



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1595 WYNKOOP STREET
DENVER, CO 80202-1129

Phone 800-227-8917

<http://www.epa.gov/region08>

2016 OCT 24 PM 12: 51

FILED
EPA REGION VIII
HEARING CLERK

DOCKET NO.: CAA-08-2017-0001

IN THE MATTER OF:

NOBLE ENERGY, INC.

RESPONDENT

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FINAL ORDER

Pursuant to 40 C.F.R. §22.13(b) and 22.18(b)(2)(3), of EPA’s Consolidated Rules of Practice, the Consent Agreement resolving this matter is hereby approved and incorporated by reference into this Final Order.

The Respondent is hereby **ORDERED** to comply with all of the terms of the Consent Agreement, effective immediately upon filing this Consent Agreement and Final Order.

SO ORDERED THIS 24th DAY OF October, 2016.

Elyana Sutin
Regional Judicial Officer

**UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

2016 OCT 24 PM 12: 51

IN THE MATTER OF:)
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NOBLE ENERGY, INC.) **Docket No. CAA-08-2017-0001**
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)
Respondent.) **COMBINED COMPLAINT AND**
) **CONSENT AGREEMENT**

FILED
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I. PRELIMINARY STATEMENT

1. This is an administrative penalty assessment proceeding brought under section 113(d) of the Clean Air Act (CAA), 42 U.S.C. § 7413(d), and sections 22.13 and 22.18 of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules), as codified at 40 C.F.R. part 22.
2. Complainant is the United States Environmental Protection Agency, Region 8 (EPA). On the EPA's behalf, Suzanne J. Bohan, Assistant Regional Administrator for the Office of Enforcement, Compliance and Environmental Justice, is delegated the authority to settle civil administrative penalty proceedings under section 113(d) of the CAA.
3. Respondent is Noble Energy, Inc., a corporation organized under the laws of Delaware and authorized to do business in the state of Colorado.
4. Respondent is a "person" as defined in section 302(e) of the CAA, 42 U.S.C. § 7602(e).
5. Complainant and Respondent, having agreed that settlement of this action is in the public interest, consent to the entry of this combined complaint and consent agreement (CCCA) without adjudication of any issues of law or fact herein, and Respondent agrees to comply with the terms of this CCCA.

II. JURISDICTION

6. This CCCA is entered into under section 113(d) of the CAA, as amended, 42 U.S.C. § 7413(d), and the Consolidated Rules, 40 C.F.R. part 22. The alleged violations in this CCCA are pursuant to section 113(a)(3)(A) of the CAA, 42 U.S.C. § 7413(a)(3)(A).
7. The EPA and the United States Department of Justice jointly determined that this matter, although it involves alleged violations that occurred more than one year before the initiation of this proceeding, is appropriate for an administrative penalty assessment. 42 U.S.C. § 7413(d); 40 C.F.R. § 19.4.

8. The Regional Judicial Officer is authorized to ratify this CCCA which memorializes a settlement between Complainant and Respondent. 40 C.F.R. §§ 22.4(b) and 22.18(b).
9. This CCCA and approval in a Final Order simultaneously commences and concludes this proceeding. 40 C.F.R. § 22.13(b).

III. GOVERNING LAW

10. Section 111 of the CAA, 42 U.S.C. § 7411, authorizes the Administrator to promulgate regulations regarding emissions from new sources, including those from stationary spark ignition (SI) internal combustion engines (ICE). The relevant regulations promulgated by the EPA, pursuant to section 111 of the CAA, are set forth in 40 C.F.R. part 60, subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines.
11. Subpart JJJJ applies to certain manufacturers, owners, and operators of SI ICE.
12. Section 111(a) of the CAA, 42 U.S.C. § 7411(a), defines the term “owner or operator” as any person who owns, leases, operates, controls, or supervises a stationary source.
13. The term “stationary source” is defined as any building, structure, facility, or installation which emits or may emit any air pollutant. 42 U.S.C. § 7411.
14. Subpart JJJJ, at 40 C.F.R. § 60.4243(b)(2)(i) requires owners or operators of stationary SI ICE greater than 25 horsepower (HP) and less than or equal to 500 HP to conduct an initial performance test to demonstrate compliance with certain emission standards not later than 180 days after initial startup of such facility, as specified in 40 C.F.R. § 60.8(a).
15. Subpart JJJJ, at 40 C.F.R. § 60.4243(b)(2)(ii) requires owners or operators of stationary SI ICE greater than 500 HP to conduct an initial performance test to demonstrate compliance with certain emission standards not later than 180 days after initial startup of such facility, as specified in 40 C.F.R. § 60.8(a).

