



# Kerr-McGee Oil & Gas Onshore LP

A subsidiary of Anadarko Petroleum Corporation

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Denver, CO 80202  
720-929-6000

December 13, 2018

Julie Murphy  
Director, Colorado Oil and Gas Conservation Commission  
Department of Natural Resources  
The Chancery Building  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: **Request for Exception to Rule 317.p**  
SARCHET 21-1HZ (Doc No. 401782167)  
SARCHET 21-2HZ (Doc No. 401782168)  
SARCHET 21-3HZ (Doc No. 401782172)  
SARCHET 21-4HZ (Doc No. 401782174)  
SARCHET 21-5HZ (Doc No. 401782176)  
SARCHET 21-6HZ (Doc No. 401782177)  
SARCHET 21-7HZ (Doc No. 401782178)

Township 3 North, Range 66 West  
Section 21: SWSW  
Weld County, Colorado

Dear Director Murphy:

Kerr-McGee Oil & Gas Onshore LP (“KMG”) respectfully requests approval for an exception to Rule 317.p to only run a cased-hole pulsed neutron, gamma-ray, and cement bond log from the kickoff point into the surface casing on one of the first wells drilled on this multi-well location. A cement bond log with cased-hole gamma ray log will be run on production casing or on intermediate casing if production liner is run. The other wells on this multi-well location will be logged with only a cement bond log with cased-hole gamma ray log from kickoff point into the surface casing. Rule 317.p of the Colorado Oil and Gas Commission's Rules and Regulations requires wells to be logged with a minimum of a resistivity log with gamma ray. The above-named wells are requested to be exempt from this requirement due to the proximity of existing well(s) with acceptable resistivity logs with gamma ray. The available log(s) meet the offsetting well surface hole distance and bearing requirements.

One of the first wells drilled will be logged with a cased-hole pulsed neutron, gamma ray, and cement bond log. The other wells on this multi-well location will run a cement bond and gamma ray log from the kickoff point into the surface casing. The Drilling Completion Report (Form 5) submitted for each well will indicate that no open-hole logs were run.

The existing well(s) within fifteen hundred (1500) feet with acceptable resistivity logs with gamma ray are listed in the table below:

<b>Well Name</b>	<b>Well Number</b>	<b>API Number</b>	<b>Distance From Well(s)</b>	<b>Azimuth (Degrees)</b>	<b>COGCC Well File Document Number</b>
MILLER	44-20	05-123-19948	792'	268° W	1045719
MILLER	4-28	05-123-21648	1102'	166° SSE	1485185

Should you have any questions, please contact our office. Thank you for your consideration.

Respectfully,

**Kerr-McGee Oil and Gas Onshore LP**



Erin Hampe  
Regulatory Analyst