



07/23/13

Mr. Matt Lepore, Director
Colorado Oil and Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

Request for Exception Location
Re: GM 701-28-HN1
(Lot 4) NWNW Section 28-6S-96W
Garfield County, Colorado

Mr. Lepore:

WPX Energy Rocky Mountain, LLC has a permit in process to drill a Niobrara horizontal well to be located in Garfield County, Colorado:

GM 701-28-HN1 (proposed)
Township 6 South, Range 96 West, 6th P.M.
Surface Location:
Section 28: NW/4NW/4 – 1314' FNL and 1035' FWL
Bottom Hole Location:
Section 21: NE/4NW/4 – 535' FNL and 629' FWL

The bottom hole target is in Federal Lease COC24099. The horizontal wellbore will enter in Federal Lease COC24099 from the NW/4NW/4 of Section 28, into the SW/4SW/4 of Section 21. Plats are attached to the Form 2 for your reference.

WPX has previously drilled a Niobrara well with a surface location and bottom hole location described as follows:

GM 743-4 (existing well)
Township 7S, Range 96W
Surface Location:
Section 4: NE/4SE/4 – 1710' FSL and 789' FEL
Bottom Hole Location:
Section 4: NE/4SE/4 – 1432' FSL and 477' FEL



Results of completions in the GM 743-4 demonstrate that the Niobrara formation is very tight and effective hydraulic fracturing stimulation does not extend to distance greater than one hundred twenty five feet from the wellbore.

The COGCC Director is empowered to allow an exception to Rule 318 (a) if it is not feasible for the operator to meet minimum distance requirement and if the request for an exception is accompanied with a signed waiver from the offsetting surface owner. WPX has obtained a waiver from the offset mineral owner to waive any objection in setback for the above described well, pursuant to Rule 318 (c) and has received permission from the said offset mineral interest owner to conduct the drilling of the GM 701-28-HN1 well at the above described location.

WPX hereby proposes to produce the subject well at a location less than 600' from a lease line to allow more efficient reservoir drainage and to assure greater ultimate recovery of hydrocarbons without violating the correlative rights of offset mineral owners.

Please give consideration to WPX's request for an exception location for this well.

Sincerely,

WPX Energy Rocky Mountain, LLC

A handwritten signature in purple ink that reads "Greg Davis".

Greg Davis