

August 4, 2011

Mr. David Bauer  
Weld County Public Works  
1111 H Street  
Greeley, Colorado 80631

**RE: COGCC Comment Period Waiver**  
**Wells: See Attached List**  
**Locations: See Attached List**  
**Weld County, Colorado**

Dear Mr. Bauer:

The Colorado Oil and Gas Conservation Commission ("COGCC") has adopted guidelines and procedures regarding oil and gas activities affecting the surface. Specifically, Rules 305(b) and 305(c) require the Local Government Designee (LGD) be given notice and a 20-day comment period upon completeness determination of a submitted Oil and Gas Location Assessment (Form 2A) and Application for Permit-to-drill (Form 2).

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

SJE has recently been made aware of an opportunity to contract a drilling rig beginning in mid-August. The rig is currently idle and is not under contract again until mid-September, thereby providing a perfect window for SJE to drill the Larson Farms Directional project. Contracting this rig on short notice will also provide SJE with considerable cost savings.

To meet the scheduling demands of the idle rig, SJE anticipates a spud date of August 14, 2011. If the permit for the above wells is not approved prior to the anticipated spud date, SJE will lose the opportunity to contract the idle rig. Per Rule 303.1.(2), the COGCC Director may issue a permit prior to the required comment period under these circumstances. To facilitate this request, we are requesting that you waive the LGD 20-day comment period.

Sincerely,

**LAMP, RYNEARSON & ASSOCIATES, INC.**

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

St. James Energy Operating, Inc.  
COGCC Comment Period Waiver  
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I, DAVID BAUER, Local Government Designee for Weld County, Colorado, hereby waive the notice and comment period as stated within COGCC Rule 305 and approve of the operations commencing upon said Oil and Gas Location Assessments and Applications for Permit-to-drill.

David Bauer  
Signature

August 8, 2011  
Date

DAVID BAUER, County Engineer  
Print Name and Title

St. James Energy Operating, Inc.  
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**Wells**

1. Larson Farms 1-24, Form 2 Document ID 400184370
2. Larson Farms 2-24, Form 2 Document ID 400184448
3. Larson Farms 3-24, Form 2 Document ID 400185245
4. Larson Farms 4-24, Form 2 Document ID 400185539
5. Larson Farms 5-24, Form 2 Document ID 400185550
6. Larson Farms 6-24, Form 2 Document ID 400185570
7. Larson Farms 7-24, Form 2 Document ID 400185560

**Locations**

1. Larson Farms Directional #1, Form 2A Document ID 400184305
2. Larson Farms Directional #2, Form 2A Document ID 400184118
3. Larson Farms Directional #3, Form 2A Document ID 400184156
4. Larson Farms Directional #4, Form 2A Document ID 400184314

August 4, 2011

Larson Farms, LLC  
29470 Weld County Road 66  
Gill, Colorado 80624

**RE: COGCC Landowner Notice Waiver  
St. James Energy Operating, Inc.  
Wells: See Attached List  
Locations: See Attached List  
Weld County, Colorado**

To Whom It May Concern:

The Colorado Oil and Gas Conservation Commission (COGCC) has adopted guidelines and procedures regarding oil and gas activities affecting the surface. These rules require that the surface owner must be given notice, "Landowner Notice," in writing by an operator upon completeness determination of a submitted Oil and Gas Location Assessment (Form 2A).

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

To meet the scheduling demands of an idle rig, SJE anticipates a drilling start date of August 14, 2011. If the permit for the above wells is not approved prior to the anticipated start date, SJE will lose the opportunity to contract the idle rig. Per Rule 303.I.(2), the COGCC Director may issue a permit prior to the required comment period under these circumstances. To facilitate this request, we are requesting that you waive the Landowner Notice.

Sincerely,  
**LAMP, RYNEARSON & ASSOCIATES, INC.**

Daniel Hull  
Designated Agent  
St. James Energy Operating

I hereby waive the Landowner Notice referenced above as stated within COGCC Rule 305 and approve of the operations commencing upon said Oil and Gas Location Assessment and Applications for Permit-to-drill.

Larson Farms, LLC - agent Jack Larson  
Signature

Printed Name:

Title: owner

8/10/11  
Date

**Wells**

1. Larson Farms 1-24, Form 2 Document ID 400184370
2. Larson Farms 2-24, Form 2 Document ID 400184448
3. Larson Farms 3-24, Form 2 Document ID 400185245
4. Larson Farms 4-24, Form 2 Document ID 400185539
5. Larson Farms 5-24, Form 2 Document ID 400185550
6. Larson Farms 6-24, Form 2 Document ID 400185570
7. Larson Farms 7-24, Form 2 Document ID 400185560

**Locations**

1. Larson Farms Directional #1, Form 2A Document ID 400184505
2. Larson Farms Directional #2, Form 2A Document ID 400184118
3. Larson Farms Directional #3, Form 2A Document ID 400184156
4. Larson Farms Directional #4, Form 2A Document ID 400184614