



**Corporate Office**

1775 Sherman Street, #3000  
Denver, Colorado 80203  
303.860.5800  
www.pdce.com

May 24, 2018

State of Colorado, Oil & Gas Conservation Commission  
Attn: Director  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: **Letter to the Director, Rule 317.p**

Elkhead-Vega 3N65W6 1-32 Pad, S2NE and Part of the S2NW Sec. 6 (See Exhibit A attached to SUA for full legal description), T3N-R65W, Weld County, Colorado

Wells: Elkhead 1N (Doc 401559096), 2N (Doc 401559200), 3N (Doc 401559486), 4N (Doc 401562604), 5N (Doc 401562739), 6N (Doc 401563322), 7N (Doc 401563554), 8N (Doc 401564361), 9N (Doc 401564487), 10N (Doc 401564689), 11N (Doc 401564864), 12N (Doc 401565106), 13N (Doc 401565237), 14N (Doc 401566255), 15N (Doc 401566450), 16N (Doc 401651935), Vega 1N (Doc 401651936), 2N (Doc 401566606), 3N (Doc 401566713), 4N (Doc 401566822), 5N (Doc 401567306), 6N (Doc 401567416), 7N (Doc 401568005), 8N (Doc 401568138), 9N (Doc 401651937), 10N (Doc 401568607), 11N (Doc 401569025), 12N (Doc 401569067), 13N (Doc 401569267), 14N (Doc 401569034), 15N (Doc 401569188), 16N (Doc 401569288)

Dear Director:

PDC Energy ("PDC") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as described above. PDC respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as adequate well log control exist in the records of offset wells drilled in the vicinity of the surface-hole location of the proposed new wells. In lieu of running an open hole log, one of the first wells drilled on the pad will be logged with Cased-hole Pulsed Neutron Log with Gamma Ray Log from kick-off point into the surface casing in addition to PDC's normal Gamma Ray/ Neutron (GR/N) log and CBL run on all wells on the pad.

The logs from the following prior-drilled well are proposed to provide adequate log coverage to characterize the geology of the area.

Well name(s) with Log	API #	Distance to well	Direction to well	Document Numbers	Type of Log
Ludwig H06-06X	05-123-25473	444'	NW	1285785	Dual Induction/Guard Log/Gamma Ray
Ludwig 2-6	05-123-14932	272'	NE	983916	Induction Log

The Cased-hole Pulsed Neutron Log with Gamma Ray Log will be run from kick-off point into the surface casing on one of the first wells drilled on the pad. The CBL and Gamma Ray/ Neutron (GR/N) logs will be run on the 5 1/2" first string, from the top of the curve to surface, on all the proposed new wells on the subject pad. The horizontal portion of each well on the pad will be logged with a measured-while-drilling Gamma Ray log and all logs will be submitted to COGCC. The Drilling Completion Report- Form 5 submitted for each well will list all logs run in that well and indicate that no open-hole logs were run. PDC hereby requests the Director to grant an exception to Rule 317.p.

If you should have any questions or concerns regarding this permit, please contact the undersigned at (303) 831-3931.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ally Ota", written in dark ink.

Ally Ota  
Regulatory Technician  
PDC Energy, Inc.