

1001 17th Street
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Denver, Colorado 80202



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September 18, 2018

Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

RE: **Request for Surface Location Exception (Outside 318A.a, 318A.c and 603.a (2))**

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| Rio LC 12-379HN | |
| Rio LC 12-379HC | |
| Rio LC 12-378HNX | |
| Rio LC 12-378HN | |
| Rio LC 12-376HN | |
| Rio LC 12-376HC | |
| Rio LC 12-375HNX | |
| Rio LC 12-375HN | |
| Rio LC 12-375HN | |
| Rio LC 12-373HC | |
| Rio LC 12-372HNX | |
| Rio LC 12-372HN | |
| Rio LC 12-371HN | |
| Rio LC 12-370OHC | |
| Rio LC 12-369HNX | |
| Rio LC 12-332HN | |
| Rio LC 12-368HN | |
| Rio LC 12-368HC | |
| Rio LC 12-366HNX | |
| Rio LC 12-366HN | |
| Rio LC 12-365HN | |
| Rio LC 12-365HC | |
| Rio LC 12-363HNX | |
| Rio LC 12-363HN | |
| Rio LC 12-242HC | |
| Rio LC 12-362HN | |
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NWNW Sec 6
Township 1 South, Range 67 West, 6th P.M.
Adams County, Colorado

Dear Director:

Please let this letter serve as a request for administrative approval of an exception location for the captioned oil and gas wells. Great Western Operating Company, LLC (“Great Western”) proposes to drill the above referenced wells at a surface location outside a legal drilling window as defined by Rule 318A.a and greater than 50’ from an existing well as defined by Rule 318A.c.

Rule 318A.a of the Colorado Oil and Gas Conservation Commission’s Rules and Regulations requires wells to be drilled in a square with sides 400 feet in length, the center of which is the center of any quarter/quarter section or in the center of any quarter section with the four sides being 800 feet in length. Great Western proposes to drill the above referenced wells at a surface location outside a legal drilling window.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission's Rules and Regulations requires wells to be staked at a surface location less than fifty (50) feet from another well. Great Western proposes to drill the above referenced wells at a surface location greater than 50' from an existing well.

Rule 603A (2) of the Colorado Oil & Gas Conservation Commission's Rules and Regulations requires a well shall be located not less than one hundred fifty (150) feet from a surface property line. The Director may grant an exception if it is not feasible for the Operator to meet this minimum distance requirement and a waiver is obtained from the offset Surface Owner(s). An exception request letter stating the reasons for the exception shall be submitted to the Director and accompanied by a signed waiver(s) from the offset Surface Owner(s). Such waiver shall be written and filed in the county clerk and recorder's office and with the Director.

Great Western respectfully requests that the COGCC review the enclosed information and approve the requested exception location waiver. The surface owner acknowledges and agrees with the staked surface location of the well. The surface owner has waived Rule 318A.a and Rule 318A.c in the Surface Use Agreement on Page 3, Sec 13, Part D. The surface owner has also waived rule 603A (2) with signed waiver.

Respectfully,

Linsey Jones

Linsey Jones
Regulatory Analyst
Great Western Operating Company, LLC