

Overland Resources LLC
1376 S. Perry Park Rd.
Sedalia, CO 80135
Tel: (303) 800-6175 Fax: (303)-385-0690

October 26, 2011

Director Neslin
Colorado Oil and Gas Conservation Commission
1120 Lincoln St, Suite 801
Denver, CO 80203

RE: Exception Location request under Rule 318.c
Township 4 South, Range 62 West, 6th P.M.
Section 35 SE4
Arapahoe County, Colorado
Proposed wells:
-Bradbury 11-35 NESE 35 4S 62W 2179 FSL 660 FEL – Overland Resources LLC, Operator
-Bradbury 12-35 NESE 35 4S 62W 1619 FSL 1120 FEL – Overland Resources LLC, Operator
-Bradbury 11-35 SESE 35 4S 62W 760 FSL 660 FEL – Overland Resources LLC, Operator

Director Neslin,

Overland Resources LLC filed a Form 2 Application for Permit to Drill (APD) the above listed three (3) wells in the in the SE Quarter of Section 35, Township 4S, Range 62 West in Arapahoe County.

The geological structure indicated by the currently producing State Bradbury #13-16 in section 36 and the information noted in the exception waiver for that well indicates a remaining productive part of the objective J Sand formation in the SE/4 of Section 35. We see the existing J2 formation in the Champlin Amoco 353 in Section 35 and believe there is potential for the J1 and J3 lenses in the SESE and NESE of Section 35 as seen in the SWSW of Section 36 in the State Bradbury #13-16. The stratigraphy in the SE4 of Section 35 requires denser spacing to efficiently and economically drain the reservoirs and we chose these locations to get the most out of these reservoirs. The D Sand is a channel sand, which can have a narrow width and varied shape which can make it difficult to predict direction when found only in one well location. The locations selected for these wells with the reduced spacing will assist us in understanding the size and shape of the D Sand channel and therefore the best way to maximize potential extraction.

Overland Resources respectfully request the Director to grant and exception to rule 318.a to allow D Sand completions to be less than 1200 feet apart, and an exception to cause 259-3 to allow more than one J Sand completion in a quarter section under Rule 318.c.

Overland Resources LLC will attach this exception waiver to the APD for all three wells. Please let me know if you have any questions or require additional information to be included with the permit application.

Thank You,

Gregory Pandolfo

Overland Resources LLC

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Manager - Overland Resources LLC