

September 29, 2011

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

**RE: Rule 318.c Exception Location Request:**  
**Banta Ridge Federal 6-18-1-103**  
**Township 1S Range 103W Sec 18: NESW**  
**Rio Blanco County, Colorado**

Dear Mr. Neslin:

Foundation Energy Management, LLC (“Foundation”), as operator, is requesting an exception location for the Banta Ridge Federal 6-18-1-103 well (“BRF 6-18”).

Legal Location:  
SWSW LOT 4 1229 FSL 618 FWL 39.957325 N LAT, 109.005475 W LON AT  
SURFACE  
NESW 1957 FSL 1807 FWL 39.959319 N LAT, 109.005369 W LON AT PRODUCING  
ZONE

This well does not meet the requirements of rule 318a of the COGCC rules: 300 SERIES DRILLING, DEVELOPMENT, PRODUCTION, and ABANDONMENT. This rule states wells must be 1200 feet from other producible wells in the same zone.

- The BRF 6-18 violates this rule by being within 1200’ of the BRF 7-18 and the proposed location of the BRF 5-18.
- The BRF 6-18 will be 1030’ from the BRF 7-18.
- The BRF 6-18 will be 1156’ from the proposed location of the BRF 5-18.

We believe that the current producing wells are not draining all of the reserves in the field. Based on calculated volumetrics in offset wells, the area shows a very low recovery factor which is often an indicator of small drainage area. The Mancos in this area is an oil reservoir, which is different than the typical Mancos B gas reservoir. For a low permeability rock like the Mancos B, there is typically a smaller drainage radius for oil than for gas. Attached you will find a map showing the locations and a sheet with volumetrics showing the calculated recovery factors for the wells.

For these reasons, we request an exception location be granted for the BRF 6-18. The BLM is the affected party in the case of the BRF 6-18. We have received a waiver for rule 318a of the COGCC’s rules from the BLM but are currently waiting for a hard copy to attach to this request.

Tulsa Office

Corporate Office

Denver Office

If you have any questions regarding this request please call me at (303) 861-0504 ext. 204 or Keelen Hauptman at ext. (303) 861-0504 ext. 202. Thank you for your help in this matter.

Best Regards,

FOUNDATION ENERGY MANAGEMENT, LLC



Matt Stark  
Operations Engineer

**Tulsa Office**

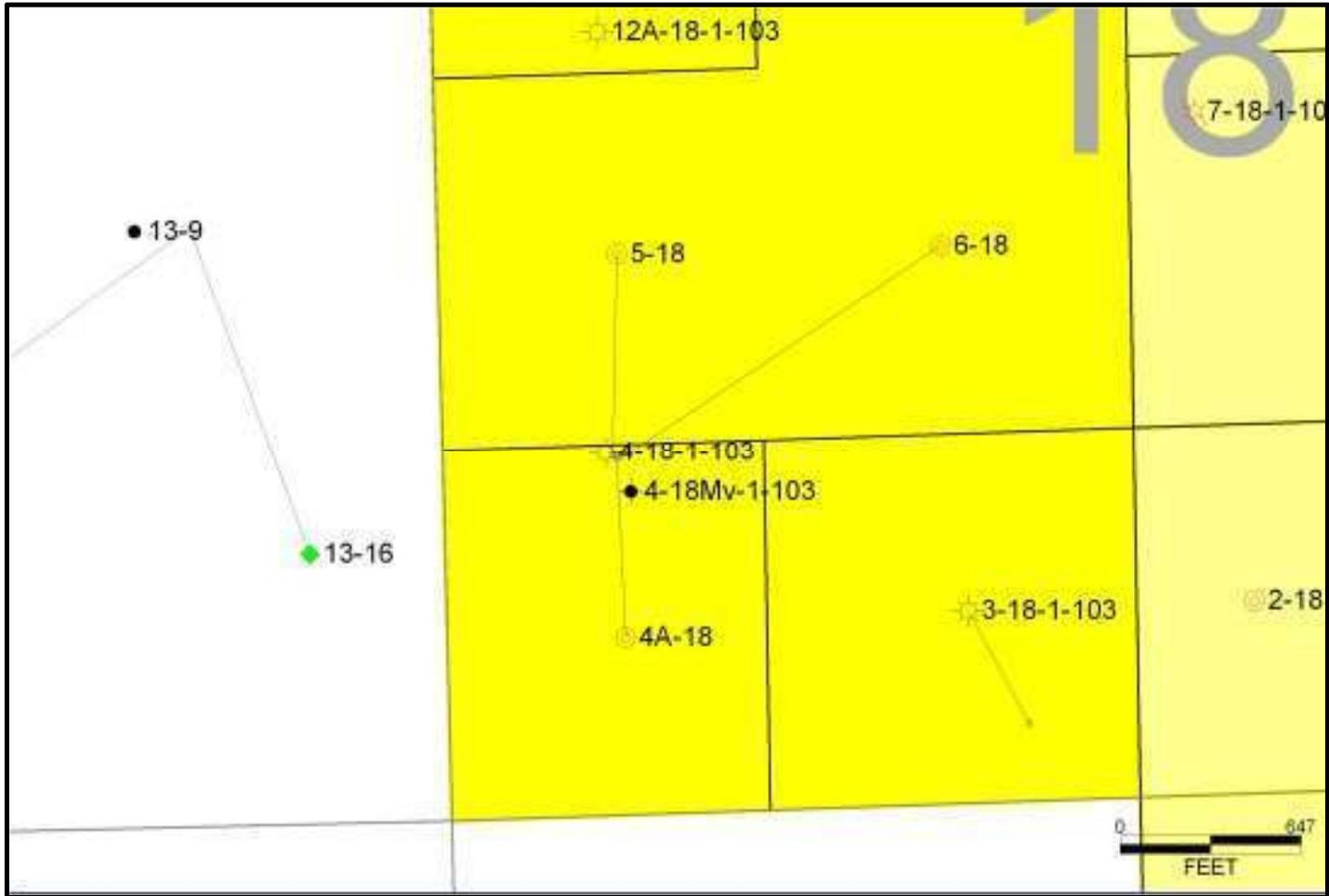
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These calculations performed assuming a black oil system in the following wells. These show that using a 40 acre drainage radius on these wells leads to a very low RF.

<b><u>Banta Ridge 12A-18</u></b>		<b>20 Acre OOIP</b>	<b>40 Acre OOIP</b>
<b>h</b>	78	798764 bo	1597527 bo
<b>Bo</b>	1		
<b>por</b>	12%	<b>Rec Factor 23%</b>	<b>Rec Factor 11%</b>
<b>Sw</b>	0.45		
<b>multiplier</b>	7758		
<b>EUR</b>	180000		

<b><u>Banta Ridge 4-18</u></b>		<b>20 Acre OOIP</b>	<b>40 Acre OOIP</b>
<b>h</b>	49	418156 bo	836312 bo
<b>Bo</b>	1		
<b>por</b>	10%	<b>Rec Factor 8%</b>	<b>Rec Factor 4%</b>
<b>Sw</b>	0.45		
<b>multiplier</b>	7758		
<b>EUR</b>	35000		

<b><u>Banta Ridge 7-18</u></b>		<b>20 Acre OOIP</b>	<b>40 Acre OOIP</b>
<b>h</b>	48	532509 bo	1065018 bo
<b>Bo</b>	1		
<b>por</b>	13%	<b>Rec Factor 4%</b>	<b>Rec Facotor 2%</b>
<b>Sw</b>	0.45		
<b>multiplier</b>	7758		
<b>EUR</b>	22000		