



## COLORADO

### Oil & Gas Conservation Commission

Department of Natural Resources

1120 Lincoln Street, Suite 801  
Denver, CO 80203

February 27, 2019

Michael T. Jewell  
Burns, Figa & Will  
6400 S. Fiddler's Green Circle, Suite 1000  
Greenwood Village, CO 80111

Re:  
Noble Energy Inc.'s Rule 303.j Complaint and Request for the Director to  
Permanently Withhold Approval of Confluence DJ LLC Form 2 Applications for  
Permits to Drill and associated Form 2A to drill twenty-seven (27) "Almont"  
wells in Weld County, Colorado

Dear Mr. Jewell,

The investigation of this complaint has concluded that Confluence DJ LLC's proposed twenty-seven (27) "Almont" wells in Weld County will not in any way materially violate the Commission's rules, regulations, orders or statutes, or otherwise present an imminent threat to public health, safety and welfare, including the environment, or a material threat to wildlife resources.

Nor will the proposed wells harm Noble's correlative rights. Your complaint incorrectly asserts that in Docket No. 180400305 "the Commissioners acknowledged and found that harm to Noble's correlative rights would result by the approval of Confluence's" drilling and spacing unit application. Complaint at p. 4. As noted in Order 407-2761, the Commission found unanimously that Confluence's application would not harm Noble's correlative rights. In the course of deliberations in Docket No. 180300305, several Commissioners made specific statements that correlative rights would not be implicated by the application. The audio recording of the Commission's January 29, 2019 hearing is available at <https://www.youtube.com/channel/UC85gdSA3EWoxH1kzjE-USbw>

These Form 2 Applications for Permits to Drill and the associated Form 2A will be approved when COGCC staff's technical review has determined they are in compliance with all applicable Commission rules, regulations, orders and statutes.

P 303.894.2100 F 303.894.2109 [www.colorado.gov/cogcc](http://www.colorado.gov/cogcc)

Commissioners: John H. Benton - Chair, Howard Boigon - Co-Vice Chair, Tommy Holton - Co-Vice Chair,  
Ashley L. Ager, James W. Hawkins, Kent Jolley, Erin A. Overturf, Dan Gibbs, Jill Hunsaker Ryan, MPH

Jared Polis, Governor | Dan Gibbs, Executive Director, DNR | Julie Murphy, Director | Jeff Robbins, Acting Director



Mr. Jewell  
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Sincerely,

A handwritten signature in blue ink, appearing to read 'Jeff Robbins', with a large, stylized loop at the end.

Jeff Robbins, Acting Director

Cc:  
Angela Mallon, AMallon@confluencelp.com  
Chris Hayes, chayas@hayeslawfirmllc.com