



December 14, 2022

State of Colorado, Oil & Gas Conservation Commission  
Attn: Director  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: **Letter to the Director, Rule 408.r**

Broe FD Pad, NENW Section 35, T6N-R67W, Weld County, Colorado  
Wells: Broe 01N (Doc 403238560), Broe 02NA (Doc 403238843), Broe 03C (Doc 403240183), Broe 04N (Doc 403240224), Broe 05N, (Doc 403240255), Broe 06NA (Doc 403240269), Broe 07C (Doc 403240288), Broe 08N (Doc 403240307), Broe 09N (Doc 403240320), Broe 10NA (Doc 403240330), Broe 11C (Doc 403240339), Broe 12N (Doc 403240355), Broe 13N, (Doc 403240367), Broe 14NA (Doc 403240372), Broe 15C (Doc 403240403), Broe 16N (Doc 403240457), Broe 17N (Doc 403240480), Broe 18NA (Doc 403240499), Broe 19C (Doc 403240518), Broe 20N (Doc 403240530), Broe 21C (Doc 403240561), Broe 22N (Doc 403240576), Broe 23N (Doc 403240596), Broe 24C (Doc 403240610), Broe 25NA (Doc 403240627), Broe 26N (Doc 403240646), Broe 27N (Doc 403240654), Broe 28NA (Doc 403240666), Broe 29C (Doc 403240677), Broe 30N (Doc 403240688)

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 408.r 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
Kodak 35-21	05-123-27391	592'	NW	1382803	Dual Induction/ Guard Log/ Gamma Ray

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 408.r.



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If you should have any questions or concerns regarding this permit, please contact the undersigned at (303) 831-3931.

Sincerely,

A handwritten signature in black ink, appearing to read "Ally Ota".

Ally Ota  
Regulatory Analyst  
PDC Energy, Inc.