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May 26, 2011

Colorado Oil and Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203
Attn: Mr. David Neslin, Director

RE: VARRA P31-74HN
Niobrara New Drill
Township 3 North, Range 67 West, 6th P.M.
Section 31: NE/4NW/4: 165' FNL & 2311' FWL (Surface Location)
Section 31: SW/4SE/4: 535' FSL & 1980' FEL (Bottom Hole Location)
Weld County, Colorado

Mr. Neslin:

Noble Energy, Inc. ("NEI") is planning to drill the captioned boundary well in accordance with the provisions of COGCC Rule 318A.e.

NEI's proposed wellbore spacing unit consists of the E/2 of Section 31, T3N, R67W, creating a 320-acre wellbore spacing unit for the Niobrara. NEI is the only owner within the proposed wellbore spacing unit, therefore NEI hereby attests that no notice letters are required under COGCC Rule 318A.e.(6).

Enclosed are copies of the following documents to assist you in your review and approval of NEI's proposed APD for the captioned well:

- Plat illustrating the proposed wellbore spacing unit and number of Niobrara wells located within each existing 160-acre governmental quarter section(s) (NE/4) and SE/4 to be less than eight (8) in accordance with COGCC Rule 318A.f.
- Plat illustrating proposed wellbore spacing unit on existing location plat.

Thank you for your attention to the enclosed. NEI respectfully requests that the COGCC review the enclosed information and approve the Application for Permit to Drill the captioned well.

Sincerely,

Susan Miller
Regulatory Analyst II
Noble Energy Inc.