

August 6, 2014

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



7535 Hilltop Circle  
Denver, CO 80221  
[www.petro-fs.com](http://www.petro-fs.com)

**RE: COGCC Rule 318A.a.: Exception Location Request  
COGCC Rule 318A.c.: Twinning Exception Location Consent  
Varra 5-I Pad: NWSE Section 5, Township 6 North, Range 67 West  
Weld County, Colorado**

Dear Mr. Lepore:

Extraction Oil & Gas, LLC (Extraction) is planning to drill 12 horizontal wells on the above referenced pad to the formations as follows:

Varra 1 will be drilled to the Codell Formation  
Varra 2 will be drilled to the Niobrara Formation  
Varra 3 will be drilled to the Niobrara Formation  
Varra 4 will be drilled to the Codell Formation  
Varra 5 will be drilled to the Niobrara Formation  
Varra 6 will be drilled to the Niobrara Formation

Varra 7 will be drilled to the Codell Formation  
Varra 8 will be drilled to the Niobrara Formation  
Varra 9 will be drilled to the Niobrara Formation  
Varra 10 will be drilled to the Codell Formation  
Varra 11 will be drilled to the Niobrara Formation  
Varra 12 will be drilled to the Niobrara Formation

The surface locations of Extraction's proposed wells have been staked outside of the COGCC Rule 318A.a. Greater Wattenberg Area (GWA) Drilling Window and are being permitted as exception locations. In addition, under the COGCC Rule 318A.c. any new Twinning well is to be located within 50 feet of an existing well. Extraction's proposed wells are located approximately 394 feet from the nearest Oil and Gas well (Varra 5-13 API# 05-123-36160). Extraction has obtained written permission from the surface owner by way of Surface Use Agreement.

Extraction respectfully requests the COGCC to review the enclosed information and approve the requested exception location waiver and Application for Permit to Drill for the wells on the subject pad. Many thanks.

Respectfully,

Jennifer Grosshans  
Regulatory Analyst  
Agent for Extraction Oil & Gas, LLC

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*We are what we repeatedly do. Excellence, then, is not an act, but a habit.*

*-Aristotle*