



April 15, 2016

State of Colorado  
Colorado Oil & Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

---

ATTN: Matt Lepore, Director  
CC: Margaret Ash, Field Operations Manager

RE: Request of Waiver of Rule 603.f

Dear Mr. Lepore,

Pursuant to Rule 502.b, Carrizo Niobrara, LLC respectfully requests a waiver of Rule 603.f allowing unused equipment (pumping units) to remain on the sites listed herein. As described below, Carrizo utilizes three (3) different artificial lift methods through the life of a well for production optimization: jet pump, gas lift, and rod pump.

Upon initial completion, jet pumps are utilized to assist in efficient frack load recovery. Once the frack fluid has been recovered and the reservoir pressure has begun to decline, the well is converted to another type of artificial lift, rod pump. Recently, gas infrastructure has developed allowing gas lift to be yet a third, more efficient intermediate form of lift. Because of the availability of supply gas, we have several locations that we have converted from rod pump to gas lift. However, as total fluid rates decline below 50 bf/d, large gas compressors become an inefficient method of artificial lift. Therefore, once the well has experienced reservoir depletion, rod pump again becomes the most efficient recovery method.

Although these pumping units may not be in use currently, Carrizo has future plans to utilize them, and therefore, it is necessary to continue to maintain them in good working condition by monthly inspection, general housekeeping and maintenance. The cost burden to remove these units and then later return them to location would be prohibitive, especially in the later life of the well. Carrizo will take the proper steps to ensure these units remaining on location will not adversely affect human or environmental health by conducting monthly inspections, performing general housekeeping and any necessary maintenance.

Below is a list of locations we respectfully request waiver of Rule 603.f on:

PAD/WELL	Loc. ID
BRINGELSON 6,7-20-9-58	435372
BRINGELSON 1-32-9-58	424273
BRINGELSON 1,2-34-9-58	425474
BRINGELSON 2,3-33-9-58, 33-21-9-58	423723
CASTOR 1,2,3-36-11-9-58	427480
NELSON RANCHES 5-27-10-59	433228
SHULL 1-25-9-60	432177
SPEAKER 1-27-31-8-61	424603

Please give this request your consideration, and if you have any questions or need additional information, please contact me.

Regards,



Scott H. Hudson  
Vice President of Drilling and Completions  
713-328-1014  
[Scott.hudson@crzo.net](mailto:Scott.hudson@crzo.net)