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noble energy

CONFIDENTIAL BUSINESS INFORMATION

November 27, 2013

Via Certified Mail – Return Receipt Requested

Ms. Cindy Beeler, 8ENF-AT
U.S. EPA, Region 8
1595 Wynkoop Street
Denver, Colorado 80202-1129

Re: Response to Request for Information Pursuant to Section 114(a)(1) of the Clean Air Act, 42 U.S.C. § 7414(a)(1); Tank Batteries Located in Weld, Boulder, and Broomfield Counties of Colorado

Dear Ms. Beeler:

Noble Energy, Inc. ("Noble") appreciates the U.S. Environmental Protection Agency, Region 8's ("EPA's") revision to the submission schedule outlined in the above-referenced Request for Information ("Request") dated August 1, 2013 concerning Noble tank batteries in Weld, Boulder, and Broomfield Counties of Colorado. All supporting data referenced in this response are included on the enclosed compact disc ("CD"). Please note that Noble has included the completed Excel spreadsheet originally provided by EPA ("EPA Workbook") in order for EPA to access the formulas, tabs, etc. embedded in that spreadsheet. Noble also included a .PDF version of all tabs in the spreadsheet to serve as a final version copy to serve as a reference copy for EPA in the event that the EPA Workbook is inadvertently modified. This response contains confidential business information and has been labeled "Confidential Business Information."

As we have discussed, Noble's response will be submitted in three (3) transmissions as follows: (1) on or before November 30, 2013, submit all required information for all systems outlined in the Request ***except for*** systems 21, 24, 25, 31, 47, 51, 53, and 54; (2) on or before December 23, 2013, submit all required information for systems 25, 31, and 53; and (3) within sixty (60) days from the date systems 21, 24, 47, 51, and 54 resume operational status, submit all required information. Because the information for system 24 was gathered before this submittal, system 24 has been included in this submittal.

In accordance with the above revised submission schedule, enclosed please find Noble's first transmission of responses to the Request.

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If you have any questions regarding this response, please contact Denee DiLuigi at (303) 228-4251.

Sincerely,

[redacted]

Vice President, DJ Basin

Enclosure (CD)

cc: Denee A. DiLuigi, Esq., Noble
[redacted] Noble
[redacted] Noble
Dana Stotsky, Esq., EPA
Andrew M. Gaydosh, EPA

Ms. Cindy Beeler
November 27, 2013

CONFIDENTIAL BUSINESS INFORMATION

NOBLE ENERGY, INC.'S RESPONSE TO EPA'S REQUEST FOR INFORMATION PURSUANT TO SECTION 114(a)(1) OF THE CLEAN AIR ACT

Noble Energy, Inc. ("Noble") respectfully submits this first transmission of responses to the U.S. Environmental Protection Agency, Region 8's ("EPA's") August 1, 2013 Request for Information Pursuant to Section 114(a)(1) of the Clean Air Act ("Request") related to Noble's tank batteries located in Weld, Boulder, and Broomfield Counties of Colorado. Noble understands that this first transmission of responses is timely if submitted to EPA on or before November 30, 2013.

GENERAL OBJECTIONS

Noble makes the following General Objections to the Request, including the request for documents contained therein, and incorporates its General Objections into each of the written responses that follow. In addition, and without waiver of its General Objections, specific objections to individual questions in the Request are stated in response to that particular question ("Specific Objections"). Without waiving or limiting these objections, Noble has attempted to respond to the Request as completely and accurately as possible based on information presently available.

(1) Noble objects to the Request to the extent that it: (a) is overly broad or vague; (b) is unduly burdensome; (c) contains redundant requests; (d) seeks the development of information not otherwise currently available as part of Noble's normal business activities; and (e) seeks information that may be derived or ascertained from documents identified and made available by Noble; or (f) that is in the public record.

(2) Noble objects to the Request to the extent it seeks information that is not authorized or required to be furnished under Section 114(a) of the Clean Air Act ("CAA") and is not relevant to the types of information required to be made available under Section 114(a) of the CAA.

(3) Noble objects to the Request to the extent it seeks undocumented information, including descriptions of oral communications, discussions, conversations, and agreements, as well as individuals' awareness of events and circumstances.

(4) Noble objects to the Request, and to the request for documents contained therein, to the extent that it calls for information or documents that are protected under the attorney-client privilege, the attorney work product doctrine, the joint defense privilege, the self-evaluation privilege, the right of privacy laws, the protections afforded trade secrets and confidential business information, and/or any other applicable privilege or protection.

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(5) Noble objects to the Request, and to the request for documents contained therein, to the extent it seeks to impose on Noble an obligation to seek or obtain information or documents from third persons or in the public record, or which otherwise is not in Noble's custody or control.

(6) Noble objects to the Request to the extent it is arbitrary and capricious, an abuse of discretion, and without basis in law.

