



July 31, 2019

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

RE: **Request for Rule 318.c. Exception to Order No. 407-1904**
Ivey LC Pad
SWSE Section 11
Township 1 South, Range 68 West, 6th P.M.
Adams County, Colorado

Ivey LC 26-363HN	Ivey LC 26-365HN
Ivey LC 26-363HNX	Ivey LC 26-366HN
Ivey LC 26-362HC	Ivey LC 26-366HNX
Ivey LC 26-362HN	Ivey LC 26-368HC
Ivey LC 26-365HC	Ivey LC 26-368HN

Dear Director Robbins:

Great Western Operating Company, LLC ("Great Western") respectfully submits this request for an exception location pursuant to Commission Rule 318.c. to grant an exception to Order No. 407-1904 to authorize one surface location adjacent to the approximate 960-acre drilling and spacing unit established by Order No. 407-1904.

Rule 318.c. provides that the Director may grant an operator's request for a well location exception to the requirements of this rule or any order because of geologic, environmental, topographic or archaeological conditions, irregular sections, a surface owner request, or for other good cause shown provided that a waiver or consent signed by the lease owner toward whom the well location is proposed to be moved, agreeing that said well may be located at the point at which the operator proposes to drill the well and where correlative rights are protected.

On March 20, 2017, the Commission entered Order No. 407-1904 which, among other things, established an approximate 960-acre drilling and spacing unit for the Application Lands and authorized up to 12 horizontal wells within the unit for the production of oil, gas and associated hydrocarbons from the Niobrara and Codell Formations. The Order states that the wells permitted under the Order shall be drilled from no more than one multi-well pad within the Application Lands, subject to Rule 318A, unless the Director grants an exception.

Order No. 407-1904 was entered after unanimous approval by the Commission on the consent agenda. No protests, interventions or objections were submitted to the application, and there are no records that the Commission deliberated the location of the well pad to limit the location to within the Application Lands.

The proposed Surface Location, which is located adjacent to the Application Lands in the Order, is already approved via COGCC Form 2A and an Adams County AUSR. Any Commission Order or requirement to move the Surface Location to within the Application Lands will result in a multi-well pad located in close proximity to multiple occupied building units, creating a greater impact to public health, safety, welfare and the environment. Great Western affirms that the proposed Surface Location presents the most optimal location for a multi-well pad to develop the Application Lands considering the geologic, topographic, and development conditions of the surface within and adjacent to the Application Lands.

For the above-referenced reasons, good cause exists to grant an exception to Order No. 407-1904 to authorize one multi-well pad adjacent to the Application Lands. Great Western has obtained written consent from Grizzly Petroleum Company, LLC ("Grizzly") the surface owner of the Surface Location and leasehold owner underlying the Surface Location, to the development of the Application Lands from the Surface Location. Please see the attached waiver executed by Grizzly.

Great Western respectfully requests review of the enclosed information and approve the requested exception to Rule 318.c.

Respectfully,



Erin Lind
Lead Regulatory Analyst

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