



**Corporate Office**

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January 24, 2011

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

Re: **Rule 318A.a., 318A.c., 318A.e.**  
Wilson 34-34H  
Township 7 North, Range 63 West  
Section 34: SESE  
Weld County, Colorado

Dear Director,

Petroleum Development Corporation doing business as PDC Energy ("PDC") hereby certifies to the Director that PDC owns all minerals in the proposed 320 acre wellbore spacing unit in the E2 of Section 34, Township 7N, Range 63W; therefore, no 20-day notice is needed to owners in the proposed wellbore spacing unit. This horizontal well location crosses existing unit boundaries and requires the formation of the proposed unit. Please see the attached spacing unit map which certifies that the SE $\frac{1}{4}$  and NE $\frac{1}{4}$  of Section 34 will have no more than eight (8) bottom-hole locations in each governmental 160 acre unit each producing from the Niobrara/Codell formation.

In addition, per rule 318A.a. and 318A.c., PDC requests a surface location waiver for the above-captioned well. The location is outside of a GWA window and not within 50' of an existing well. 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. Attached is the surface location waiver.

We respectfully request that you approve this waiver and proposed spacing unit. If you should have any questions or concerns regarding this permit, please contact the undersigned at (303) 860-5800.

Sincerely,

A handwritten signature in blue ink that reads "Liz Lindow".

Liz Lindow  
Permit Analyst  
PDC Energy