

April 19, 2018

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

Re: Exception Location Requests to COGCC Rules 318A.a & 318A.c.:

Merlin Pad: SWNW Section 29, Township 6N, Range 67W, Weld County, CO

Merlin 29E-10-1C (Doc # 401562733), Merlin 29E-10-5N (Doc # 401564046), Merlin 29E-10-2C (Doc # 401563311), Merlin 29E-10-6N (Doc # 401564216) Merlin 29E-10-3C (Doc # 401563526), Merlin 29E-10-4N (Doc # 401563750)

Dear Ms. Murphy,

Please let this letter serve as a request for administrative approval of an exception location for the captioned oil and gas wells. Extraction Oil & Gas, Inc. (Extraction) is planning to drill the above referenced horizontal wells at a surface location outside a legal drilling window as defined by Rule 318A.a and farther than 50 feet from an existing well as defined by Rule 318A.c.

Rule 318A.a of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be drilled in a square with sides 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 800 feet in length. Extraction proposes to drill the above referenced wells at a surface location outside a legal drilling window.

Rule 318A.c of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be staked at a surface location greater less than fifty (50) feet from another well. Extraction proposes to drill the above referenced wells at a surface location farther than 50' from an existing well.

The location of the above referenced well has been determined per the surface owner's request. Waivers of the subject rules have been signed by the surface owner are enclosed for your review.

Sincerely,

Chris Freeman

Senior Regulatory Analyst Extraction Oil & Gas, Inc.