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11/6/14

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

RE: **Variance Request to Rule 318.c., Location of Wells**  
**Exception Location - Spacing Order 535-480**  
**Douglas LC35-775, Douglas LC35-770**  
SWSW Sec. 26, Township 9 North, Range 59 West, 6th P.M.  
Weld County, Colorado

Dear Director:

Noble plans to drill the subject horizontal well(s) on the described location. Noble requests a variance to Rule 318.c. for an exception location to Order No. 535-480. The subject Order states that the productive interval of the wellbore shall be located no closer than 150 feet from the productive interval of any other wellbore located in the unit without exception being granted by the Director. The lateral path of Noble's proposed horizontal well(s) will be closer than 150 feet from the productive interval of another wellbore located in the unit (noted below). Therefore, Noble respectfully requests this exception be granted by the Director as Noble is the Operator of the encroached upon well. Please see Noble's Anti-Collision Mitigation BMP noted below.

**CASTOR LC35-62HN, 149' from proposed well(s)**

API No. 05-123-37507

Operator: Noble Energy Inc.

SW/4SW/4 Section 35, Township 9 North, Range 59 West, 6th P.M.

**Anti-collision:**

Prior to drilling operations, Operator will perform an anti-collision scan of existing offset wells that have the potential of being within close proximity of the proposed well. This anti-collision scan will include definitive MWD or gyro surveys of the offset wells with included error of uncertainty per survey instrument, and compared against the proposed wellpath with its respective error of uncertainty. If current surveys do not exist for the offset wells, Operator may have gyro surveys conducted to verify bottomhole location. The proposed well will only be drilled if the anti-collision scan results indicate that there is not a risk for collision, or harm to people or the environment. For the proposed well, upon conclusion of drilling operations, an as-constructed gyro survey will be submitted to COGCC with the Form 5.

Respectfully,

*Susan Miller*

Susan Miller  
Regulatory Specialist