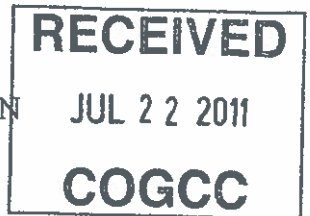


BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO



IN THE MATTER OF CHANGES TO THE RULES) CAUSE NO. 1R
OF PRACTICE AND PROCEDURE OF THE OIL &)
GAS CONSERVATION COMMISSION OF THE) DOCKET NO. 1108-RM-02
STATE OF COLORADO)

K.P. KAUFFMAN COMPANY, INC. COMMENTS
TO THE PROPOSED CHANGES TO COMMISSION RULE 318A


ORIGINAL

K.P. Kauffman Company, Inc. ("KPK") submits its comments in accordance with the Notice of Hearing dated June 30, 2011, in support of proposed changes to Rule 318A of the Commission's Rules of Practice and Procedure, 2 CCR 404-1 ("Rules"). KPK is a privately held oil and gas exploration and production company that operates approximately nine hundred (900) wells in Colorado, the majority of which are located in the Greater Wattenberg Area (GWA) of the Denver-Julesburg Basin. KPK's primary oil and gas production and exploration operations are located in the Sussex-Shannon Formation within the GWA.

KPK is in the process of completing its first horizontal well in the Sussex-Shannon Formation and is developing an extensive horizontal drilling program within the Sussex-Shannon Formation of the GWA. KPK supports the proposed changes to Rule 318A for the greater flexibility the proposed changes offer in the creation of wellbore spacing units and for the increased benefit to mineral owners, residents and industry through further development of the GWA. Through its support for the proposed changes to 318A, KPK would like to affirm that the scope of the proposed changes encompasses all Cretaceous Period formations, including the Sussex-Shannon Formation, in horizontal drilling to increase the overall benefit to mineral owners, residents, surface owners and industry.

Respectfully submitted this 22nd day of July, 2011.

K.P. Kauffman Company, Inc.



Kevin P. Kauffman
Chairman and C.E.O.