MEMORANDUM

TO: File No. S7-42-10

FROM: Eduardo A. Aleman

Special Counsel

Division of Corporation Finance

RE: Meeting with Noble Energy about resource extraction rulemaking

DATE: October 15, 2013

On October 15, 2013, Barry Summer, Eduardo Aleman, and Elliot Staffin of the Division of Corporation Finance, and Vladimir Ivanov of the Division of Economic and Risk Analysis met with Kenneth M. Fisher, Chief Financial Officer and Executive Vice President of Noble Energy, and Megan Malone of Venable LLP.

The participants discussed Section 1504 of the Dodd-Frank Wall Street Reform and Consumer Protection Act.