



April 9, 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**
Hester Farms II 31-H Pad: Lot 2 NW Section 31, Township 7 North, Range 66 West
Proposed Wells: Hester Farms II A-31-32HN, Doc #401500952, Hester Farms II B-31-32HN, Doc #401500953, Hester Farms II C-31-32HN, Doc #401500954, Hester Farms II D-31-32HC, Doc #401500955, Hester Farms II E-31-32HN, Doc #401500956, Hester Farms II F-31-32HN, Doc #401500958, Hester Farms II G-31-32HN, Doc #401500959, Hester Farms II H-31-32HC, Doc #401500960, Hester Farms II I-31-32HN, Doc #401500961, Hester Farms II J-31-32HN, Doc #401500962, Hester Farms II K-31-32HN, Doc #401500964, Hester Farms II L-31-32HC, Doc #401500966

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 two (2) existing wells within 1500' of the location. The first well, the Tjaden 36-14 well (API # 05-123-23893), has a surface location approximately 1265' west of the proposed Hester Farms II F-31-32HN. A sufficient open-hole log for this well was filed as Doc No. 1407364 (Dual Induction/ Gamma Ray) in the COGCC's database. The second well, the Hester 31-23 well (API # 05-123-25183), has a surface location approximately 367' southeast of the proposed Hester Farms II F-31-32HN. The open-hole log for this well is filed as Doc No. 700028066 (LAS/Dual Induction/Compensated Density/Neutron/Gamma Ray) in the COGCC's database. Together these logs can determine formation tops, bases and other stratigraphic markers by depth.

Bayswater will, upon completion of the subject wells on the Hester Farms II 31-H 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.

A handwritten signature in blue ink, appearing to read 'Mark E. Brown', is written over a light blue rectangular background.

Mark E. Brown
Operations Manager