



ARCADIS U.S., Inc.
189 Cedar St #1
Buffalo, Wyoming
82834
Tel 307 684 5891
Fax 307 684 5961
www.arcadis-us.com

State of Colorado
Attn: Matt Lepore
Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

ENVIRONMENT

Subject:

Follow Up to Final Reclamation Variance Request for Portion of the Citation Oil and Gas Corporation (Citation) Koch 22-7 2 (Facility ID# 218128, API# 05-073-06113) Access Road

Date:

January 11, 2016

Dear Mr. Lepore,

Contact:

Ben Shoup

Phone:

(307) 684-5891

Email:

Ben.shoup@arcadis-us.com

Our ref:

WY002655.0001

This letter is submitted on behalf of Citation and is in regards to a reclamation variance request for a portion of the Koch 22-7 2 access road. On November 24, 2016, Citation received notice that the original Koch 22-7 2 access road variance request was not approved due to updated requirements of Rule 1001.c. Ryan Costa has been our point of contact throughout this process and on November 30th, 2015, he sent COGCC's latest guidance for requesting final reclamation variance requests. In a phone call on December 2, 2015, and a follow up email on December 4th, 2015, between Ryan and Ethan Jahnke of Arcadis it was agreed that the existing landowner waiver would suffice as long as more information pertaining to the updated Section II, B, of Rule 1001.c, was included in the variance request. Below addresses all items pertaining to that Section (as of the latest COGCC revised date of 12/17/2015). See italics for Citation's response.

1. All wells on the location have been plugged and abandoned with a subsequent Form 6 approved. *See attached Form 6 for the Koch 22-7 2 well site (Appendix 1).*
2. All oil and gas equipment has been removed from the location. *See attached pictures (Appendix 2).*
3. All trash and debris belonging to the operator, or a third party/service company working on behalf of the operator, has been removed from the location. *See attached pictures (Appendix 2).*
4. Evidence that noxious weeds have been controlled as required by Rule 1004. *See attached pictures (Appendix 2).*
5. Documentation that the surface owner consultation for final reclamation per Rules 306.a and 306.f has occurred, including the date. *See attached*

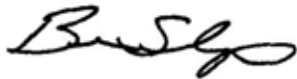
Imagine the result

document submitted by Citation detailing discussions with the landowner, Mr. William Lyons, regarding the road and the well site since 2011 (Appendix 3).

6. Documents accurately depicting the existing state of reclamation for the entire location. *See attached pictures (Appendix 2).*
7. The site is stabilized and stormwater management controls are in place prior to COGCC's scheduled final reclamation inspection. *See attached pictures (Appendix 2).*
8. An analysis demonstrating that public health, safety, and welfare, including the environment and wildlife resources, will not be significantly adversely impacted by granting the requested variance. *The road is a two-track, similar to its original state prior to construction of the Koch 22-7 2 well pad. As the photos show, the road and soils are stabilized with no erosion issues and the Koch 22-7 2 well is plugged and abandoned. The topography is relatively flat and the nearest drainage is approximately 0.3 miles to the south. The landowner would like to keep the cattle guard, which is not filled with sediment, at the entrance of the road to remain for ranching operations. Based on the information above, the public health, safety, and welfare is not expected to be impacted if this variance is granted. See attached pictures of existing road (Appendix 2).*

Sincerely,

ARCADIS U.S., Inc.



Ben Shoup
Client Director, Oil and Gas Sector

Copies:
Ethan Jahnke; Principal Scientist

/file

Enclosure



Appendix 1



02285616

1/2

FORM

6

Rev
02/11

state of Colorado

Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80205 Phone: (303) 894-2100 Fax: (303) 894-2109



DE ET OE ES

Date Received:

WELL ABANDONMENT REPORT

This form is to be submitted as an Intent to Abandon whenever an abandonment is planned on a borehole. After the abandonment is complete, this form shall again be submitted as a Subsequent Report of the actual work completed. The approved intent shall be valid for six months after the approval date, after that period, a new intent will be required. Attachments required with the Intent to Abandon are wellbore diagrams of the current configuration and the proposed configuration with plugs set.

A Subsequent Report of Abandonment shall indicate the actual work completed. Attachments required with a Subsequent Report are a wellbore diagram showing plugs that were set and casing remaining in the hole, the job summaries from all plugging contractors used, including wireline and cementing (third party verification) and any logs that may have been run during abandonment.

