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January 22, 2015

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

RE: **Request for Surface Location Exception (Outside 318A.a and 318A.c)**

**Milliken Inv HD 22-199HN  
Milliken Inv HD 22-162HN  
Milliken Inv HD 22-162HC  
Milliken Inv HD 22-159HN  
Milliken Inv HD 22-122HN  
Milliken Inv HD 22-122HC**

**Milliken Inv HD 22-119HN  
Milliken Inv HD 22-079HC  
Milliken Inv HD 22-079HN  
Milliken Inv HD 22-042HN  
Milliken Inv HD 22-039HC  
Milliken Inv HD 22-039HN  
Milliken Inv HD 22-002HN**

Township 4 North, Range 67 West, 6<sup>th</sup> P.M.  
Section 22  
Weld County, Colorado

Dear Director:

Great Western Operating Company, LLC is planning to drill the above mentioned well to the Codell & Niobrara formations.

The surface location of Great Western's proposed wells has been staked outside of the 318A.a drilling window. The location is being permitted as an exception location. This location is a good location to both reduce the impact on the surface owner and to increase the number of wells reachable from one well pad to minimize surface disturbance. The exception location waiver for rule 318A.a and the twinning waiver for rule 318A.c. are included in the attached surface use agreement.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission (COGCC) Rules and Regulations requiring the wells drilled greater than 50 feet from a well unless safety or mechanical consideration of the well to be twinned or topographical or surface constraints justify a location greater than 50 feet the operator shall provide consent to the exception signed by the surface owner on which the well is proposed to be located in order for the Director to approve the well location.

Great Western Operating Company, LLC respectfully request that the COGCC review the enclosed information and approve the requested exception location waiver and Application for Permit to Drill the above captioned wells.

Respectfully,

*Callie Fiddes*

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Regulatory Technician  
Great Western Operating Company, LLC