



May 14, 2025

**VIA EFORMS**  
**ATTACHMENT TO FORM 2 (DOC NO. 404049109)**

Colorado Energy and Carbon Management Commission  
Attn: Ms. Julie Murphy, Director  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

**Re: Rule 401.c.(2) Exception Location Request**  
**Ignacio 33-7 29P #1H Well**

Dear Ms. Murphy,

LOGOS Operating, LLC (“LOGOS”), respectfully makes this application to the Colorado Energy and Carbon Management Commission (“ECMC”) for an exception location for the Ignacio 33-7 29P #1H Well (API No. 30-067-10057) (hereinafter the “Subject Well”). Information pertinent to the Subject Well is set forth below:

- Operator: LOGOS Operating, LLC (Operator No. 10679)
- Well Name: Ignacio 33-7 29P #1H Well (API No. 30-067-10057)
- Legal Location: SESE of Section 29 of Township 33 North, Range 7 West, NMPM, La Plata County, Colorado (“33N-7W”)
- Anticipated Productive Formation: Mancos formation
- Spacing Order: Order No. 558-1
- Approved Spacing Unit: The following lands in 33N-7W (herein, the “Spacing Unit”):
  - Section 27: W/2
  - Section 28: E/2, NENW, S2NW, SW
  - Section 29: S2NE, SE
- Required Setbacks: 600 feet from the boundaries of the Spacing Unit
- Surface Owner: Southern Ute Indian Tribe
- Mineral Owner: Southern Ute Indian Tribe

LOGOS spud the Subject Well, a horizontal well with a lateral within the Mancos formation, on February 24, 2025. After drilling the Subject Well, LOGOS confirmed that the as-drilled well path for the Subject Well is closer than the 600-foot productive interval setback specified in ECMC Order No. 558-1. Section 2 of Order No. 558-1 states that:

“The productive interval of the wellbore will be located no closer than 600 feet from the unit boundaries, and no closer than 250 feet from the productive interval of any other wellbore located in the unit, unless the Director grants an exception.”

**LOGOS Operating, LLC**  
2010 Afton Place - Farmington, NM 87401 - Direct 505-324-4100 - Fax 505-832-3095

Specifically, LOGOS determined that the as-drilled well path for the Subject Well would, , encroach upon the required 600-foot setback from the Spacing Unit boundary by a maximum of approximately 37 feet at the "Intended First Take Point" and extends over a lateral distance of approximately 537 feet (with the encroachment narrowing as the well moves further out on the lateral). The encroachment is depicted on the portion of the as-drilled plat attached hereto as Exhibit A.

To date, LOGOS has not completed the Subject Well. Upon completion of the wellbore of the Subject Well, the encroachment of the Subject Well on the required setback from the southern boundary line of the Spacing Unit would be in violation of Section 2 of Order No. 558-1. The Mancos formation is not subject to fieldwide spacing, and the Mancos formation underlying the NWNE of Section 32 of 33N-7W is not subject to a special Spacing Order. As such, the Subject Well only encroaches upon the NWNE of Section 32 of 33N-7W. The owner of the leasehold estate covering the Mancos formation underlying the NWNE of Section 32 of 33N-7W is Enduring Resources IV, LLC ("Enduring").

ECMC Rule 401.c. provides that Operators may request in writing from the Director an exception to the Well completion location requirements of Rule 401 or any order because of geologic, environmental, topographic, or archaeological conditions, irregular sections, a Surface Owner request, or for other good cause shown. Rule 401.c further provides that the Operator will submit the written exception location request and waivers pursuant to Rule 401.c.(2).B, as attachments to the Form 2, Application for Permit to Drill.

LOGOS respectfully requests that the Director approve the exception location for the Subject Well. Enduring has been advised of the approximately 37 foot (or less) encroachment along approximately 537 feet of the boundary line between the Spacing Unit and the NWNE of Section 32 of 33N-7W. Enduring has ample experience in developing the Mancos formation and is of the opinion that an encroachment of this magnitude would not prevent future development of the Mancos formation underlying the area if such development is pursued. A signed Exception Location Waiver from Enduring is attached as Exhibit "B."

Please note that this application is being made prior to completion of the Subject Well and, therefore, prior to any violation of the setback requirements set forth in Order No. 558-1. The Exception Request is made to maximize development of the Mancos formation utilizing an already-drilled, but not yet productive, wellbore. It is LOGOS' belief that the failure to complete the Subject Well between the Intended First Take Point and the point at which the wellbore is compliant with the setbacks required in Order No. 558-1 would result in significant resource waste as it is not likely that the area would be developed by an additional Mancos formation wellbore in the future.

If any additional information is necessary to evaluate this application, please contact me by email at [cjeffus@logosresourcesllc.com](mailto:cjeffus@logosresourcesllc.com). Thank you for your consideration.

