



**VIA EFORMS**

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

November 11, 2020

RE: Rule 318.A.a and 318A.c. Exception Location Request  
Confluence Resources- Freedom 33 Pad- T1N-R65W Section 33: SW/4SW/4  
**Desha 4-5-4L Document No.: 402506641**  
**Desha 4-3-4L Document No.: 402511209**  
**Desha 4-4-4L Document No.: 402511949**  
**Desha 4-8-2L Document No.: 402511996**  
**Desha 4-9-1L Document No.: 402511997**  
**Desha 4-10-3L Document No.: 402511998**  
**Desha 4-11-2L Document No.: 402511999**  
**Desha 4-12-1L Document No.: 402512003**  
**Desha 4-13-3L Document No.: 402512004**

Dear Director Murphy:

Confluence Resources (Confluence) respectfully requests that the Director grant exception locations to Colorado Oil and Gas Conservation Commission (COGCC) Rules 318A.a. or 318A.c for the above referenced wells. The surface locations, pertaining to the Applications for Permit to Drill (APDs), do not conform to COGCC Rules 318A.a. or 318A.c due to surface owner request.

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 wells falls outside of these drilling windows.

COGCC Rule 318A.c. stipulates that a GWA well surface location shall be less than 50' from an existing well. As planned, the surface locations are greater than 50' from an existing well.

Confluence requests the Director approve the proposed exception locations. The surface owner acknowledges and agrees with the staked surface locations for the wells. The Exception Location Waiver for Rule 318A.a. and 318A.c. is located in the Surface Use Agreement on page 2, section 5.

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

Sincerely,

Andrea Gross  
Permit Agent for Confluence Resources

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