



September 28, 2015

Colorado Oil & Gas Conservation Commission
Matt Lepore, Director
1120 Lincoln Street Suite 801
Denver Colorado

Re: Request for Open Hole Logging Exception pursuant to rule 317.p.
XTO Energy Inc.
RNPU 197-15A1 Well
NW 1/4 SE 1/4 Section 15, Township 1 South, Range 97 West, 6th P.M.
Rio Blanco County, Colorado

Dear Director Lepore:

XTO Energy Inc. (XTO) hereby requests an Open-Hole Logging Exception to Rule 317 p., which states in part, "operators shall be required to run a minimum of an open-hole resistivity and gamma ray logs from TD into the surface casing, with sufficient description of the stratigraphy and adequately verify the setting depth of surface casing and any aquifer coverage". The surface location of this well is located at 2,170' FEL and 2,034' FSL of Section 15, Township 1 South, Range 97 West 6th P.M..

Here are some concerns that we have had drilling the RNPU 197-15A1 well that are mandating us to request for an exception to Rule 317 p:

- 1). Due to well instability and continues lost circulation, we have made the decision to cut short the proposed TD of 13,614' to +/- 12,600'.
- 2). Long open hole section of variable zones of lost circulation ranging between +/- 120 bbls/hr
- 3). Concern on hole stability due to long open-hole time.
- 4). Ledge issue (reduction in bit size at 8,500'), which we believe will be risky in sending wireline tool into the well bore.
- 5). Concern over spring loaded side-contact tool that may risk getting stuck or losing logging tool in the rugose hole.
- 6). Furthermore, we commit to running open-hole logs on subsequent wells off this pad in the near future.

Therefore, due to these concerns, XTO Energy is requesting an exception to Rule 317 p., requiring open-hole logs. The proposed logging program is detailed below.

RNPU 197-15A1 Logging Program:

- a. Cement Bond Log (CBL): There will be a cement bond log with gamma-ray run on production casing into the surface casing
- b. Cased-hole Pulsed Neutron Log/Gamma-ray Log: Will run cased-hole logs from TD into the surface casing to adequately describe the stratigraphy.

There are no offsetting wells within 750' from RNPU 197-15A1 surface location with open-hole resistivity logs. However, it is our plan to drill subsequent wells off the same pad in section 15 with a logging program that will include open-hole resistivity and gamma ray logs.

Despite not having any offset wells within 750' with resistivity logs, there are four wells within the area, although not from the same section (Sec. 15) with open-hole resistivity logs available:

Well Name	API #	Log Type	Dist. from SHL
DUCK CRK FED	051-0308433	Res/Nue-Den/Son	6455'
INDIAN WELLS-FED 22-1-97	051-0308188	Res/Nue-Den/Frac. finder	6122'
SQUARE S -HERRING 1	051-0305244	Resistivity	6062'
NPU 197-3A1 Wild Horse	051-0310770	Array Induction	9986'

Based on the forgoing, no violation of the basic intent of the Oil and Gas Conservation Act will occur by the granting of this Exception.

The Form 5, Completion Report, for the RNPU 197-15A1 will list all logs run, attaching said logs to the form. The Form 5 for a well without open-hole logs shall clearly state "No open hole logs were run" and reference the approved Exception to Rule 317 p. granted for the well.

Respectfully,
XTO Energy Inc.



Faith Amadi
Geologist Staff/ Rocky Mountains Division