



**VIA EMAIL**

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

February 12, 2014

RE: Variance Request – Setback to Overhead Power  
Tabula Rasa Energy, LLC  
**Andreatta 3**  
SHL: 1,381' FSL 1,610'FWL (NE/4 SW/4)  
BHL: 706' FNL 710' FEL (NE/4 NE/4)  
Sec. 10 T29S R69W  
Huerfano County, Colorado  
Surface Ownership: Fee  
Mineral Lease: Fee

Dear Mr. Lepore,

This variance request is being submitted on behalf of Tabula Rasa Energy, LLC (Tabula Rasa). Per the new Colorado Oil and Gas Conservation Commission (COGCC) location requirements, Rule 604 b. (1) A., the proposed location does not meet the required 200' safety setback. The location is currently proposed at ±153' southeast of an existing overhead utility line in Sec. 10 T29S R69W (NE/4 SW/4) of Huerfano County, Colorado.

The proposed Andreatta 3 will be drilled on the existing Andreatta 2 (API No. 05-055-06302) wellpad identified by Location ID, 324578. The Andreatta 2 was staked and drilled per previous COGCC regulations with a setback of 150' to all overhead utilities. To date, including construction and drilling, there were no incidents or threats to safety due to the proximity of the overhead utility.

If Tabula Rasa moved the proposed location to comply with the 200' safety setback per Rule 604.b.(1)(A), additional disturbance would be necessary as there is not enough room on the existing well pad to make this move. If the proposed location is required to be moved 200' from the overhead power, it will require increased surface disturbance, which would disregard the surface owner's request per the Surface Use Agreement (SUA) that states, the "Operator agrees to utilize the smallest pad size needed to perform oil and gas operations." The existing pad is already over the SUA's maximum disturbed acreage of 1.5 acres that the Surface Owners specifically requested. Tabula Rasa has worked diligently with the Surface Owner to accommodate their requests which is the reason they chose the proposed location.

**Your Assets / Our Expertise**

- Regulatory
- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance

The additional surface disturbance is shown on the attached drawings which incorporate the additional volumes of dirt necessary for each situation. The proposed location as requested would require  $\pm 2,800$  CY of fill material necessary to stabilize the slope on the southern portion of the pad accommodating the additional room the drilling rig would require.

Moving the location to southwest would require over twice the amount of fill,  $\pm 6,050$  CY. The existing area is steep and additional fill would create greater probability of stormwater washout, sediment migration and slope degradation. Maintaining the existing integrity of the slope with as little additional surface disturbance as possible will maintain the integrity of the location while allowing Tabula to drill the additional well.

The power line in question is operated by Tabula and is used to power the gas plant also owned by Tabula. Tabula Rasa cannot deactivate the lines during the drilling of this well as the power is used for the gas plant operations. Requiring Tabula Rasa to deactivate the lines could cause large scale problems at the gas plant and increase the safety hazards. Tabula Rasa is confident this well can be drilled at the requested location without posing safety risks to the nearby overhead utility (see attached Derrick – Power Line Distances for Exception Location).

Tabula Rasa respectfully requests that you approve this variance request for the above reasons and allow Tabula Rasa to drill the well in a safe manner while decreasing the need for additional disturbance in a highly potential erosive environment.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 7000 S. Yosemite St., Suite 290B, Englewood, CO 80112. Please contact Kim Rodell or Andrea Gross at 303-942-0506, or at [krodell@upstreampm.com](mailto:krodell@upstreampm.com) or [agross@upstreampm.com](mailto:agross@upstreampm.com), respectively, if you have any questions. Thank you.

