



July 18, 2019

Mr. Jeff Robbins, 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**  
**Rio LC Pad: NWNW Section 6 T1S R67W, Adams County, Colorado**  
**Permitted Wells: Rio LC 12-376HN, 001-10457; Rio LC 12-376HC, 001-10458; Rio LC 12-375HNX, 001-10459; Rio LC 12-375HN, 001-10469; Rio LC 12-373HN, 001-10464; Rio LC 12-373HC, 001-10463; Rio LC 12-372HNX, 001-10465; Rio LC 12-372HN, 001-10471; Rio LC 12-371HN, 001-10470; Rio LC 12-370HC, 001-10460; Rio LC 12-369HNX, 001-10468; Rio LC 12-368HN, 001-10466; Rio LC 12-368HC, 001-10462; Rio LC 12-366HNX, 001-10467; Rio LC 12-366HN, 001-09945; Rio LC 12-365HN, 001-09946; Rio LC 12-365HC, 001-09947; Rio LC 12-363HNX, 001-09948; Rio LC 12-363HN, 001-09949; Rio LC 12-362HN 001-09951 ; Rio LC 12-332HN, 001-10461; Rio LC 12-242HC, 001-09950**

Dear Director,

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.

Great Western Operating Company has identified an existing well with adequate open-hole well log control within 750' of the proposed new wells. See chart below:

Well	API	Distance	Bearing	Log & Doc No.
Sack 11-6	001-09464	423'	SE	Dual Induction Guard w/Gamma Ray, Document #1219566

Great Western 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)-939-5377.

Respectfully,

Toby Sachen  
Contract Regulatory Specialist