



June 5, 2020

Mr. Jeff Robbins, Director
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: **COGCC Rule 317.p: Open Hole Logging Exception Request**
Groves Farm 34-L Pad: NESE Section 34, Township 7 North, Range 65 West
Proposed Wells: Groves Farm M-34-33HN (Doc #402203240), Groves Farm N-34-33HC (Doc #402203241), Groves Farm O-34-33HN (Doc #402203242), Groves Farm P-34-33HN (Doc #402203243), Groves Farm Q-34-33HN (Doc #402203244), Groves Farm R-34-33HC (Doc #402203245), Groves Farm S-34-33HN (Doc #402203246), Groves Farm T-34-33HN (Doc #402203247), Groves Farm U-34-33HN (Doc #402203248), Groves Farm V-34-33HC (Doc #402203249), Groves Farm W-34-33HN (Doc #402203250), Groves Farm X-34-33HN (Doc #402203251)
Weld County, Colorado

Dear Director Robbins,

This letter is a request for an exception to the Colorado Oil and Gas Conservation Commission (COGCC) Rule 317.p, of an Open Hole Logging requirement for the wells at the location as listed above.

This request is based on adequate open-hole well log control from one (1) existing well within 750' of the location. The well, the Groves Farm 43-34 well (API # 05-123-24593), has a surface location approximately 556' southeast of the proposed Groves Farm X-34-33HN. A sufficient open-hole log for this well is filed as Doc No. 1420516 (Compensated Density/Neutron/Dual Induction/Gamma Ray) in the COGCC's database. This log can determine formation tops, bases and other stratigraphic markers by depth.

Bayswater will, upon completion of the subject wells on the Groves Farm 34-L Pad, report on Form 5 that no open hole logs were run per this exception request to Rule 317.p. Operator will log one of the first wells drilled on the pad with Cased hole Pulsed Neutron Log with Gamma Ray Log from lowest possible point within the curve section up and into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing into the surface casing. The horizontal portion of every well will be logged with a measured while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run in that well and have those logs attached. 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.

Thank you and please call the undersigned if you have any questions.

Mark E. Brown
Operations Manager