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March 3, 2020

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**  
Grays Federal 5N65W27 1-10 Pad, SWNW, Sec. 27, T5N-R65W, Weld County, Colorado  
Wells: Grays Federal 1N (Doc 402329269), 2N (Doc 402329271), 3N (Doc 402329609), 4N (Doc 402329610), 5N (Doc 402329636), 6N (Doc 402329639), 7N (Doc 402329644), 8N (Doc 402329647), 9N (Doc 402329650), 10N (Doc 402139517)

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
Kowitz 27-5	05-123-13474	445'	SE	1002081	Dual Induction/SFL/GR

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,

Ally Ota  
Regulatory Analyst  
PDC Energy, Inc.