IV. STIPULATED FACTS

16. Respondent is engaged in the production of onshore oil and natural gas, with operations located in Weld County, Colorado.
17. Respondent is an “owner or operator” of certain stationary SI ICE at production facilities (Facilities) located in Weld County, Colorado listed in Appendix A. The Facilities are stationary sources.
18. The Facilities’ SI ICE engines with a site rating HP of more than 25 HP and less than 500 HP, identified in Appendix A, Tables A-1 and A-3, are subject to 40 C.F.R. § 60.4243(b)(2)(i).
19. The Facilities’ SI ICE engines with a site rating HP of more than 500 HP, identified in Appendix A, Table A-2, are subject to 40 C.F.R. § 60.4243(b)(2)(ii).

20. On July 12, 2016, Respondent submitted a voluntary self-disclosure notification to the EPA. Respondent disclosed that the engines listed in Appendix A, Tables A-1, A-2 and A-3 were in potential noncompliance with the performance testing requirements of 40 C.F.R. §§ 60.8(a) and 60.4243.
21. On or about April 28, 2016, through June 7, 2016, Respondent completed the required testing for the engines described in Appendix A, Tables A-1 and A-2.

V. ALLEGED VIOLATIONS OF LAW

22. Based on Respondent's self-disclosure, the EPA determined that the engines listed in Appendix A, Table A-1 were not tested within 180 days of initial startup, in violation of 40 C.F.R. §§ 60.4243(b)(2)(i) and 60.8(a). These violations continued from the earliest date of non-compliance of February 9, 2016, until the last date of non-compliance of May 5, 2016.
23. Based on Respondent's self-disclosure, the EPA determined that the engines listed in Appendix A, Table A-2 were not tested within 180 days of initial startup, in violation of 40 C.F.R. §§ 60.4243(b)(2)(ii) and 60.8(a). These violations continued from the earliest date of non-compliance of February 9, 2016, until June 7, 2016.
24. Based on Respondent's self-disclosure, the EPA determined that the engines listed in Appendix A, Table A-3 were not tested within 180 days of initial startup, in violation of 40 C.F.R. §§ 60.4243(b)(2)(i) and 60.8(a). These violations shall be resolved on or before December 31, 2016 in accordance with paragraph 31 of this CCCA.

VI. TERMS OF CONSENT AGREEMENT

25. For the purposes of this proceeding, as required by 40 C.F.R. § 22.18(b)(2), Respondent:
 - a. admits that the EPA has jurisdiction over the subject matter alleged in this CCCA;
 - b. neither admits nor denies the alleged violations of law stated above;
 - c. consents to the assessment of a civil penalty as stated below;
 - d. consents to the conditions specified in this CCCA;
 - e. waives any right to contest the alleged violations of law set forth in Section V of this CCCA; and
 - f. waives its rights to appeal any Final Order which approves this CCCA.
26. For the purposes of this proceeding, Respondent:
 - a. agrees that this CCCA states a claim upon which relief may be granted against Respondent;

- b. acknowledges that this CCCA constitutes an enforcement action for purposes of considering Respondent's compliance history in any subsequent enforcement actions;
- c. waives any and all remedies, claims for relief and otherwise available rights to judicial or administrative review that Respondent may have with respect to any issue of fact or law set forth in this CCCA, including any right of judicial review under section 307(b)(1) of the CAA, 42 U.S.C. § 7607(b)(1);
- d. consents to personal jurisdiction in any action to enforce this CCCA in the United States District Court for the District of Colorado; and
- e. waives any rights it may possess at law or in equity to challenge the authority of the EPA to bring a civil action in a United States District Court to compel compliance with the CCCA and to seek an additional penalty for such noncompliance, and agrees that federal law shall govern in any such civil action.

27. Section 113(d)(1)(B) of the CAA, 42 U.S.C. § 7413(d)(1)(B), and 40 C.F.R. part 19 authorize the assessment of a civil penalty of up to \$44,539 per day of violation for each violation of the implementing regulations associated with the requirements of 42 U.S.C. § 7411. To determine the amount of the civil penalty to be assessed, the EPA took into account the facts of this case as they relate to the factors set forth in section 113(e)(1) of the CAA, 42 U.S.C. § 7413(e)(1).

28. The EPA's Policy on Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations (April 11, 2000), commonly referred to as the "Audit Policy" requires a regulated entity to meet certain conditions in the Audit Policy in order for the EPA to decline to seek (or reduce) gravity-based civil penalties.

29. Penalty Payment. Respondent agrees to:

- a. pay a civil penalty of \$23,136 (EPA Penalty) within 30 calendar days of the Effective Date of this CCCA;
- b. pay the EPA Penalty using any method, or combination of methods, provided on the websites <https://www.epa.gov/financial/makepayment> and <http://www2.epa.gov/financial/additional-instructions-making-payments-epa>, and identifying each and every payment with the docket number associated with this matter. Within 24 hours of payment of the EPA Penalty, send proof of payment to North.Alexis@epa.gov ("proof of payment" means, as applicable, a copy of the check, confirmation of credit card or debit card payment, confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to the EPA requirements, in the amount due).

30. If Respondent fails to timely pay any portion of the penalty assessed under this CCCA, the EPA may:

- a. request the Attorney General to bring a civil action in an appropriate district court to recover: the amount assessed; interest at rates established pursuant to 26 U.S.C. § 6621(a)(2); the United States' enforcement expenses; and a 10 percent quarterly nonpayment penalty, 42 U.S.C. § 7413(d)(5);
- b. refer the debt to a credit reporting agency or a collection agency, 42 U.S.C. § 7413(d)(5), 40 C.F.R. §§ 13.13, 13.14, and 13.33;
- c. collect the debt by administrative offset (i.e., the withholding of money payable by the United States to, or held by the United States for, a person to satisfy the debt the person owes the Government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, 40 C.F.R. part 13, subparts C and H; and
- d. suspend or revoke Respondent's licenses or other privileges, or (ii) suspend or disqualify Respondent from doing business with the EPA or engaging in programs the EPA sponsors or funds, 40 C.F.R. § 13.17.

31. Conditions. As a condition of settlement, Respondent agrees to the following:

- a. To remedy the alleged violations described in paragraph 24 above, Respondent agrees to complete the required Nitrogen Oxides (NO_x) and Carbon Monoxide (CO) emissions testing for the operational engines listed in Appendix A, Table A-3 by December 31, 2016.
- b. Unless removed from service from the Facility, if an engine listed in Appendix A, Table A-3 is not currently operational, it must be tested within 30 days of startup.
- c. The engine locations and testing schedule in Appendix A, Table A-3 will apply to the emissions testing, referenced in paragraph 31.a above, in lieu of the 30-day testing notification requirement per 40 C.F.R. § 60.8(d).
- d. Respondent must submit the testing results to the EPA within 60 days of performing the testing described in this paragraph 31.a to Ms. Alexis North, at the address below, per 40 C.F.R. § 60.4245(d):

Ms. Alexis North
1595 Wynkoop Street (8ENF-AT)
Denver, Colorado 80202

32. Respondent agrees that the time period from the Effective Date of this Agreement until all of the conditions specified in paragraph 31 above are completed (Tolling Period) shall not be included in computing the running of any statute of limitations potentially applicable to any action

brought by Complainant on any claims (Tolled Claims) set forth in Section V of this Agreement. Respondent shall not assert, plead, or raise in any fashion, whether by answer, motion or otherwise, any defense of laches, estoppel, or waiver, or other similar equitable defense based on the running of any statute of limitations or the passage of time during the Tolling Period in any action brought on the Tolled Claims.

