



RBU
P.O. Box 2197
Houston, TX 77252-2197

January 29, 2014

Colorado Oil and Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, Colorado 80203

Re: Request for exception of Rule 318a
State Harvard & State Blanca
Township 5 South, Range 65 West
Section: 12 NWNE
Arapahoe County, Colorado

Director Lepore:

ConocoPhillips respectfully requests an exception to Rule 318a allowing the State Harvard and State Blanca wells to be drilled and produced at a distance closer than stated in said rule. Per rule 318a:

A well drilled two thousand five hundred feet (2,500) or greater shall be located not less than six hundred (600) feet from any lease line, and shall be located not less than one thousand two hundred (1200) feet from any other producible or drilling oil or gas well when drilling to the same common source of supply.

The top of the proposed production zones for the State Harvard & State Blanca wells measures 939 feet between each well. ConocoPhillips has positioned these two horizontal wellbores to maximize the laterals, thus maximizing the efficient drainage of the Niobrara reservoir and reducing the surface impact on the Lowry Range. As the owner/operator of the leases for both wells, ConocoPhillips Company will self-waive the right to protest the reduced distance between the stated wells. Please accept this location exception request also as a signed self-waiver.

Should you have any questions or need additional information, please do not hesitate to contact me at (281) 206-5770 or (432) 202-4112.

Sincerely,

A handwritten signature in black ink, appearing to read 'Justin Carlile'.

Justin Carlile
ConocoPhillips
Regulatory Specialist