



June 13, 2017

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

RE: **Request to the Director for Exception Location (Spacing Order)**

Wells on Pad location:

Kaufman #5 Pad 42A-24-692 (OGLA Doc #: 401236045); Kaufman 42C-24-692 (APD doc #: 401185964); Kaufman 42A-24-692 (API: 05-045-21215); Kaufman 42B-24-692 (API: 05-045-21212); Kaufman 43A-24-692 (API: 05-045-21210); Kaufman 43B-24-692 (API: 05-045-21211); Kaufman 43C-24-692 (API: 05-045-21213); Kaufman 43D-24-692 (API: 05-045-21217); Kaufman 44A-24-692 (API: 05-045-21219); Kaufman 44B-24-692 (API: 05-045-21218); Kaufman 44-24C-692 (API: 05-045-21214); Kaufman 44D-24-692 (API: 05-045-21216)

NWSE, Section 24, Township 6 South, Range 92 West, 6th P.M.
Garfield County, Colorado

Dear Director:

The location is being permitted as an exception location for spacing order 191-81. Vanguard has obtained written permission contained in a Surface Use Agreement, from the surface owner.

Under the Spacing Order 191-81, wells “shall be drilled from the surface either vertically or directionally from no more than one pad located on a given quarter-quarter section.” The surface location of Vanguard’s proposed wells has been staked in the same quarter-quarter section as Kaufman Pad #7 (Location ID: 413453); also, owned by Vanguard. As stated on page two of the Surface Use Agreement, due to topographical constraints and other concerns it is necessary that two pads be located in the NW/4 SE/4 of Section 24, T6S, R92W.

Thank you for your attention to the enclosed information. Vanguard respectfully requests that the COGCC review the enclosed information and approve the requested exception location waivers and Application for Permit to Drill the captioned wells.

Respectfully,

Jack Desmond
Regulatory Analyst
Vanguard Operating, LLC