



11/29/11

VIA ELECTRONIC TRANSMITTAL

Colorado Oil and Gas Conservation Commission
Attn: David Neslin, Director
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Rule 318A.a & 318A.c Exception Location Waiver

Rancho Water Valley #2-6-4 Well: 220' FNL, 239' FEL, Sec. 4 T5N R67W
Rancho Water Valley #2-8-4 Well: 220' FNL, 224' FEL, Sec. 4 T5N R67W
Rancho Water Valley #3-9-4 Well: 220' FNL, 208' FEL, Sec. 4 T5N R67W

Dear Mr. Neslin,

Tekton Windsor, LLC (TW) respectfully requests that the Director grant an exception to Rule 318.A for the above wells. These wells are spotted as above, on a single site and in accordance with the wishes of the surface owner, in order to maximize future land use possibilities and minimize surface disturbance. Per COGCC Rule 318.A(a), a GWA well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside a 800' by 800' drilling window centered at the center of each quarter section, or per rule 318.A(c) shall not be less than 50' from an existing well. These well surface locations fall outside of the prescribed 400' by 400' drilling window centered at the center of each quarter-quarter section, or outside the 800' by 800' drilling window centered at the center of each quarter section and are not located within 50' of an existing well.

A waiver from the affected surface owner is attached.

Sincerely,

Clayton L. Doke
Petroleum Engineer
Peterson Energy Management, Inc.
Consultants to Tekton Windsor, LLC