



August 18, 2016

Mr. Matthew Lepore, Director  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street, Ste. 801  
Denver, Colorado 80203

Re: Exception Location Requests to COGCC Rules 318A.a & 318A.c.:  
Markham wells: NWSE, Section 32, Township 4 North, Range 68 West, Weld County, CO

Dear Mr. Lepore:

Cub Creek Energy is planning to drill the following 12 horizontal wells:

Markham 1 – Doc # 400990454, Markham 2 – Doc # 400990483, Markham 3 – Doc # 400990491,  
Markham 4 – Doc # 400990509, Markham 5 – Doc # 400990516, Markham 6 – Doc # 400990526,  
Markham 7 – Doc # 400990631, Markham 8 – Doc # 400990636, Markham 9 – Doc # 400990644,  
Markham 10 – Doc # 400990650, Markham 11 – Doc # 400990658, Markham 12 – Doc # 400990689.

The 1<sup>st</sup> Group of Form 2 Permits are Approved, which are the Markham 3 thru 10. The 2<sup>nd</sup> Group are approved, which are the Markham 11 & 12, which are the North Boundary wells. The remaining 2 South Boundary wells, Markham 1 & 2, are being submitted with this request.

The surface locations of Cub Creek's proposed wells have been staked outside of the COGCC Rule 318A.a. Greater Wattenberg Area (GWA) Drilling Window. Under the COGCC Rule 318A.c. any new twinning well is to be located within 50 feet of an existing well. The proposed Cub Creek wells listed above are not within 50 ft of an existing well. The surface owner has waived Rules 318A.a. & 318A.c. in the SUA on p.4, Item # (8) which is attached to each APD.

Cub Creek Energy respectfully requests the COGCC to review the enclosed information and approve the requested exception location to rule 318A.a & 318A.c. for the Applications for Permits to Drill for the wells on the subject pad. This is the best location for the wells since it is near an existing well but is at a further distance from the building unit.

Sincerely,

Paul Gottlob  
Regulatory & Engineering Technician  
Consultant to Cub Creek Energy