Sincerely,



Kimberly J. Rodell  
Permit Agent for Tabula Rasa Energy, LLC

KJR/kjr

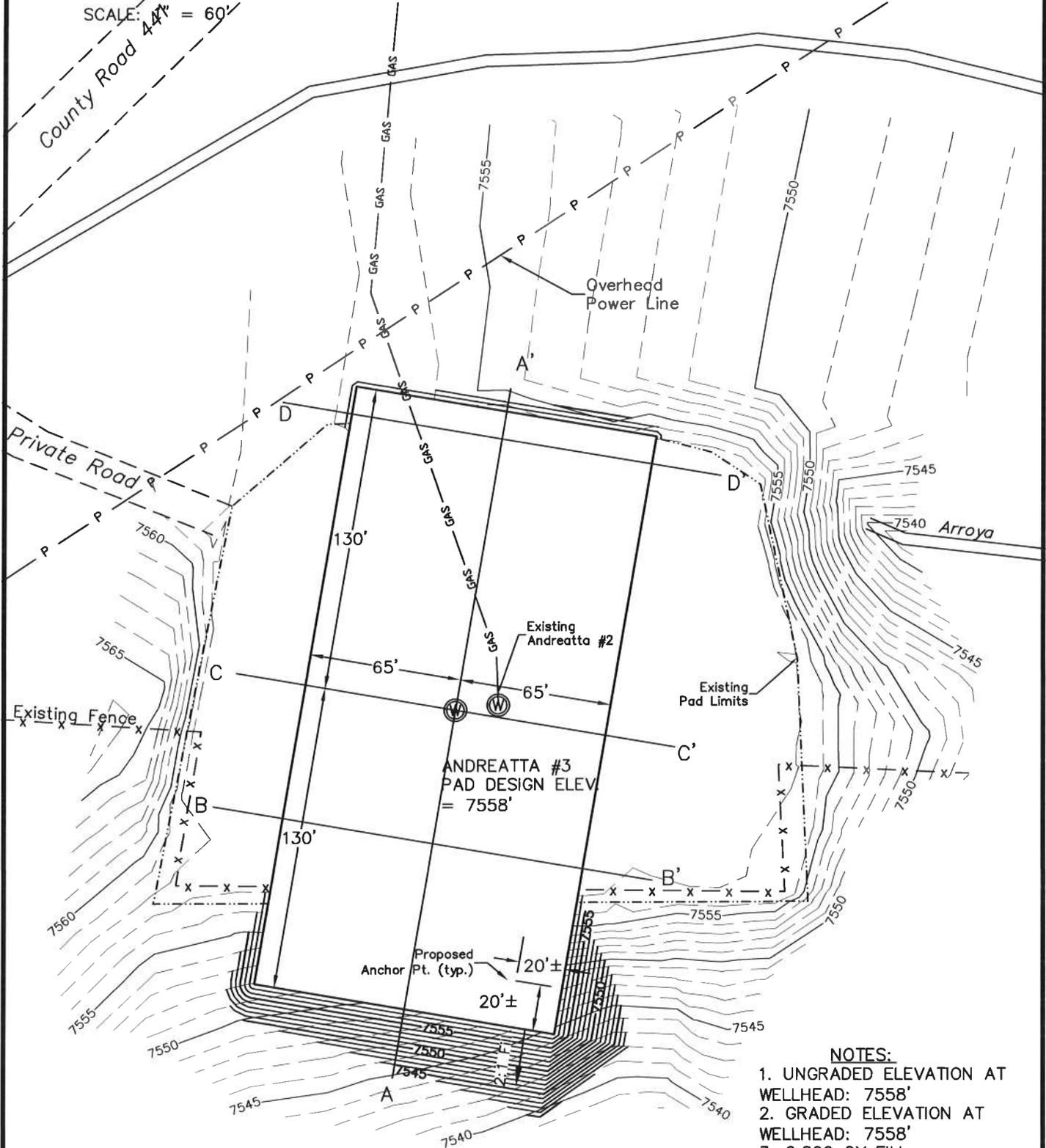
cc: Tabula Rasa Energy, LLC



# CONSTRUCTION LAYOUT DRAWING

## ANDREATTA #3

SCALE: 1/4" = 60'



