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Mr. Matt Lepore, COGCC Director
1120 Lincoln Street, Suite 801
Denver, Colorado 80203
PH: (303) 894-2100 Ext: 5122

Mr. Lepore,

ConocoPhillips requests an exception to Rule 317.p which states that the operator shall be required to run a minimum of a resistivity log with gamma-ray or other petrophysical log(s) approved by the Director that adequately describe the stratigraphy of the wellbore. A cement bond log shall be run on all production casing or, in the case of a production liner, the intermediate casing, when these casing strings are run. ConocoPhillips proposes an alternative logging program to Rule 317.p for the Prosper Farms 4-65 2-1 4AH and 4CH due to the offset well that has adequate logs on file. The Offset well is the Amoco Westan Fischahs #1 which is 478' from the Prosper Farms 4-65 2-1 4CH. The offset well has the following logs on file with the COGCC.

- Induction Log (Doc# 972853)
- Resistivity Log (Doc# 42190, 421091 and 421092)

One of the first wells drilled on the Prosper Farms 4-65 2-1 pad will be logged with Cased-hole Pulsed Neutron Log with Gamma Ray Log from TD into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or an intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma ray log. The Form 5, Completion Report, for each well on the pad will list all logs run in that well and have those logs attached. The Form 5 for each well shall clearly state "No open-hole logs were run" and shall reference the Rule 317.p Exception granted for the well.

Please see the well information below:

Prosper Farms 4-65 2-1 4AH
API# 05-005-07249
(Form 2 # 400861872)
SWSW Section 2, 4 South, 65 West

Amoco Westan Fischas 1 (Form 2# 421089)
SWSW Section 2, 4 South, 65 West
API# 05-005-06204
Facility ID 377757

Prosper Farms 4-65 2-1 4CH
API # 05-005-07250
(Form 2 # 400871343)
SWSW Section 2, 4 South, 65 West

Respectfully,

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ConocoPhillips Rockies BU