



**VIA EFORMS**

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

February 1, 2017

RE: Rule 318.A.a and 318A.c. Exception Location Request  
Ward Petroleum Corporation  
**Brighton Lakes 3031-1-4HC**  
**Document Number 401199710**  
SHL: 260' FSL 1,070' FWL (SW/4SW/4)  
Sec. 20 T1S R66W  
BHL:  $\pm 460'$  FSL  $\pm 710'$  FEL (SE/4 SE/4)  
Sec. 31 T1S R66W  
Adams County, Colorado  
Surface: Fee  
Mineral Lease: Fee

Dear Mr. Lepore:

Ward Petroleum Corporation (Ward) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rule 318A.a. and Rule 318A(c) for the above referenced well. The surface location, pertaining to the Application for Permit to Drill (APD), does not conform to COGCC Rules 318A(a) and Rule 318A.c due to surface owner request. The preferred location was agreed upon Ward and the surface owner through multiple conversations and meetings.

COGCC Rule 318.A.a stipulates that a Greater Wattenberg Area (GWA) well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside a 800' by 800' drilling window centered at the center of each quarter section. The above referenced well falls outside of these drilling windows.

COGCC Rule 318A.c. stipulates that a GWA well surface location shall not be less than 50' from an existing well. As planned, this surface location is greater than 50' from an existing well.

Ward requests the Director approve the proposed exception location. The surface owner acknowledges and agrees with the staked surface location of the well. The Exception Location Waiver for Rule 318A.a. (GWA Windows) and 318A.c. (GWA Twinning) is located in the attached Surface Use Plan in Section 6.18.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 7000 S. Yosemite St., Suite 290B, Englewood, CO 80112. Please contact me at 303-942-0506 or at [agross@upstreampm.com](mailto:agross@upstreampm.com) if you have any questions.

Sincerely,

Andrea J. Gross  
Permit Agent for Ward Petroleum Corporation

**Your Assets / Our Expertise**

- Regulatory
- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance