



VIA EFORMS

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

December 11, 2019

RE: Rule 318.A.a. and 318A.c. Exception Location Request
Confluence Resources
Freedom 33 Pad-Buford DSU
Sec. 33 T1N R65W
Weld County, Colorado
Surface: Fee
Mineral Lease: Fee

Buford 33-9-1L	Doc#: 402218849	Buford 33-6-2L	Doc#: 402220441
Buford 33-8-2L	Doc#: 402219859	Buford 33-6-4L	Doc#: 402220575
Buford 33-8-4L	Doc#: 402219967		
Buford 33-7-1L	Doc#: 402220098		
Buford 33-7-3L	Doc#: 402220158		

Dear Director Robbins:

Confluence Resources (Confluence) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rules 318A.a. or 318A.c. for the above referenced wells. The surface location, pertaining to the Application for Permit to Drill (APD), does not conform to COGCC Rules 318A.a. or 318A.c. due to surface owner request. The proposed surface location was agreed upon by the surface owner after several consultations.

COGCC Rule 318.A.a. stipulates that a Greater Wattenberg Area (GWA) well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside an 800' by 800' drilling window centered at the center of each quarter section. The above referenced wells fall outside of these drilling windows.

The Colorado Oil and Gas Conservation Commission Rule 318A.c. 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.

Confluence requests the Director approve the proposed exception location. The surface owner acknowledges and agrees with the staked surface location of the well. The signed Exception Location Waiver is attached.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 7000 S. Yosemite St., Suite 290B, Englewood, CO 80112. Please contact me at 303-942-0506 or at agross@upstreampm.com if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Andrea J. Gross".

Andrea J. Gross
Permit Agent for Confluence Resources