

December 28, 2017

Colorado Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203
Attention: Matt Lepore, Director

RE: TEP Rocky Mountain LLC (TEP) – Request for Waiver of 20-day Comment Period per Rule 305.c.
For the Tri State Trucking PA 643-26, Form 2 (Doc #401479415)
Tri State Trucking PA 22-25 Pad (COGCC Loc #335123)
Township 6 South, Range 95 West, 6th P.M.
Section 25: SE1/4NW1/4
Garfield County, Colorado

Dear Mr. Lepore:

This letter requests a waiver of Rule 305.c., providing for a 20-day comment period on each Form 2 and Form 2A, on behalf of TEP Rocky Mountain LLC (TEP), who is seeking expedited approval and issuance of the Tri State Trucking PA 643-26 Form 2 (Doc #401479415) on the PA 22-25 pad.

This request is a result of TEP's need to drill a replacement well without consultation per Rule 303.I.(2) based on the addition of a replacement well following a failed attempt to drill a well, resulting in a plug and abandonment (P&A). As represented by TEP, during operations on the Tri State PA 443-26 well (API # 05-045-23664-00), a stuck pipe event occurred in the surface hole. The bottom-hole assembly (BHA) became free of the restriction, but backed-off at a service break in the mud motor. This created a fish in the hole. After failed attempts to recover the fish, P&A operations commenced upon approval from the COGCC and the BLM. A Form 6 (Doc # 401481265) for this well was submitted on December 13, 2017. A Form 6 (Doc # 401481265) for this well was submitted on December 13, 2017.

Consequently, a replacement well (PA 643-26) was identified and selected for the A13 pad cellar slot. This slot was selected as it was best suited for anti-collision efforts relative to the new wells planned for this location. The position of this slot is most conducive for conductor hole operations when accounting for the rig position and wellhead spacing. The ideal time to set the conductor for this slot is on or about January 5, 2018, prior to the 20-day public comment period and subsequent approval. The challenges associated with drilling the conductor beyond this timeframe would result in increased costs and time required to modify skid rails, standpipe, flowline, and electrical lines, and require manipulation to avoid well heads that will be installed during completions operations.

We acknowledge this request waives the 20-day comment period and expedites the approval of the Form 2 prior to the 20-day posting pursuant to rule 305.b, removing the opportunity for COGCC to receive public comments from the public, the local governmental designee, the Colorado Department of Public Health and Environment, or the Colorado Division of Wildlife. We also understand the need for TEP's request given the situation and requirement to drill a total of 25 wells, which is consistent in the agreement between TEP and Tri State Trucking.

We also acknowledge that the situation described above indicates TEP's commitment to act immediately upon the approval of the Form 2 to set the conductor on the new well and continue with drilling operations on the PA 22-25.

Thank you for your attention to this waiver request and expedited approval of TEP's drilling permit.

Sincerely,

A handwritten signature in cursive script that reads "Monte Morris".

Monte Morris
Tri State Trucking, LLC