(7) Noble objects to the Request to the extent it calls for a legal conclusion.

(8) Noble objects to the Request to the extent it calls for an expert opinion which was not available at the time of the drafting of this response. Notwithstanding this objection, Noble has answered the Request to the best its ability.

OBJECTIONS TO DEFINITIONS

Without waiving or limiting its General Objections, which apply to all of the Requests below, Noble makes the following objections to the Definitions and to all questions, including requests for copies of documents, which use these Definitions. Without waiving or limiting its Objections to the Definitions, Noble has responded to the Request as completely and accurately as possible.

Noble objects to each Definition to the extent that it is inconsistent with applicable law, regulation, guidance, and interpreting court decisions.

Noble objects to any Definition that requires Noble to make a legal conclusion in its Response.

Noble objects to the Definition of "condensate storage tank" because it relies on the undefined term "atmospheric storage tank" in its definition. Noble further objects to the Definition to the extent that it is inconsistent with applicable federal regulations.

Noble objects to the Definition of "control device" because it is vague, incomplete, and overbroad. Noble further objects to the Definition of "control device" because it is inconsistent with the regulatory definition of control device as defined in 40 C.F.R. § 63.981.

Noble objects to the Definition of "document" and "writing" to the extent that it describes information that is outside of Noble's possession and control, calls for hearsay, and improperly seeks information protected by the attorney-client privilege, work product doctrine, and any other applicable privileges.

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RESERVATIONS OF RIGHTS AND DEFENSES REGARDING THE EPA WORKBOOK

To respond to the Request, and per EPA's instruction, Noble has used the Microsoft Excel workbook format file (Noble114_032513.xlsx) ("EPA Workbook"), which was provided to Noble on a compact disc as part of the Request as Enclosure 7. Noble notes that EPA pre-filled portions of the EPA Workbook with information and formulas before providing it to Noble. Noble notes that it did not create the template, formulas, tabs, and the like; Noble simply inserted data that specifically responded to the question posed in the column consistent with the question number set forth in the Request. In some cases, Noble has corrected data due to the discovery of an error and has so noted it in the EPA Workbook. Noble is not able to guarantee the accuracy of the data or the validity of the formulas, metadata, or any other data entered by EPA. Noble takes no responsibility for the accuracy of the text, data, metadata, and the like that was generated by EPA and provided to Noble in the EPA Workbook. Noble respectfully reserves all rights and defenses available to it in law or equity, and Noble's use of the EPA Workbook to respond to the Request does not waive such rights. Furthermore, if additional information becomes available that would cause Noble to conclude that any information provided by EPA was incomplete or inaccurate, Noble respectfully reserves its right to amend its response to this Request.

RESERVATIONS OF ALL RIGHTS AND DEFENSES

Without waiving or limiting its General Objections, Specific Objections, and Objections to Definitions, Noble respectfully reserves all rights and defenses available to it in law or equity.

RESPONSES TO QUESTIONS

Question No. 1: *The Environmental Protection Agency (EPA) assigned tank vapor capture system #s to the list of tank battery locations in Enclosure 4, to recognize and identify tank battery locations whose condensate tank vapors are manifolded together between one or more tank battery location(s) and routed to a common control device. Please state whether the tank battery location names associated with the tank vapor capture system #s identified by the EPA in Enclosure 4 are correct. If they are incorrect, please provide correct identification and explain.*

Response No. 1: Notwithstanding the General Objections and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble states as follows:

Upon Noble's review of Enclosure 4, certain information required correction to ensure accuracy. In some instances, the number of tank batteries associated with a response group was inaccurate. In other instances, AIRS AFS #s and/or Tank Battery Location Names were inaccurate. For instance, Noble notes that the Tank Battery Location Names included under

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EPA-Assigned Vapor Capture System #15 are in fact part of EPA-Assigned Vapor Capture System #14. As such, Noble deleted the tank batteries associated with EPA-Assigned Vapor Capture System #15 and included such tank batteries in EPA-Assigned Vapor Capture System #14.

While these corrections have specifically been noted in the EPA Workbook, which was provided to Noble on a compact disc as part of the Request as Enclosure 7, Noble is nonetheless providing below the updated text of Enclosure 4 that reflects corrections made to ensure accuracy in this first transmission. The corrections are highlighted and/or struck through for ease of review.

Enclosure 4

Noble Energy, Inc.
INFORMATION REQUEST
TANK BATTERY LOCATION NAMES

Questions in Enclosure 5 pertain to the tank battery locations listed below.

