



# Petroleum Development Corporation

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March 9, 2009

State of Colorado  
Oil & Gas Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, CO 80203

Re: **Rule 318A.a., A.c. Waiver**  
Brown 20ND, Brown 20MD, Ryland 31-20D  
Ryland 32-20D, Brown 20AD, Brown 20OD  
Weld County, Colorado

Dear Director:

Per rule 318A.a. and 318A.c., Petroleum Development Corporation is requesting a surface location waiver for the above-captioned wells, located in the SENW of Section 20, T4N, R67W.

The locations were moved to this location outside of a GWA window and not within 50' of an existing well per the request of the surface owner. This location is a good location to both reduce the impact on the surface owner and to increase the number of wells reachable from one well pad to minimize surface disturbance.

We respectfully request that you approve this waiver per the request of the surface owners and to reduce the impact on surface operations. Attached is the surface location waiver.

If you have any questions, please contact Sarah Garrett at 303-860-5800.

Thank you,

Sarah M. Garrett  
Landman  
Petroleum Development Corporation