Doug,

I just wanted to let you know we are working on our response. I didn't want you to think we were ignoring your email.

Thank you,

Craig

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**Julie Webb (Contractor)** <[Julie.Webb@nblenergy.com](mailto:Julie.Webb@nblenergy.com)>  
To: "Andrews - DNR, Doug" <[doug.andrews@state.co.us](mailto:doug.andrews@state.co.us)>, Denver Regulatory <[DenverRegulatory@nblenergy.com](mailto:DenverRegulatory@nblenergy.com)>, "Stephany Olsen (Contractor)" <[Stephany.Olsen@nblenergy.com](mailto:Stephany.Olsen@nblenergy.com)>

Thu, Jan 16, 2020 at 2:43 PM

Good afternoon Doug,

Please find the updated completed below and the required attachments. Please let me know if you need any additional information.

Thank you,

## Julie Webb

Senior Regulatory Analyst

Progressive Consulting

c: (616) 813-5063

e: [jwebb@progressivepcs.net](mailto:jwebb@progressivepcs.net)

e: [Julie.webb@nblenergy.com](mailto:Julie.webb@nblenergy.com)

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**From:** Andrews - DNR, Doug <doug.andrews@state.co.us>  
**Sent:** Friday, January 3, 2020 3:09 PM  
**To:** Denver Regulatory <DenverRegulatory@Nblenergy.com>; Stephany Olsen (Contractor) <Stephany.Olsen@nblenergy.com>  
**Subject:** EXTERNAL: COGCC Amended Form 2A review of Noble Energy's Cecil USX A 01-65-1HN location - Form 2A Doc #402152355

Craig & Stephany,

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

1) As this Form 2A is being Amended due to an overbuild of the approved disturbance area, please provide an updated Location Drawing and updated Hydrology Map.

Attached

2) In the Facilities section Noble Energy has indicated there are three (3) VOC Combustors on this Oil & Gas Location. However, the Facility Layout Drawing does not depict any VOC Combustors on this Oil & Gas Location. Please confirm the count of VOC Combustors and, if necessary, revise the Facility Layout Drawing to show them.

The Scaled Facility drawing has been updated to show the VOCs.

3) In the Other Facilities section Noble Energy has indicated there are three (3) 12" temporary poly lines to supply fresh water to the site. Typically we see temporary fresh water supply lines used for well completions. However, the wells on this Oil & Gas Location have already been drilled and completed. What are these temporary fresh water supply lines for?

The temporary lines were for initial completions, however we would like to keep them on the permit if this well requires a re-frac or re-complete in the future.

4) In the Construction section Noble Energy has indicated interim reclamation will begin 1/1/20. However, there is an operator comment indicating interim reclamation began on 4/1/12 and has been completed. Therefore, I will change that date from 1/1/20 to 4/1/12.

Thank you for making the update. We cannot enter a date in the past.

5) In the Drilling Waste Management Program section Noble Energy has indicated drilling fluids and cuttings will be disposed of Offsite at a Commercial Disposal facility. As these wells have already been drilled, no more drilling waste disposal is anticipated. Therefore, I will change the disposal designation to N/A.

Thank you for making the update.

6) Noble Energy has provided Rule 803 Lighting BMP that states "*Lighting on the drill pad location is considered temporary and will be used during drilling/recompletion activities.*" As these activities have already been completed, I would like to remove this statement from the Lighting BMP.

This can be removed.

7) Noble Energy has provided a Rule 604.c.(2)A Noise BMP that states "*Sound walls are to be utilized around compressors if they should be located at the Cecil USX A Production Facility.*" As Noble Energy has indicated there are sound walls around the gas compressor, I'd like to remove the phrase "...*if they should be located at the Cecil USX A Production Facility.*" from this BMP.

This can be updated

8) As this is a Buffer Zone location, please provide an Odor mitigation BMP that addresses mitigation of nuisance odors related to the current ongoing production operations.

*This is an existing location that is not anticipated to have impacts to adjacent building units related to odor. Should any activity be conducted onsite requiring the use of drilling fluids, the following will apply: Noble utilizes D822 drilling fluid which does not contain off-road diesel. The flashpoint for D822 is 211F compared to 130F for products containing off-road diesel. Noble will maintain a supply of Odor Amour (Benzaco product) which is an odor neutralizer compatible with D822 to be utilized as need in the event of a landowner complaint. Noble will notify the COGCC via Sundry if there is a significant change in the drilling fluid utilized on this location.*

9) As this is a Buffer Zone location, please send me the Rule 305.a. Pre-Application Notification Certification attachment and the Rule 306.e. Certification letter that indicates if any meetings/consultations were requested and I will add them to the Form 2A.

Both certifications are attached

Please respond to this correspondence by January 24, 2020. If you have any questions, please contact me. Thank you.

*Doug Andrews*

Oil & Gas Location Assessment Specialist - Northeast Colorado



**COLORADO**  
Oil & Gas Conservation  
Commission  
Department of Natural Resources

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**5 attachments**

-  **Cecil USX A 01-65-1HN\_Operator Certification.pdf**  
220K
-  **12 SCALED FACILITY\_CECIL USX A PAD (2019-08-07).pdf**  
817K
-  **Hydrology Map\_CECIL USX A PAD (2019-08-07).pdf**  
1139K
-  **NOI Cert\_CECIL USX A01-65-01HN PAD.pdf**  
272K
-  **Location Drawing\_CECIL USX A PAD (2019-08-07).pdf**  
360K