RECEIVED

Document Number:

OCT 31 2011

COGCC

OGCC Operator Number: 17180

Contact Name: Kimberly Moorhead

Name of Operator: Citation Oil & Gas Corp.

Phone: (281) 891-1555

Address: P O Box 690688

Fax: (281) 460-2168

City: Houston

State: TX

Zip: 77269-0688

Email: kmoorhead@cogc.com

For Intent 24 hour notice required, Name: _____

Tel: _____

COGCC contact: _____

Email: _____

API Number 05-073-06113---

Well Name: Koch

Well Number: 2

Location: QtrQtr: SENW

Section: 7

Township: 12S

Range: 52W

Meridian: 6th PM

County: Lincoln

Federal, Indian or State Lease Number: _____

Field Name: Clifford

Field Number: _____



Notice of Intent to Abandon



Subsequent Report of Abandonment

Only Complete the Following Background Information for Intent to Abandon

Latitude: _____

Longitude: _____

GPS Data:

Data of Measurement: _____

PDOP Reading: _____

GPS Instrument Operator's Name: _____

Reason for Abandonment: ☐ Dry☐ Production for Sub-economic☐ Mechanical Problems☐ Other _____Casing to be pulled: ☐ Yes☐ No

Top of Casing Cement: _____

Fish in Hole: ☐ Yes☐ No

If yes, explain details below

Wellbore has Uncemented Casing leaks: ☐ Yes☐ No

If yes, explain details below

Details: _____

Current and Previously Abandoned Zones

Formation	Code	Perf. Top	Perf. Btm	Date	Method of Isolation	Plug Depth
Marmaton		6009	6012		Sqz'd w/ 200 Sx	

Total: 0 zone(s)

Casing History

Casing Type	Size of Hole	Size of Casing	Weight Per Foot	Setting Depth	Sacks Cement	Cement Bot	Cement Top	Status
Surface	13 3/8"	7"	68#	308	300	308	Surface	
Production	8 3/4"	7"	23	5315	350	5315	6000	

Plugging Procedure for Intent and Subsequent Report

CIBP #1: Depth 3300 with 2 sacks cmt on top. CIBP #2: Depth _____ with _____ sacks cmt on top.
 CIBP #3: Depth _____ with _____ sacks cmt on top. CIBP #4: Depth _____ with _____ sacks cmt on top.
 CIBP #5: Depth _____ with _____ sacks cmt on top.

NOTE: Two(2) sacks cement required on all CIBPs.

Set _____ sks cmt from _____ ft. to _____ ft. in	Plug Type: _____	Plug Tagged: <input type="checkbox"/>
Set _____ sks cmt from _____ ft. to _____ ft. in	Plug Type: _____	Plug Tagged: <input type="checkbox"/>
Set _____ sks cmt from _____ ft. to _____ ft. in	Plug Type: _____	Plug Tagged: <input type="checkbox"/>
Set _____ sks cmt from _____ ft. to _____ ft. in	Plug Type: _____	Plug Tagged: <input type="checkbox"/>
Set _____ sks cmt from _____ ft. to _____ ft. in	Plug Type: _____	Plug Tagged: <input type="checkbox"/>

Perforate and squeeze at 3275 ft. with 70 sacks. Leave at least 100 ft. in casing 3175 CIGR Depth
 Perforate and squeeze at 2922 ft. with 30 sacks. Leave at least 100 ft. in casing 2822 CIGR Depth
 Perforate and squeeze at 360 ft. with 50 sacks. Leave at least 100 ft. in casing 260 CIGR Depth
 (Cast Iron Cement Retainer Depth)

Set _____ sacks half in. half out surface casing from _____ ft. to _____ ft. Plug Tagged: ☐

Set 20 sacks at surface

Cut four feet below ground level, weld on plate Above Ground Dry-Hole Marker: ☐ Yes ☐ No

Set _____ sacks in rat hole Set _____ sacks in mouse hole

Additional Plugging Information for Subsequent Report Only

Casing Recovered: _____ ft. of _____ inch casing Plugging Date: 10/12/2011
 *Wireline Contractor: Peak Wireline Service, INC. *Cementing Contractor: Allied Cementing Co., LLC
 Type of Cement and Additives Used: Common
 Flowline/Pipeline has been abandoned per Rule 1103 ☒ Yes ☐ No *ATTACH JOB SUMMARY

Provide Technical Detail:

I hereby certify all statements made in this form are, to the best of my knowledge, true, correct, and complete.

