



July 31, 2019

Grizzly Petroleum Company, LLC
1001 17th Street
Suite 2000
Denver, Colorado 80202

RE: Rule 318.c. Waiver : 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 26-362HC	Ivey LC 26-365HN
Ivey LC 26-362HN	Ivey LC 26-366HN
Ivey LC 26-363HN	Ivey LC 26-366HNX
Ivey LC 26-363HNX	Ivey LC 26-368HC
Ivey LC 26-365HC	Ivey LC 26-368HN

Dear Grizzly Petroleum Company, LLC:

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.

The multi-well pad proposed on your surface is located on lands adjacent to the Application Lands described in the approved Order and can not be drilled without an exception. Alternative locations within the Application Lands would 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 Operating Company, LLC ("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.

Great Western believes good cause exists to grant an exception to Order No. 407-1904 to authorize one multi-well pad adjacent to the Application Lands. Please indicate your consent to this exception by signing below.


Respectfully,



Erin Lind
Lead Regulatory Analyst

Great Western Operating Company, LLC
1001 17th Street
Suite 2000
Denver, Colorado 80202

Signed for Identification:

By:  Date: 8/1/19
Name: Steve Stack
Title: Vice President