



September 20, 2018

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

RE: Exception location request to order No. 191-82
Kaufman 5 Pad 42A-24-692: NWSE, Section 24, Township 6 South, Range 92 West
Garfield County, Colorado

Dear Ms. Murphy,

Vanguard Operating, LLC (Vanguard), respectfully request an exception to spacing orders 191-82 requiring only one pad per quarter/quarter. The CBC 1 pad would be the second pad in the NWSE of Section 24, Township 6 South, Range 92 West. The existing Kaufman 7 location includes a sixteen (16), directional wells drilled in 2011, but this location does not provide adequate surface area to safely drill, complete and produce eleven (11) additional directional wells from this existing location. Therefore, Vanguard requires a second pad in the NWSE of Section 24, to safely drill, complete and produce the eleven (11) wells associated with the Kaufman 5 Pad 42A-24-692. Sufficient surface area is limited in this area due to the topography. The surface owner waived the requirement of only one pad per quarter/quarter in the SUA on page 2, paragraph 3, therefore, an additional waiver is not required.

Respectfully,

A handwritten signature in blue ink that reads "Julie Webb".

Julie Webb
Regulatory Analyst
Vanguard Operating, LLC

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