

November 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**
Leffler 26-A Pad: NWNW Section 26, Township 7 North, Range 66 West
Proposed Wells: Leffler A-26-28HN Doc #401796677, Leffler BA-26-28HC Doc #401796679,
Leffler B-26-28HN Doc #401796678, Leffler C-26-28HN Doc #401796680,
Leffler D-26-28HN Doc #401796681, Leffler EA-26-28HN Doc #401796684,
Leffler E-26-28HC Doc #401796682, Leffler F-26-28HN Doc #401796685,
Leffler G-26-28HN Doc #401796686, Leffler H-26-28HC Doc #401796688,
Leffler HA-26-28HN Doc #401796689, Leffler I-26-28HN Doc #401796690,
Leffler J-26-28HN Doc #401796691, Leffler K-26-28HC Doc #401796692,
Leffler KA-26-28HN Doc #401796693, Leffler L-26-28HN Doc #401796694
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 two (2) existing wells within 1500' of the location and with a difference in bearing from the proposed well of more than 90 degrees. The first well, the Leffler 41-27 well (API # 05-123-26688), has a surface location approximately 721' west of the proposed Leffler H-26-28HC. A sufficient open-hole log for this well was filed as Doc No. 1544903 (Compensated Density/Neutron/Gamma Ray) in the COGCC's database. The second well, the Magnusson 1-23 well (API # 05-123-11293), has a surface location approximately 874' northeast of the proposed Leffler A-26-28HN. The open-hole log for this well is filed as Doc No. 989432 (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 Leffler 26-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.



BAYSWATER
EXPLORATION & PRODUCTION, LLC

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

Respectfully,

Aaron Cross
Permitting Technician
Agent for Bayswater Exploration & Production, LLC