Response Group #	EPA-Assigned Tank Vapor Capture System #	Tank Battery Location name	APCD ID (AIRS AFS #)
1	1	Stroh H 12-18	1238248
	1	Stroh H 12-22	1238249
	1	Stroh H 12-21	1239022
1	2	Stroh H 12 1, 2,7,8	1233705
	2	Stroh H 12-27	1237200
	2	Stroh D7-31	1237426
1	3	Turk Blue D 19-4, 5,6, 2J	1233590
	3	Butterball D 19-200	1233590
	3	Dechant D19-35D (added)	1239A6E
	3	Butterball D19-17D (added)	1239A6B
	3	Butterball D19-18D (added)	1239A6C
	3	Butterball D19-19D (added)	1239A6D
1	4	Elton Red V 12-1, 8	1231763
1	5	Thomason X 16-11,12,13	1231745

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1	6	Bierig 1-26B	1236901
	6	Rhoadarmer 1-26B	1236698
1	7	UPRC 23-TH6,UPV 23-8H6	1233489
		UPRC 23-7H6,UPV 23-8H6 (corrected name)	
	7	UPV 23-1H6, 2H6	1233745
1	8	lkenouye 29-10,F 29-23	1232813
	8	lkenouye F 28-33	1237247
	8	lkenouye F 29-22	1237252
1	~~9~~	~~Gemini K1-99 HZ~~ (moved to #52)	~~1238539~~
	9	Gemini K1-15,16	1233663
1	10	Alles F 33-22	1237117
	10	Alles 33-7H5	1232826
	10	Alles 3	1232221
1	11	Alles F 33-18	1238373
	11	Alles F 33-27	1238419
1	12	Alexander F 33-24 (had 1232751)	1237115
	12	Alexander F 33-21	1237111
	12	Alexander F 34-33	1237116
	12	Alexander F 33-1, 33-2 (had 1237115)	1232751
1	13	Alles F 33-29	1238371
	13	Alles F 33-28	1238310
1	14	Lundvall J 18-18	1238224
	14	Lundvall J 18-2	1238308
	14	Lundvall J 17-30	1238222
	14	Lundvall J 17-31	1238332
	14	Lundvall J 17-32	1238223
	14	Lundvall J 18-1, 8	1238306
	14	Lundvall J 18-22 included from system #15	1238250
	14	Lundvall J 18-21 included from system #15	1238225
	14	Lundvall J 18-17 included from system #15	1238307
	14	Lundvall J 18-27 included from system #15	1238226
	14	Lundvall J 18-28 included from system #15	1238227
1	~~15~~	~~Lundvall J 18-22~~ all included in system #14	~~1238250~~
	~~15~~	~~Lundvall J 18-21~~ all included in system #14	~~1238225~~
	~~15~~	~~Lundvall J 18-17~~ all included in system #14	~~1238307~~
	~~15~~	~~Lundvall J 18-27~~ all included in system #14	~~1238226~~
	~~15~~	~~Lundvall J 18-28~~ all included in system #14	~~1238227~~
1	16	Steve J 18-23	1236095
	16	Steve J 18-15 & 16	1236102
	16	Steve J 18-9 & 10	1236104
1	17	Duke J 4-11,14,25	1236490
	17	Duke J 4-12,13	1236505

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	17	Duke J 4-33	1236502
	17	Duke USX J 5-9,16	1236493
1	18	Austyn J 9-3,6	1235674
	18	Austyn J 9-5,19	1235675
1	19	Turk White D 19-1, 2, 8	1233639
2	20	Haller X21-7J1, Haller 41-21, Arends X21-2	1235466
2	21	Aguilar 29-11H5,12H5	1232790
2	22	Soco 29-1	1233720
	22	Soco 29-2, 29-7	1232156
2	23	Franklin 28-1,28-15,F 28-23	1233676
2	24	McElroy 41-5	1234920
2	25	Schank J 35-27	1237171
	25	Schank J 35-1 (added)	1237174
	25	Schank J 35-31 (added)	1237172
2	26	Brozovich MA 8-10,15,16J	0141324
2	27	Simpson MD 2-1,2,7, 8J	0131275
2	28	Bierig 1-26, 8-26	1231915
	28	Rhoadarmer 1-26,2-26	1232497
2	29	Meyer 1, J 26-16	1232773
2	30	Mantel J 23-10, 23-15	1233662
	30	Wiedeman J 23-11,14	1233483
2	31	Schank 1, J 35-2	1232710
2	32	Lundvall 13-14,15	1233046
2	33	Lundvall 1 & J 18-6 & 18-12	1234627
2	34	Flatirons 1-36, I 36-4	1232146
2	35	Butterball D 19-27D (moved from #36)	1238940
	35	LDS D 20-29D	1238945
2	36	LDS (Thompson) D 20-31D	1238942
	36	LDS D 20-30D	1238941
	36	LDS D-17-13 (moved from #35)	1238965
2	37	MICK D 18-11,12,13,14,25	1232085
2	38	Dechant X08-15,24	1239503
3	39	Meguire 21-3P, X 21-4	1237547
3	40	Green MA 17-9,15,16J	0141322
3	41	Green MA 17-1, 2,8J	0141323
3	42	Beyer MA 10-5	0141325
3	43	Young 5-23,MC23-14D	0131317
	43	Young MC 23-110, 12D	0131421
3	44	Morris MC 27-2, 7 & 8	0131295