Signed: Kimberly Moorhead Print Name: Kimberly Moorhead
 Title: Completion Analyst Date: 10/26/2011 Email: kmoorhead@cogc.com

Based on the information provided herein, this Well Abandonment Report (Form 6) complies with COGCC Rules and applicable orders and is hereby approved.

COGCC Approved: _____ Date: _____

CONDITIONS OF APPROVAL, IF ANY:

Attachment Check List

Att Doc Num	Name
<u>2285617</u>	<u>wellbore diagram</u>
<u>2285618</u>	<u>wireline Job Summary</u>

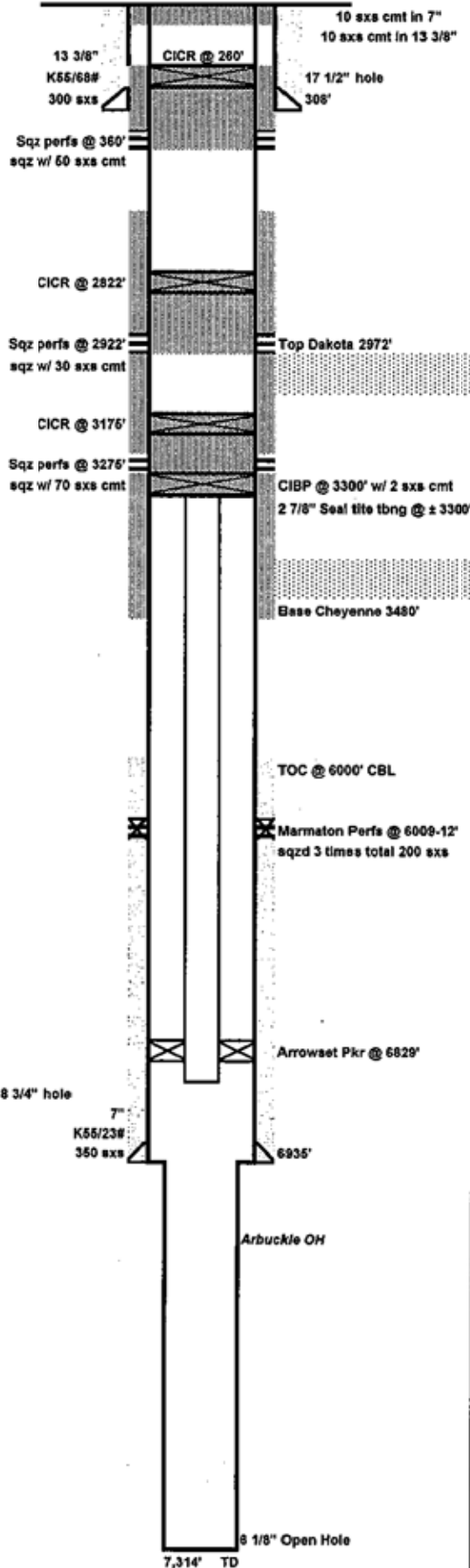
Total Attach:

2285619 Cement Job Summary



Form 6
2285616

FINAL



Lease:		Well No.	Koch #2
API No. 05-073-06113		Status	PA
Location: SENW Sec. 7 T12S-R52W			
County: Lincoln	State: CO	Field:	Clifford
TD 7314'	GL 4947'	Spud Date:	5/11/1983
PBTD 7309'	KB 4956'	Comp Date:	2/24/1984
Current Perfs/OH: OH 6935-7309'		Current Zone: Arbuckle	

Unit Make:		Unit Size:	
Unit S/N:		Unit Rotation:	
SPM:	Stroke Length:	Unit Sheave:	
Prime Mover:		Motor Sheave:	
Motor S/N:		Motor RPM:	

	Size	Grade / Wt	Depth	Hole Size	Cement
Surface	13 3/8"	K55/68#	308'	17 1/2"	300 sxs
Production	7"	K55/23#	5315'	8 3/4"	350 sxs
Production	7"	N80/26#	5315-6935'	8 3/4"	350 sxs
Production					
Liner					

[illegible][illegible]

Comments

PREPARED BY: JH	UPDATED: 7/28/2011
-----------------	--------------------

**PEAK WIRELINE SERVICES, INC.**

P.O. Box 864

Cheyenne Wells, CO 80810

Phone 719-767-8707

Fax 719-767-5522

Invoice

4971 Form 6
2285616**REMIT TO:**Wireline 1/2
Job SummaryDATE 10-11-2011

OCT 31 2011

CHARGE TO: CITATION OIL GAS INC

ADDRESS

LEASE AND WELL NO. KCCW 22-7

FIELD

NEAREST TOWN

COUNTY LINCOLNSTATE COCUSTOMER'S ORDER NO. GEORGE WOLFESEC. 7TWP. 12SRANGE 52WZERO GROUND LEVELCASING SIZE 7"WEIGHT 25"

CUSTOMER'S T.D.

