



February 25, 2019

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

**RE: EXCEPTION LOCATION REQUEST (Outside 318A.a Windows & 318A.c Twinning)**

**Grotheer 5-61 11A Pad (2A Doc # 401949715)**

Township 5N, Range 61W, 6th PM  
Section 11, SWSW  
Weld County, Colorado

<i>Grotheer 5-61 11A-2-1 (Doc # 401949607)</i>	<i>Grotheer 5-61 11A-14-23-1 (Doc # 401949618)</i>
<i>Grotheer 5-61 11A-2-2 (Doc # 401949611)</i>	<i>Grotheer 5-61 11A-14-23-2 (Doc # 401949621)</i>
<i>Grotheer 5-61 11A-2-3 (Doc # 401949612)</i>	<i>Grotheer 5-61 11A-14-23-3 (Doc # 401949624)</i>
<i>Grotheer 5-61 11A-2-4 (Doc # 401949613)</i>	<i>Grotheer 5-61 11A-14-23-4 (Doc # 401949625)</i>
<i>Grotheer 5-61 11A-2-5 (Doc # 401949616)</i>	<i>Grotheer 5-61 11A-14-23-5 (Doc # 401949626)</i>

Dear Director Robbins:

Bison Oil & Gas II is planning to drill the above-mentioned wells to the Niobrara formation.

Rule 318A.a of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be drilled and completed in a square with sides four hundred (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 eight hundred (800) feet in length.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission (COGCC) Rules and Regulations requires wells to be staked at a surface location less than fifty (50) feet from another well.

The surface location of Bison Oil & Gas II's proposed wells has been staked outside of the 318A.a drilling window and are not within 50' of an existing well. This location is being permitted as an exception location. These wells were located as such due to a negotiated SUA with the surface owner. The exception location waiver for rule 318A.a and the twinning waiver for rule 318A.c. are included in the SUA: Section 6.F.

Bison Oil & Gas II respectfully request that the COGCC review the enclosed information and approve the Exception Location Request and Application for Permit to Drill for the above captioned well(s).

Respectfully,

Ariana Solis  
Regulatory Analyst