



Kerr-McGee Oil & Gas Onshore LP

1099 18th Street, Suite 700
Denver, CO 80202
(720) 929-6000

Nov. 21, 2024

Julie Murphy
Director, Energy & Carbon Management Commission
Department of Natural Resources
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203

Request for Exception to Rule 408.r

TULIP WEST 30-1HZ (Doc. No. 403972215)	TULIP EAST 30-12HZ (Doc. No. 403976034)
TULIP WEST 30-2HZ (Doc. No. 403972386)	TULIP EAST 30-13HZ (Doc. No. 403976051)
TULIP WEST 30-3HZ (Doc. No. 403974530)	TULIP EAST 30-14HZ (Doc. No. 403976057)
TULIP WEST 30-4HZ (Doc. No. 403975147)	TULIP EAST 30-15HZ (Doc. No. 403976060)
TULIP WEST 30-5HZ (Doc. No. 403975745)	TULIP EAST 30-16HZ (Doc. No. 403976064)
TULIP WEST 30-6HZ (Doc. No. 403975792)	TULIP EAST 30-17HZ (Doc. No. 403976065)
TULIP WEST 30-7HZ (Doc. No. 403975875)	TULIP EAST 30-18HZ (Doc. No. 403976067)
TULIP WEST 30-8HZ (Doc. No. 403975890)	TULIP EAST 30-19HZ (Doc. No. 403976074)
TULIP WEST 30-9HZ (Doc. No. 403975995)	TULIP EAST 30-20HZ (Doc. No. 403976084)
TULIP WEST 30-10HZ (Doc. No. 403976006)	TULIP EAST 30-21HZ (Doc. No. 403976089)
TULIP WEST 30-11HZ (Doc. No. 403976025)	TULIP EAST 30-22HZ (Doc. No. 403976092)

Township 4 North, Range 67 West, 6th P.M.
Section 30: NW 1/4 NE 1/4
Weld County, Colorado

Dear, Director Murphy:

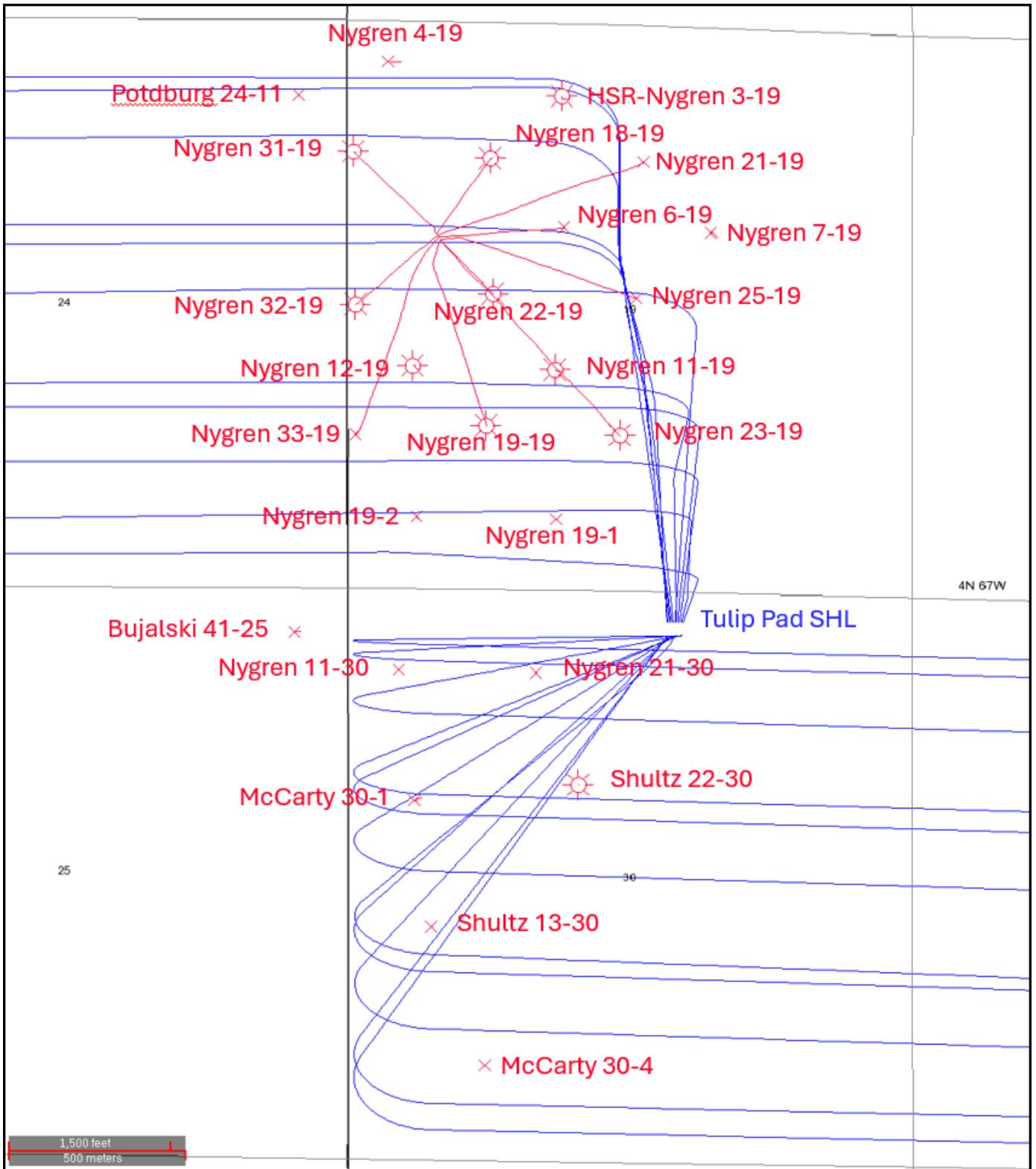
Kerr-McGee Oil & Gas Onshore LP (“KMG”) respectfully requests approval for an exception to Rule 408.r to only run a cased-hole pulsed neutron, gamma-ray, and cement bond log from the kickoff point into the surface casing on one of the first wells drilled on this multi-well location. A cement bond log with cased-hole gamma ray log will be run on production casing or on intermediate casing if production liner is run. The other wells on this multi-well location will be logged with only a cement bond log with cased-hole gamma ray log from kickoff point into the surface casing. Rule 408.r of the Energy & Carbon Management Commission's Rules and Regulations requires wells to be logged with a minimum of a resistivity log with gamma ray. The above-named wells are requested to be exempt from this requirement due to the proximity of existing well(s) with acceptable resistivity logs with gamma ray.

