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May 28, 2015

Colorado Oil and Gas Conservation Commission
The Chancery Building
1120 Lincoln Street, Suite 801
Denver, CO 80203
Attn: Mr. Matt Lepore, Director

RE: **Letter to the Director, Rule 317.p**
Wells Ranch AE32-650, AR32-645, AE32-640 and AE32-635
Section 32 NW/4NW/4: Township 6 North, Range 62 West, 6th P.M.
Weld County, Colorado

Dear Director:

Noble Energy, Inc. ("Noble") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as described above. Noble respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as suitable gamma ray and resistivity logs exist in the records from prior wells drilled in the vicinity of the surface-hole location of the proposed new well(s).

The logs from the following prior-drilled well are proposed to provide adequate log coverage to characterize the geology of the area are located within 1500' of the subject well(s).

Well name(s) with Log	API Number	Log Document Number(s)
Wells Ranch AE32-05	05-123-30489	1290646
Wells Ranch US AE31-09P	05-123-29065	2547092

One of the first wells drilled on the multi-well location will be logged with cased-hole pulsed neutron, gamma-ray, and cement bond logs from TD into the surface casing. The other wells on the multi-well location will be logged with only a cement bond log with cased-hole gamma-ray log from TD into the surface casing. The stratigraphy in the well logged with cased-hole pulsed neutron and gamma-ray can be described by correlating the cased-hole logs with existing open-hole resistivity and gamma-ray well log control in offsetting wells. The stratigraphy in the wells logged with only a cement bond log with cased-hole gamma-ray log can be described by correlating the cased-hole gamma-ray log with the cased-hole pulsed neutron and gamma-ray logs run in the one well. The depth of the surface casing in all the wells can be verified by the attenuation of either or both the gamma-ray and the cement bond log at the surface casing shoe. The coverage of aquifers in all the wells can be verified through the combination of the description of the stratigraphy and the verification of the depth of surface casing. Logging program description provided as a Drilling/Completion Operations BMP on every Form 2 on the multi-well location, including a description of the Form 5 requirements. Rule 317.p Exception Request Letter attached to the Form 2 (letter requirements below). The Form 5 for each well 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." Noble hereby requests the Director to grant an exception to Rule 317.p.

If you should have any questions or concerns regarding this permit, please contact the undersigned at 303-228-4000.

Respectfully,

Jan Kajiware
Regulatory Analyst III