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3	45	Mary Miller 1, 2, 3, 4-35	0131296
3	46	Donley 1-36, MC 36-7	0131267
3	47	Reynolds 1	1238925
	47	Reynolds 2, 28-3	1232743
3	48	Erbes 5-2H5	1234877
3	49	Horton D 18-200, 22P	1239605
	49	Scooter 18-10, 15, 16, 4J	1233589
3	49	Scooter D 18-8, 9,Ji	
3	50	Arapahoe 1-36, MC 36-3,5,6	0131297
3	51	lkenouye 1	1235797
3	52	Gemini G6-33	1238500
	52	Gemini K1-99 HZ (moved from #9)	1238539
	52	Gemini Kl-9,10	1231725
3	53	Schank J 35-20	1237063
	53	Schank J 35-21	1237064
	53	Schank 2, J 35-6	1233679
3	54	Evans Industrial Park 1,2	1234620
3	55	Weiderspon J 16-12,13	1231873

Question No. 2: *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), affirmatively state whether Noble conducted, prior to construction of the tank vapor capture system and control device, a design analysis of the tank vapor capture system and control device. If your response is yes, please provide the date of that analysis and state whether the design analysis was performed to ensure that the tank vapor capture system and control device were adequately designed and sized to handle reasonably foreseeable fluctuations in emissions and minimize emissions to the atmosphere to the maximum extent practicable, and if not why not. If a pre-construction design analysis has been conducted, please supply all documents supporting the design analysis of each tank vapor capture system and control device. If Noble did not conduct a pre-construction design analysis for any tank vapor capture system listed in Enclosure 4, please answer the question accordingly.*

Response No. 2: Notwithstanding the General Objections and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 2 are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted." As noted in the EPA Workbook, Noble did not conduct a design analysis for tank vapor capture systems associated with the first transmission of responses to the Request. Noble

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offers the following explanation for its determination that a design analysis was not warranted:

As an initial matter, design analyses are not required to be conducted under applicable federal or state requirements. [redacted] During this time frame, Noble was purchasing a large number of control devices of the same make and model. Installation was modular, and additional units could be installed if operational parameters indicated the need for additional devices to achieve the control efficiency rates required by applicable requirements and to handle reasonably foreseeable fluctuations in emissions of VOCs.

Question No. 3: *If Noble did not conduct a design analysis of the tank vapor capture system and control device prior to construction as addressed in Question 2, affirmatively state whether Noble has ever conducted such an analysis. If your response is yes, please provide the date of that analysis and state whether the design analysis was performed to ensure that the tank vapor capture system and control device were adequately designed and sized to handle reasonably foreseeable fluctuations in emissions and minimize emissions to the atmosphere to the maximum extent practicable, and if not why not. If a design analysis has been conducted, please supply all documents supporting the design analysis of each tank vapor capture system and control device, including the date of the analysis. If Noble did not conduct a design analysis for any tank vapor capture system listed in Enclosure 4, please answer the question accordingly.*

Response No. 3: Notwithstanding the General Objections and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 3 are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted." As noted in the EPA Workbook, Noble did not conduct a design analysis for tank vapor capture systems associated with the first transmission of responses to the Request. Noble offers the following explanation for its determination that a design analysis was not warranted:

As indicated in Response No. 2, design analyses are not required to be conducted under applicable federal or state requirements. [redacted]

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[redacted]

Question No. 4: *For those tank capture systems listed in Enclosure 4 (or if corrected in response to Question 1), for which Noble has never conducted a design analysis of the tank vapor capture system and control device, then for each tank vapor capture system, please conduct a design analysis of the existing tank vapor capture system(s) and control device(s). Quantify the peak total emission flow (cubic feet per second) due to flash emissions attributed with liquid dump events from the pressurized vessel upstream of the condensate storage tanks, along with w/b/s emissions. Your design analysis shall establish the flow capacity in cubic feet per second of the existing tank vapor capture system(s) and control device(s). You must supply input parameters, calculations and all supporting documentation.*

Objection No. 4: Noble objects to this question because it seeks information related to the following undefined terms: "design analysis," "liquid dump events," and "pressurized vessel," which terms are vague and overly broad.

Response No. 4: Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 4 are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

[redacted] Further explanation is provided in the analysis documents, which are included in the "Simulation Results" subfolder of the "Documents Consulted" folder on the enclosed compact disc.

Question No. 5(a): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

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a. *Piping & instrumentation diagram of the process (wellhead(s) to control device). If more than one condensate storage tank is present within a tank vapor capture system, describe how condensate flows between condensate storage tanks.*

Objection No. 5(a): Noble objects to this question because it seeks information related to the following undefined terms: "piping & instrumentation diagram" and "process," which terms are vague and overly broad.