PEAK WL SERVICES T.D.

FLUID LEVEL 1020ENGINEER HANDLEROPERATOR LAURENCE**PERFORMING**

CODE REFERENCE	DESCRIPTION	NO HOLES	DEPTH FROM	TO	AMOUNT
113000	3 1/2" HCA	4	3275	3276	850
		4	2922	2923	450
		4	360	361	450
		4	2800	2801	450

PLUGS, PACKERS, AND OTHER

CODE REFERENCE	MFG. TYPE	CASING SIZE	WEIGHT	DEPTH	AMOUNT
143010	WATERMANN	7"	23"	3175	2300
143010	WATERMANN	7"	23"	2872	2300
145010	WATERMANN	7"	23"	260	2300

MATERIAL INVENTORY**TRUCK RENTAL**

CODE REFERENCE	RUN NO.	PREVIOUS INVOICE NO.	AMOUNT
102995	ONE		800

DEPTH OF OPERATIONS CHARGES					
CODE REFERENCE	FROM	TO	NO. FEET	PRICE PER FT.	AMOUNT
142005	10	375	375	MIN	850
	SETTING CHARGE				
142005	10	2822	2822	MIN	850
	SETTING CHARGE				
142005	01	260	260	MIN	850

SUB TOTAL

1075

TAX

31277

PLEASE PAY FROM THIS INVOICE
TOTAL

110777

RECEIVED THE ABOVE SERVICE ACCORDING TO THE TERMS AND CONDITIONS SPECIFIED BELOW WHICH
WE HAVE READ AND TO WHICH WE HEREBY AGREE.

Customer

George Wolfe**General Terms and Conditions**

- All accounts are to be paid within the terms fixed by Peak Wireline Services invoices; and should these terms not be observed, interest at the rate of 1.5% per month will be charged from the date of such invoice.
- Because of the uncertain conditions existing in a well which are beyond the control of Peak Wireline Services, it is understood by the customer that Peak Wireline Services cannot guarantee the results of their service and will not be held responsible for personal or property damage in the performance of their services.
- Should any of Peak Wireline Services instruments be lost or damaged in the performance of the operation requested, the customer agrees to make every reasonable effort to recover same, and to reimburse Peak Wireline Services for the value of the items which cannot be recovered, or the cost of repairing damage to items recovered.
- It is further understood and agreed that all depth measurements shall be supervised by the customer or its employees and customer hereby certifies that the zones, as shot were approved.
- The customer certifies that it has the full right and authority to order such work on such well and that the well in which the work is to be done by Peak Wireline Services is in proper and suitable conditions for the performance of said work.
- No employee is authorized to alter the terms or conditions of this agreement.

4970

 $\frac{2}{2}$

Invoice

DATE 10-6-2013

CHARGE TO:

ADDRESS

LEASE AND WELL NO. KOCH 22-7

FIELD

NEAREST TOWN

COUNTY LINCOLNSTATE

CUSTOMER'S ORDER NO. GROFF WOLFE

SEC.

TWP. 123

RANGE 5 mi.

ZERO 10 M.

CASING SIZE

WEIGHT 23

CUSTOMER'S T.D.

PEAK WL SERVICES T.D.

FLUID LEVEL 1901

ENGINEER

OPERATOR *Lawrence*

TRUCK RENTAL			
CODE REFERENCE	RUN NO.	PREVIOUS INVOICE NO.	AMOUNT
107495	CNE		800
DEPTH OF OPERATIONS CHARGES			

PLUGS, PACKERS, AND OTHER				
CODE REFERENCE	MFG. TYPE	CASING SIZE	WEIGHT	DEPTH AMOUNT
115010	Replugs			5300 1500
15000	Replugs			5300 150

SUB TOTAL	2785
TAX	80 77
PLEASE PAY FROM THIS INVOICE TOTAL	2865 77

RECEIVED THE ABOVE SERVICE ACCORDING TO THE TERMS AND CONDITIONS SPECIFIED BELOW WHICH
WE HAVE READ AND TO WHICH WE HEREBY AGREE.

Customer

General Terms and Conditions

- (1) All accounts are to be paid within the terms fixed by Peak Wireline Services invoices; and should these terms not be observed, interest at the rate of 1.5% per month will be charged from the date of such invoice.
- (2) Because of the uncertain conditions existing in a well which are beyond the control of Peak Wireline Services, it is understood by the customer that Peak Wireline Services cannot guarantee the results of their service and will not be held responsible for personal or property damage in the performance of their services.
- (3) Should any of Peak Wireline Services' instruments be lost or damaged in the performance of the operation requested, the customer agrees to make every reasonable effort to recover same, and to reimburse Peak Wireline Services for the value of the items which cannot be recovered, or the cost of repairing damage to items recovered.
- (4) It is further understood and agreed that all depth measurements shall be supervised by the customer or its employees and customer hereby certifies that the zones, as shot were approved.
- (5) The customer certifies that it has the full right and authority to order such work on such well and that the well in which the work is to be done by Peak Wireline Services is in proper and suitable conditions for the performance of said work.
- (6) No employee is authorized to alter the terms or conditions of this agreement.



Appendix 2


Project Name: Citation: WY002566 Lincoln County Pad Remediation		Site Location: Lincoln County, Colorado	Date: March 11 and June 18, 2015 Photographed By: Ethan Jahnke
Photo No. 1	Koch 22-7- 2		
Direction Photo Taken: North			
Description: Looking north at reclaimed Koch 22-7 2 pad			


Photo No. 2	Koch 22-7- 2	
Direction Photo Taken: West		
Description: Looking west at reclaimed Koch 22-7 2 pad		

Photo No. 3	Koch 22-7- 2	
Direction Photo Taken: South		
Description: Looking south at reclaimed Koch 22-7 2 pad		

Photo No. 4	Koch 22-7- 2	
Direction Photo Taken: East		
Description: Looking east at reclaimed Koch 22-7 2 pad		

Photo No. 5	Koch 22-7- 2	
Direction Photo Taken: South		
Description: Looking south at Koch 22-7 2 access road		


Photo No. 6	Koch 22-7- 2	
Direction Photo Taken: East		
Description: Looking east at former Koch 22-7 2 pit location		

Photo No. 7	Koch 22-7- 2	
Direction Photo Taken: East		
Description: Looking east at Koch 22-7 2 access road that landowner is requesting a variance from reclamation		

Photo No. 8	Koch 22-7- 2	
Direction Photo Taken: East		
Description: Looking east at Koch 22-7 2 access road that landowner is requesting a variance from reclamation. At the end of this road is where the reclamation will begin.		



Appendix 3

Jahnke, Ethan

From: Jahnke, Ethan
Sent: Monday, January 11, 2016 1:38 PM
To: Jahnke, Ethan
Subject: FW: COGCC Completeness Check - form 4 doc#400932930

-----Original Message-----

From: Jahnke, Ethan
Sent: Monday, January 11, 2016 1:11 PM
To: Jahnke, Ethan <Ethan.Jahnke@arcadis.com>
Subject: FW: COGCC Completeness Check - form 4 doc#400932930

-----Original Message-----

From: Herschel Kennedy [mailto:HKennedy@cogc.com]
Sent: Monday, December 14, 2015 12:15 PM
To: Jahnke, Ethan <Ethan.Jahnke@arcadis.com>
Cc: Shoup, Ben <Ben.Shoup@arcadis.com>
Subject: RE: COGCC Completeness Check - form 4 doc#400932930

