



10/16/2018

VIA ELECTRONIC TRANSMITTAL

Colorado Oil and Gas Conservation Commission
Attn: Director Julie Murphy
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: Rule 318.c Location Exception Request to Rule 318.a.

St. Croix Operating, Inc.: **Shotgun 1**: SWSE Sec. 9-T3S-R50W, Washington County, Colorado

Dear Director Murphy,

This Location Exception Request is being submitted for the subject well pad & facility due to Geologic conditions determined by the operator. A Pooling Spacing Unit has been applied for and is on the December Docket. Based upon the above data St. Croix Operating, Inc. respectfully requests that the Director grant a Location Exception from requirements set forth in Rule 318.a.

Should you have any questions or concerns please contact the undersigned at 720-420-5747.

Sincerely,

Paul Gottlob
Regulatory & Engineering Technician
Integrated Petroleum Technologies Inc
Consultants to St. Croix Operating, Inc.