



June 17, 2011

Department of Natural Resources  
Oil and Gas Conservation Commission  
The Chancery Building  
1120 Lincoln St., Suite 801  
Denver, CO 80203

Re: Request for Exception to Rule 318A.a & 318A.e  
Morton 1-12 Morton 3-12  
Morton 7-12 Morton 8-12  
Morton 17-12 Morton 21-12  
Morton 24-12 Morton 41-12  
Township 1 North, Range 67 West  
Section 12: SW/4NE/4  
Weld County, Colorado

Ladies/Gentlemen:

Kerr-McGee Oil & Gas Onshore LP ("KMG") respectfully requests the Director approve an exception to Rule 318A.e to allow the above referenced wells to be drilled at the above referenced location. Rule 318A.a and Rule 318A.e of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be drilled/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 (800) feet in length.

Per Surface Use Agreement dated June 22, 2010, surface owner consent is given by Article 1 - Areas Reserved for Future Wells as shown on Exhibit "C". Should you have any questions, please contact our office. Thank you for your consideration.

Very truly yours,

**Kerr-McGee Oil & Gas Onshore LP**

A handwritten signature in black ink, appearing to read 'Cheryl Light'.

Cheryl Light  
Senior Regulatory Analyst

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