



July 15, 2019

Director
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Ste. 801
Denver, Colorado 80203

Re: **Exception Location Requests to COGCC Rules 318A.a:**
VIC 20-E Pad: SENE Section 20, Township 7N, Range 67W, Weld County, CO

Dear Director,

Extraction Oil & Gas, Inc. (Extraction) is planning to drill the following 3 horizontal wells:

Vic 29W-20-1N (doc #401652598)
Vic 20W-20-13C (doc #401652596)
Vic 20W-20-12N (doc #401652594)

Please let this letter serve as a request for administrative approval of an exception location for the aforementioned horizontal wells. Extraction Oil & Gas, Inc. is planning to drill and operate these wells from a surface location outside a legal drilling window as defined by Colorado Oil and Gas Commission (COGCC) Rule 318A.a. Colorado Oil and Gas Conservation Commission (COGCC) Rule 318A.a 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. Extraction proposes to drill the above referenced wells between 40 and 220 feet outside of the SENE legal drilling window.

The location of the above referenced wells has been determined per the surface owner's request and a Surface Use Agreement (SUA) with the surface owner has been executed. The surface owner has waived COGCC Rule 318A.a.. Please find the Exception Location Waiver highlighted on page 4 of the attached SUA.

Sincerely,

Kelsi Welch
Regulatory Analyst
Extraction Oil & Gas, Inc.