

From: [Arthur Koepsell - DNR](#)
To: ["Julie Webb"; "Asher Weinberg"](#)
Cc: [Greg Deranleau - DNR](#)
Subject: Noble Sundry Notices requesting Exceptions to Rule 318A.f
Date: Friday, September 18, 2015 3:14:00 PM

Julie and Asher,

The COGCC has been reviewing document numbers 400899405, 400899408 and 400899414 which request exceptions to Rule 318A.f. A review of the attachments to all three of the Sundries indicate that Noble is only making one attempt to contact the owners of potential water sources by uncertified mail. Rule 318A.f. provides important data that is demonstrative to individual water well owners and the public at large that oil and gas development is not negatively impacting water quality and gives confidence that it would be caught quickly, therefore the COGCC does not consider a single letter requesting consent to sample a water well to be a reasonable good faith effort.

The COGCC recognizes that a potential water source owner did grant access in December 2014 and March 2015 but could not be contacted to actually collect a sample. However, Noble had six months between March (the last documented contact) and September to follow up with that owner or other potential water source owners. For example, the attachment for the Sundry Notice for the Moser H22-567 (doc number 400899405) identified six additional potential water source owners for which attempts to gain consent by phone or direct contact could have been made.

At this time Sundry Notices 400899405, 400899408 and 400899414 will be put on hold until Noble provides additional documentation of their efforts including attempts to contact the owner that granted consent but then could not be contacted. Please provide documentation demonstrating Noble's reasonable good faith efforts to obtain consent to conduct sampling by October 2, 2015.

Please contact me if you have any questions.

Thanks,

Arthur

Arthur W. Koepsell, P.G.
Environmental Data Analyst



COLORADO
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From: [Asher Weinberg](#)
To: [Arthur Koepsell - DNR](#)
Subject: Read: Noble Sundry Notices requesting Exceptions to Rule 318A.f
Date: Friday, September 18, 2015 3:16:59 PM

Your message

To: Asher Weinberg
Subject: EXTERNAL: Noble Sundry Notices requesting Exceptions to Rule 318A.f
Sent: Friday, September 18, 2015 3:14:56 PM (UTC-07:00) Mountain Time (US & Canada)
was read on Friday, September 18, 2015 3:16:21 PM (UTC-07:00) Mountain Time (US & Canada).

From: [Julie Webb](#)
To: [Arthur Koepsell - DNR](#)
Subject: Read: Noble Sundry Notices requesting Exceptions to Rule 318A.f
Date: Monday, September 21, 2015 7:48:37 AM

Your message

To: Julie Webb
Subject: Noble Sundry Notices requesting Exceptions to Rule 318A.f
Sent: Friday, September 18, 2015 3:13:22 PM (UTC-07:00) Mountain Time (US & Canada)
was read on Friday, September 18, 2015 6:14:14 PM (UTC-07:00) Mountain Time (US & Canada).