33. The provisions of this CCCA, upon incorporation into a Final Order, shall apply to and be binding upon the EPA and upon Respondent, its successors and assigns. From the Effective Date of this CCCA until the penalty is paid in full, Respondent must give written notice and a copy of this CCCA to any successors in interest prior to any transfer of ownership or control of any portion of or interest in the Facility. Simultaneously with such notice, Respondent shall provide written notice of such transfer, assignment, or delegation to the EPA. In the event of any such transfer, assignment, or delegation, Respondent shall not be released from the obligations or liabilities of this CCCA unless the EPA has provided written approval of the release of said obligations or liabilities.
34. By signing this CCCA, Respondent acknowledges that this CCCA will be available to the public and agrees that this CCCA does not contain any confidential business information or personally identifiable information.
35. By signing this CCCA, the undersigned representative of Complainant and the undersigned representative of Respondent each certify that he or she is fully authorized to execute and enter into the terms and conditions of this CCCA and has the legal capacity to bind the Party he or she represents to this CCCA.
36. By signing this CCCA, both Parties agree that each Party's obligations under this CCCA constitute sufficient consideration for the other Party's obligations.
37. This CCCA, upon incorporation into a Final Order by the Regional Judicial Officer and full satisfaction by the Parties, shall be a complete, full and final settlement of the EPA's civil penalty claims against Respondent for the specific violations alleged in this CCCA.
38. By signing this CCCA, Respondent certifies that the information it has supplied concerning this matter was at the time of submission true, accurate, and complete for each such submission, response, and statement. Respondent acknowledges that there are significant penalties for submitting false or misleading information, including the possibility of fines and imprisonment for knowing submission of such information, under 18 U.S.C. § 1001.
39. Except as qualified by paragraph 30 above, each Party shall bear its own attorney's fees, costs, and disbursements incurred in this proceeding.

VII. EFFECT OF CCCA

40. In accordance with 40 C.F.R. § 22.18(c), completion of the terms of this CCCA resolves only Respondent's liability for federal civil penalties for the violations and facts specifically alleged above.

41. Penalties paid pursuant to this CCCA shall not be deductible for purposes of federal, state or local taxes.
42. This CCCA constitutes the entire agreement and understanding of the Parties and supersedes any prior agreements or understandings, whether written or oral, among the Parties with respect to the subject matter hereof.
43. The terms and conditions of this CCCA may not be modified or amended except upon the written agreement of both parties, and approval of the Regional Judicial Officer.
44. Any violation of this Order may result in a civil judicial action for an injunction or civil penalties of up to \$93,750 per day per violation, or both, as provided in section 113(b)(2) of the CAA, 42 U.S.C. § 7413(b)(2), as well as criminal sanctions as provided in section 113(c) of the CAA, 42 U.S.C. § 7413(c). The EPA may use any information submitted under this Order in an administrative, civil judicial, or criminal action.
45. Nothing in this Agreement shall relieve Respondent of the duty to comply with all applicable provisions of the CAA and other federal, state, or local laws or statutes, nor shall it restrict the EPA's authority to seek compliance with any applicable laws or regulations, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit.
46. Nothing herein shall be construed to limit the power of the EPA to undertake any action against Respondent or any person in response to conditions that may present an imminent and substantial endangerment to the public health, welfare, or the environment.
47. The EPA reserves the right to revoke this CCCA and settlement penalty if and to the extent that the EPA finds, after signing this CCCA, that any information provided by Respondent was materially false or inaccurate at the time such information was provided to the EPA, and the EPA reserves the right to assess and collect any and all civil penalties for any violation described herein. The EPA shall give Respondent notice of its intent to revoke, which shall not be effective until received by Respondent in writing.

VIII. EFFECTIVE DATE

48. Respondent and Complainant agree to issuance of a final order approving this CCCA. Upon filing, the EPA will transmit a copy of the filed CCCA to the Respondent. This CCCA and subsequently issued Final Order shall become effective after execution of the Final Order by the Regional Judicial Officer, on the date of filing with the Hearing Clerk.

The foregoing Combined Complaint and Consent Agreement In the Matter of Noble Energy, Inc., is Hereby Stipulated, Agreed, and Approved.

NOBLE ENERGY, INC.

