



June 25, 2018

Ms. Julie Murphy, Director  
Colorado Oil and Gas Conservation Commission  
1120 Lincoln Street, Ste 801  
Denver, CO 80203

**RE: COGCC Rule 317.p: Open Hole Logging Exception Request**

**Ruegge 4H-N165 Pad: SESE, Sec 4, T1N-R65W, Weld County**

**Proposed Wells:** Ruegge 3C-4H-N165 API 123-46569, doc #401683737; Ruegge 3D-4H-N165 API 123-46556; Ruegge 3E-4H-N165 API 123-46565; Ruegge 3F-4H-N165 API 123-46570; Ruegge 3G-4H-N165 API 123-46566; Ruegge 3H-4H-N165 API 123-46558; Ruegge 3I-4H-N165 API 123-46559; Ruegge 3J-4H-N165 API 123-46562; Ruegge 3K-4H-N165 API 123-46563; Ruegge 3L-4H-N165 API 123-46561; Ruegge 3M-4H-N165 API 123-46567; Ruegge 3N-4H-N165 API 123-46571; Ruegge 3O-4H-N165 API 123-46564; Ruegge 3P-4H-N165 API 123-46557; Ruegge 3Q-4H-N165 API 123-46560 and Ruegge 3R-4H-N165 API 123-46568

Dear Director Murphy,

Please let this letter serve as a request for a Rule 317.p. Exception for the proposed wells listed above. Rule 317.p requires logging all wells with a minimum of a resistivity log with gamma ray to adequately describe the stratigraphy and open-hole logs to adequately verify the setting depth of surface casing and aquifer coverage.

Crestone Peak Resources Operating LLC (Crestone) has identified an existing well with adequate open-hole well log control within 750' of the proposed new wells:

<u>Well</u>	<u>API</u>	<u>Distance</u>	<u>Bearing</u>	<u>Log &amp; Doc No.</u>
Stelling 24-4	123- 20848	~200'	SW	DUAL INDUCTION/GUARD LOG Doc # 1253858

Crestone is requesting to run a combination RST/CBL (reservoir saturation tool using pulsed neutron) cased-hole log on the 7" casing of one of the first wells to be drilled on the pad. All of the captioned wells will have a cement bond log with gamma ray run from the intermediate casing shoe, or as close as possible, to above surface casing shoe to verify the setting depth of surface casing and aquifer coverage. The horizontal portion of all subject wells will be logged while drilling with a gamma ray tool.

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. The Form 5 for each well on the pad will identify the well that was logged with alternative logs by API number, well name and well number.



**CRESTONE PEAK**  
RESOURCES

Thank you for your assistance with this matter. Should you have any questions or comments, please contact me at (720) 410-8487.

Regards,

Meghan Campbell  
Regulatory Analyst