

1001 17<sup>th</sup> Street  
Suite 2000  
Denver, Colorado 80202



Linsey Jones  
Regulatory Analyst  
Tel: 720-595-2218  
E-mail: ljones@gwogco.com

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

RE: **Request for Surface Location Exception (Outside 318A.a and 318A.c)**  
Ivey LC Pad  
SWSE Section 11  
Township 1 South, Range 68 West, 6<sup>th</sup> P.M.  
Adams County, Colorado

**Well Names:**

Ivey LC 02-036HC Doc# 402125793	Ivey LC 26- 365HN Doc# 402129777
Ivey LC 02-033HC Doc# 402125539	Ivey LC 26- 365HC Doc# 402129594
Ivey LC 26- 362HC Doc# 402129484	Ivey LC 26- 366HN Doc# 402129348
Ivey LC 26- 362HN Doc# 402129538	Ivey LC 26- 366HNX Doc# 402129495
Ivey LC 26- 363HN Doc# 402129340	Ivey LC 26- 368HN Doc# 402129111
Ivey LC 26- 363HNX Doc# 402129424	Ivey LC 26- 368HC Doc# 402128807

Dear Director,

Great Western Operating Company, LLC (“Great Western”) plans to drill oil and gas wells from the above-described surface locations.

Rule 318A.a of the Colorado Oil and Gas Conservation Commission (“COGCC”) Rules and Regulations requires that wells drilled within the Greater Wattenberg Area (“GWA”) be drilled in 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 a square with sides eight hundred (800) feet in length, the center of which is the center of any governmental quarter section (“800’ window”). The above referenced wells are proposed at a surface location outside a legal drilling window as defined by Rule 318A.a. These wells were located outside of the GWA window due to a negotiated SUA with the surface owner. Great Western has obtained written permission from the surface owner by way of signed waiver.

The Colorado Oil and Gas Conservation Commission Rule 318A.c. (2) states that, “when an operator is requesting a surface well location greater than fifty feet (50’) from a well. . .the operator shall provide a consent to the exception signed by the surface owner on which the well is proposed to be located in order for the Director to approve the well location administratively.” The planned surface locations are greater than 50’ from an existing well due a request by the surface owner through a negotiated SUA.

Great Western respectfully requests that the COGCC review the enclosed information and approve the requested exception location. 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 attached Exception Location Waiver.

Respectfully,

*Linsey Jones*

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Regulatory Analyst  
Great Western Operating Company, LLC