

From: [Watts, Debra](#)
To: [Davidson, Landon](#); [Cranford, Chuck](#); [Bush, Ted](#); [Matthews, Matt](#); [Poupart, Jeff](#); [Chernikov, Sergei](#)
Cc: [Larick, Keith](#); [Smith, Eric](#); [Wilcox, Betty](#)
Subject: RE: Draft Complaint Attorney Client Privileged and Attorney Work-Product
Date: Monday, March 18, 2013 9:31:24 AM
Attachments: [image001.jpg](#)

I apologize for not sending a not with my previous email.

Go ahead and edit the document sent out this morning with track changes and I'll collect the changes. I suspect we'll need them by COB, but we'll find out during our meeting. If you have no edits, email me and let me know that as well. Thanks!

From: Watts, Debra
Sent: Monday, March 18, 2013 6:46 AM
To: Davidson, Landon; Cranford, Chuck; Bush, Ted; Matthews, Matt; Poupart, Jeff
Cc: Larick, Keith; Smith, Eric; Wilcox, Betty
Subject: FW: Draft Complaint Attorney Client Privileged and Attorney Work-Product

From: Cooper, Kathy [kcooper@ncdoj.gov]
Sent: Monday, March 18, 2013 6:33 AM
To: Watts, Debra
Subject: Draft Complaint Attorney Client Privileged and Attorney Work-Product

Debra,

I meant to send my e-mail Attorney Client Privileged.

Please discard the previous e-mail and send this one instead.

Attached is the draft of the Complaint. Please send it to everyone who needs to see it before our conference call today at 11.

I haven't decided on the Exhibits but I can let you know later tomorrow morning.

I need to check with Lacy about how Duke wants to be sued. Right now this complaint names Carolina Power and Light Company d/b/a Progress Energy Carolinas, Inc. as the defendant. I noticed on the Secretary of State's website that Duke is changing the name, of Progress Energy as well to Duke Energy Progress. CP&L's shareholders voted for the name change on 3/8/13 but it is not effective until April 29, 2013.

I'll get that part straight. Just wanted you to know.

Please just add me to the conference call. I have to contact someone this morning and need to be in my office.

Thanks,

Kathy

Kathryn Jones Cooper
Special Deputy Attorney General
Water and Land Section
Environmental Division

signature



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Kathryn Jones Cooper
Special Deputy Attorney General
Water and Land Section
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From: Watts, Debra [<mailto:debra.watts@ncdenr.gov>]
Sent: Friday, March 15, 2013 11:44 AM
To: Cooper, Kathy
Subject: FW: DWQ Proposed Response to AG Checklist

Kathy

I've been having trouble getting this email to go through because of the map we tried to include. The map is on the jump drive I just brought over. Here's the map to it. It's under:

- NPDES and APS...
 - CO Groundwater monitoring files
 - Figure 1 compliance well map January 2013

From: Watts, Debra
Sent: Friday, March 15, 2013 10:34 AM
To: 'Cooper, Kathy'
Cc: Matthews, Matt; Bush, Ted; Poupart, Jeff; Chernikov, Sergei; Davidson, Landon; Cranford, Chuck; Watts, Debra; Smith, Eric; Wilcox, Betty
Subject: FW: DWQ Proposed Response to AG Checklist

Kathy

Attached is our response to your checklist. Also attached are documents that support the narratives, such as the Groundwater Exceedances Summary Table and the map that shows where the wells are that have the referenced exceedances.

All our supporting documents are currently on the Google Shared Drive Jeff Poupart made available, but we will also walk over a jump drive with all the documents for your convenience.

Let us know of anything additional you may need. I will be in the office today, as well as most of our staff. Also, let us know if Monday is ok to meet.

Thanks Kathy!

Debra J. Watts, Supervisor
Groundwater Protection Unit
Aquifer Protection Section
919-807-6338

From: Watts, Debra
Sent: Thursday, March 14, 2013 4:36 PM
To: Poupart, Jeff; Chernikov, Sergei; Cranford, Chuck; Davidson, Landon; Watts, Debra
Cc: Wilcox, Betty; Smith, Eric; Bush, Ted; Matthews, Matt; Larick, Keith
Subject: DWQ Proposed Response to AG Checklist

Attached is the checklist we have put together in response to Kathy Cooper's request for information in preparing for the Ashville Injunction Relief. I have basically cut and paste, with a little formatting, to address the issues. I have also included a map and two summary charts that support the statements we have made in the attached checklist.

Please look at this and see if you have changes we need to make. Particularly look at names, titles, etc. that are listed for witnesses and or verification. Let me know what your changes are NLT Friday at 9:00 a.m. I will send this to Kathy shortly after that time. Thanks! djw

From: Cooper, Kathy [<mailto:kcooper@ncdoj.gov>]
Sent: Monday, March 11, 2013 5:45 PM
To: Watts, Debra
Subject: Checklist

Kathryn Jones Cooper
Special Deputy Attorney General
Water and Land Section

Environmental Division

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