

December 19, 2014



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

Attn: Matthew Lepore, Director

RE: **Request to the Director for 318A.a Exception Location Request**  
**Request to the Director for 318A.c Twinning Exception Location Consent**  
**Pronghorn D-28 Pad: SWSW Section 28, Township 5 North, Range 61 West, Weld County, Colorado**

Pronghorn D-28-B2 (1250' FSL, 349' FWL), Pronghorn D-28-B1 (1250' FSL, 369' FWL),  
Pronghorn C-W-28HNC (1250' FSL, 389' FWL), Pronghorn C13-W43-28HNB (1250' FSL, 409' FWL),  
Pronghorn 13-43-28HNC (1250' FSL, 429' FWL), Pronghorn D13-X43-28HNB (1250' FSL, 449' FWL),  
Pronghorn D-X-28HNC (1250' FSL, 469' FWL), Pronghorn D-28-B4 (1170' FSL, 359' FWL),  
Pronghorn D-28-B3 (1170' FSL, 379' FWL), Pronghorn E-Y-28HNC (1170' FSL, 399' FWL),  
Pronghorn E14-Y44-28HNB (1170' FSL, 419' FWL), Pronghorn 14-44-28HNC (1170' FSL, 439' FWL),  
Pronghorn D14-X44-28HNB (1170' FSL, 459' FWL)

Director Lepore:

Bonanza Creek Energy Operating Company, LLC. (Bonanza) intends to drill the above referenced horizontal oil and gas wells to the Niobrara Formation from a well pad to be located as described above. The surface locations of the proposed wells have been staked outside of a 318A.a Greater Wattenberg Area (GWA) drilling window and are being permitted as exception locations, in an effort to optimize the lateral length of the associated horizontal wells. Bonanza has obtained written permission from the surface owner.

Additionally, under Rule 318A.c, any new twinning well is to be located within 50 feet of an existing well. Bonanza has obtained written permission from the surface owner to locate the proposed wells greater than 50 feet from an existing well.

Bonanza respectfully requests the COGCC to review the enclosed information and approve the requested Exception Location waiver and Application for Permit to Drill the captioned wells.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Julie L. Vigil'.

Julie L. Vigil  
Senior Regulatory Specialist  
BONANZA CREEK ENERGY OPERATING COMPANY, LLC.