R.M. Patten DD 10/3/16 10/3/2016
Signature Date

Printed Name: R. MARK PATTESON
Title: VICE PRESIDENT
Address: 1625 BROADWAY, STE 2200, DENVER, CO 80202
Respondent's Federal Tax Identification Number: 73-0785597

RESPONDENT

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION 8,

[Signature] OCT 6 - 2016

Suzanne J. Bohan
Assistant Regional Administrator
Office of Enforcement, Compliance,
and Environmental Justice

United States Environmental Protection Agency
1595 Wynkoop Street, 8ENF
Denver, Colorado 80202-1129

COMPLAINANT

Appendix A: Tables of Violations

Table A-1: Engines less than 500 hp requiring performance testing within 180 days of start-up pursuant to 40 C.F.R. §§ 60.4243(b)(2)(i) and 60.8(a)

<u>Location name</u>	<u>Engine(s)</u>	<u>Serial No.</u>	<u>Manuf Date</u>	<u>Test Due Date</u>	<u>Actual Test Date</u>
LC 25 Econode	203 hp Caterpillar G3306TA	R6S00579	3/12/2013	3/15/2016	5/4/2016
LC 25 Econode	203 hp Caterpillar G3306TA	G6X08419	3/22/2012	3/15/2016	5/5/2016
LC 25 Econode	92 hp Buck's 5.7L GM	10CHMM411120004	11/1/2014	3/15/2016	5/3/2016
LC 25 Econode	92 hp Buck's 5.7L GM	10CHMM412030018	12/1/2014	3/15/2016	5/3/2016
LC 25 Econode	239 hp Doosan D8.1L	EEPOG301564	7/17/2013	3/15/2016	5/2/2016
LC 25 Econode	239 hp Doosan D8.1L	EEPOG301434	6/4/2013	3/15/2016	5/2/2016
LC 34 Econode	92 hp Buck's 5.7L GM	10CHMM407160061	7/1/2014	2/9/2016	5/4/2016
LC 34 Econode	92 hp Buck's 5.7L GM	10CHMM412030020	12/1/2014	2/9/2016	4/29/2016
LC 34 Econode	239 hp Doosan D8.1L	EEPOG301533	7/12/2013	2/9/2016	4/28/2016
LC 34 Econode	239 hp Doosan D8.1L	EEPOG301830	11/19/2013	2/9/2016	4/28/2016
10 Engines					

Table A-2: Engines greater than 500 hp requiring subsequent performance testing every 8,760 hours or 3 years of operation pursuant to 40 C.F.R. §§ 60.4243(b)(2)(ii) and 60.8(a)

<u>Location name</u>	<u>Engine(s)</u>	<u>Serial No.</u>	<u>Manuf Date</u>	<u>Test Due Date</u>	<u>Actual Test Date</u>
LC 25 Econode	1680 hp Waukesha L7044GSI	5283703758	5/20/2014	3/15/2016	6/7/2016
LC 34 Econode	1680 hp Waukesha L7044GSI	5283703748	5/16/2014	2/9/2016	6/7/2016
2 Engines					

Table A-3: Engines less than 500 hp requiring performance testing within 180 days of start-up pursuant to 40 C.F.R. §§ 60.4243(b)(2)(i) and 60.8(a)

