

## **Out of Window & Twinning Surface Location Exception Request Rule 318A.a & Rule 318A.c**

August 18, 2020

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

**RE: Request for Surface Location Exception (318A.a, 318A.c)**

<b>Well Name</b>	<b>Document #</b>
Prairie LE 17-021HN	<b>402391694</b>
Prairie LE 17-022HN	<b>402391695</b>
Prairie LE 18-031HC	<b>402391696</b>
Prairie LE 18-039HC	<b>402391700</b>
Prairie LE 18-040HNX	<b>402391698</b>
Prairie LE 31-369HC	<b>401872019</b>

Prairie LE Pad  
Township 1 South, Range 66 West, 6<sup>th</sup> P.M.  
Section 20: S 1/2 SW 1/4  
Adams County, Colorado

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 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 page 13 section 6.15 (B).

Respectfully,

*Linsey Jones*

Linsey Jones  
Regulatory Analyst  
Great Western Operating Company, LLC