



VIA EFORMS

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

September 4, 2018

RE: Exception Location Request: Rule 318.A.a and 318A.c

Flaherty 18-1-1	Doc#: 401747286	Flaherty 18-7-1	Doc#: 401750114
Flaherty 18-1-3	Doc#: 401747835	Flaherty 18-7-3	Doc#: 401749978
Flaherty 18-2-2	Doc#: 401747972	Flaherty 18-8-2	Doc#: 401749882
Flaherty 18-2-4	Doc#: 401749663	Flaherty 18-8-4	Doc#: 401749500
Flaherty 18-3-1	Doc#: 401749730		
Flaherty 18-3-3	Doc#: 401749903		
Flaherty 18-4-2	Doc#: 401750134		
Flaherty 18-4-4	Doc#: 401750403		
Flaherty 18-5-1	Doc#: 401751922		
Flaherty 18-5-3	Doc#: 401751915		
Flaherty 18-6-2	Doc#: 401751808		
Flaherty 18-6-4	Doc#: 401750352		

Flaherty 18-1

Sec. 18 T4N R62W
Weld County, Colorado
Surface: Fee
Mineral Lease: Fee

Dear Director Julie Murphy:

Confluence DJ LLC (Confluence) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rule 318A.a. and Rule 318A.c for the above referenced well. The surface location, pertaining to the Application for Permit to Drill (APD), does not conform to COGCC Rules 318A a due to surface owner request. The preferred location was agreed upon with Confluence and the surface owner through multiple conversations and meetings.

COGCC Rule 318.A.a stipulates that a Greater Wattenberg Area (GWA) well surface location must be within a 400' by 400' drilling window centered at the center of each quarter-quarter section, or inside a 800' by 800' drilling window centered at the center of each quarter section. The above referenced well falls outside of these drilling windows.

COGCC Rule 318A.c.(2) stipulates that a Greater Wattenberg Area (GWA) well surface location shall not be greater than 50' from an existing well. As planned, these surface locations are greater than 50' from an existing well. As you are aware, the surface locations were chosen in concurrence with your wishes, as the surface owner, and due to topography.

Your Assets / Our Expertise

- Regulatory
- Storm-water Management Plans
- Project Coordination
- Permitting
- Government Relations
- EA/EIS Assistance

Confluence requests the Director approve the proposed exception location. The surface owner acknowledges and agrees with the staked surface location of the well. The Exception Location Waiver for Rule 318A.a. and Rule 318A.c (GWA Windows) is in the attached Surface Use Agreement on page two Section 6.

Please send a copy of all correspondence to Upstream Petroleum Management, Inc. at 7000 S. Yosemite St., Suite 290B, Englewood, CO 80112. Please contact me at 303-942-0506 or at agross@upstreampm.com if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Kimberly Rodell". The signature is written in a cursive, flowing style.

Kimberly Rodell
Permit Agent for Confluence DJ LLC