



BLACK RAVEN ENERGY, INC.

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October 20, 2011

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

**RE:** Request for authorization to waive set-back requirements in Rule 318.a & 318.c  
**Powell-Roten 946-2-14** - T9N-R46W Sec. 2: SW/4SW/4  
**Powell-Roten 946-2-13** - T9N-R46W Sec. 2: NW/4SW/4  
**Skold Farms 946-11-24** - T9N-R46W Sec. 11: SE/4SW/4  
**Skold Farms 946-11-23** - T9N-R46W Sec. 11: NE/4SW/4  
**Skold Farms 946-11-34** - T9N-R46W Sec. 11: SW/4SE/4

Dear Director,

Black Raven Energy, Inc. hereby requests the approval from the COGCC to waive the setback requirements within Rule 318.a and 318.c. The above referenced, proposed wells are to be drilled in the D Sand Formation, which is greater than 2,500 feet in depth. Rule 318.a reveals that a well drilled greater than 2,500 feet deep shall not be less than 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 COGCC.

The Powell-Roten 946-2-14 well is within 850 feet from the Powell-Roten 946-2-13 well. The Powell-Roten sisters' own all of the minerals in the W/2 and SE/4 of Section 2, T9N-46W.

The Skold Farms 946-11-24 well is 917 feet from the Skold Farms 946-11-23 well and 1,109 feet from the Skold Farms 946-11-34 well. With that, Skold Farms 946-11-23 is approximately 1,014 feet from the Skold Farms 946-11-34 well. Skold Farms, LTD owns the minerals in 'all' of Section 11, T9N-46W.

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The results of our 3-D seismic have identified very specific well locations that will allow us to evaluate potential hydrocarbon producing zones in both the Niobrara and D Sand intervals from the same wellbore. Therefore we respectfully request that Colorado Oil and Gas Conservation Commission waive the setback requirements within 318.a and 318.c in regard to these specific wells and allow us to permit, drill and complete these wells.

With kind regard,  
Black Raven Energy, Inc.



Janice Aldstadt  
Landman