

October 11, 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  
Hungenberg Pad: SESE Section 27, Township 6 North, Range 65 West  
Proposed Wells: Hungenberg UH 1 (Doc # 401732133), Hungenberg UH 2 (Doc # 401732135),  
Hungenberg UH 3 (Doc # 401732136), Hungenberg UH 4 (Doc # 401732137), Hungenberg UH 5  
(Doc # 401732138), Hungenberg UH 6 (Doc # 401732140), Hungenberg UH 7 (Doc #  
401732141), Hungenberg UH 8 (Doc # 401732142), Hungenberg UH 9 (Doc # 401732145)  
Weld County, Colorado**

Dear Director Murphy,

Incline Operating, LLC (Incline) is applying to the Colorado Oil and Gas Conservation Commission (COGCC) to drill 9 wells on the above referenced pad. The surface locations of Incline's proposed wells have been staked outside of the 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").

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 373'-455' SW of the nearest oil and gas well (Swanson 44-27 API# 05-123-11820).

Incline has obtained written permission from the surface owner by way of signed waiver. These wells are located outside of the GWA Window due to a negotiated SUA with the surface owner.

Incline respectfully requests the COGCC approve the exception location request and Applications for Permit to Drill for the wells on the Hungenberg pad. Many thanks for your consideration of this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Garrett'.

Justin Garrett  
Regulatory Analyst  
Agent for Incline Operating, LLC