1. The Koch #2 well was plugged 10/12/11, line from tanks to wellhead was flushed with fresh water, cut & capped approximately 4' below surface.
2. 10/25/11: Who: Mr. William Lyons, Herschel Kennedy-COGC had phone conversation regarding Koch 2 well site and road.
What: Landowner wishes to keep location and road for ranching operation. Mr. Lyons was willing to release COGC from obligation to reclaim location & road. He will maintain both and keep weed growth down.
Why: Use as feeding and watering station for cattle.
3. 12/11/11: Phone conversation
Who: Bill Lyons, Bob Rogers & Herschel Kennedy-COGC.
What: Explained to Mr. Lyons the waiver suggested in October was too vague, did not address enough of a plan to control weeds, prevent erosion or control dust. COGC made suggestion to remove gravel/sand from location and mow weeds. Also related to him COGCC has final authority over oil & gas operations, he can not release COGC from reclamation obligations.
Why: Still desires to use site and road as feed/watering station.
4. Between January 2012 and March 2014, had phone conversation with Mr. Lyons in an attempt to reach a mutual agreement either to reclaim the location or request a waiver to use as a feed/water station. Unable to reach agreement until after COGCC inspection in May 2014.
5. Waiver 6/12/14
Who: Mr. William Lyons and Herschel Kennedy, Bob Rogers-COGC.
What: Landowner waiver for access road variance. Citation met with Mr. Lyons to discuss regarding landowner keeping access road for ranching operations. Citation planned on reclaiming site but, in order to keep up landowner relations, worked with the landowner to submit a variance request.
When: Numerous contacts over the course of several months to coordinate the submittal of a landowner variance for the access road. Waiver signed on 6/12/14.
Why: Landowner wants access road for ranching operations.

6. Waiver 9/23/15

Who: Mr. Lyons and Herschel Kennedy (via phone). Waiver was mailed to Mr. Lyons, and he signed it when he returned from Oklahoma.

What: Landowner waiver for access road variance.

When: Mr. Kennedy contacted Mr. Lyons several times over the course of three months to have him re-sign the landowner waiver to keep the existing access road. Waiver sent to Mr. Lyons in June and signed on 9/23/15

Why: COGCC wanted more information for variance. Landowner still wants to use access road for ranching operations.

From: Sarah King [mailto:SKing@cogc.com]

Sent: Tuesday, November 24, 2015 9:50 AM

To: Jahnke, Ethan <Ethan.Jahnke@arcadis.com<mailto:Ethan.Jahnke@arcadis.com>>

Cc: Sharon Ward <SWard@cogc.com<mailto:SWard@cogc.com>>; Justin Dean

<JDean@cogc.com<mailto:JDean@cogc.com>>; Herschel Kennedy

<HKennedy@cogc.com<mailto:HKennedy@cogc.com>>

Subject: FW: COGCC Completeness Check - form 4 doc#400932930

Ethan,

I received the email below from the COGCC regarding the reclamation sundry I filed on 11/9/2015 for the Koch 22-7 2. They are not satisfied with the landowner waiver we provided to them. I have highlighted the issues below.

Sarah King

Regulatory Analyst III

Citation Oil & Gas Corp.

281-891-1570

14077 Cutten Road

Houston, TX 77069

From: Costa - DNR, Ryan [mailto:ryan.costa@state.co.us]

Sent: Tuesday, November 24, 2015 10:34 AM

To: Sarah King

Cc: Catherine Roy - DNR

Subject: COGCC Completeness Check - form 4 doc#400932930

Ms. King,

This email is in regards to the form 4 doc#400932930 containing the Rule 502b variance request for the KOCH 22-7 location.

As part of the review process I have conducted a completeness check of the information provided and have determined that additional information is needed in order for the COGCC to properly consider the request.

Some of the information that appears to be lacking includes the following:

In the landowner waiver, there is no acknowledgement that the current condition of the area subject to the waiver is satisfactory to the surface owner.

There is no acknowledgment by the surface owner that the areas not subject to waiver will remain under COGCC jurisdiction until passing the final reclamation requirements.

There is no documentation showing the operator consulted in good faith efforts with surface owner regarding final reclamation. "Information describing the consultation (who, what, where, when) should be provided."

An analysis seems to be lacking of how public health, safety, and welfare will be protected and significant adverse environmental impacts prevented if a variance is granted. Simply just stating in the letter to the director that "it will not impact the protection of public health, safety, welfare or environment " seems to be insufficient to make a determination.

Please see the most current Operator Guidance document Rule 1001.c: RECLAMATION VARIANCES AND WAIVERS for more information. <http://cogcc.state.co.us/reg.html#/opguidance>

I will go ahead and return the form 4 back into draft status so you will be able to make changes.

Let me know if you have any questions,

Ryan

Ryan Costa
Southeastern Reclamation Specialist

[co_dnr_div_ogcc_300_rgb_ltrhd_v3]

O 719.868.2047<tel:303.894.2100%20x5162> | C 719.505.3245<tel:303.894.2100%20x5162>

1120 Lincoln Street, Suite 801, Denver, CO 80203 ryan.costa@state.co.us<mailto:Allison.Rothermel@state.co.us> | www.colorado.gov/cogcc<<http://www.colorado.gov/cogcc>>

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