



EOG Resources, Inc.
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July 21, 2011

VIA EMAIL – TO FOLLOW BY HAND-DELIVERY

Rob Willis and Peter Gowen
Colorado Oil & Gas Conservation Commission
1120 Lincoln St., Suite 801
Denver, CO 80203

Re: Cause No. 1R, Docket No. 1108-RM02 – Comment/Protest of EOG Resources, Inc.

Dear Rob and Peter:

EOG Resources, Inc. (“EOG”) hereby presents the following comment/protest to the rulemaking to amend Rule 318A in Staff Recommendation Cause No. 1R, Docket 1108-RM-02 due to the following reasons:

1. EOG Resources, Inc. holds substantial leasehold position in the following townships: 6N 62W, 6N 61W, 5N 62W, 5N 61W, 4N 62W, 4N 61W (“Exclusion Area”)
2. EOG Resources, Inc. has spaced the bulk of Exclusion Area as 640 acre drilling and spacing units with one (1) horizontal lateral per unit as approved in COGCC Order 421
3. There is limited oil and gas development in the Exclusion Area.

EOG supports the request to amend Rule 318A as it pertains to the developed areas of the Wattenberg Field. The proposed changes to the rule are an eloquent solution to allow for horizontal infill drilling in areas of existing vertical development.

However, EOG does not support the inclusion the Exclusion Area where 1) there is minimal vertical development, and 2) Spacing is already in place to determine how horizontal development may occur.

EOG humbly requests that the Exclusion Area be considered outside of the jurisdiction of the amended rulemaking area.

Thank you in advance for your attention to this matter and please contact me at 303-262-9426 or via email at jason_mclaren@eogresources.com with any questions or concerns.

Very truly yours,



Jason McLaren,
Landman, EOG Resources, Inc.

Matthew Crockett,
Corporate Counsel, EOG Resources, Inc.

cc: Margaret Humecki (via email)
Mike Schween – EOG Resources, Inc. (via email)
Dave Padgett- Noble Energy (via email)