



**EOG Resources, Inc.**  
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Denver, CO 80202  
Main: 303-572-9000  
Fax: 303-824-5400

February 17, 2015

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

RE: **Waiver Request - Rule 318A.n.**  
EOG Resources, Inc.  
Fox Creek 504-2524H  
SHL: 652' FSL & 552' FEL, Section 25, T12N, R63W, SESE – 6<sup>th</sup> P.M.  
BHL: 600' FNL & 865' FEL, Section 24, T12N, R63W, NENE – 6<sup>th</sup> P.M.  
Weld County, CO

Dear Mr. Lepore,

EOG Resources, Inc. (EOG) is applying for a drilling permit for the above captioned well. As currently planned, the existing EOG Fox Creek 2-25H wellbore, API #: 05-123-31400-01, will lie within 150' of the horizontal lateral of EOG's proposed Fox Creek 504-2524H. Interwell distance between the proposed and existing wellbore path is within 150'. Fox Creek 2-25H is a producing well and is owned/operated by EOG.

Prior to drilling operations, EOG will perform an anti-collision review of existing offset wells that have the potential of being within close proximity of the proposed well. This anti-collision review may include MWD or gyro surveys of the offset wells with included error of uncertainty per survey instrument and compared against the proposed well path with its respective error of uncertainty. If the current surveys do not exist for the offset wells, EOG may have gyro surveys conducted to verify bottom hole location. EOG may also perform IFR (In Field Reference) to increase survey accuracy. The proposed well will only be drilled if the anti-collision review results indicate that the risk of collision is sufficiently low as defined by the anti-collision plan. With separation factors greater than 1.5, or if the risk of collision has been mitigated through other means including shutting in wells, plugging wells, increased drilling fluid in the event of lost returns or as is appropriate for the specific situation. In the event of an increased risk of collision, that risk will be mitigated to prevent harm to people, the environment or property. A MWD directional survey for the proposed well will be submitted to the COGCC with the Form 5 upon completion of drilling operations.

Rule 318A.n of the Colorado Oil & Gas Conservation Commission's Rules & Regulations prohibits the drilling of horizontal wells within 150' of an offset well unless this requirement is waived by the operator of the encroached upon well. As operator of the proposed Fox Creek 504-2524H, EOG respectfully requests that the Director grant a waiver to Rule 318A.n. and allow the captioned well to be drilled within 150' of the existing Fox Creek 2-25H.

Sincerely,

Mickenzie Larsen  
Regulatory Administrator