



September 28, 2021

Mrs. 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**  
**Ruby 7-J Pad: NESW Section 7, Township 7 North, Range 65 West**  
**Proposed Wells: Ruby East 1 (Doc #402466315), Ruby East 2 (Doc #402467050),**  
**Ruby East 3 (Doc #402467051), Ruby East 4 (Doc #402467052), Ruby East 5 (Doc #402467053),**  
**Ruby East 6 (Doc #402467054), Ruby East 7 (Doc #402467055), Ruby East 8 (Doc #402467056),**  
**Ruby East 9 (Doc #402467057), Ruby East 10 (Doc #402467058), Ruby East 11 (Doc #402467059),**  
**Ruby East 12 (Doc #402467060), Ruby West 1 (Doc #402467067), Ruby West 2 (Doc #402467068),**  
**Ruby West 3 (Doc #402467069), Ruby West 4 (Doc #402467070), Ruby West 5 (Doc #402467072),**  
**Ruby West 6 (Doc #402467073), Ruby West 7 (Doc #402467074), Ruby West 8 (Doc #402467075),**  
**Ruby West 9 (Doc #402467076), Ruby West 10 (Doc #402467077), Ruby West 11 (Doc #402467078),**  
**Ruby West 12 (Doc #402467079), Ruby West 13 (Doc #402467080), Ruby West 14 (Doc #402467081),**  
**Ruby West 15 (Doc #402467082), Ruby West 16 (Doc #402467083), Ruby West 17 (Doc #402467084),**  
**Ruby West 18 (Doc #402467085), Ruby West 19 (Doc #402467086), Ruby West 20 (Doc #402467087)**  
**Weld County, Colorado**

Dear Director Murphy,

Bayswater Exploration & Production, LLC (Bayswater) is planning to drill 32 horizontal wells on the Ruby 7-J Pad as referenced above. COGCC Rule 604.a.(2) states that a Well will be located not less than 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 the property line:

Well Name	SHL Footage	Distance to property line
Ruby East 7	2498' FNL, 2428' FWL	150' S
Ruby East 8	2513' FNL, 2428' FWL	131' S
Ruby East 9	2528' FNL, 2428' FWL	120' S
Ruby East 10	2543' FNL, 2428' FWL	105' S
Ruby East 11	2558' FNL, 2428' FWL	90' S
Ruby East 12	2573' FNL, 2428' FWL	75' S
Ruby West 1	2587' FSL, 2427' FWL	60' N
Ruby West 2	2572' FSL, 2427' FWL	75' N
Ruby West 3	2557' FSL, 2427' FWL	90' N
Ruby West 4	2542' FSL, 2426' FWL	105' N
Ruby West 5	2527' FSL, 2426' FWL	120' N
Ruby West 6	2512' FSL, 2426' FWL	135' N
Ruby West 7	2497' FSL, 2426' FWL	150' N



**BAYSWATER**  
**EXPLORATION & PRODUCTION, LLC**

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 signed waiver. Bayswater has obtained written permission from the offset surface owner by way of signed waiver; the surface owner is the same on both sides of the property line.

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,

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