One of the first wells drilled will be logged with a cased-hole pulsed neutron, gamma ray, and cement bond log. The other wells on this multi-well location will run a cement bond and gamma ray log from the kickoff point into the surface casing. The Drilling Completion Report (Form 5) submitted for each well will indicate that no open-hole logs were run.

The existing wells with acceptable resistivity logs with gamma ray represent stratigraphic control for the proposed development of Tulip West and Tulip East wells listed in the table below:

Well Name	Well Number	API Number	Log Type	ECMC Document Identifier Number - Log File:
Nygren	4-19	05-123-23449	GR/RES	1390159
Podtburg	24-11	05-123-26867	GR/RES	1375461
HSR-Nygren	3-19	05-123-20453	GR/RES	1233671
Nygren	31-19	05-123-29334	GR/RES	1288568
Nygren	18-19	05-123-29332	GR/RES	1288606
Nygren	21-19	05-123-23990	GR/RES	1288399
Nygren	6-19	05-123-29333	GR/RES	1288385
Nygren	7-19	05-123-23506	GR/RES	1391028
Nygren	32-19	05-123-29327	GR/RES	1288447
Nygren	22-19	05-123-27364	GR/RES	1288609
Nygren	25-19	05-123-29331	GR/RES	1288445
Nygren	12-19	05-123-23492	GR/RES	1319822
Nygren	11-19	05-123-23491	GR/RES	1391079
Nygren	33-19	05-123-29328	GR/RES	1620386
Nygren	19-19	05-123-29326	GR/RES	1298083
Nygren	23-19	05-123-29329	GR/RES	1620591
Nygren	19-2	05-123-12053	SP/RES	1025131
Nygren	19-1	05-123-12024	SP/RES	1025137
Bujalski	41-25	05-123-20610	GR/RES	1217078
Nygren	11-30	05-123-25201	GR/RES	1369768
Nygren	21-30	05-123-26255	GR/RES	1369770
McCarty	30-1	05-123-12076	SP/RES	1025159
Shultz	22-30	05-123-25210	GR/RES	1369774
Shultz	13-30	05-123-26419	GR/RES	1369773
McCarty	30-4	05-123-12492	GR/RES	999881

Figure 1:



Should you have any questions, please contact our office. Thank you for your consideration.

Sincerely,

Kerr-McGee Oil and Gas Onshore LP

A handwritten signature in blue ink, appearing to read "Loryn Spady". The signature is fluid and cursive, with the first name "Loryn" written in a larger, more prominent script than the last name "Spady".

Loryn Spady
Regulatory Analyst