

1625 Broadway  
Suite 2000  
Denver, CO 80202

Tel: 303.228.4305  
Fax: 303.228.428

Robin Hill-Richardson  
Senior Landman



Brian Macke  
Director, Colorado Oil & Gas  
Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

COGCC

Dear Mr. Macke

Noble Energy, Inc. hereby respectfully requests a variance in accordance with Rule 502b to the 40 acre drilling and spacing unit requirements set forth in Orders 139-45 and 139-51 covering Section 6 of Township 8 South, Range 95 West, Garfield County, Colorado. At the time of application, Noble was not aware of the extreme irregularities in the entire Section 6. These irregularities cause the entire Section 6 to comprise of 88.89 acres (see attached Exhibits A & B) and therefore, Noble asks your approval of the spacing units designated below in the entire Section 6.

Spacing Unit #1 - Lot 13 & West  $\frac{3}{4}$  of Lot 12, comprised of 25.74 acres  
Surface hole location undetermined

Spacing Unit #2 - Lot 11 & East  $\frac{1}{4}$  of Lot 12, comprised of 25.25 acres  
Surface hole location undetermined

Spacing Unit #3 - Lot 10, comprised of 19.04 acres  
Surface hole location undetermined

Spacing Unit #4 - Lot 9, comprised of 18.86  
Proposed surface hole location in the NW/4NW/4 Sec. 8

The surface hole locations for spacing units 1, 2, & 3 cannot be determined at this time, however, Noble agrees that there will be no more than one surface location for each 40 acres for wells drilled downhole in spacing units 1, 2 & 3 as set out in the above referenced Order(s). The terrain is very rough and Noble has not been able to find an acceptable pad site.

Please indicate your approval of this request by signing below. Copies of the fully executed letter and Exhibits A & B will be attached to the APD's Noble files for these spacing units (2 wells per spacing unit).

Thank you very much for your consideration of this request.

Sincerely,

  
Robin Hill-Richardson  
Senior Landman

Approved this \_\_\_ day of January, 2007.

