



May 23, 2014

VIA ELECTRONIC TRANSMITTAL

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

RE: Rule 318A.a and 318A.c Exception Location Request

Duck Club 1 Well: 240' FSL, 2407' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 2 Well: 240' FSL, 2381' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 3 Well: 240' FSL, 2355' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 4 Well: 240' FSL, 2329' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 5 Well: 239' FSL, 2303' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 6 Well: 239' FSL, 2277' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 7 Well: 239' FSL, 2251' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 8 Well: 239' FSL, 2225' FEL, Section 12, T1S-R66W, Adams County, Colorado  
Duck Club 9 Well: 239' FSL, 2199' FEL, Section 12, T1S-R66W, Adams County, Colorado

Dear Mr. Lepore,

Extraction Oil & Gas, LLC (EXT) respectfully requests that the Director grant an exception to Rule 318.A for the above wells. These wells are spotted as above in accordance with the wishes of the surface owner, in order to maximize future land use possibilities and minimize surface disturbance. Per COGCC Rule 318A.a, a GWA well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside a 800' by 800' drilling window centered at the center of each quarter section, or per rule 318A.c shall not be less than 50' from an existing well. These well surface locations fall outside of the prescribed 400' by 400' drilling window centered at the center of each quarter-quarter section, or outside the 800' by 800' drilling window centered at the center of each quarter section and are not located within 50' of an existing well.

Sincerely,

Ruben Markarian  
Engineer  
Integrated Petroleum Technologies Inc.  
Consultants to Extraction Oil & Gas, LLC