

06 January 2015

Colorado Oil and Gas Conservation  
Commission  
The Chancery Building  
1120 Lincoln Street, Suite 801  
Denver, CO 80203



410 17th Street, Suite 1500  
Denver, CO 80202  
(720) 440-6100 phone  
(720) 279-2331 fax

[BonanzaCrk.com](http://BonanzaCrk.com)

Attn: Matthew Lepore, Director

**RE: Request for Exception to Rule 317.p Requirement to Run Open-Hole Logs**

State Seventy Holes F-J-4HNB (API# 05-123-39210), State Seventy Holes F-J-4HC (API# 05-123-39213)  
State Seventy Holes F-4 Pad NENW Sec. 3, T4N, R62W, 6<sup>th</sup> PM, Weld County, Colorado

Mr. Lepore:

Bonanza Creek Energy Operating Company, LLC. ("Bonanza") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as described above. Bonanza respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as it requires open-hole logs to be run.

Bonanza proposes to collect cased-hole logs on one well per multi-well pad. While running cement bond logs on the selected well, Bonanza will also run Cased-Hole Gamma Ray / Neutron Density logs to describe the stratigraphy of the vertical portion of the selected wellbore. Bonanza will continue to collect cement bond logs on each intermediate casing job on each wellbore.

The reason Bonanza is requesting this exception is to reduce the risk of losing the hole or increasing chances of difficulties in running the intermediate string. Additionally, our horizontal wells require drilling the curve through the Sharon Springs Fm, which has proven to be very challenging at times. The less time the hole is left open, the greater our success rates. Additionally, this would cut our rig time on the first well on a pad by at least 1/2 day. This savings will add up quick when applied to the multiple locations Bonanza drills each year.

The Drilling Completion Report – Form 5 submitted for each well will indicate that no open-hole logs were run and indicate on which well the cased-hole logs were run. Bonanza respectfully requests that the COGCC review the enclosed information and approve an exception to Rule 317.p with respect to the proposed APDs.

Thank you for your attention to this matter.

Sincerely,

**BONANZA CREEK ENERGY OPERATING COMPANY, LLC.**

A handwritten signature in blue ink that reads "Keith S. Caplan".

Keith S. Caplan  
Senior Regulatory Specialist