

December 11, 2009

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Mr. David Neslin, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Ste 801
Denver, CO 80203

RE: Request for Exception to Rule 318A.c
Hall 25-34
Section 25, T6N, R67W
Weld County, Colorado

Dear Mr. Neslin,

Orr Energy is planning on drilling the Hall 25-34 to the Codell/Niobrara/J Sands formations. The proposed well is located in the SW/SE of Section 25, T6N, R67W where according to the COGCC database the Long #1 is located. The database also shows this well is producing from the Sussex formation, not the Codell/Niobrara/J Sands as the Hall 25-34 will be. The actual status of the Long #1 may be different than what the COGCC database reflects since no information has been input since 2007.

Rule 318A.c.2 requires twinning of wells producing from same formation unless the surface owner grants permission of the new location. Orr Energy does not believe this rule is applicable in this case but has obtained a waiver to this rule from the surface owner's representative Mr. Brent Hall.

Orr Energy respectfully requests this exception location be granted in this situation.

Please call me at (303) 928-7128 if you have any questions.

Sincerely,
For Orr Energy, LLC



Cheryl Johnson
Regulatory Tech
Petroleum Field Services