



November 20, 2012

Submitted via email: comments-rocky-mountain-arapaho-roosevelt@fs.fed.us

Karen Roth
Forest NEPA Coordinator
U.S. Forest Service
2150 Center Ave, Building E
Fort Collins, CO 80526

RE: Environmental Assessment of the Ball 3D Seismic Exploration Project by Noble Energy, Inc.

Dear Ms. Roth:

Western Energy Alliance appreciates the opportunity to provide written comments on the environmental assessment (EA) of the Ball 3D seismic exploration project in the Pawnee National Grassland area by Noble Energy, Inc. (Noble) to the U.S. Forest Service (USFS). Western Energy Alliance represents 400 companies engaged in all aspects of environmentally responsible exploration and production of natural gas and oil in Colorado and across the West.

General Comments

We support Noble's proposed Ball 3D seismic project and recognize it as a necessary and efficient method of finding valuable oil and natural gas resources. This project shows Noble's timely development of leases and progress towards production of resources in the Pawnee National Grassland area. The EA adequately addresses the proposed project's impact on the environmental resources in the planning area and describes the measures that will be utilized to protect those resources.

Seismic Technologies

Seismic surveys have been used by the oil and natural gas industry for decades to discover resources deep within the ground, reducing the number of risky and expensive exploratory wells across the land. Innovations in seismic technology and data processing now allow for 3D seismic analysis, giving more precise information with less disturbance of the land and wildlife, and fewer impacts on water and air quality.

Socio-economic Impacts

The potential revenues generated from oil and natural gas production by Noble, Inc. could be extremely beneficial to the people of Colorado and to the United States as a whole. Oil

and natural gas production in the area could provide new sources of income for Colorado land owners and ranchers, and it could fill in much needed revenue gaps for Colorado county, state, and local treasuries.

Air Quality: Technology and Best Management Practices

Noble strives to implement the Best Available Control Technologies (BACT) and Best Management Practices (BMP) to improve air quality and reduce emissions from its operations. In its Colorado Wattenberg operations, for example, Noble is implementing a new transportation strategy to reduce truck traffic and emissions and is working to boost the use of closed loop drilling which has the potential to reduce its rig emissions by 25-50%. Noble also utilizes pad drilling whenever possible to minimize surface disturbance and associated construction/dust reduction.

Wildlife Protections

Noble is committed to protecting local wildlife and plant populations and habitat where it operates. The measures to be used in the project area to avoid wildlife conflicts, including the use of timing limitations, are critical elements of the design criteria for the proposed project. Noble has committed to avoid, minimize, and mitigative impacts to local populations of mountain plover, northern leopard frog, prairie dogs, and raptors, and will avoid areas with threatened and endangered plants. Noble will also utilize existing USFS information for habitat occupancy, use, and quality throughout the life of the project.

Traffic and Road Improvements

Sharing the road safely and responsibly is how Noble operates. Noble has developed a comprehensive policy towards communicating and coordinating seismic acquisition and other high traffic operations with the County and City governments in which it operates. Noble also coordinates transparently and proactively with landowners on all activities.

Community Improvements

Noble is a responsible corporate citizen and a solid partner in the communities in which it operates and believes in creating value through responsible leadership. Noble believes that oil and gas development will bring significant, high-paying jobs to the region and other important socio-economic benefits.

Domestic Energy Independence

Noble believes that there are significant and attainable oil resources in the Niobrara formation and other target areas underlying the project area that could contribute to the nation's domestic energy production. According to ICF International, the Niobrara formation holds 10.25 billion barrels of technically recoverable oil and could produce up to

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286,000 barrels of oil and condensate per day by 2020. At a time when the American public is becoming increasingly concerned about the amount of energy it imports, oil and natural gas development in Colorado could help reduce our reliance on foreign imports, increase and diversify U.S. transportation fuel supplies, and help spur state, regional, and national economic growth.

Conclusion

Western Energy Alliance appreciates the opportunity to submit comments to USFS. We strongly support the Noble Ball 3D Seismic Project and encourage USFS to move forward with the approval of the EA and issue a Finding of No Significant Impact (FONSI). If you have any questions, please contact me at skimball@westernenergyalliance.org or (720) 289-3478.

Sincerely,



Spencer Kimball
Manager of Government Affairs