

April 12, 2018

Ms. Julie Murphy, Director
Colorado Oil & Gas Conservation Commission
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: **COGCC Rule 317.p: Open Hole Logging Exception Request**
KTC Farms 35-A Pad: NWNW Section 35, Township 7 North, Range 66 West

Proposed Wells:

**KTC Farms A-35-36HN, Doc #401465279, KTC Farms B-35-36HC, Doc #401465355,
KTC Farms BA-35-36HN, Doc #401465637, KTC Farms C-35-36HN, Doc #401465691,
KTC Farms D-35-36HN, Doc #401465713, KTC Farms E-35-36HC, Doc #401465751,
KTC Farms EA-35-36HN, Doc #401465782, KTC Farms F-35-36HN, Doc #401465870,
KTC Farms G-35-36HN, Doc #401465878, KTC Farms H-35-36HC, Doc #401465892,
KTC Farms HA-35-36HN, Doc #401465898, KTC Farms I-35-36HN, Doc #401465912,
KTC Farms J-35-36HN, Doc #401465924, KTC Farms K-35-36HC, Doc #401465940,
KTC Farms KA-35-36HN, Doc #401465975, KTC Farms L-35-36HN, Doc #401465982**
Weld County, Colorado

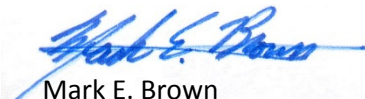
Dear Director Murphy,

This letter is a request for an exception to the Colorado Oil and Gas Conservation Commission (COGCC) Rule 317.p, of an Open Hole Logging requirement for the wells at the location as listed above.

This request is based on adequate open-hole well log control from one (1) existing well within 750' of the location. The well, the Wilson 1-35 well (API # 05-123-11540), has a surface location approximately 613' east of the proposed KTC Farms F-35-36HN. A sufficient open-hole log for this well is filed as Doc No. 10057604 (Dual Induction/Gamma Ray) in the COGCC's database. This log can determine formation tops, bases and other stratigraphic markers by depth.

Bayswater will, upon completion of the subject wells on the KTC Farms 35-A Pad, report on Form 5 that no Open hole logs were run per this exception request to Rule 317.p. Operator will log one of the first wells drilled on the pad with Cased hole Pulsed Neutron Log with Gamma Ray Log from TD 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 "No open-hole logs were run" and shall reference the Rule 317.p Exception granted for the well.

Thank you and please call the undersigned if you have any questions.



Mark E. Brown
Operations Manager