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Colorado Oil and Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203
Attn: Mr. Matt Lepore, Director

RE: **Request to the Director for Exception Location to Spacing Order #407-1939**
Affected Wells on Pad location:
Larson A23-622 (Doc #401181753), Larson AA19-624 (Doc #401181758)
Section 24: SE/4SE/4 Township 6 North, Range 64 West, 6th P.M.
Weld County, Colorado

Dear Director:

The Top of Producing Zone between NEI's subject proposed locations has been measured to the distance of 145'. This distance was submitted on the above referenced Applications for Permit to Drill. Paragraph 2 of Spacing Order 407-1939 states that the productive interval of the wellbore will be located no closer than 150' from the productive interval of any wellbore producing from the same source of supply within the unit, unless the Director grants an exception.

The proposed locations are being permitted to two separate formations. The Larson A23-622 is being permitted to produce the Niobrara formation, while the Larson AA19-624 is being permitted as a Codell-producing well. After drilling, the Top of Producing Zone will be further adjusted to the as-drilled depth. At this time the actual treated intervals of the wells will be determined based on the actual top of the permitted formation and will be placed more than 150' from the treated intervals of all other wells being drilled, in compliance with Spacing Order 407-1939. These actual values will be presented on the submitted completion reports for these wells.

Based on these facts, NEI respectfully requests that the COGCC grant an exception to the Order to allow for the approval of the Applications for Permit to Drill as currently planned.

Respectfully,

Justin Garrett
Regulatory Analyst II
Noble Energy Inc.