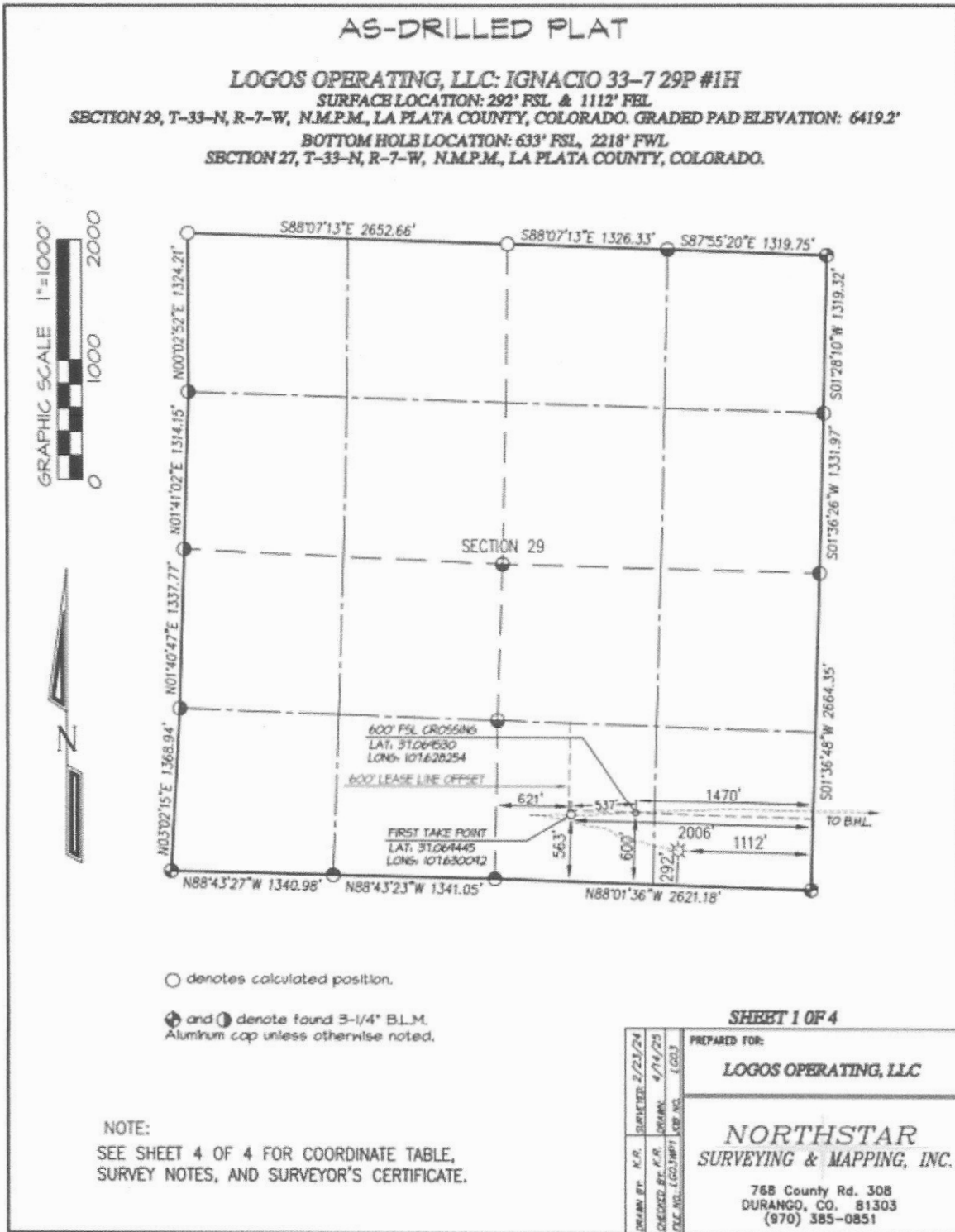
Sincerely,

A handwritten signature in black ink, reading "Christopher Jeffus", written over a horizontal line.

