



May 20, 2014

Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203  
Attention: Matt Lepore, Director

RE: GM 24-12 Pad – 603.A. (1) Variance Request  
SWSW, Section 12-T7S-R96W  
Grand Valley Field  
Garfield County, Colorado

Dear Mr. Lepore:

This letter is a variance request in regards to Rule 603.a. (1) which states: "At the time of initial drilling, a well shall be located not less than two hundred (200) feet from buildings, public roads, major above ground utility lines, or railroads.

The GM 44-12 (Doc. No. 400567995) and GM 344-12 (Doc. No. 400568471) are both < 200' from an overhead electric line (OHE). The GM 44-12 is approximately 196' from OHE and the GM 344-12 is approximately 198' from OHE. The rig height is 156' but using only the mast height the rig is 132'. If we had a catastrophic failure the mast would fall over but not the sub base.

WPX is requesting for a 603.a. (1) variance request to this rule. WPX has also submitted a signed wavier from Public Service of Colorado granting WPX permissions to conduct drilling operations on the locations mentioned above. This signed wavier was submitted with the original APD applications.

If you have any questions or concerns please contact me directly at 303-606-4086.

Sincerely,

Reed Haddock  
Regulatory Specialist Staff  
[Reed.Haddock@wpxenergy.com](mailto:Reed.Haddock@wpxenergy.com)  
WPX Energy Rocky Mountain, LLC  
1001 17<sup>th</sup> Street, Suite 1200  
Denver, CO 80202