



LAMP RYNEARSON
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ENGINEERS | SURVEYORS | PLANNERS

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July 28, 2011

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

Re: Request for 318A Surface Location Exception
Wells: Larson Farms 1-24, Larson Farms 2-24, Larson Farms 3-24,
Larson Farms 4-24, Larson Farms 5-24, Larson Farms 6-24, and
Larson Farms 7-24
Township 6 North, Range 64 West, 6th PM
Surface Location: NE 1/4 of the SW 1/4, Section 24
Weld County, Colorado

Dear Mr. Neslin:

St. James Energy Operating, Inc. is planning to drill the referenced wells outside of the designated GWA drilling window and hereby requests an exception to Rule 318A.a. The locations are being permitted as an exception location. The wells will be drilled outside of the GWA window in an effort to minimize surface disturbance to the landowner's farm fields and improve drilling efficiency by utilizing a single well pad for multiple wells.

St. James Energy Operating, Inc. respectfully requests that the COGCC approve the requested exception location and Application for Permit to Drill for the referenced wells. Thank you for your attention to this matter. Please contact Lamp Rynearson and Associates at (970) 226-0342 with any questions or concerns.

Sincerely,

LAMP, RYNEARSON & ASSOCIATES, INC.

Daniel Hull, PE
Designated Agent
St. James Energy Operating, Inc.

ddh/jz

enclosures