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August 16, 2011

David Neslin
Bill Yokley
COGCC
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: *Bondad 33-9 #9A*
API #05-067-08743
Sec. 23, T33N, R9W
1556' FSL and 1321' FEL
La Plata County, Colorado

Dear Mr. Neslin and Mr. Yokley:

Williams Production Company, LLC (WPX) submitted a Form 2 and Form 4 with plans to recompleting the above referenced well to the Mancos formation. The Mancos formation has not been spaced yet so we are subject to COGCC Rule 318 which states:

All wells drilled for oil or gas to a common source of supply shall have the following setbacks:

- a. **Wells 2,500 feet or greater in depth.** A well to be drilled two thousand five hundred (2,500) feet or greater shall be located not less than six hundred (600) feet from any lease line, and shall be located not less than one thousand two hundred (1,200) feet from any other producible or drilling oil or gas well when drilling to the same common source of supply, unless authorized by order of the Commission upon hearing.

This proposed wellbore recompletion would be located within 600' from the lease to the south causing it to be non-standard.

Pursuant to Rule 502(b), WPX respectfully requests the Commission issue a variance to Rule 318(b) without going to hearing. WPX sent notification letters to the offset mineral owners of the adjacent lease via certified mail. Attached are copies of the letters as well as the plat showing the location of the well to the lease and a copy of the spreadsheet showing who was notified and whether or not they signed a waiver.

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To date, no protests have been received. We received 9 waivers out of 22 letters sent. The 9 waivers represent 53.56% mineral ownership in the lease, so a majority ownership has waived their objection to the proposed recompletion.

Thank you for your consideration of this request. Please let me know if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Heather Riley", with a long horizontal flourish extending to the right.

Heather Riley
Regulatory Specialist, Sr.
Encl (as stated)