- NOTES:**
1. UNGRADED ELEVATION AT WELLHEAD: 7558'
  2. GRADED ELEVATION AT WELLHEAD: 7558'
  3. 2,800 CY FILL

REV: 2-5-14 TO ADD FILL VOLUME

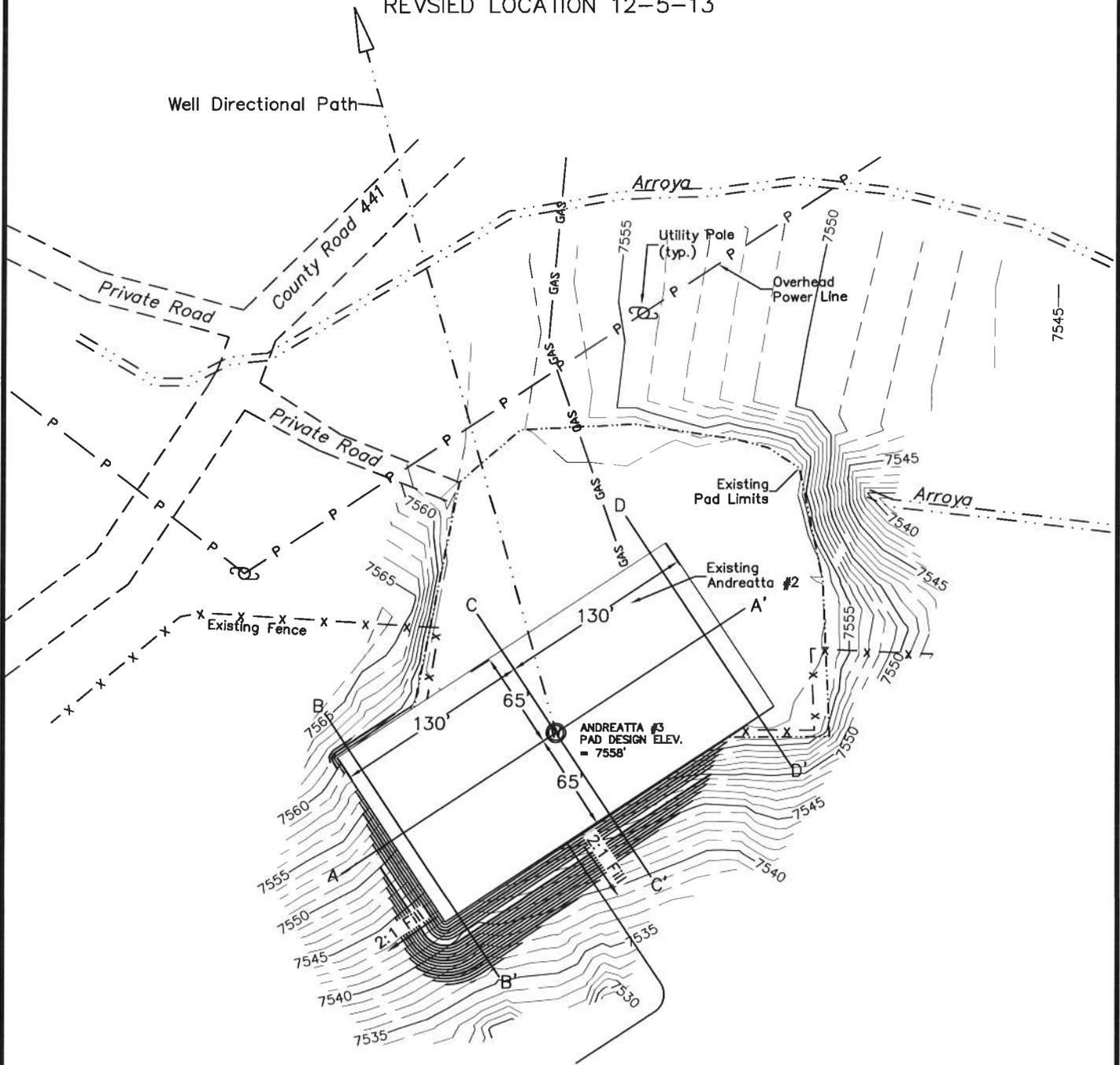
 <b>Tabula Rasa ENERGY</b>	DRAWN BY: NLE	<b>ANDREATTA #3 WELL PAD PLAN</b>	PAGE 2/4
	DATE: 07/19/2013		
DRAWING NAME: ANDREATTA #3 -CONST			

# CONSTRUCTION LAYOUT DRAWING

ANDREATA #3  
 1303' FSL, 1578' FWL  
 REVSIED LOCATION 12-5-13



SCALE: 1" = 100'



**NOTES:**

1. UNGRADED ELEVATION AT WELLHEAD: 7558'
2. GRADED ELEVATION AT WELLHEAD: 7558'
3. 6,050± CY FILL

REV: 2-5-14 TO ADD FILL VOLUME

 <b>Tabula Rasa ENERGY</b>	DRAWN BY: NLE	<b>ANDREATA #3 WELL PAD PLAN</b>	PAGE 2/4
	DATE: 12/05/2013		
DRAWING NAME: ANDREATA #3 -CONST			

# Derrick – Power Line Distances for Exception Location