Response No. 5(a): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(a) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

[redacted] The name of the PDF file provided in the "ResponseToQuestions" tab corresponds to the Tank Vapor Capture System identified by EPA.

Question No. 5(b): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

b. *Identify the gas gathering pipeline into which the tank battery location enters and the maximum allowable operating pressure (psig) of that pipeline.*

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Objection No. 5(b): Noble objects to this question because it seeks information related to the following undefined terms: "gas gathering pipeline" and "maximum allowable operating pressure," which terms are vague and overly broad.

Response No. 5(b): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(b) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Question No. 5(c): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

c. *Provide a list of the wells which flow to the initial separator(s) and a narrative description of how the production from those wells is set to flow to the initial separator(s) (e.g. based on time, pressure, other parameter(s), or a combination of these). State whether more than one well can flow to an initial separator concurrent with another well or wells.*

Objection No. 5(c): Noble objects to this question because it seeks information related to the following undefined terms: "production" and "flow," which terms are vague and overly broad.

Response No. 5(c): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(c) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Question No. 5(d): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered*

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with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:

d. Provide a description, name and tag# ID of the initial separator(s) (e.g. single stage, dual stage, dual coil, HLP, YGR, etc.). For each stage of the initial separator(s) provide the following:

i. The maximum operating pressure (psig) and temperature (°F)
ii. If more than one stage in the initial separator(s), describe where flash emissions from subsequent stages of initial separator(s) are routed
iii. An indication of whether the final separator stage features a device on the liquid outlet line to prevent a vortex from forming during a liquid dump event which could lead to unintentional gas carry through.

Objection No. 5(d): Noble objects to this question because it seeks information related to the following undefined terms: "maximum operating pressure," "liquid dump event," "device," and "unintentional gas carry through," which terms are vague and overly broad.

Response No. 5(d): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(d) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Noble is not providing name or tag ID#'s for the initial separators as this information does not exist and is not otherwise required by applicable requirement to be maintained.

[redacted]

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[redacted]

Question No. 5(e): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

e. Describe whether there is an intermediate separation vessel(s) between the initial separator and the condensate storage tank. If so, provide:

i. The maximum operating pressure (psig) and temperature (°F).
ii. Describe where flash emissions from the intermediate separation vessel(s) are routed.

Objection No. 5(e)(i)-(ii): Noble objects to this question because it seeks information related to the following undefined terms: "intermediate separation vessel(s)", "maximum operating pressure," and "flash emissions," which terms are vague and overly broad.

Response No. 5(e)(i)-(ii): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(e) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Question No. 5(f): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

f. Provide the condensate outlet pipe interior diameter (inches) from the separation vessel immediately upstream of the condensate storage tank (if the interior pipe diameter is not available, measure the separator outlet exterior pipe diameter, and so note).

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Response No. 5(f): Notwithstanding the General Objections and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(f) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

[redacted] s noted in the EPA Workbook at tab "ResponseToQuestions."

Question No. 5(g): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

g. Provide the condensate outlet pipe orifice plate diameter (inches) from the separation vessel immediately upstream of the condensate storage tank.

Objection No. 5(g): Noble objects to this question because it seeks information related to the following undefined terms: "orifice plate" and "separation vessel," which terms are vague and overly broad.

Response No. 5(g): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(g) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Question No. 5(h): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

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h. Describe whether the produced condensate is trucked or piped offsite from the condensate storage tank. If neither, provide an explanation.

Objection No. 5(h): Noble objects to this question because it seeks information on undefined "produced condensate," which term is vague and overly broad.

Response No. 5(h): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(h) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Question No. 5(i): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

i. Describe whether the flow of condensate from the separation vessel immediately upstream of the condensate storage tank is continuous or is in intermittent batches.

Objection No. 5(i): Noble objects to this question because it seeks information related to the following undefined terms: "flow," "condensate," and "intermittent batches," which terms are vague and overly broad.

Response No. 5(i): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(i) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

It should be noted that flow from the separation vessel immediately upstream of the condensate storage tank is considered batch. The flow is started when the liquid level in the vessel reaches a height sufficient to raise an internal float, which opens the valve. The flow continues until the level is lowered to the point where the float then closes the valve.

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Question No. 5(j): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

j. If the flow of condensate from the separation vessel immediately upstream of the condensate storage tank is in intermittent batches, provide:

i. A narrative description of what triggers a condensate liquid dumping event.

ii. The maximum condensate volume (barrels) of the separation vessel immediately upstream of the condensate storage tank.

iii. An estimate of the instantaneous flow rate during a dumping event. This may be estimated using one of the following methods:

1. Instantaneous flow rate = average daily production (barrels) I (dumping frequency (dumping events per day) x duration of a dumping event (hours). The average daily production is provided in the EPA workbook (worksheet: ResponseToQuestions) [the average daily production is calculated from Noble's reported Oil Production data to COGIS for 2008-2011]; or

2. Instantaneous flow can be calculated based on the flow coefficient of the dump valve (gpm/psi$^{0.5}$) and the pressure differential across the valve (psi) and the specific gravity of the hydrocarbon liquid (available in the extended hydrocarbon pressurized liquid analysis asked for in Question 6).

