



Corporate Office

1775 Sherman Street, #3000
Denver, Colorado 80203
303.860.5800
www.petd.com

January 21, 2011

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

Re: **Rule 318A.a., A.c. Waiver, Rule 603.a.2 Waiver, Rule 318Ae, proposed spacing unit**
Coors Energy 14-25H, SWSW, Section 25, T3N, R64W, Weld County, Colorado

Dear Director:

Per rule 318A.a., 318A.c., 603.a.2, Petroleum Development Corporation doing business as PDC Energy ("PDC") is requesting a surface location waiver for the above-captioned well. The locations were moved to this location outside of a GWA window, is not within 50' of an existing well per the request of the surface owner, and will be drilled closer than 150' from the nearest property line. 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 are the surface location waivers.

Furthermore, PDC hereby certifies to the Director that PDC owns all minerals in the proposed 320 acre wellbore spacing unit in the S2 of Section 25, Township 3N, Range 64W; 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 SW $\frac{1}{4}$ and NW $\frac{1}{4}$ of Section 17 will have no more than eight (8) bottom-hole locations in each governmental 160 acre unit each producing from the Niobrara/Codell formation. PDC hereby requests the Director's approval.

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, appearing to read "Liz Lindow".

Liz Lindow
Regulatory Analyst
PDC Energy