



**LAMP RYNEARSON
& ASSOCIATES**
ENGINEERS | SURVEYORS | PLANNERS

4715 Innovation Drive, Suite 100
Fort Collins, Colorado 80525
[P] 970.226.0342
[F] 970.226.0879
www.LRA-Inc.com

August 11, 2011

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

RE: Permit Issuance Without Notice or Consultation per Rule 303.I.(2)
Wells: See Attached List
Location: See Attached List
Weld County, Colorado

Dear Mr. Neslin:

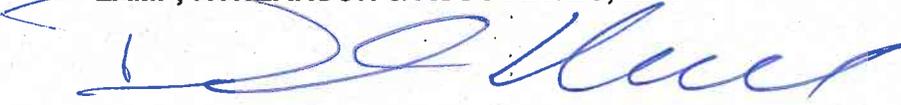
St. James Energy Operating (SJE) has filed an Oil and Gas Location Assessment and five Applications for Permit to Drill in the southeast and southwest quarters of Section 24, Township 6 North, Range 64 West, Weld County, Colorado.

Due to exigent circumstances, significant economic hardship to the drilling contractor will result if drilling on the above referenced wells does not commence by August 14, 2011. The exact order in which the five wells will be drilled has yet to be determined, which is the reason for requesting a waiver for all five APDs. It is assumed at this time that the drilling contractor would begin with the Larson Farms 7-24 well at the southern end of the pad and move north; however, once on-site the drilling contractor would make the final determination.

To overcome this economic hardship, we respectfully request that you approve the Location Assessment and the five Applications for Permit to Drill per Rule 303.I.(2) prior to the spud date of August 14, 2011. To help facilitate this request, we have provided waivers from the landowner, operator, and LGD.

I, Daniel Hull, swear that the information I am submitting is true and correct to the best of my knowledge. In filing this request I am acting with the knowledge and consent of St. James Energy Operating, Inc.

Sincerely,
LAMP, RYNEARSON & ASSOCIATES, INC.


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

DDH/jz

Leaving a Legacy of Enduring Improvements to Our Communities - PURPOSE STATEMENT

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Enclosures

Wells

1. Larson Farms 3-24, Form 2 Document ID 400185245
2. Larson Farms 4-24, Form 2 Document ID 400185539
3. Larson Farms 5-24, Form 2 Document ID 400185550
4. Larson Farms 6-24, Form 2 Document ID 400185570
5. Larson Farms 7-24, Form 2 Document ID 400185560

Location

1. Larson Farms Directional #3, Form 2A Document ID 400184156

