

**BEFORE THE OIL AND GAS CONSERVATION COMMISSION  
OF THE STATE OF COLORADO**

IN THE MATTER OF THE PROMULGATION AND	)	CAUSE NO. 407
ESTABLISHMENT OF FIELD RULES TO GOVERN	)	
OPERATIONS FOR THE CODELL-NIOBRARA	)	DOCKET NO. 180700624
FORMATION, WATTENBERG FIELD, WELD	)	
COUNTY, COLORADO	)	TYPE: SPACING

**SUBSTITUTION OF COUNSEL**

Effective June 15, 2018, Brent Chicken and Steptoe & Johnson PLLC hereby withdraw from representation of Incline Niobrara Partners, LP (“INP”) in the above-captioned matter for all purposes.

Nathan Davis and Cody Bourke of Snell & Wilmer L.L.P., whose relevant contact information appears immediately below, hereby enter their appearance in the above-captioned matter on behalf of INP, effective for all purposes on June 15, 2018:

**Nathan K. Davis  
Cody C. Bourke  
Snell & Wilmer L.L.P.  
1200 Seventeenth Street, Suite 1900  
Denver, Colorado 80202-5854  
Telephone: (303) 634-2000  
Facsimile: (303) 634-2020  
ndavis@swlaw.com; cbourke@swlaw.com**

Please direct all future correspondence and inquiries concerning the above-captioned matter to Nathan Davis and Cody Bourke of Snell & Wilmer L.L.P. at the contact information set forth above.

DATED this 26th day of June, 2018.

FOX ROTHSCHILD LLP

By: /s/ Brent D. Chicken  
BRENT D. CHICKEN (CO Bar No. 36217)  
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303-893.4300  
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SNELL & WILMER L.L.P.

By: /s/ Cody C. Bourke  
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***Attorneys for Applicant Incline Niobrara  
Partners, LP***

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ESTABLISHMENT OF FIELD RULES TO GOVERN	)	
OPERATIONS FOR THE CODELL AND NIOBRARA	)	DOCKET NOS. 180700624
FORMATIONS, WATTENBERG FIELD, WELD	)	
COUNTY, COLORADO	)	TYPE: SPACING

**CERTIFICATE OF SERVICE**

Brent Chicken, of lawful age and being first duly sworn upon his oath, states and declares that he is the attorney for Incline Niobrara Partners, LP in the above-captioned matter, and that on June 26, 2018 he caused a true and complete copy of the foregoing Substitution of Counsel to be sent postage prepaid, via regular U.S. Mail, to the following parties:

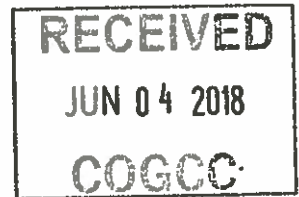
Jamie Jost Kelsey Wasylenky Jost Energy Law, P.C. jjost@jostenergylaw.com kwasylenky@jostenergylaw.com	Colorado Oil and Gas Conservation Commission 1120 Lincoln Street, Suite 801 Denver, CO 80203 Phone: (303) 894-2100 Fax: (303) 894-2109
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/s/ Brent Chicken  
Brent Chicken  
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Writer's Contact Information



May 29, 2018

Colorado Oil and Gas Conservation Commission  
Attn: Jane Stanczyk  
Permit and Technical Services Manager  
1120 Lincoln St.  
Ste. 801  
Denver, CO 80203

ORIGINAL

RE: Noble Energy Inc.'s Objection to Incline Niobrara Partners, L.P.'s  
Commission Rule 318A Proposed Horizontal Well Notices

Dear Ms. Stanczyk:

In mid-April 2018, our client Incline Niobrara Partners, L.P. ("INP") forwarded multiple Commission Rule 318A.(4)(D) horizontal well proposals (collectively, "318A Proposals") to, among various other parties, Noble Energy, Inc. ("Noble"). The 8 subject horizontal wells, colloquially named the Shearon, Jenkins and Deschene Wells (collectively, "Wells"), all share a common proposed surface location in Section 28, Township 6 North, Range 64 West, 6<sup>th</sup> P.M.

On May 11, 2018, pursuant to Commission Rule 318A.e.(5)B, Noble filed an objection covering each of INP's 318A Proposals ("Objection"), indicating that the Wells, and the associated operator-designated drilling and spacing units, should be denied because: (i) INP is not an "Owner" as defined by Commission Rules; (ii) the 318A Proposals will result in waste due to suboptimal orientation of the Wells; and (iii) the 318A Proposals will "substantially impact" and "directly and adversely affect" Noble's development plans.

Pursuant to Commission Rule 318A.e.(5)C, we write to respectfully request that the foregoing dispute/matter be set for hearing before the Commission. Given Commission Staff's previously-stated position that no contested matters will be entertained at the Commission's June 11-12, 2018 hearings, INP respectfully requests that the foregoing matter be assigned a docket number, and be scheduled for the Commission's July 30-31, 2018 hearings.

Please do not hesitate to contact us with any problems, questions or concerns.

Very truly yours,

A blue ink signature of Brent D. Chicken.

Brent D. Chicken

cc: Jamie L. Jost