



# UPSTREAM

Petroleum Management, Inc.

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

January 28, 2020

RE: Rule 318.A.a. and 318A.c. Exception Location Request  
Confluence Resources  
**Judy 34 Pad**  
Sec. 34 T1N R65W  
Weld County, Colorado  
Surface: Fee  
Mineral Lease: Fee

Buford 33-5-3L	Doc#: 402286105	Buford 33-3-3L	Doc#: 402286132
Buford 33-5-1L	Doc#: 402286119	Buford 33-3-1L	Doc#: 402437966
Buford 33-4-4L	Doc#: 402438026	Buford 33-2-4L	Doc#: 402286134
Buford 33-4-2L	Doc#: 402286128	Buford 33-2-2L	Doc#: 402437890

Dear Director Robbins:

Confluence Resources (Confluence) respectfully requests that the Director grant an exception location to Colorado Oil and Gas Conservation Commission (COGCC) Rules 318A.a. or 318A.c. for the above referenced wells. The surface location, pertaining to the Application for Permit to Drill (APD), does not conform to COGCC Rules 318A.a. or 318A.c. due to surface owner request. The proposed surface location was agreed upon by the surface owner after several consultations.

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 an 800' by 800' drilling window centered at the center of each quarter section. The above referenced wells fall outside of these drilling windows.

The Colorado Oil and Gas Conservation Commission Rule 318A.c. states that, "when an operator is requesting a surface well location greater than fifty feet (50') from a well, the operator shall provide a consent to the exception signed by the surface owner on which the well is proposed to be located in order for the Director to approve the well location administratively." The planned surface locations are greater than 50' from an existing well due a request by the surface owner through a negotiated SUA.

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 318A.c. is located in the attached Surface Use Agreement on page 2, 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](mailto:agross@upstreampm.com) if you have any questions.

Sincerely,

Andrea J. Gross  
Permit Agent for Confluence Resources

## Your Assets / Our Expertise

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