



CRESTONE PEAK
RESOURCES

September 28, 2018

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

**RE: COGCC Rule 318A.a.: Surface Owner Exception Location Request
COGCC Rule 318A.c.: Twinning Exception Location Request
Herbers 20H-B167 Pad: NWNE Section 20, Township 1 North, Range 67 West
Proposed Wells: [Herbers 1A-20H-B167, 401742213; Herbers 1B-20H-B167, 401742215;
Herbers 1C-20H-B167, 401742216; Herbers 1D-20H-B167, 401742218; Herbers 1E-20H-B167,
401742219; Herbers 1F-20H-B167, 401742220; Herbers 1G-20H-B167, 401742222; Herbers 1H-
20H-B167, 401742223; Herbers 1I-20H-B167, 401742227; Herbers 1J-20H-B167, 401742230;
Herbers 1K-20H-B167, 401742234]
Weld County, Colorado**

Dear Director Murphy:

Crestone Peak Resources Operating LLC (CPR) proposes to drill eleven (11) horizontal wells on the above referenced pad.

Colorado Oil & Gas Conservation Commission (COGCC) Rule 318A.a. requires surface locations within a square with sides four hundred (400) feet in length, the center of which is the center of any governmental quarter-quarter section ("400' window"); or within a square with sides eight hundred (800) feet in length, the center of which is the center of any governmental quarter section ("800' window"). The above referenced wells are proposed at a surface location outside a legal drilling window as defined by Rule 318A.a.

COGCC Rule 318A.c requires a new surface location to be less than 50' from an existing surface well location. The above referenced wells are proposed at a surface location approximately 394'-490' WSW of the nearest oil and gas well (Herbers 31-20 API# 05-123-19695).

These wells were located outside of the GWA Window due to a negotiated SUA with the surface owner. CPR has obtained written permission from the surface owner by way of Surface Use Agreement.

CPR respectfully requests the COGCC approve the exception location request and Application for Permit to Drill for the wells on the subject pad. Many thanks for your consideration of this matter.

Respectfully,

Toby Sachen
Contract Regulatory Specialist