



**RAISA ENERGY**

April 25, 2018

Dina L. Rael & Tom Gray Elk Rael  
140 Terra Vista Street  
Brighton, CO 80601

RE: Waiver of Rule 318A.a.(1)  
Raisa State 27HZC #1 through Raisa State 27HZC #4;  
Raisa State 27HZNB #1 through Raisa State 27HZNB #6;  
Raisa State 27HZNC #1 through Raisa State 27HZNC #6  
Surface Location – Section 27, T1N, R66W, Weld County, Colorado

<b>Well Name</b>	<b>FSL</b>	<b>FWL</b>
Raisa State 27HZC #1	510'	1751'
Raisa State 27HZC #2	482'	1602'
Raisa State 27HZC #3	342'	1602'
Raisa State 27HZC #4	230'	1602'
Raisa State 27HZNB #1	538'	1751'
Raisa State 27HZNB #2	454'	1752'
Raisa State 27HZNB #3	510'	1601'
Raisa State 27HZNB #4	426'	1602'
Raisa State 27HZNB #5	370'	1602'
Raisa State 27HZNB #6	286'	1602'
Raisa State 27HZNC #1	482'	1752'
Raisa State 27HZNC #2	538'	1601'
Raisa State 27HZNC #3	454'	1602'
Raisa State 27HZNC #4	398'	1602'
Raisa State 27HZNC #5	314'	1602'
Raisa State 27HZNC #6	258'	1602'

To Whom It May Concern:

Raisa II Operating, LLC (“Raisa”) staked the above-mentioned wells at surface locations as indicated above and on the attached Well Location Certificates. These wells are being drilled under the rules and regulations of the Colorado Oil and Gas Conservation Commission’s (“COGCC”) Rule 318A known as the Greater Wattenberg Area Special Well Location, Spacing and Unit Designation Rule. The rule states that all boundary infill wells be drilled from the same surface locations as previously designated in Rule 318A.a.(1) which reads:

“The Greater Wattenberg Area (“GWA”) is defined to include those lands from and including Townships 2 South to 7 North and Ranges 61 West to 69 West, 6<sup>th</sup> P.M. In the GWA, operators may utilize the following described surface drilling locations (“GWA windows”) to drill, twin, deepen, or recomplete a well (“GWA well”) and to commingle any or all of the Cretaceous Age formations from the base of the Dakota Formation to the surface:

- (1) A square with sides four hundred (400) feet in length, the center of which is the center of any governmental quarter-quarter section (“400’ window”);

The Raisa State 27HZC #1 through Raisa State 27HZC #4; Raisa State 27HZNB #1 through Raisa State 27HZNB #6; and Raisa State 27HZNC #1 through Raisa State 27HZNC #6 wells were staked outside the defined 400’ window.

As these locations were staked with your consent and approval, Raisa respectfully requests your consent to an exception location for the Raisa State 27HZC #1 through Raisa State 27HZC #4; Raisa State 27HZNB #1 through Raisa State 27HZNB #6; and Raisa State 27HZNC #1 through Raisa State 27HZNC #6, wells by waiver of the COGCC Rule 318A.a.(1).

If this meets with your approval, please sign and date both originals of this letter, keeping one for your files and returning one to undersigned.

Thank you for your time and consideration in this matter. If you have any questions or comments, please call the undersigned at 973-476-5913.

Respectfully,



Jack Desmond  
Senior Regulatory Analyst  
Vanoco Consulting, LLC  
jdesmond@vanococonsulting.com



Raisa II Operating, LLC  
1560 Broadway  
Denver, CO 80202  
303-854-9141  
www.raisaenergy.com

Raisa II Operating, LLC  
 Raisa State 27HZC #1 through Raisa State 27HZC #4;  
 Raisa State 27HZNB #1 through Raisa State 27HZNB #6;  
 Raisa State 27HZNC #1 through Raisa State 27HZNC #6  
 Rule 318A.a.(1) waiver  
 April 25, 2018  
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THE UNDERSIGNED SURFACE OWNER HEREBY WAIVES RULE 318A.a.(1) AS IT APPLIES TO THE SURFACE LOCATION OF THE BELOW MENTIONED WELLS AND APPROVES THE SURFACE LOCATION AS INDICATED BELOW FROM THE SECTION LINES OF 27, TOWNSHIP 1 NORTH, RANGE 66 WEST, WELD COUNTY, COLORADO