<u>Location name</u>	<u>Engine(s)</u>	<u>Serial No.</u>	<u>Manufacture Date</u>	<u>Test Due Date</u>
Cecil USX A01-65-1HN & A01-66-1HN	400 hp Caterpillar 3306TA	G6X08641	5/2/2012	12/31/2016
FURROW STATE USX 16-62-1HN, 21-69-1HN	84 hp Cummins G5.9C84	2LB016730	Nov-12	12/31/2016
FURROW USX AB 15-99	99 hp Red River CB98	9807120001	2/8/2010	12/31/2016
Furrow USX AB21-69-1HN/16-62-1HN	325 hp Caterpillar G3406TA	4FD04326	4/12/2012	12/31/2016
CIRCLE RANCH FEDERAL LB07-62HN	133 hp Caterpillar G3306NA	R6S01490	10/4/2013	12/31/2016
WELLS RANCH USX AA 35-65HN	211 hp G3306NA	G6X08459	Mar-12	12/31/2016
Crow Creek Econode	239 hp Doosan D8.1L	EEPOG301834	2/17/2014	12/31/2016
Gravel Draw 9-9H	134 hp Generac 9L	G00012448	1/14/2014	12/31/2016
Richter AB 27-65HN	151 hp GM 5.7	27198	3/27/2013	12/31/2016
Wells Ranch 13-67HN	151 hp GM 5.7	29093	8/30/2013	12/31/2016
Bronco State AF 10-64-1HN	151 hp GM 5.7	29083	8/30/2013	12/31/2016
Keota PC LB 26-62HN	151 hp GM 5.7	29094	8/30/2013	12/31/2016
Rohn LB 22-62	151 hp GM 5.7	29095	8/30/2013	12/31/2016
Hunt LF 18-62HN	151 hp GM 5.7	31815	6/26/2014	12/31/2016
BALL RANCH AC04-72HN	65 hp Arrow L-795	L-601212	9/23/2012	12/31/2016
BALL RANCH GW27-63HN	65 hp Arrow L-795	L-601189	9/28/2012	12/31/2016
Caster PC LA 36-68HN	65 hp Arrow L-795	L-601291	12/31/2012	12/31/2016
Cecil USX A 01-63-1HN	42 hp Ajax E-42	99918	10/26/2009	12/31/2016
DEGENHART STATE AE16-63HN	32 hp Arrow C-106	304768-C	12/31/2012	12/31/2016
JONES AC05-65HN	65 hp Arrow L-795	L-601079	8/24/2012	12/31/2016
JONES AC06-75HN	65 hp Arrow L-795	L-601194	9/28/2012	12/31/2016
KERN GW17-78HN	65 hp Arrow L-795	ADL795008	4/15/2013	12/31/2016
LETTERLY USX AB23-68HN	32 hp Arrow C-106	304637-C	6/21/2012	12/31/2016
Montana State PC LG 16-68HN	32 hp Arrow C-106	ABC106005	2/15/2013	12/31/2016
RAMIREZ AC29-72HN	65 hp Arrow L-795	L-601263	11/21/2012	12/31/2016
Timbro LC 12-78HN	65 hp Arrow L-795	L-601290	12/31/2012	12/31/2016

WAHLERT AC33-63HN	65 hp Arrow L-795	L-601140	8/24/2012	12/31/2016
WAHLERT AC33-64HN	65 hp Arrow L-795	L-601300	12/31/2012	12/31/2016
WAHLERT AC33-65HN	65 hp Arrow L-795	L-601138	8/24/2012	12/31/2016
WAHLERT AC33-66HN	65 hp Arrow L-795	L-601077	8/24/2012	12/31/2016
WAHLERT AC33-67HN	65 hp Arrow L-795	L-601144	8/24/2012	12/31/2016
WAHLERT AC33-68HN	65 hp Arrow L-795	L-601141	8/24/2012	12/31/2016
WALCKER AC07-65HN	32 hp Arrow C-106	304761-C	12/11/2012	12/31/2016
WELLS RANCH AE 08-69-1HN	32 hp Arrow C-106	304731-C	10/24/2012	12/31/2016
WELLS RANCH USX AA 11-65HN	40 hp Ajax E-565	86141	Aug-12	12/31/2016
WELLS RANCH USX AE29-99HZ	65 hp Arrow L-795	L-600329	6/7/2010	12/31/2016
WELLS RANCH USX AE31-98HZ	32 hp Arrow C-106	304683-C	9/19/2012	12/31/2016
TIMBRO LD 06-64HN	86 hp GM 5.7	1M11226AH	8/01/2011	12/31/2016
38 Engines				

CERTIFICATE OF SERVICE

The undersigned certifies that the original of the attached **COMBINED COMPLAINT AND CONSENT AGREEMENT and FINAL ORDER** in the matter of **NOBLE ENERGY, INC.;** **DOCKET NO.: CAA-08-2017-0001** was filed with the Regional Hearing Clerk on October 24, 2016.

Further, the undersigned certifies that a true and correct copy of the documents were emailed to, Abigail Dean, Enforcement Attorney. True and correct copies of the aforementioned documents were placed in the United States mail certified/return receipt on October 24, 2016, to:


Respondent

R. Mark Patteson, Vice President
Noble Energy, Inc.
1625 Broadway, Suite 2200
Denver, CO 80202

And emailed to:

Jessica Farmer
U. S. Environmental Protection Agency
Cincinnati Finance Center
26 W. Martin Luther King Drive (MS-0002)
Cincinnati, Ohio 45268

October 24, 2016



Melissa Haniewicz
Regional Hearing Clerk

