



To: Jeff Comstock  
Natural Resources Director  
Moffat County, Colorado  
221 W. Victory Way, Suite 130  
Craig, CO 81625

October 19, 2015

From: GRMR Oil and Gas, LLC  
370 Interlocken Blvd, Ste 550  
Broomfield, CO 80021

**RE: Waiver of Surface Owner Consultation**  
**Location: Hamill 19-16HA located in the SESE Section 19 T5N R90W**  
**Form 2A Doc#: 400917437**  
**Form 2 Doc #: 400779996**

Dear Mr. Comstock,

GRMR Oil and Gas, LLC ("GRMR") is planning to drill the Hamill 19-16HA from the existing pad where the Hamill 19-16D is located (currently drilling). The Colorado Oil and Gas Conservation Commission ("COGCC") has not yet issued an approved drilling permit ("APD") for the Hamill 19-16HA and under current circumstances, would not issue an APD until the first week of November. GRMR is asking the COGCC to expedite an approved APD and associated Forms 2 & 2A so that GRMR can drill the subject well immediately following the current well (Hamill 19-16D). If an expedited APD approval is not granted GRMR would be required to either:

- 1) Demobilize the drilling rig and wait until the required drilling permits are issued. This would result in forfeiting our current drilling contract, incurring significant trucking costs, excess traffic in the area, and delayed oil and gas production from the Hamill 19-16D,

Or

- 2) Allow the drilling rig to wait on location until the permit is approved. This would result in incurring unknown amounts of extra standby costs and possibly pushing drilling activity into December, bringing tough weather related surface conditions and possibly affecting wildlife migration patterns.

Pursuant to COGCC Rule 305.c (copy attached), prior notification to all landowners within 500' of the proposed well must be given, allowing for a 20 day comment period prior Form 2A approval. GRMR is requesting a variance from the COGCC, pursuant to Rule 303.I.(2) to waive this 20 day comment period, allowing for continuous drilling operations. This waiver requires both landowner and Local Governmental Designee (LGD) approval.

Since the Hamill 19-16 well pad location has already been constructed and GRMR has commenced drilling operations for the Hamill 19-16D well on this pad, GRMR would prefer to continue uninterrupted operations on the Hamill 19-16HA immediately after TD has been reached (or production casing has been cemented in place) on the Hamill 19-16D. GRMR respectfully requests your approval below to waive the 20 day comment period pursuant to Rule 303.I.(2).

Sincerely,

Michael Griffis  
Operations Manager  
GRMR Oil and Gas, LLC

I agree to waive the 20 day comment period.

I DO NOT agree to waive the 20 day comment period.

Executed on the \_\_\_ day of October, 2015.



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Jeff Comstock  
Director  
Natural Resources Director  
Moffat County, Colorado

Enclosures:

COGCC Rule 303.I.(2)  
COGCC Rule 305.c