



**VIA EFORMS**

Director Julie Murphy  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

May 2, 2018

RE: Rule 318.A.a and 318A.c. Exception Location Request  
Confluence Resources  
**Desha 4-6-4L**  
**Document No.: 401393775**  
SHL: 885' FSL 450' FWL (SW/4 SW/4)  
Sec. 33 T1N R65W  
BHL:  $\pm 470$  FSL  $\pm 2,580$ ' FWL (SE/4 SW/4)  
Sec. 9 T1S R65W  
Weld County, Colorado  
Surface: Fee  
Mineral Lease: Fee

Dear Director Murphy:

Confluence Resources (Confluence) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rules 318A.a. or 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. or 318A.c due to surface owner request.

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.

Confluence requests the Director approve the proposed exception location. The surface owner acknowledges and agrees with the staked surface location of the well and waives the Greater Wattenberg Rule 318.A.a and 318A.c. The Exception Location waiver is located on page 2, section 5 of the attached Surface Use Agreement.

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 Confluence Resources

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