

July 3, 2018



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

**RE: Request to the Director for 318A.a and 318A.c Surface Location Exceptions**

**Pad Location:**

NENW Section 7, Township 1 South, Range 67 West, 6<sup>th</sup> P.M.  
Adams County

**Wells on Pad Location:**

B-Farms LD 18-388HC	Document #: 401466645	B-Farms LD 18-385HNX	Document #: 401687473
B-Farms LD 18-392HN	Document #: 401450425	B-Farms LD 18-384HC	Document #: 401687475
B-Farms LD 18-394HNX	Document #: 401450432	B-Farms LD 18-384HN	Document #: 401687477
B-Farms LD 18-036HN	Document #: 401450429	B-Farms LD 18-383HN	Document #: 401687534
B-Farms LD 18-392HC	Document #: 401450426	B-Farms LD 18-383HNX	Document #: 401687539
B-Farms LD 18-039HC	Document #: 401450431	B-Farms LD 18-390HN	Document #: 401687556
B-Farms LD 18-034HC	Document #: 401450646	B-Farms LD 18-389HN	Document #: 401687564
B-Farms LD 18-034HN	Document #: 401450428	B-Farms LD 18-396HN	Document #: 401687566
B-Farms LD 18-393HN	Document #: 401450427	B-Farms LD 18-397HNX	Document #: 401687567
B-Farms LD 18-037HC	Document #: 401450430	B-Farms LD 18-398HNX	Document #: 401687568
B-Farms LD 18-391HNX	Document #: 401683814	B-Farms LD 18-385HN	Document #: 401687467
B-Farms LD 18-388HNX	Document #: 401687413	B-Farms LD 18-386HN	Document #: 401687455
B-Farms LD 18-382HC	Document #: 401687438	B-Farms LD 18-387HC	Document #: 401687450
B-Farms LD 18-387HN	Document #: 401687439		

Dear Director Murphy,

Great Western Operating Company, LLC is planning to drill the above mentioned wells to the Niobrara and Codell 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 signed windows exception location waiver for rule 318A.a is attached to the Form 2.

Rule 318A.c of the Colorado Oil and Gas Conservation Commission (COGCC) Rules and Regulations requiring the wells drilled greater than fifty (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 fifty (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 and Application for Permit to Drill the above captioned wells.

Respectfully,

A handwritten signature in blue ink that reads "Geoff Lee".

**Geoff Lee**

Regulatory Analyst

Great Western Operating Company, LLC