  
Brian Macke, Director

See 6 85 9SW

RECEIVED

January 17, 2007 JAN 18 07

# SECTION 6, T8S, R95W, 6th P.M.

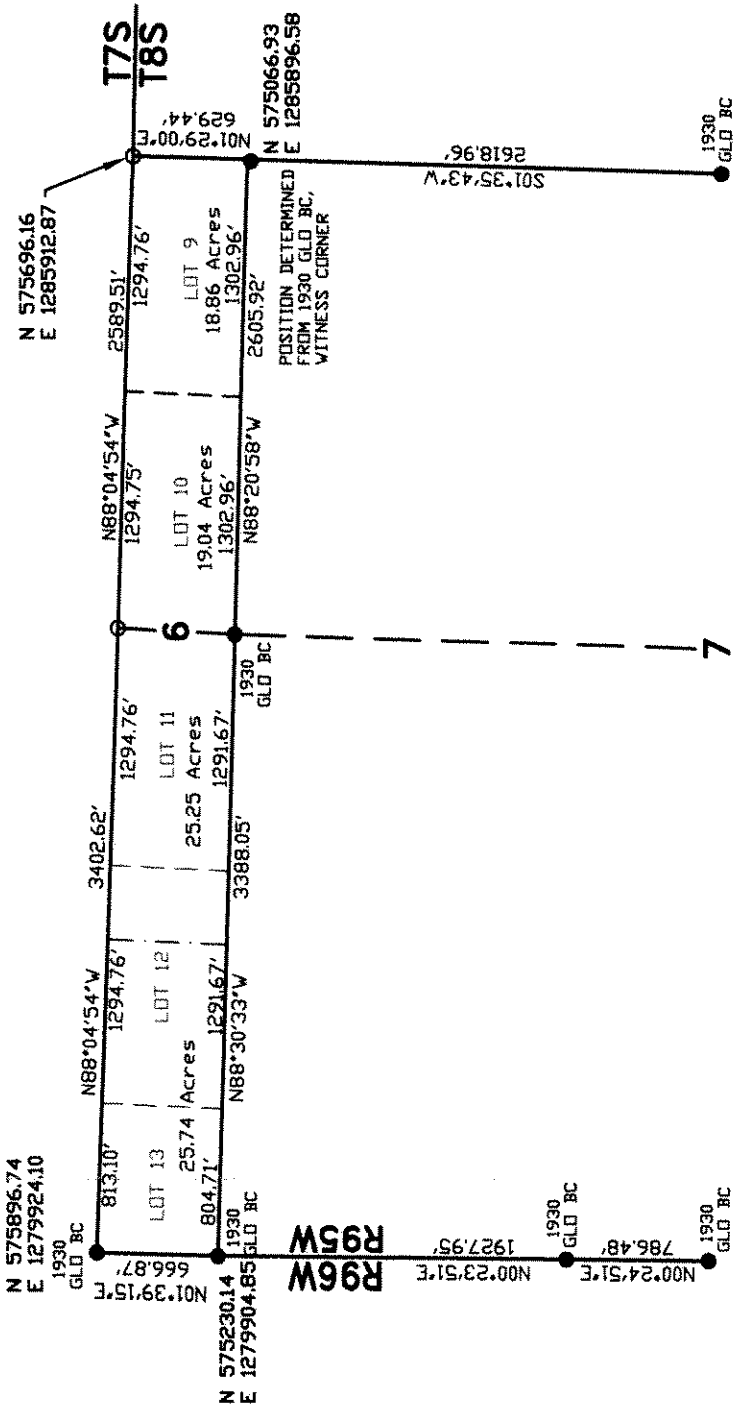
ACREAGE IS APPROXIMATE



**RECEIVED**

JAN 18 2007 NAD 1927  
GRID NORTH  
SCALE 1" = 1000'

**COGCC**



## BASIS OF BEARING

SPCS CO CENTRAL NAD  
27, BASED ON NGS TRIG.  
STATION "FABER"

THE BASIS OF BEARINGS  
FOR THIS SURVEY IS  
REFERENCED TO THE  
SOUTH LINE OF THE SW¼  
OF SECTION 6, BEING  
MONUMENTED AS SHOWN AND  
BEARING N 88° 30' 33" W.

## LEGEND

- FOUND MONUMENT
- CALCULATED CORNER
- ⊙ APPROXIMATE BHL

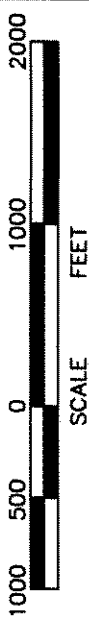


EXHIBIT A



**RIFFIN & ASSOCIATES, INC.**  
1414 ELK ST., ROCK SPRINGS, WY 82801

**NOBLE ENERGY, INC.  
DRILLING AND SPACING UNIT**

PH. (307) 362-5028	SCALE: 1" = 1000'
FAX (307) 362-1056	JOB No. 14286
DATE REVISED: 1/17/07	DATE DRAWN: 11/29/06

**SECTION 6, T. 8 S., R. 95 W., 6th P.M.  
GARFIELD COUNTY, COLORADO**

## Z

# REVIEWS

COGCC

NAD 1927  
GRID NORTH

SCALE 1" = 1000'



SPCS CO CENTRAL NAD  
27, BASED ON NGS TRIG.  
STATION "FABER"

THE BASIS OF BEARINGS  
FOR THIS SURVEY IS  
REFERENCED TO THE  
SOUTH LINE OF THE SW $\frac{1}{4}$   
OF SECTION 6, BEING  
MONUMENTED AS SHOWN AND  
BEARING N 88° 30' 33" W.

- FOUND MONUMENT
- CALCULATED CORNER
- ◎ APPROXIMATE BHL



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**RIFFIN & ASSOCIATES, INC.**  
1414 ELK ST., ROCK SPRINGS, WY 82901

**SECTION 6, T. 8 S., R. 95 W., 6th P.M.  
GARFIELD COUNTY, COLORADO**

PH. (307) 362-5028  
SCALE: 1" = 1000'

FAX (307) 362-1056

DATE REVISED: 1/17/07	DATE DRAWN: 11/29/06
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