



July 13, 2017

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

RE: Request to the Director for 318A.a (Window) & 318A.c (Twinning) Surface Location Exception

Pad Location:

SESE Section 34
Township 1 North, Range 67 West, 6th P.M.

Wells on Pad Location:

Marcus LD 11-361HNX	Document #: 401306250
Marcus LD 11-363HNX	Document #: 401306213
Marcus LD 11-365HNX	Document #: 401306180
Marcus LD 11-368HNX	Document #: 401306166
Marcus LD 11-371HNX	Document #: 401306152
Marcus LD 11-373HNX	Document #: 401306059
Marcus LD 11-376HNX	Document #: 401306022
Marcus LD 11-378HNX	Document #: 401306001
Marcus LD 11-380HNX	Document #: 401305930

Dear Director Lepore,

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

The surface location of Great Western's proposed wells has been staked outside of the 318A.a drilling window. 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 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.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission (COGCC) Rules and Regulations requiring the wells drilled greater than 50 feet from a well unless safety or mechanical consideration of the well to be twinned or topographical or surface constrains justify a location greater than 50 feet the operator shall provide consent to the exception signed by the surface owner on which the well is proposed to be located in order for the Director to approve the well location. The exception location waiver for rule 318A.a and the twinning waiver for rule 318A.c. are included in the attached surface use agreement.

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

Respectfully,

Ashley Noonan

Ashley Noonan
Senior Regulatory Analyst
Great Western Operating Company, LLC