



March 24, 2014

Matt Lepore, Director  
Colorado Oil & Gas Conservation Commission  
1100 Lincoln Street, Suite 801  
Denver, CO 80203

**Re: Triton #1 UIC Re-Permitting, Weld County**

**Request for Approval for Form 2a Prior to Expiration of Comment Period Pursuant to Rule 303.i, the  
"Exigent Circumstances" Clause**

Dear Mr. Lepore,

Integrated Petroleum Technologies, Inc. (IPT) in Golden, Colorado is representing Triton Energy Services, LLC in the permitting process for the Triton #1 UIC well ("SWD") proposed at the Weld County Industrial Park in Peckham. With this letter we request your assistance in approving the new Location Assessment Form 2A.

Triton Water Disposal Services initially proposed the subject well in Lot #2 as shown on the plat below, and the State of Colorado approved the site. The original approval included a comment period for the public and notification to all surrounding mineral rights owners and mineral rights lessees. There were no tangible objections to the original permit application other than one comment from a neighbor to the South which was reviewed by the State. The State approved the permit. Subsequent to the state's approval Triton became aware of the concerns of neighbors to the South and though the Company had the right to drill the well regardless, they did not in order to be a good neighbor.

At the same time the company entered into an agreement to convey the parcel immediately adjacent to the originally approved drilling location to Weld County as this was the optimum place for the county to construct a road machinery storage facility because of its proximity to CR 33. (See below plat). The advancement of the transaction with Weld County to convey the land for the grader shed also affected the Company's decision to not drill the well at the approved location due to safety concerns.

Triton's new proposed location approximately 915' east of the original site will not disturb the neighbors to the south or east nor interfere with the county's operations.

The urgency of the request to permit the new location is due to the fact that the rig that is drilling Triton's other well near the Greeley Weld County Airport is nearly finished and is contracted to move directly to Triton #1. Interruption of this process would cost the Company \$21,000 per day at the drilling contractor's standby rig rate.

IPT requests the Colorado Oil and Gas Conservation Commission ("COGCC") to expedite the Form 2A Location Assessment by approving it without the full 20-day comment and notification period pursuant to Rule 303.i. Because the original well was permitted *with* public comment, Triton owns the land, the new



location is better for the reasons stated and the economic consequences of a delay are serious, there are strong grounds for COGCC to waive the comment period pursuant to the rule. The one new property owner in the ¼ mile notification zone has been notified and has raised no objections to the well's placement.

Additionally, once the facilities are sized and their final design established, Triton will submit a Form 2a for the UIC facility that would undergo the full comment period.

The COGCC has asked that the LGD for this area of Weld County also approve a waiver of the 20 day comment period so we are asking you to approve this on the same grounds. Also included as attachments to this letter are the Waiver Letter from the Weld County LGD, Tom Parko and the Exigent Circumstances Letter IPT submitted on 3/12/14. Since time is of the essence and the daily penalty is significant we would appreciate a quick response as we need the time to build location. Thank you for your time and consideration of our request. If you have any questions, I can be reached at 720-560-2700 or clay.doke@iptenergyservices.com.

Best regards,

Clayton Doke  
Senior Petroleum Engineer

