



## Petroleum Development Corporation

1775 Sherman Street, Suite 3000, Denver, CO 80203

Ph: (303) 860-5800, Fax: (303) 860-5838

July 15, 2009

Department of Natural Resources  
Oil and Gas Conservation Commission  
The Chancery Building  
1120 Lincoln St., Suite 801  
Denver, CO 80203

Re: Chevron 12C-7D Refile  
API # 05-045-14269

To Whom It May Concern:

Petroleum Development Corporation ("PDC") is in possession of a letter from David Neslin, COGCC Director, to Williams Production RMT Company, dated June 19, 2009 (the "Letter"), discussing certain refile circumstances under the new rules. I understand that the COGCC staff is currently working on a guidance document for refiling under various circumstances. However, as there is no guidance document as of yet regarding these particular set of circumstances (i.e. refiling a permit for a location that has already been built), PDC would like to submit under guidance set out in the Letter until such time as a public guidance document is available.

Similar to Williams' stated situation in the Letter, the location for the Chevron 12C-7D was built prior to the effective date of amended rules under a previously approved permit. In order to address the concerns Director Neslin set out in the Letter and to follow the intent of the one year expiration of drilling permits, PDC would like to state the following:

- There is no further surface disturbance planned;
- No variance is created under 306.c.(1)A. or 306.d.(1).;
- The location does not fall within a Restricted Surface Occupancy area.

In order to prevent expiration of the existing permit while waiting for the guidance document, and to minimize gaps in the drill schedule, PDC respectfully requests that the COGCC begin the approval process for this location. Please don't hesitate to contact me with any questions. I can be reached at 303-860-5803, or via e-mail at [sgarrett@petd.com](mailto:sgarrett@petd.com).

Sincerely,

Sarah M. Garrett  
Landman/Permit Agent