



**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.e Exception Location Boundary Well Request

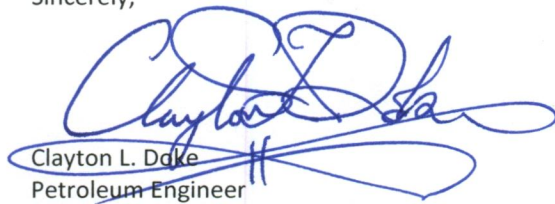
392 Ventures #22JD Well: PSU; S/2 SW Sec. 15 & N/2 NW Sec. 22 T6N R67W
392 Ventures #22MD Well: PSU; SESW, SWSE Sec. 15 & NENW, NWNE Sec. 22 T6N R67W
392 Ventures #22RD Well: PSU; S/2 SE Sec. 15 & N/2 NE Sec. 22 T6N R67W
392 Ventures #22ND Well: PSU; W/2 NE & E/2 NW Sec. 22 T6N R67W
392 Ventures #22KD Well: PSU; S/2 NW & N/2 SW Sec. 22 T6N R67W
392 Ventures #22OD Well: PSU; SENW, SWNE, NESW, NWSE Sec. 22 T6N R67W
392 Ventures #22SD Well: PSU; S/2 NE, N/2 SE Sec. 22 T6N R67W

Mr. Neslin,

Peterson Energy Operating, Inc. (POPCO) respectfully requests that the Director grant an exception to the location stipulation for Rule 318A.e for the above listed wells. Rule 318A.e stipulates that GWA infill boundary well rules apply to Township 1 North, Ranges 66 West through 68 West; Township 1 North, Range 69 West: E½; Township 2 North, Ranges 64 West through 68 West; Township 2 North, Range 69 West: E½; Township 3 North, Ranges 64 West through 67 West; Township 4 North, Ranges 63 through 67 West; Township 5 North, Ranges 63 West through 67 West; and Township 6 North, Ranges 63 West through 66 West, 6th P.M. As planned these wells fall outside of the location provisions for GWA infill wells by approximately 3 miles. The wells are spotted as above in order to maximize the efficient production of hydrocarbon resources while protecting correlative rights. Please find attached the mineral owner's waiver.

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

Sincerely,



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

attachments