Objection No. 5(j)(i)-(iii): Noble objects to this question because it seeks information related to the following undefined terms: "condensate liquid dumping event," "daily production," and "instantaneous flow rate," which terms are vague and overly broad.

Response No. 5(j)(i)-(iii): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(j) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

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As noted in the Reservation of Rights and Defenses to the EPA Workbook Section of this response, Noble did make certain, limited changes to the EPA Workbook. In this instance, Noble notes that it compared the data in the EPA Workbook "ProductionData" tab with data from the Colorado Oil and Gas Information System, or COGIS, database and corrected the data where it found errors. In addition, Noble added data for 2012 and through May of 2013 to the "ProductionData" tab. The average barrels per day calculation reflects this addition.

[redacted]

Question No. 5(k): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

k. For each tank vapor capture system, provide the number of associated condensate storage tank(s) and their volume (barrels). For this question, associated condensate storage tank means a tank whose vapors are captured and conveyed to a tank vapor capture system.

Objection No. 5(k): Noble objects to this question because it seeks information related to the term "associated condensate storage tank," the proposed definition of which is vague and overly broad.

Response No. 5(k): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(k) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

For reference, please note that Noble's responses in the EPA Workbook at tab "ResponseToQuestions" are formatted to identify the number of tanks and the individual volume of each of those tanks. For example, in Tank Vapor Capture System #1, there are [redacted]

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Question No. 5(l): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

l. *Describe the condensate tank vapor capture system which routes tank vapors to the on-site control device by providing the following:*

- *i.* *Pressure relief settings (psi) on the thief hatch and pressure relief valve on the condensate storage tank(s) or tank vapor capture system. Note any changes in pressure relief settings that may have occurred and date when changed.*
- *ii.* *Thief hatch gasket/seal information, including the type of gasket/seal used (e.g. rubber, Viton).*
- *iii.* *Pipe length (feet) from the condensate storage tank(s) to the control device (if the vapor capture system collects vapor from multiple tanks, use the average pipe length for all the condensate storage tanks to the control device).*
- *iv.* *Inner pipe diameter (inches) of the tank vapor capture system from the condensate storage tank(s) to the control device.*
- *v.* *Number of short radius elbows (short radius elbows have a radius equal to the pipe diameter).*
- *vi.* *Number of long radius elbows (long radius elbows have a radius 1.5 times the pipe diameter).*
- *vii.* *Number and type of valves (e.g. gate, check, globe, etc.).*
- *viii.* *If the control device is an enclosed flare/combustor, provide the rated pressure loss across the combustor burner assembly as provided by the manufacturer of the combustion device (psi).*
- *ix.* *Describe any low points in the tank vapor collection system piping where liquids could accumulate. Describe the frequency of draining these liquids. Describe the indicator, if any, that notifies the operator that liquids must be drained.*
- *x.* *Set-point pressure (ounces per square inch) and maximum flow capacity (scf/hr) at that set-point of any backpressure valves installed on the vapor collection system.*
- *xi.* *Provide a narrative description of the operations and maintenance program Noble employs to ensure emissions are minimized from the condensate tank(s) and tank vapor capture system(s) including thief hatch(es) and pressure relief valve(s), and the frequency of such.*

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Objection No. 5(l)(i)-(xi): Noble objects to this question because it seeks information related to the following undefined terms: "low points" and "indicator," which terms are vague and overly broad.

Response No. 5(l)(i)-(xi): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(l) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

In response to Question No. 5(l)(iii) in the EPA Worksheet for EPA Tank Vapor Capture System #3, [redacted]

With respect to the response to Question No. 5(l)(viii), Noble provided copies of the manufacturer specification sheets (where available), which are located in the "Maintenance and Specification Sheets" subfolder in the "Documents Consulted" folder on the enclosed compact disc.

Question No. 5(m): *Separately, for each tank vapor capture system listed in Enclosure 4 (or if corrected in response to Question 1), provide responses to the information requested below. For ease of organization, we have provided a workbook in Enclosure 7 for this data to be entered with column headings corresponding to the questions below. Please use this workbook (worksheet: ResponseToQuestions) to provide the following information:*

m. Identify the type of control device used (e.g. combustion device, VRU, etc.). If a combustor (i.e. enclosed flare) is used, provide the following:

i. The combustor manufacturer specifications showing the maximum flow rate of tank vapors under which a control efficiency of at least 95% for volatile organic compounds can be achieved (scf/hr).

ii. The combustor manufacturer recommended maintenance and service requirements.

iii. Provide a narrative description of the servicing Noble performs on the combustor(s) and the frequency of such.

