



UPSTREAM

Petroleum Management, Inc.

7000 S. Yosemite St., Suite 290B
Englewood, CO 80112
phone 303.942.0506
www.upstreampm.com

VIA EFORMS

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

July 19, 2018

RE: Rule 318.A.a and 318A.c. Exception Location Request
Confluence Resources- Judy 34 Pad- T1N-R65W Section 34: SW/4SW/4
Desha 4-1-1L Document No.: 401392220
Desha 4-1-3L Document No.: 401392815
Desha 4-2-2L Document No.: 401393358
Desha 4-2-4L Document No.: 401393485
Desha 4-3-1L Document No.: 401392493
Desha 4-3-3L Document No.: 401393575
Desha 4-4-2L Document No.: 401393652
Desha 4-4-4L Document No.: 401393673
Desha 4-5-1L Document No.: 401392575
Desha 4-5-3L Document No.: 401393705

Dear Ms. Murphy:

Confluence Resources (Confluence) respectfully requests that the Director grant exception locations to Colorado Oil and Gas Conservation Commission (COGCC) Rules 318A.a. or 318A.c for the above referenced wells. The surface locations, pertaining to the Applications for Permit to Drill (APDs), do 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 wells falls outside of these drilling windows.

COGCC Rule 318A.c. stipulates that a GWA well surface location shall be less than 50' from an existing well. As planned, the surface locations are greater than 50' from an existing well.

Confluence requests the Director approve the proposed exception locations. The surface owner acknowledges and agrees with the staked surface locations for the wells. The Exception Location Waiver for Rule 318A.a. and 318A.c. is located in the attached Surface Use Agreement on page 2, section 6.

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 tjenkins@upstreampm.com if you have any questions.

Sincerely,



Tishany Jenkins
Permit Agent for Confluence Resources

Your Assets / Our Expertise

- Regulatory
- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance