



September 19, 2012

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203  
Attention: Mr. Matt Lepore

Gentlemen:

Whiting Oil & Gas Corp. ("Whiting") respectfully requests the Director of the Colorado Oil & Gas Conservation Commission ("Commission") grant a well location exception under Rule 318.c or grant a variance under Rule 502.b, for our Wildhorse 16-1613BH well, allowing the well to be completed as proposed in this letter.

Whiting has drilled the following horizontal wells to develop the Niobrara formation in Section 16, Township 9 North, Range 59 West, 6<sup>th</sup> P.M., Weld County, Colorado:

Wildhorse 16-13H API#05-123-32615

Wildhorse 16-42H API#05-123-34749

All of Section 16 is covered by a single state lease in which the State of Colorado is the lessor and Whiting owns interests as lessee.

No spacing orders have been issued by the Commission for any lands in Section 16. The Niobrara formation is located at a depth of greater than 2500 feet in Section 16. As you know, pursuant to Rule 318.a, a well drilled to a depth in excess of 2,500 feet shall be located not less than 600 feet from any lease line and not less than 1,200 feet from any other oil and gas well producible from or drilling to the same common source of supply, unless an exception is granted.

Whiting proposes to drill the Wildhorse 16-1613BH well in Section 16 for which the completed portion of the well bore for the well will be not less than 660 feet from any lease line and the well to well distance at the closest uncemented point shall be no less than 148 feet.

The proposed well would be located in the interior of the section, with existing wells located between the proposed new well and lease boundaries. No waivers have been obtained because the proposed well would not be moved toward any adjacent owner. Whiting believes that correlative rights would be protected because the proposed well would remain more than 600 feet from any lease line.

*Whiting Petroleum Corporation  
and its wholly owned subsidiary  
Whiting Oil and Gas Corporation*

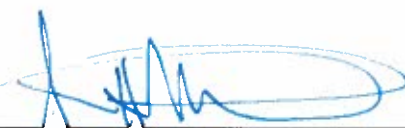
1700 Broadway, Suite 2300, Denver, Colorado 80290-2300 Office: 303.837.1661 Fax: 303.861.4023

Whiting believes the proposed well is necessary to efficiently and adequately drain the Niobrara formation in Section 16. Failure to drill the additional well will leave unrecovered resource in the ground.

Whiting believes its proposed well location and setback rules (1) will allow more efficient drainage of the Niobrara formation, (2) will not promote waste, (3) will not violate correlative rights and (4) will assure the greatest ultimate recovery of gas and associated substances from the reservoir.

Whiting requests the Director approve the exception location for the proposed well under Rule 318.c or grant a variance under Rule 502.b, allowing the proposed well to be completed as proposed in this letter.

WHITING OIL & GAS CORP.

By: 

Scott McDaniel, Regional Land Manager  
1700 Broadway, Suite 2300  
Denver, CO 80290-2300  
Telephone: 303-390-4261  
Scott.McDaniel@whiting.com