



Kerr-McGee Oil & Gas Onshore LP

A subsidiary of Anadarko Petroleum Corporation

1099 18th Street
Denver, CO 80202
720-929-6000

September 23, 2015

Matt Lepore
Director, Colorado Oil and Gas Conservation Commission
Department of Natural Resources
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: Request for Exception to Rule 317.p
HIGHLANDS 27C-33HZ (Doc No. 400882453)
HIGHLANDS 15C-9HZ (Doc No. 400882454)
HIGHLANDS 15N-9HZ (Doc No. 400882455)
HIGHLANDS 16C-9HZ (Doc No. 400882456)
HIGHLANDS 1N-33HZ (Doc No. 400882457)
HIGHLANDS 26C-33HZ (Doc No. 400882458)
HIGHLANDS 26N-33HZ (Doc No. 400882459)
HIGHLANDS 27N-33HZ (Doc No. 400882460)
HIGHLANDS 28N-33HZ (Doc No. 400882461)
HIGHLANDS 2C-33HZ (Doc No. 400882462)
HIGHLANDS 2N-33HZ (Doc No. 400882463)
HIGHLANDS 36C-9HZ (Doc No. 400882464)
HIGHLANDS 36N-9HZ (Doc No. 400882465)
HIGHLANDS 37N-E9HZ (Doc No. 400882466)
HIGHLANDS 37N-W9HZ (Doc No. 400882467)
HIGHLANDS 38N-9HZ (Doc No. 400882468)
Township 1 North, Range 66 West
Section 9: NENE & NWNE
Weld County, Colorado

Dear Director Lepore:

Kerr-McGee Oil & Gas Onshore LP (“KMG”) respectfully requests approval for an exception to Rule 317.p 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 317.p of the Colorado Oil and Gas 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. The available log(s) meet

the offsetting well requirements and have a surface location within seven hundred fifty (750) feet of the proposed well(s).

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 well(s) within seven hundred and fifty feet (750) with acceptable resistivity logs with gamma ray are listed in the table below:

Well Name	Well Number	API Number	Distance From Well(s)	Azimuth (Degrees)	COGCC Well File Document Number
FT LUPTON HIGHLANDS	31-9	05-123-23765	573	245	1382796
FT LUPTON HIGHLANDS	41-9	05-123-22626	437	125	1440485

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

Sincerely,

Kerr-McGee Oil & Gas Onshore LP



Ronett Powers
Regulatory Analyst II