



February 22, 2019  
 Colorado Oil and Gas  
 Conservation Commission  
 410 17th Street, Suite 1400  
 Denver, CO 80202  
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[Bonanzacrck.com](http://Bonanzacrck.com)

February 18, 2019

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)**

State Antelope 34-12 Pad (Amended 2A Doc # 401928290)  
 Township 5N, Range 62W, 6th PM  
 Section 12, SWSE  
 Weld County, Colorado

State Antelope E14-12-1XRLNB (Doc # 401928292)	State Antelope J14-F11-12HNB (Doc # 401928323)
State Antelope O24-K21-12HNB (Doc # 401928326)	State Antelope O34-K31-12HNB (Doc # 401928328)
State Antelope T34-P31-12HNB (Doc # 401928331)	State Antelope T44-P41-12HNB (Doc # 401928335)
State Antelope Y-U-12HNB (Doc # 401928337)	State Antelope 34-12-1XRLNB (Existing 05-123-36597)
State Antelope 44-41-12HNB (Existing 05-123-36599)	

Dear Director Robbins,

Bonanza Creek Energy Operating Company LLC. (“Bonanza”) is planning to drill the above-mentioned wells to the Niobrara and Codell formation.

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 Bonanza’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 reduce the impact on the surface owner. The exception location waiver for rule 318A.a and the twinning waiver for rule 318A.c. are included as an attachment to the APD.

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.

Bonanza respectfully request that the COGCC review the enclosed information and approve the requested exception location waivers and Application for Permit to Drill the above captioned well.

Respectfully,

Brian Dodek  
 Manager – Environmental & Regulatory Compliance