



07/29/2013

VIA ELECTRONIC TRANSMITTAL

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

RE: Rule 318A.c Exception Location Request

PICO Niobrara LLC eight (8) well Afton Pad: Afton 12-16H-1, Afton 12-16H-2, Afton 12-16H-3, Afton 12-16H-4, Afton 12-16H-5, Afton 12-16H-6, Afton 12-16H-7, Afton 12-16H-8: SESE Sec. 12-T1S-R68W, Adams County, Colorado

Dear Mr. Lepore,

PICO Niobrara LLC (PICO) respectfully requests that the Director grant an exception to Rule 318.A for the above wells. These wells are spotted as above in accordance with the wishes of the surface owner, in order to maximize future land use possibilities and minimize surface disturbance. Per COGCC Rule 318A(I).c shall not be less than 50' from an existing well. These well surface locations are not located within 50' of an existing well.

A wavier from the affected surface owner is attached.

Sincerely,

Clayton L. Doke
Senior Engineer
Peterson Energy, a Division of IPT
Consultants to PICO Niobrara LLC



07/17/2013

VIA ELECTRONIC TRANSMITTAL

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

RE: Rule 603.a(2) Exception Location Request: Property Line Setbacks

PICO Niobrara LLC eight (8) well Afton Pad: Afton 12-16H-1, Afton 12-16H-2, Afton 12-16H-3, Afton 12-16H-4, Afton 12-16H-5, Afton 12-16H-6, Afton 12-16H-7, Afton 12-16H-8: SESE Sec. 12-T1S-R68W, Adams County, Colorado

Dear Mr. Lepore,

PICO Niobrara LLC (PICO) respectfully requests that the Director grant an exception to Rule 603.a(2) for the above wells. These wells are spotted as above in accordance with the wishes of the surface owner and in order to maximize future land use possibilities and minimize surface disturbance. Per Rule 603.a(2) of the Colorado Oil and Gas Conservation Commission (COGCC) the surface location of a well must be no less than 150' from a property line. As planned above, these wells are closer than 150' to the property line, the closest being 133'.

A waiver from the affected surface owner is attached.

Sincerely,

Clayton L. Doke
Senior Engineer
Peterson Energy, a Division of IPT
Consultants to PICO Niobrara LLC



07/17/2013

VIA ELECTRONIC TRANSMITTAL

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

RE: Rule 604.a(1) Exception Location Request

PICO Niobrara LLC eight (8) well Afton Pad: Afton 12-16H-1, Afton 12-16H-2, Afton 12-16H-3, Afton 12-16H-4, Afton 12-16H-5, Afton 12-16H-6, Afton 12-16H-7, Afton 12-16H-8: SESE Sec. 12-T1S-R68W, Adams County, Colorado

Dear Mr. Lepore,

PICO Niobrara LLC (PICO) respectfully requests that the Director grant an exception to Rule 604.a.(1) for the above wells. These wells are spotted as above in accordance with the wishes of the surface owner and in order to maximize future land use possibilities and minimize surface disturbance. Colorado Oil and Gas Conservation Commission Rule 604.a.(1) effective August 1, 2013 stipulates that all wells or production facilities must be located more than five hundred (500) feet from a building unit, and that the location provisions for an applicable SUA be specific on facilities locations. As planned above, the wells are closer than 500' to a building unit, the closest being 276', and due to the general nature of the SUA, PICO is required to get surface owner approval of this location.

Waivers from the affected surface owners are attached.

Sincerely,

Clayton L. Doke
Senior Engineer
Peterson Energy, a Division of IPT
Consultants to PICO Niobrara LLC