



April 7, 2017

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

Re: 502.b Variance, COGCC Rule 1003.b.
Document # 401251500

Director Lepore:

Carrizo (Niobrara) LLC ("Carrizo") requests a variance under Rule 502.b to Rule 1003.b. requirements for certain previously disturbed land described in more detail below, which Carrizo is not currently using. Attached is a Form 4 Sundry Notice, which the Commission may use to approve this variance request. Carrizo requests a variance from the timing requirements of Rule 1003.b for the following the previously disturbed land ("Variance Area"):

Carrizo Oil & Gas Inc., Pergamos, 8-11-7-60, Location ID 424579, NWNW Sec-8, T-7N, R-60W

Carrizo requests a variance from the requirements to conduct interim reclamation actions in the Variance Area for a period of Three (3) years. Currently, there are no producing wells on the Variance Area. Carrizo does not have plans to drill wells on the location, however, has leased the surface from the land owner on an ongoing basis to use the location to as storage yard. However, Carrizo does have subsequent drilling plans in the area and continued use of the variance area as a "yard" will have substantial impact on Carrizo's ability to efficiently enact this drilling program. Rule 1003.b requires areas no longer in use and those areas that will not have subsequent activities within the next 12 months be reclaimed within three months on cropland and six months on non-cropland. This would require Carrizo to re-contour, de-compact, and re-vegetate the Variance Area which would render it unusable as a yard.

To ensure adequate protection of public health, safety, and welfare, and the environment Carrizo has completed the following actions

- (1) Ensured good condition of all access roads and locations within the Variance Area
- (2) Removed all trash and debris belonging to Carrizo and its agents from the Variance Area.

Carrizo will also undertake the following actions on an ongoing basis

- (3) Inspect the area for spills and releases, and to conduct general housekeeping.
- (4) Continue to comply with Rule 1002.f regarding site stabilization and stormwater management controls by a) following our stormwater management plan, b) having our pumpers notify the foreman and/or superintendent of any erosion issues after a precipitation event, c) having a 3rd party perform inspections and remediate or notify Carrizo of any erosion identified d) having monthly reports from the 3rd party sent to Carrizo to ensure that any compliance or issues have been addressed.
- (5) Continue to comply with Rule 1003.a regarding removal of certain equipment
- (6) Continue to comply with Rule 1003.f regarding weed management by a) spraying for weeds in the spring and as needed b) mowing the Area usually twice a year in the summer and at the end of growing season c) having pumpers drag the Area and associated lease roads d) having pumpers notify foreman and/or superintendent of any weed issues

The attached exhibits provide documentation of these activities. Carrizo also will undertake any other necessary measures that it determines in good faith are necessary to protect the public health, safety, welfare, and the environment.

The surface owner, United Surface & Minerals, LLC. understands and has agreed to this extension as evidenced in the Reclamation Agreement that is attached to the Form 4 filing.

Please let us know if any additional information is needed to approve this request for a variance from Rule 1003 pursuant to Rule 502.b.

Best regards,

Handwritten signature of Scott Hudson and Carol Peatt. The signature is written in cursive and includes a vertical line separating the two names.

Scott Hudson
Vice President of Drilling and Completions