



July 5, 2018

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

Re: **COGCC Rule 317.p: Open Hole Logging Exception Request**
KUGEL 18H-H267 PAD: SENE Section 18, Township 2 North, Range 67 West, Weld County, CO
Proposed Wells: [Kugel 1A-18H-H267, 401675774; Kugel 1B-18H-H267, 401675776; Kugel 1C-18H-H267, 401675777; Kugel 1D-18H-H267, 401675778; Kugel 1E-18H-H267, 401675779; Kugel 1F-18H-H267, 401675780; Kugel 1G-18H-H267, 401675781; Kugel 1H-18H-H267, 401675782; Kugel 1I-18H-H267, 401675783; Kugel 1J-18H-H267, 401675784; Kugel 1K-18H-H267, 401675785; Kugel 1L-18H-H267, 401675786; Kugel 1M-18H-H267, 401675787; Kugel 1N-18H-H267, 401675788]

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 (CPR) has identified an existing well with adequate open-hole well log control within 750' of the proposed new wells. See chart below:

| <u>Well</u> | <u>API</u> | <u>Distance</u> | <u>Bearing</u> | <u>Log & Doc No.</u> |
|-------------|------------|-----------------|----------------|------------------------------|
| Kugel 2-18 | 123-15282 | 680' | NW | Dual Induction w/GR, #979258 |

CPR 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.

Thank you for your assistance with this matter. Should you have any questions or comments, please contact me at (720) 410-8478.

Respectfully,

Erin Lind
Regulatory Analyst