

October 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.: Window Exception Location Request  
COGCC Rule 318A.c.: Twinning Exception Location Request  
C33-15 Multi Pad: SWSE Section 33, Township 4 North, Range 64 West  
Proposed Wells: Guttersen D09-750 (Doc #401795623), Guttersen D09-745 (Doc # 401795622), Guttersen D09-721 (Doc # 401795621), Guttersen C28-750 (Doc # 401795620), Guttersen C28-745 (Doc # 401795619), Guttersen C28-735 (Doc # 401795618), Guttersen C28-725 (Doc # 401795617), Guttersen C28-715 (Doc # 401795616)  
Weld County, Colorado**

Dear Director Murphy,

Noble Energy, Inc. (Noble) plans to drill eight (8) wells on the C33-15 Multi Pad as referenced above. The surface locations of Noble's proposed wells have been staked outside of the Colorado Oil & Gas Conservation Commission (COGCC) Rule 318A.a. Greater Wattenberg Area Drilling Window and are being permitted as exception locations.

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). These wells were located outside of the GWA Window due to a negotiated SUA with the surface owner.

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 297'-464' SE of the nearest oil and gas well (Lindsay 33-1, API 05-123-13153). Noble has obtained written permission from the surface owner by way of Surface Use Agreement.

Noble respectfully requests the COGCC to review the enclosed information and approve the requested exception location request and Applications for Permit to Drill for these wells. If you should have any questions or require additional information, please contact me at your earliest convenience at (303) 288-4232, or CDPNBLPermitting@nbleenergy.com

Regards,  
**NOBLE ENERGY, INC.**



Holly Hill  
EHSR - DJ Regulatory Supervisor