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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)**
Gus LD Pad
SENE Section 21
Township 1 South, Range 67 West, 6th P.M.
Adams County, Colorado

Well Names:

Gus LD 15-022HN	Doc #: 401785901	Gus LD 15-036HNX	Doc #: 401787058
Gus LD 15-022HNX	Doc #: 401785928	Gus LD 15-038HC	Doc #: 401787117
Gus LD 15-023HC	Doc #: 401785951	Gus LD 15-038HN	Doc #: 401787150
Gus LD 15-023HN	Doc #: 401785966	Gus LD 34-372HN	Doc #: 401785780
Gus LD 15-025HN	Doc #: 401785989	Gus LD 34-372HNX	Doc #: 401785791
Gus LD 15-025HNX	Doc #: 401786010	Gus LD 34-373HC	Doc #: 401785732
Gus LD 15-026HC	Doc #: 401786021	Gus LD 34-373HN	Doc #: 401785765
Gus LD 15-026HN	Doc #: 401786042	Gus LD 34-375HN	Doc #: 401785658
Gus LD 15-028HN	Doc #: 401786068	Gus LD 34-375HNX	Doc #: 401785701
Gus LD 15-028HNX	Doc #: 401786135	Gus LD 34-376HC	Doc #: 401785612
Gus LD 15-029HC	Doc #: 401786181	Gus LD 34-376HN	Doc #: 401785646
Gus LD 15-029HN	Doc #: 401786195	Gus LD 34-378HN	Doc #: 401785475
Gus LD 15-030HN	Doc #: 401786722	Gus LD 34-378HNX	Doc #: 401785533
Gus LD 15-031HNX	Doc #: 401786768	Gus LD 34-379HC	Doc #: 401785071
Gus LD 15-032HC	Doc #: 401786805	Gus LD 34-379HN	Doc #: 401785387
Gus LD 15-032HN	Doc #: 401786831		
Gus LD 15-033HN	Doc #: 401786858		
Gus LD 15-033HNX	Doc #: 401786885		
Gus LD 15-035HC	Doc #: 401786905		
Gus LD 15-035HN	Doc #: 401786958		
Gus LD 15-036HN	Doc #: 401786990		

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 to 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 Surface Use Agreement on pages 1 and 2, in the fourth and fifth paragraphs.

Respectfully,

Linsey Jones

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Regulatory Analyst
Great Western Operating Company, LLC