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Response No. 5(m)(i)-(iii): Notwithstanding the General Objections and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 5(m) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

In response to Question No. 5(m)(i), Noble provided copies of the manufacturer specification sheets (where available), which are located in the "Maintenance and Specification Sheets" subfolder in the "Documents Consulted" folder on the enclosed compact disc.
In response to Question No. 5(m)(ii), Noble provided copies of the manufacturer recommended maintenance and service requirements (where available), which are located in the "Maintenance and Specification Sheets" subfolder in the "Documents Consulted" folder on the enclosed compact disc.

In response to Question No. 5(m)(iii), Noble provided a copy of the Noble VOC Maintenance PM Schedule (entitled "Noble VOC Maintenance PM schedule.PDF"), which can be located in the "Maintenance and Specification Sheets" subfolder in the "Documents Consulted" folder on the enclosed compact disc. This document outlines the servicing Noble performs on the combustors. [redacted]

Question No. 6(a): *Provide the following analytical results for each tank battery location listed in Enclosure 4. Submit via pdf file, noting the filename in the workbook (worksheet: ResponseToQuestions):*

a. *An extended hydrocarbon liquid analysis of a pressurized oil sample from the pressurized vessel immediately upstream of the condensate storage tank(s). Follow the sampling protocol found in Appendix C of the API E&P TANK Version 2.0 User's Manual. If such samples and analyses have been done within the past 12 months, you may provide this data. Include a copy of the lab analysis report showing:*

   i. *Date and time of sample collection.*
   ii. *Name of tank battery location.*
   iii. *Description of where, within the tank battery location process, the sample was collected.*
   iv. *Operating temperature (°F) and pressure (psi) of the vessel at the time the sample was collected.*

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v. *The pressure (psi) of the sample at the time it was received by the laboratory.*

Objection No. 6(a): Noble objects to this question because it seeks information on an undefined "extended hydrocarbon liquid analysis," which term is vague and overly broad.

Response No. 6(a): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 6(a) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

Copies of the lab analysis reports are located in the "Hydrocarbon Liquid Analyses" subfolder of the "Documents Consulted" folder on the enclosed compact disc.

Question No. 6(b): *Provide the following analytical results for each tank battery location listed in Enclosure 4. Submit via pdf file, noting the filename in the workbook (worksheet: ResponseToQuestions):*

b. *API Gravity and Reid Vapor Pressure (RVP) (psia) of the "sales oil" in the condensate storage tank(s).*

Objection No. 6(b): Noble objects to this question because it seeks information related to undefined "sales oil," which term is vague and overly broad.

Response No. 6(b): Notwithstanding the General Objections, Specific Objections, and Reservations of All Rights and Defenses and incorporating relevant facts from other responses herein, Noble responds as follows:

Please refer to the answers provided in the EPA Workbook at tab "ResponseToQuestions," which was provided to Noble on a compact disc as part of the Request as Enclosure 7. The supporting documentation and individuals consulted to respond to Question No. 6(b) are also included in the EPA Workbook at tabs "DocumentsConsulted" and "PersonsConsulted."

[redacted]

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REQUEST FOR CONFIDENTIAL BUSINESS INFORMATION STATUS

Certain information included in Noble's responses herein contains information that Noble considers to be confidential commercial information pursuant to 5 U.S.C. § 552(b)(4). Accordingly, Noble asserts a claim of confidentiality for the information provided and has marked it as confidential. Noble provides this information marked as confidential on the condition that EPA not disclose the information publicly pursuant to the Freedom of Information Act or any other authority, including, but not limited to, Section 114(c) of the CAA, 42 U.S.C. § 7414(c), and EPA's regulations related to the confidentiality of business information at 40 C.F.R. Part 2, Subpart B. Noble also requests that EPA, in accordance with the Federal Privacy Act, 5 U.S.C. §552a, not disclose the personnel information submitted as part of this Response in the Personnel List document (Personnel List.pdf) contained in the "Documents Consulted" folder on the enclosed compact disc. Should EPA dispute Noble's claim of confidentiality or consider disclosing the confidential information to any other party, please contact Denee DiLuigi at (303) 228-4251 immediately. In accordance with Enclosure 3 to the Request, Noble offers answers or comments to the following questions:

CBI Question No. 1: *What specific portions of the information are alleged to be entitled to confidential treatment? Specify by page, paragraph and sentence when identifying the information subject to your claim.*

Response to CBI Question No. 1: Noble asserts a claim of business confidentiality over the information contained in this response related to descriptions of Noble's tank batteries, including, but not limited to, schematics, pictorial representations, written descriptions, and/or flow diagrams. Noble asserts a claim of business confidentiality over every page, image, and reference describing Noble's tank batteries, their lay-out, and their infrastructure, including all documents contained in the "Process Flow Diagrams" subfolder of the "Documents Consulted" folder on the enclosed compact disc.

