

August 25, 2021

Ms. Julie Murphy, Director
 Colorado Oil and Gas Conservation Commission
 1120 Lincoln Street, Suite 801
 Denver, Colorado 80203

RE: COGCC Rule 604.a.(2): Property Line Exception Location Request
Blehm 18-I Pad: Lot 3, Section 18, Township 7 North, Range 66 West
Proposed Wells: Blehm 1 [Doc #402378539], Blehm 2 [Doc #402378538], Blehm 3 [Doc #8042378537],
Blehm 4 [Doc #8042378536], Blehm 5 [Doc #8042378535], Blehm 6 [Doc #8042378533],
Blehm 7, [Doc #402378546], Blehm 8 [Doc #402378547], Blehm 9 [Doc #402378548],
Blehm 10 [Doc #402378549], Blehm 11 [Doc #402378550], Blehm 12 [Doc #402378551]
Weld County, Colorado

Dear Director Murphy,

Bayswater Exploration & Production, LLC (Bayswater) is planning to drill 12 horizontal wells on the Blehm 18-I Pad as referenced above. COGCC Rule 604.a.(2) states that a well shall be located not less than one hundred fifty (150) feet from a surface property line. The surface locations of Bayswater's proposed wells shall be less than one hundred fifty (150) feet from a surface property line and are thus being permitted as exception locations. The table below shows which wells are within 150 feet of a property line:

Well Name	SHL Footage	Distance to property line
Blehm 1	2615' FNL, 1577' FWL	146'
Blehm 2	2654' FSL, 1509' FWL	133'
Blehm 3	2646' FSL, 1603' FWL	119'
Blehm 4	2639' FSL, 1616' FWL	106'
Blehm 5	2631' FSL, 1629' FWL	93'
Blehm 6	2623' FSL, 1642' FWL	80'
Blehm 7	2616' FSL, 1656' FWL	67'
Blehm 8	2608' FSL, 1669' FWL	54'
Blehm 9	2600' FSL, 1682' FWL	41'
Blehm 10	2593' FSL, 1695' FWL	27'
Blehm 11	2585' FSL, 1708' FWL	14'
Blehm 12	2577' FSL, 1721' FWL	1'

As referenced in 604.a.(2), the Director may grant an exception if it is not feasible for the Operator to meet this minimum distance requirement and a waiver is obtained from the offset Surface Owner(s). These wells are being proposed to a location agreed upon with the surface owner via Surface Use Agreement. Bayswater has obtained written permission from the offset surface owner by way of surface use agreement, as the surface owner is the same on both sides of the property line.

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August 25, 2021
Page 2



Bayswater respectfully requests the COGCC to review the enclosed information and approve the requested property line exception location request and Applications for Permit to Drill for these wells.

Respectfully,

A handwritten signature in black ink, appearing to read 'J. Garrett'.

Justin Garrett
Regulatory Analyst
Agent for Bayswater Exploration & Production, LLC