

February 21, 2018

Colorado Oil & Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203

Attn: Director, COGCC

RE: Exception Location Request to Rule 318A.a – GWA Drilling Window
Exception Location Request to Rule 318A.c – GWA Twinning
Elder Pad (Form 2A Doc #: 401548407)
Township 7 North, Range 65 West, 6th P.M.
NWSW of Section 11: 2464' FSL, 435' FWL (Form 2A Reference Point)
Weld County, Colorado

COGCC Director:

Please let this letter serve as a request for administrative approval of a Rule 318A.a. and Rule 318A.c. exception location. Nickel Road Operating LLC (NRO) proposes to place the wells listed below at a location outside of the Greater Wattenberg Area (GWA) drilling window as required per Rule 318A.a and further than 50' from the nearest well as required per Rule 318A.c.

Well Name	Form 2 Doc #
ELDER 1X-HNB-12-07-65	401548159
ELDER 1X-HC-12-07-65	401548218
ELDER 1X-HNC-12-07-65	401548230
ELDER 2X-HNB-12-07-65	401548242
ELDER 2X-HC-12-07-65	401548254
ELDER 2X-HNC-12-07-65	401548258
ELDER 3X-HNB-12-07-65	401548273
ELDER 3X-HC-12-07-65	401548277
ELDER 3X-HNC-12-07-65	401548283
ELDER 4X-HNB-12-07-65	401548300
ELDER 4X-HC-12-07-65	401548303
ELDER 4X-HNC-12-07-65	401548306
ELDER 5X-HNB-12-07-65	401548317
ELDER 5X-HC-12-07-65	401548320
ELDER 5X-HNC-12-07-65	401548327
ELDER 6X-HNB-12-07-65	401548332
ELDER 6X-HC-12-07-65	401548339
ELDER 6X-HNC-12-07-65	401548347
ELDER 7X-HNB-12-07-65	401548361
ELDER 7X-HC-12-07-65	401548365

Well Name	Form 2 Doc #
ELDER 1X-HNB-09-07-65	401548420
ELDER 1X-HC-09-07-65	401548422
ELDER 1X-HNC-09-07-65	401548423
ELDER 2X-HNB-09-07-65	401548424
ELDER 2X-HC-09-07-65	401548425
ELDER 2X-HNC-09-07-65	401548426
ELDER 3X-HNB-09-07-65	401548428
ELDER 3X-HC-09-07-65	401548430
ELDER 3X-HNC-09-07-65	401548431
ELDER 4X-HNB-09-07-65	401548432
ELDER 4X-HC-09-07-65	401548433
ELDER 4X-HNC-09-07-65	401548434
ELDER 5X-HNB-09-07-65	401548435
ELDER 5X-HC-09-07-65	401548436
ELDER 5X-HNC-09-07-65	401548437
ELDER 6X-HNB-09-07-65	401548439
ELDER 6X-HC-09-07-65	401548440
ELDER 6X-HNC-09-07-65	401548441
ELDER 7X-HNB-09-07-65	401548442
ELDER 7X-HC-09-07-65	401548444

ELDER 7X-HNC-12-07-65	401548368
ELDER 8X-HNB-12-07-65	401548374
ELDER 8X-HC-12-07-65	401548382
ELDER 8X-HNC-12-07-65	401548388

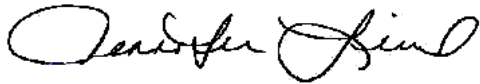
ELDER 7X-HNC-09-07-65	401548449
ELDER 8X-HNB-09-07-65	401548450
ELDER 8X-HC-09-07-65	401548451
ELDER 8X-HNC-09-07-65	401548452

The pad has been located outside of the GWA window at the request of the surface owner as the proposed location lessens surface area disturbance on the property and maintains a location outside of the designated floodplain area. Due to the required operational space needed between the 2 sets of wells, the wells nearest each other are greater than 50' apart.

The surface owner has waived the Rule 318A.a. and 318A.c. location requirements, please refer to attached surface use agreement. NRO respectfully requests the review and approval of this Rule 318A.a. and Rule 318A.c. exception location.

Thank you for your consideration. Should you have any questions, please contact me at 303-406-1117 or jen@jenlindllc.com

Sincerely,



on behalf of Nickel Road Operating LLC

Jennifer Lind
Regulatory Specialist
Jennifer Lind LLC