Noble further asserts a claim of business confidentiality over extended hydrocarbon liquid analyses and related analysis of hydrocarbon streams produced in response to Question Nos. 4 and 6. Specifically, Noble asserts a claim of business confidentiality over: 1) each page of the reports referenced by filename in columns P and BN of the EPA Worksheet at tab "ResponseToQuestions" and/or located in the "Simulation Results" or "Hydrocarbon Liquid Analyses" subfolder of the "Documents Consulted" folder on the enclosed compact disc; and 2) all information contained in the EPA Workbook at the "ResponseToQuestions" tab in columns Q, R, AB, AC, BN, BO, and BP that relates to hydrocarbon and/or product stream analyses in any way.

Finally, Noble asserts a claim of confidentiality over all information contained in the Personnel List document (Personnel List.pdf) contained in the "Documents Consulted" folder on the enclosed compact disc.

CBI Question No. 2: *For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event. Additionally, explain why the information should be protected for the time period you've specified.*

Response to CBI Question No. 2: Noble respectfully requests that EPA maintain such information as confidential in perpetuity because, as described in more detail below, comprehensive and specific information on tank battery process flows/lay-out/infrastructure and/or hydrocarbon streams is not the type of information shared with the general public or other regulators, and widespread dissemination of this information could hurt Noble's position vis-à-vis its competitors by providing competitors with detailed information about Noble's operations.

CBI Question No. 3: *What measures have you taken to protect the information claimed as confidential from undesired disclosure? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?*

Response to CBI Question No. 3: Noble has not distributed its process flow diagrams/tank battery schematics or hydrocarbon analyses/reports to third-parties or provided such information to governmental authorities for public dissemination. Although specific gravity of oil and heating value of natural gas are provided to the Colorado Oil and Gas Conservation Commission ("COGCC"), those values are not provided in the form of the reports for which Noble seeks confidential treatment because the reports contain more detail than is required to be shared with COGCC.

CBI Question No. 4: *Is the information contained in any publicly available material such as the internet, publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?*

Response to CBI Question No. 4: The detailed information contained in the process flow diagrams/tank battery schematics, hydrocarbon analyses, and/or other similar diagrams/analyses is not the kind of information that Noble would customarily release to the public – namely because: 1) the schematics and process flow diagrams could be used by competitors to construct and operate more efficient and/or productive tank batteries; and 2) hydrocarbon analyses may inform business decisions by Noble with respect to operations in Weld, Boulder, and Broomfield Counties. For that reason, Noble does not share such information via advertisement, mailing, or internet publication. While general descriptions of tank batteries and/or oil and gas resources in the Denver-Julesberg Basin can be found

using basic research tools, the specific details contained in Noble's process flow diagrams/schematics and hydrocarbon analyses cannot.

CBI Question No. 5: *Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.*

Response to CBI Question No. 5: No governmental body has made a determination as to the confidentiality of the information for which Noble seeks confidential treatment.

CBI Question No. 6: *For each category of information claimed as confidential, explain with specificity whether disclosure of the information is likely to result in substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?*

Response to CBI Question No. 6: With respect to tank battery lay-out, process flow, and infrastructure, competitors could use the details to reverse engineer tank batteries akin to Noble's, without the time and money that Noble has invested into making the tank batteries more efficient, productive, and safe. Protecting the confidentiality of this information protects Noble's commercial interests from unfair incursion by competitors.

With respect to the hydrocarbon analyses and related reports, the physical and chemical properties of the product drawn from Noble's wells in Weld, Boulder, and Broomfield Counties are used by Noble to make and support business decisions with respect to continued operations in those areas. Such information could provide Noble's competitors with insight into the product available from those areas without needing to similarly invest in exploration in those areas, as Noble has already done. Moreover, because the hydrocarbon and related analyses provide details on the quality of the reserves being extracted, competitors could use this information to better inform their own business decisions to Noble's detriment. Noble's commercial interests will be protected if this information is granted confidential treatment.

CBI Question No. 7: *Is there any other explanation you deem relevant to the EPA's determination of your business confidentiality claim that is not covered in the preceding questions? If so, you may provide such additional explanation.*

Response to CBI Question No. 7: Noble has responded to these questions as completely and accurately as possible based on information presently available. Noble has no additional information to provide to EPA at this time but respectfully reserves its right to amend its response to these questions in the future.

Ms. Cindy Beeler
November 27, 2013

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STATEMENT OF CERTIFICATION

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my personal inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements, and information, including the possibility of fines or imprisonment pursuant to section 113(c)(2) of the Act and 18 U.S.C. §§ 1001, 1341, and 1505.

Vice President, DJ Basin
(Title)

November 26, 2013
(Date)