

February 16, 2012

Colorado Oil and Gas Conservation Commission (COGCC)
1120 Lincoln Street
Denver, CO 80203

Attention: Mr. David Neslin – Director COGCC
Mr. Larry Coler – Permitting COGCC

RE: Southwestern Energy Production Company
Request for Expedited Permit Issuance per COGCC Rule 303.I.(2)

Wells Names: Ewertz Farms 1-58 #1-26P – Permit Application Attached
Ewertz Farms 1-58 #1-26H – Permit Application Attached

In consideration of extenuating circumstances beyond our control, Southwestern Energy Production Company (SEPCO) is respectfully requesting the COGCC expedite the approval of the APD's for the above referenced well is being submitted electronically.

The proposed well is the first of a two well exploratory program in Adams and Arapahoe counties, respectively. While SEPCO operates a number of drilling rigs in other states, we do not have a rig available and have been contacting numerous drilling contractors and regional operators for months attempting to find an opportunity to utilize a drilling rig that is already operating in the region. It has been very difficult to find a rig that meets our standards, has the correct operational components to drill a well to this depth, perform coring operations, can drill a horizontal lateral, and is available for our two wells. We have recently identified such a rig and are working to finalize a contract. The challenge is one of timing.

The rig we have found (the Patterson #166) is currently drilling a well in Colorado for the US Government and is expected to become available around April 1, 2012 and possible sooner if project funding is reduced.

In order to be prepared to receive the rig on April 1st, SEPCO must first construct the drilling location and the access road, as well as arrange and contract numerous drilling support services, none of which can begin or be finalized until after we have received an approved APD from the COGCC. While construction timing depends to some degree on the weather, this can typically take 3 to 4 weeks to finalize contracts and perform the work. Therefore, we are requesting your approval by March 1, 2012.

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If SEPCO is unable to obtain the permit in time to secure and utilize the Patterson drilling rig, significant and detrimental financial hardship will be realized by SEPCO. It is impossible to anticipate when another rig of adequate size and ability may become available in the area. This would result in SEPCO being forced to move in a rig from a much farther distance, and at a significant cost. A rig move from our Arkansas operation for example, was estimated to cost between \$700,000 - \$1,000,000 round trip. Similarly, if SEPCO elects to execute the drilling rig contact, and the location is not ready to receive the rig, SEPCO would be responsible for tens of thousands of dollars for standby charges each day until the location is ready.

We have discussed our timing constraints with the two landowners involved and with a local government designee, and have received their written support for waiving of the required 20 day relevant Notice, Comment and Approval periods. Their letters of support are attached to this letter.

Per COGCC Rule 301.1 (2), SEPCO hereby affirms that due to exigent circumstances, SEPCO will experience unnecessary economic hardship if the above referenced well permit is not received on, or about, March 1, 2012. It is SEPCO's understanding that the Director of the COGCC may issue a permit in circumstances when the operator's affirmation and demonstration to his satisfaction that, due to exigent circumstances, significant economic hardship in the form of unnecessary or reasonable charges (either stand by charges or high mobilization costs) will occur.

Please do not hesitate to call me if you have any questions, or need additional information. I can be reached anytime by mobile at (281) 642 - 2600.

Thank you in advance for your consideration.

Respectfully,



John T. Campbell

Director, New Venture Operations
Southwestern Energy

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wisely investing the cash flow from our
underlying Assets, will create Value+®