Well Name	FSL	FWL
Raisa State 27HZC #1	510'	1751'
Raisa State 27HZC #2	482'	1602'
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Raisa State 27HZNC #6	258'	1602'

By: *Dina Rael*  
 Name: Dina L. Rael  
 Date: 5/18/18

By: *Tom Gray Elk Rael*  
 Name: Tom Gray Elk Rael  
 Date: 5/18/18



April 25, 2018

Dina L. Rael & Tom Gray Elk Rael  
140 Terra Vista Street  
Brighton, CO 80601

RE: Twinning Location Exception - Rule 318A.c.  
("Twinning Waiver")  
Raisa State 27HZC #1 through Raisa State 27HZC #4;  
Raisa State 27HZNB #1 through Raisa State 27HZNB #6;  
Raisa State 27HZNC #1 through Raisa State 27HZNC #6  
Surface Location – Section 27, T1N, R66W, Weld County, Colorado

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Raisa State 27HZNC #6	258'	1602'

To Whom It May Concern:

Raisa II Operating, LLC ("Raisa") staked the above-mentioned wells at surface locations as indicated above and on the attached Well Location Certificates. These wells are being drilled under the rules and regulations of the Colorado Oil and Gas Conservation Commission's ("COGCC") Rule 318A known as the Greater Wattenberg Area Special Well Location, Spacing and Unit Designation Rule. Rule 318A.c.(1) states:

"A new surface well location shall be approved in accordance with the Commission rules when it is less than fifty (50) feet from an existing surface well location."

Rule 318A.c.(2) states:

“When the operator is requesting a surface well location greater than fifty (50) feet from a well (unless safety or mechanical considerations of the well to be twinned or topographical or surface constraints justify a location greater than fifty (50) feet, the operator shall provide a 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 administratively.”

The Raisa State 27HZC #1 through Raisa State 27HZC #4; Raisa State 27HZNB #1 through Raisa State 27HZNB #6; and Raisa State 27HZNC #1 through Raisa State 27HZNC #6 wells were staked over fifty (50) feet from an existing well. As these locations were staked greater than fifty (50) feet from an existing well, Raisa respectfully requests your consent to an exception location for the aforementioned wells per COGCC Rule 318A.c.(2).

If this meets with your approval, please sign and date both originals of this letter, keeping one for your files and returning one to undersigned.

Thank you for your time and consideration in this matter. If you have any questions or comments, please call the undersigned at 303-854-9141.

Respectfully,



Jack Desmond  
Senior Regulatory Analyst  
Vanoco Consulting, LLC  
jdesmond@vanococonsulting.com



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Denver, CO 80202  
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www.raisaenergy.com

Raisa II Operating, LLC

April 25, 2018

Twinning Location Exception - Rule 318A.c.

("Twinning Waiver")

Raisa State 27HZC #1 through Raisa State 27HZC #4;

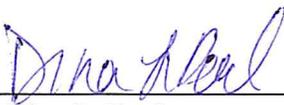
Raisa State 27HZNB #1 through Raisa State 27HZNB #6;

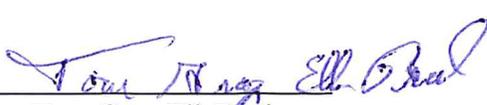
Raisa State 27HZNC #1 through Raisa State 27HZNC #6

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THE UNDERSIGNED SURFACE OWNER HEREBY CONSENTS TO THE EXCEPTION LOCATION PER RULE 318A.C(2) AS IT APPLIES TO THE SURFACE LOCATION OF THE WELLS NOTED BELOW AND APPROVES THE SURFACE LOCATION AS INDICATED AND AS MEASURED FROM THE SECTION LINES OF 27, TOWNSHIP 1 NORTH, RANGE 66 WEST, WELD COUNTY, COLORADO.

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