



**VIA EFORMS**

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

February 4, 2020

**RE: Exception Location Request: Rule 318.A.a**

Willow 22-14-2L	<b>Doc#:</b> 401959144	Willow 22-20-2L	<b>Doc#:</b> 401962353
Willow 22-15-3L	<b>Doc#:</b> 401959842	Willow 22-21-3L	<b>Doc#:</b> 401962536
Willow 22-16-1L	<b>Doc#:</b> 401960297	Willow 22-6-4L	<b>Doc#:</b> 401963069
Willow 22-17-2L	<b>Doc#:</b> 401961190	Willow 22-4-4L	<b>Doc#:</b> 402294263
Willow 22-5-4L	<b>Doc#:</b> 401961488		
Willow 22-18-3L	<b>Doc#:</b> 401961908		
Willow 22-19-1L	<b>Doc#:</b> 401962167		

**Willow 22 Pad**

Sec. 22 T1N R65W  
Weld County, Colorado  
Surface: Fee  
Mineral Lease: Fee

Dear Director Jeff Robbins:

Confluence DJ LLC (Confluence) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rule 318A.a. for the above referenced well. The surface location, pertaining to the Application for Permit to Drill (APD), does not conform to COGCC Rules 318A a due to surface owner request. The preferred location was agreed upon with Confluence and the surface owner through multiple conversations and meetings.

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 a 800' by 800' drilling window centered at the center of each quarter section. The above referenced well falls outside of these drilling windows.

Confluence requests the Director approve the proposed exception location. The surface owner acknowledges and agrees with the staked surface location of the well. The Exception Location Waiver for Rule 318A.a. (GWA Windows) is in the attached Surface Use Agreement on Page 7, Section 9.

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 [tjenkins@upstreampm.com](mailto:tjenkins@upstreampm.com) if you have any questions.

Sincerely,

Tishany Jenkins  
Permit Agent for Confluence DJ LLC

**Your Assets / Our Expertise**

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- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance