

1801 Broadway
Suite 500
Denver, Colorado 80202



Natalie Svendsen
Regulatory Analyst
Tel: 303.398.0394
E-mail:nsvendsen@gwogco.com

January 16, 2018

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

RE: **Exception Location Request (Outside 318A.a Windows & 318A.c Twinning)**

Tollway LC 24-361HN	Document #: 401508795	Tollway LC 24-371HN	Document #: 401508999
Tollway LC 24-361HNX	Document #: 401508870	Tollway LC 24-372HN	Document #: 401509006
Tollway LC 24-362HC	Document #: 401508883	Tollway LC 24-372HNX	Document #: 401509008
Tollway LC 24-362HN	Document #: 401508886	Tollway LC 24-373HC	Document #: 401509016
Tollway LC 24-363HN	Document #: 401508892	Tollway LC 24-373HN	Document #: 401509029
Tollway LC 24-363HNX	Document #: 401508898	Tollway LC 24-375HN	Document #: 401509034
Tollway LC 24-365HC	Document #: 401508909	Tollway LC 24-375HNX	Document #: 401509048
Tollway LC 24-365HN	Document #: 401508919	Tollway LC 24-376HC	Document #: 401509063
Tollway LC 24-366HN	Document #: 401508927	Tollway LC 24-376HN	Document #: 401509069
Tollway LC 24-366HNX	Document #: 401508933	Tollway LC 24-378HN	Document #: 401509072
Tollway LC 24-368HC	Document #: 401508941	Tollway LC 24-378HNX	Document #: 401509091
Tollway LC 24-368HN	Document #: 401508949	Tollway LC 24-379HC	Document #: 401509102
Tollway LC 24-369HN	Document #: 401508968	Tollway LC 24-379HN	Document #: 401509106
Tollway LC 24-369HNX	Document #: 401508996	Tollway LC 24-380HN	Document #: 401509110
Tollway LC 24-370HC	Document #: 401508997	Tollway LC 24-380HNX	Document #: 401509119

NWSW Section 7
Township 1 South, Range 67 West, 6th P.M.
Adams County, Colorado

Dear Director:

Great Western Operating Company, LLC is planning to drill the above mentioned well to the Codell & Niobrara formations.

Rule 318A.a of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be drilled and completed in a square with sides four hundred (400) feet in length, the center of which is the center of any quarter/quarter section or in the center of any quarter section with the four sides being eight hundred (800) feet in length.

The surface location of Great Western's proposed wells has been staked outside of the 318A.a drilling window. The location is being permitted as an exception location. This location is a good location to both reduce the impact on the surface owner and to increase the number of wells reachable from one well pad to minimize surface disturbance. The exception location waiver for rule 318A.a and the twinning waiver for rule 318A.c. are included in the attached surface use agreement.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission (COGCC) Rules and Regulations requiring the wells drilled greater than 50 feet from a well unless safety or mechanical consideration of the well to be twinned or topographical or surface constrains justify a location greater than 50 feet the operator shall provide 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.

Great Western Operating Company, LLC respectfully request that the COGCC review the enclosed information and approve the requested exception location waiver and Application for Permit to Drill the above captioned wells.

Respectfully,

Natalie Svendsen

Natalie Svendsen, J.D.
Regulatory Analyst
Great Western Operating Company, LLC