



**peterson energy  
operating, inc.**

06/23/11

VIA ELECTRONIC SUBMITTAL

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

RE: Rule 318A.a Exception Location Request

**392 Ventures #21-22 Well:** 1510'FNL, 2314' FWL, Sec. 22 T6N R67W  
**392 Ventures #31-22 Well:** 1521'FNL, 2344' FWL, Sec. 22 T6N R67W  
**392 Ventures #41-22 Well:** 1537'FNL, 2390' FWL, Sec. 22 T6N R67W  
**392 Ventures #42-22 Well:** 1548'FNL, 2420' FWL, Sec. 22 T6N R67W  
**392 Ventures #32-22 Well:** 1563'FNL, 2415' FWL, Sec. 22 T6N R67W  
**392 Ventures #33-22 Well:** 1552'FNL, 2385' FWL, Sec. 22 T6N R67W  
**392 Ventures #23-22Well:** 1542'FNL, 2355' FWL, Sec. 22 T6N R67W  
**392 Ventures #22-22 Well:** 1536'FNL, 2339' FWL, Sec. 22 T6N R67W  
**392 Ventures #12-22 Well:** 1525'FNL, 2309' FWL, Sec. 22 T6N R67W  
**392 Ventures #22AD Well:** 1520'FNL, 2294' FWL, Sec. 22 T6N R67W  
**392 Ventures #22CD Well:** 1543'FNL, 2405' FWL, Sec. 22 T6N R67W  
**392 Ventures #22JD Well:** 1505'FNL, 2299' FWL, Sec. 22 T6N R67W  
**392 Ventures #22MD Well:** 1516'FNL, 2329' FWL, Sec. 22 T6N R67W  
**392 Ventures #22RD Well:** 1527'FNL, 2360' FWL, Sec. 22 T6N R67W  
**392 Ventures #22ND Well:** 1532'FNL, 2375' FWL, Sec. 22 T6N R67W  
**392 Ventures #22KD Well:** 1531'FNL, 2324' FWL, Sec. 22 T6N R67W  
**392 Ventures #22OD Well:** 1547'FNL, 2370' FWL, Sec. 22 T6N R67W  
**392 Ventures #22SD Well:** 1558'FNL, 2400' FWL, Sec. 22 T6N R67W

Gentlemen,

Peterson Energy Operating, Inc. (POPCO) respectfully requests that the Director grant an exception to Rule 318A.a for the above listed wells. Colorado Oil and Gas Conservation Commission Rule 318A.a stipulates that a Greater Wattenberg Area (GWA) well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside a 800' by 800' drilling window centered at the center of each quarter section. The above-described wells fall outside of these windows. These wells are spotted as above, on a single site and in accordance with the wishes of the surface owner, in order to maximize future land use possibilities and minimize surface disturbance. Please find attached the surface owner's waiver.

Please contact the undersigned at 970-669-7411 with any questions.

Sincerely,

Clayton L. Doke  
Petroleum Engineer  
Peterson Energy Operating, Inc.

attachments