



May 16, 2017

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

**RE: Request to the Director for 318A.a Surface Location Exception (Outside 318A.a Drilling Window)**

**Pad Location:**

NENE Section 30  
Township 6 North, Range 67 West, 6<sup>th</sup> P.M.

**Wells on Pad Location:**

Raindance FC 23-209HN	<b>Document #:400945698</b>	Raindance FC 26-209HN	<b>Document #:401141335</b>
Raindance FC 23-209HC	<b>Document #:400945712</b>	Raindance FC 26-232HN	<b>Document #:401141359</b>
Raindance FC 23-232HNX	<b>Document #:400945732</b>	Raindance FC 26-232HNX	<b>Document #:401141385</b>
Raindance FC 23-232HN	<b>Document #:400945716</b>	Raindance FC 26-249HC	<b>Document #:401141406</b>
Raindance FC 23-249HN	<b>Document #:400945733</b>	Raindance FC 26-272HN	<b>Document #:401141438</b>
Raindance FC 23-272HC	<b>Document #:400945817</b>	Raindance FC 26-289HN	<b>Document #:401142971</b>
Raindance FC 23-289HNX	<b>Document #:400945884</b>	Raindance FC 26-289HNX	<b>Document #:401142985</b>
Raindance FC 23-289HN	<b>Document #:400945915</b>	Raindance FC 26-312HC	<b>Document #:401142996</b>
Raindance FC 23-312HN	<b>Document #:400945926</b>	Raindance FC 26-312HN	<b>Document #:401143002</b>
Raindance FC 23-312HC	<b>Document #:400946146</b>	Raindance FC 26-329HN	<b>Document #:401143020</b>
Raindance FC 23-329HNX	<b>Document #:400946049</b>	Raindance FC 26-352HNX	<b>Document #:401144663</b>
Raindance FC 23-352HN	<b>Document #:400945747</b>	Raindance FC 26-369HC	<b>Document #:401144674</b>
Raindance FC 23-369HN	<b>Document #:401141055</b>	Raindance FC 26-369HN	<b>Document #:401144680</b>
Raindance FC 23-369HC	<b>Document #:401141056</b>	Raindance FC 26-392HN	<b>Document #:401143080</b>
Raindance FC 23-392HNX	<b>Document #:401141058</b>	Raindance FC 26-392HNX	<b>Document #:401144683</b>
Raindance FC 26-009HN	<b>Document #:401143123</b>	Raindance FD 20-202HNX	<b>Document #:401059164</b>
Raindance FC 26-032HN	<b>Document #:401144161</b>	Raindance FD 20-202HN	<b>Document #:400945951</b>
Raindance FC 26-032HC	<b>Document #:401144242</b>	Raindance FD 20-239HN	<b>Document #:400945974</b>
Raindance FC 26-049HN	<b>Document #:401144313</b>	Raindance FD 20-239HC	<b>Document #:400945965</b>
Raindance FC 26-072HNX	<b>Document #:401144339</b>	Raindance FD 20-242HNX	<b>Document #:400945992</b>
Raindance FC 26-089HC	<b>Document #:401144351</b>	Raindance FD 20-242HN	<b>Document #:400946077</b>
Raindance FC 26-089HN	<b>Document #:401144375</b>	Raindance FD 20-282HN	<b>Document #:400946075</b>
Raindance FC 26-112HN	<b>Document #:40114491</b>	Raindance FD 20-282HC	<b>Document #:400946080</b>
Raindance FC 26-112HNX	<b>Document #:401144505</b>	Raindance FD 20-319HNX	<b>Document #:400946101</b>
Raindance FC 26-129HC	<b>Document #:401144556</b>	Raindance FD 20-319HN	<b>Document #:400946087</b>
Raindance FC 26-152HN	<b>Document #:401144650</b>	Raindance FD 20-322HN	<b>Document #:400946117</b>
Raindance FC 26-169HN	<b>Document #:401141163</b>	Raindance FD 20-359HC	<b>Document #:400946123</b>
Raindance FC 26-169HNX	<b>Document #:401141257</b>	Raindance FD 20-362HNX	<b>Document #:400946144</b>
Raindance FC 26-192HC	<b>Document #:401141260</b>	Raindance FD 20-362HN	<b>Document #:400945702</b>
		Raindance FD 20-399HC	<b>Document #:400945628</b>

Dear Director Lepore,

Great Western Operating Company, LLC is planning to drill the above mentioned wells to the Niobrara formation.

Rule 318A.a of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be drilled and completed in a square with sides four hundred (400) feet in length, the center of which is the center of any quarter/quarter section or in the center of any quarter section with the four sides being eight hundred (800) feet in length.

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 windows exception location waiver for rule 318A.a is included in the attached surface use agreement. This is noted on the first page, paragraph 3.

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

Respectfully,

*Ashley Noonan*

**Ashley Noonan**  
Senior Regulatory Analyst  
Great Western Operating Company, LLC