

January 8, 2019

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

**RE: Exception Location Request to Order 407-2616**

DeHaan South Well Pad (Form 2A Doc #: 401515579)  
Township 7 North, Range 65 West, 6<sup>th</sup> P.M.  
SWSW of Section 17: 1129' FSL, 540' FWL (Form 2A Reference Point)  
Weld County, Colorado

Dear Ms. Murphy,

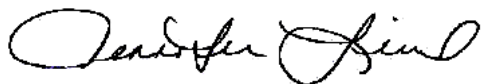
Please let this letter serve as a request for administrative approval of an exception location to approved Spacing Order 407-2616. Nickel Road Operating LLC (NRO) proposes to place the following wells at a location less than 150' from another wellbore's planned perforated interval as required per the aforementioned order:

Well Name	Form 2 Doc #	Inter-well Distance
DEHAAN 5X-HNB-16-07-65	401515566	138'
DEHAAN 5X-HC-16-07-65	401515569	
DEHAAN 6X-HNB-16-07-65	401515570	138'
DEHAAN 6X-HC-16-07-65	401515572	
DEHAAN 7X-HNB-16-07-65	401515573	138'
DEHAAN 7X-HC-16-07-65	401515575	
DEHAAN 8X-HNB-16-07-65	401515576	138'
DEHAAN 8X-HC-16-07-65	401515578	

The wells being encroached upon are NRO's proposed wells off of the same pad location, therefore written consent of an offset operator is not required at this time. The wells have been located as proposed based on NRO's inter-well spacing pattern and stratigraphy of the area. The wells will be completed in and produce from separate formations, being the Niobrara formation and Codell formation. NRO respectfully requests the review and approval of this exception location.

Should you have any questions, please contact me at 303-406-1117 or  
jennifer.lind@nickelroadoperating.com.

Sincerely,

**Nickel Road Operating**

Jennifer Lind  
Regulatory & Environmental Manager