



March 8, 2018

Director Julie Murphy
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Ste. 801
Denver, Colorado 80203

Re: COGCC Rule 318A.a.: Exception Location Request

Dear Director Murphy:

Petro Operating Co., LLC is planning to drill the following 20 horizontal wells (#3 thru #22) as follows:
BEF WEST Pad: SENE & NESE Section 2, Township 1 South, Range 66 West, Adams County, Colorado

BEF WEST 3, Form 2 Doc #401394354
BEF WEST 4, Form 2 Doc #401394360
BEF WEST 5, Form 2 Doc #401394365
BEF WEST 6, Form 2 Doc #401394387
BEF WEST 7, Form 2 Doc #401394392
BEF WEST 8, Form 2 Doc #401394408
BEF WEST 9, Form 2 Doc #401394412
BEF WEST 10, Form 2 Doc #401394446
BEF WEST 11, Form 2 Doc #401394454
BEF WEST 12, Form 2 Doc #401394464
BEF WEST 13, Form 2 Doc #401394469
BEF WEST 14, Form 2 Doc #401394518
BEF WEST 15, Form 2 Doc #401394521
BEF WEST 16, Form 2 Doc #401394532
BEF WEST 17, Form 2 Doc #401394536
BEF WEST 18, Form 2 Doc #401394540
BEF WEST 19, Form 2 Doc #401394561
BEF WEST 20, Form 2 Doc #401394563
BEF WEST 21, Form 2 Doc #401394567
BEF WEST 22, Form 2 Doc #401394572

The surface locations of Petro Operating Co., LLC (Petro) proposed wells have been staked outside of the COGCC Rule 318A.a. Greater Wattenberg Area (GWA) Drilling Window.

The Surface Use Agreement, page 3, Item 5 Waivers has a consent to the Exception & Twinning rules and is an attachment to the APD. Petro Operating Co., LLC respectfully requests the COGCC to review the enclosed information and approve the requested exception location to rule 318A.a for the Applications for Permits to Drill for the wells on the subject pad.

Sincerely,

Paul Gottlob
Regulatory & Engineering Technician
Consultant to Petro Operating Co., LLC