



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

June 22, 2011

Mr. Bruce T. Barker, Weld County Attorney
915 10th St.
Greeley, CO 80632
Email: bbarker@co.weld.co.us

**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. Barker:

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 On May 25, 2011 the approvals for the aforementioned APDs were withdrawn based on spacing concerns of the contents of Order No. 421-04.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 scheduled for hearing June 27, 2011.

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 until the aforementioned APD approvals are reinstated resulting in an economic hardship of an estimated \$270,000. 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.



Hence EOG requests that you in your capacity as the Local Government Designee for Weld County, Colorado, sign the waiver set forth below.

Please be advised that the surface owner is aware of the planned drilling operations, and has already waived his 30-day Notice, Comment and Approval period; a true copy of that waiver is attached.

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
435-781-9111 Office
435-621-9099 Cell

**WAIVER OF LGD NOTIFICATION PERIOD
COGCC Rule 305c. Notice, Comment and Approval Period**

I Bruce T. Barker, on behalf of David Barber the local government designee for Weld County, Co hereby waive the statutory notice, comment, and approval period allowances as stated within the COGCC Rule 305.c. specifically related to the permitting of Critter Creek 29-02H located within Lot 2 (NWNE) Section 2, T11N, R63W, and Randall Creek 12-21H located within Lot 2 (NENW), Section 21, T12N, R62W of Weld County, Colorado.

Bruce T. Barker, Weld County
Attorney