



EOG Resources, Inc.  
1060 E Hwy 40  
Vernal, Utah 84078

June 21, 2011

Mr. David Neslin, Director  
Colorado Oil & Gas Conservation Commission  
11200 Lincoln St., Ste 801  
Denver, CO 80203

**RE: Rule 303.i (2) Special Circumstances for  
Permit Issuance Without Full Notice  
Lot 2 (NWNE), Section 2, T11N, R63W  
Crittter Creek 29-02H  
Document #400168625 Form 2, #400177213 Form 2A  
and,  
Lot 3 (NENW), Section 21, T12N, R62W  
Randall Creek 12-21H  
Document #400173272 Form 2, #400173361 Form 2A**

Dear Mr. Neslin:

In light of exigent circumstances as set forth in further detail below, EOG Resources, Inc. respectfully requests the Colorado Oil & Gas Conservation Commission (COGCC) favorably consider issuing the above referenced drilling and facility permits without requiring the relevant full statutory notice periods.

Based on Order No. 421-04 EOG filed three Applications for Permits to Drill additional horizontal wells, Crittter Creek 32-10H, Crittter Creek 33-15H, and Crittter Creek 34-16H, within the approved 1280-acre laydown drilling and spacing units. On May 25, 2011 the approvals for the aforementioned APDs were withdrawn based on spacing concerns of the contents of Order No. 421-04. On June 1, 2011 after meeting with the COGCC permitting staff, EOG submitted an Amended Application to amend Order No 421-4 clarifying EOGs intend to vacate the 640-acre spacing units only as they relate to the one (1) horizontal well located in each rolling laydown 1280 drilling and spacing unit.

With the suspension of the aforementioned APDs if EOG does not secure the approved permits for the above referenced two (2) well locations and associated facility on or about June 24, 2011 EOG will incur standby charges for the rig at \$30,000 per day. Additionally, EOG has a contractual obligation to drill Randall Creek 12-21H by August, 2011. If we fail to drill and complete the well within the contractual time frame EOG will lose all rights to the section.

Per Rule 303.i (2), EOG Resources, Inc. hereby affirms that due to the referenced exigent circumstances, EOG and the relevant mineral lessor(s) will experience unnecessary economic hardship if the required permits for the above referenced wells are not received on or about June 24, 2011.



EOG is in the process of securing waivers for the 30-day Notice, Comment and Approval period per COGCC Rule 305.c. from Bruce T. Barker, Esq., Weld County Attorney in his capacity as the Local Government Designee, and from the surface owner. Upon receipt of the required waivers EOG will immediately provide a copy to the COGCC in accordance with the rules for special issuance without full notice.

In light of the matters set forth herein, EOG respectfully requests that the COGCC issue the necessary permits on an expedited basis.

Please don't hesitate to contact me if you have any questions or comments. Thank you for your consideration of this request.

Sincerely,

Kaylene R. Gardner  
Sr. Regulatory Specialist  
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435-621-9099 Cell