Christopher Jeffus  
Sr. Vice President – Land/Legal  
LOGOS Operating, LLC

Exhibit A

Portion of as-drilled plat for the Subject Well depicting encroachment on the required setback from the southern boundary line of the Spacing Unit





May 7, 2025

*Via Email*

Enduring Resources IV, LLC  
Attn: Mr. Travis Whitham  
6300 S Syracuse Way, Suite 525  
Centennial, CO 80111

**Re: Rule 401.c.(2) Exception Location Waiver Request  
Ignacio 33-7 29P #1H Well**

Dear Mr. Whitham,

On February 24, 2025, LOGOS Operating, LLC ("LOGOS") (Operator No. 10679) spud the Ignacio 33-7 29P #1H Well (API No. 30-067-10057) (hereinafter the "Subject Well"), in the SESE of Section 29 of Township 33 North, Range 7 West, NMPM, La Plata County, Colorado ("33N-7W"). The Well is subject to Colorado Energy and Carbon Management Commission ("ECMC") Order No. 558-1, which covers the following lands in 33N-7W (herein, the "Spacing Unit"):

Section 27: W/2  
Section 28: E/2, NENW, S2NW, SW  
Section 29: S2NE, SE

After drilling the Subject Well, a horizontal well with a lateral within the Mancos formation, LOGOS determined that the as-drilled well path for the Subject Well is closer than the 600-foot productive interval setback specified in ECMC Order No. 558-1. Section 2 of Order No. 558-1 states that:

"The productive interval of the wellbore will be located no closer than 600 feet from the unit boundaries, and no closer than 250 feet from the productive interval of any other wellbore located in the unit, unless the Director grants an exception."

Specifically, LOGOS determined that the as-drilled well path for the Subject Well would encroach upon the required 600-foot setback from the Spacing Unit boundary by a maximum of approximately 37 feet at the "Intended First Take Point," which point is located at the "First Take Point" depicted on Exhibit A, and extends over a lateral distance of approximately 537 feet (with the encroachment narrowing as the well moves further out on the lateral). The encroachment is depicted on the portion of the as-drilled plat attached hereto as Exhibit A from the "First Take Point" to the "600' FSL Crossing" shown on such plat.

**LOGOS Operating, LLC**

2010 Afton Place - Farmington, NM 87401 - Direct 505-324-4100 - Fax 505-832-3095

To date, LOGOS has not completed the Subject Well. Upon completion of the wellbore of the Subject Well, the encroachment of the Subject Well on the required setback from the southern boundary line of the Spacing Unit would be in violation of Section 2 of Order No. 558-1. The Mancos formation is not subject to fieldwide spacing, and the Mancos formation underlying the NWNE of Section 32 of 33N-7W is not subject to a special Spacing Order. As such, the Subject Well only encroaches upon the NWNE of Section 32 of 33N-7W. The owner of the leasehold estate covering the Mancos formation underlying the NWNE of Section 32 of 33N-7W is Enduring Resources IV, LLC ("Enduring").

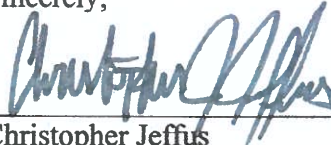
ECMC Rule 401.c. provides that Operators may request in writing from the Director an exception to the Well completion location requirements of Rule 401 or any order because of geologic, environmental, topographic, or archaeological conditions, irregular sections, a Surface Owner request, or for other good cause shown. The Director will not approve an exception location request unless the Operator demonstrates in sufficient detail that correlative rights are protected and submits with its request a waiver signed by the leased mineral interest owners. LOGOS plans to request from the ECMC Director an exception location for the Subject Well under Rule 401.c.

Given the minimal encroachment and orientation of the wellbore, LOGOS is confident that correlative rights would be protected and that this encroachment would not prevent future development of the Mancos formation underlying the encroached-upon area if such development is pursued.

For these reasons and pursuant to Rule 401.c., LOGOS respectfully requests an exception location waiver for the Subject Well from the setback requirements set forth in Order No. 558-1. If you agree to such a waiver, please indicate by executing the enclosed waiver.

For any questions regarding the Subject Well and the exception location request, please contact me by email at [cjeffus@logosresourcesllc.com](mailto:cjeffus@logosresourcesllc.com). Thank you for your consideration.

Sincerely,



Christopher Jeffus  
Sr. Vice President – Land/Legal  
LOGOS Operating, LLC

Enduring Resources IV, LLC, as Lessor under that certain Oil and Gas Lease dated April 29, 1953, effective July 20, 1953, between the Southern Ute Indian Tribe, as Lessor, and General Petroleum Corporation, as Lessee, recorded in Book 372, Page 492 of the Official Public Records of La Plata County, Colorado, hereby voluntarily waive the 600-foot productive interval setback specified in ECMC Order No. 558-1 for the Ignacio 33-7 29P #1H Well (API No. 30-067-10057), insofar as such well encroaches upon the required setback from the NWNE of Section 32 of Township 33 North, Range 7 West, NMPM, La Plata County, Colorado, in the manner depicted on Exhibit "A" attached hereto.

Accepted and agreed to this 8<sup>th</sup> day of May, 2025.

**Enduring Resources IV, LLC**

By:  \_\_\_\_\_

Name: Alex B. Campbell

Title: Vice President

Exhibit A

Portion of as-drilled plat for the Subject Well depicting encroachment on the required setback from the southern boundary line of the Spacing Unit

