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April 12, 2018

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

RE: **Request for Surface Location Exception (Outside 318A.a and 318A.c)**

Tower LD 19-019HN	<b>Document #:401286909</b>	Tower LD 19-219HN	<b>Document #:401603300</b>
Tower LD 19-019HNX	<b>Document #:401286810</b>	Tower LD 19-222HN	<b>Document #:401603302</b>
Tower LD 19-022HC	<b>Document #:401603281</b>	Tower LD 19-222HNX	<b>Document #:401603303</b>
Tower LD 19-022HN	<b>Document #:401603282</b>	Tower LD 19-259HC	<b>Document #:401603304</b>
Tower LD 19-059HNX	<b>Document #:401603283</b>	Tower LD 19-259HN	<b>Document #:401603305</b>
Tower LD 19-062HN	<b>Document #:401603284</b>	Tower LD 19-262HN	<b>Document #:401603306</b>
Tower LD 19-099HC	<b>Document #:401603286</b>	Tower LD 19-299HNX	<b>Document #:401603307</b>
Tower LD 19-099HN	<b>Document #:401603287</b>	Tower LD 19-302HC	<b>Document #:401603308</b>
Tower LD 19-102HNX	<b>Document #:401603289</b>	Tower LD 19-302HN	<b>Document #:401603309</b>
Tower LD 19-139HN	<b>Document #:401603290</b>	Tower LD 19-339HN	<b>Document #:401603310</b>
Tower LD 19-142HC	<b>Document #:401603291</b>	Tower LD 19-342HNX	<b>Document #:401603311</b>
Tower LD 19-142HN	<b>Document #:401603293</b>	Tower LD 19-379HC	<b>Document #:401603312</b>
Tower LD 19-179HN	<b>Document #:401603295</b>	Tower LD 19-379HN	<b>Document #:401603313</b>
Tower LD 19-179HNX	<b>Document #:401603296</b>	Tower LD 19-382HN	<b>Document #:401287832</b>
Tower LD 19-182HC	<b>Document #:401603298</b>	Tower LD 19-382HNX	<b>Document #:401287817</b>

SWNW Section 21  
Township 1 South, Range 67 West, 6<sup>th</sup> P.M.  
Adams County, Colorado

Dear Director:

Please let this letter serve as a request for administrative approval of an exception location for the captioned oil and gas wells. Great Western Operating Company, LLC ("Great Western") proposes to drill the above referenced wells at a surface location outside a legal drilling window as defined by Rule 318A.a and greater than 50' from an existing well as defined by Rule 318A.c.

Rule 318A.a of the Colorado Oil and Gas Conservation Commission's Rules and Regulations requires wells to be drilled in a square with sides 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 800 feet in length. Great Western proposes to drill the above referenced wells at a surface location outside a legal drilling window.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission's Rules and Regulations requires wells to be staked at a surface location less than fifty (50) feet from another well. Great Western proposes to drill the above referenced wells at a surface location greater than 50' from an existing well.

Great Western respectfully requests that the COGCC review the enclosed information and approve the requested exception location waiver. The surface owner acknowledges and agrees with the staked surface location of the well. The surface owner has waived Rule 318A.a and Rule 318A.c in the Surface Use Agreement on Page 1 and Page 2.

Respectfully,

*Geoff Lee*

Geoff Lee  
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Great Western Operating Company, LLC