

July 21, 2020

Colorado Oil and Gas Conservation
Commission The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203
Attn: Ms. Julie Murphy, Director

RE: Request to the Director, Rule 317.p Requirement to Log Well Exception

Section 19: NENW Township 3N, Range 64 West, 6th P.M.

Weld County, Colorado

D 19-03 Well Pad:

Independence D18-759 (API # 05-123-48804)

Independence D18-767 (API # 05-123-48805)

Dear Director:

Noble Energy, Inc. ("Noble") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as noted above. Noble respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as suitable gamma ray and resistivity logs exist in the records from prior wells drilled near the surface-hole location of the proposed well(s).

The log from the following prior-drilled well is proposed to provide adequate log coverage to characterize the geology of the area and is located within 1500' of the proposed wells.

Well name(s) with Log	API Number	Distance to well	Direction to well	Log Document Number(s)	Type of Log
Butterball D19-18D	05-123-35583	<750'	S	2317440	Resistivity

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. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) 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 "Open-hole logging exception - No open-hole logs were run", and shall clearly identify the type of log and the well (by API#) in which open-hole logs were run. Noble 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 303-228-4422.

Respectfully,



Julie Webb
Sr. Regulatory Analyst