



Corporate Office

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9/28/2011

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

Re: **Rule 318Ae – Proposed Spacing Unit**
Spaur 41-31H
Township 7 North, Range 63 West
Section 31: N2
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 31, 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. PDC hereby requests the Director to approve the well.

Please see the attached spacing unit map which certifies that the NW $\frac{1}{4}$ and NE $\frac{1}{4}$ of Section 31 will have no more than eight (8) bottom-hole locations in each governmental 160 acre unit producing from the Niobrara formation.

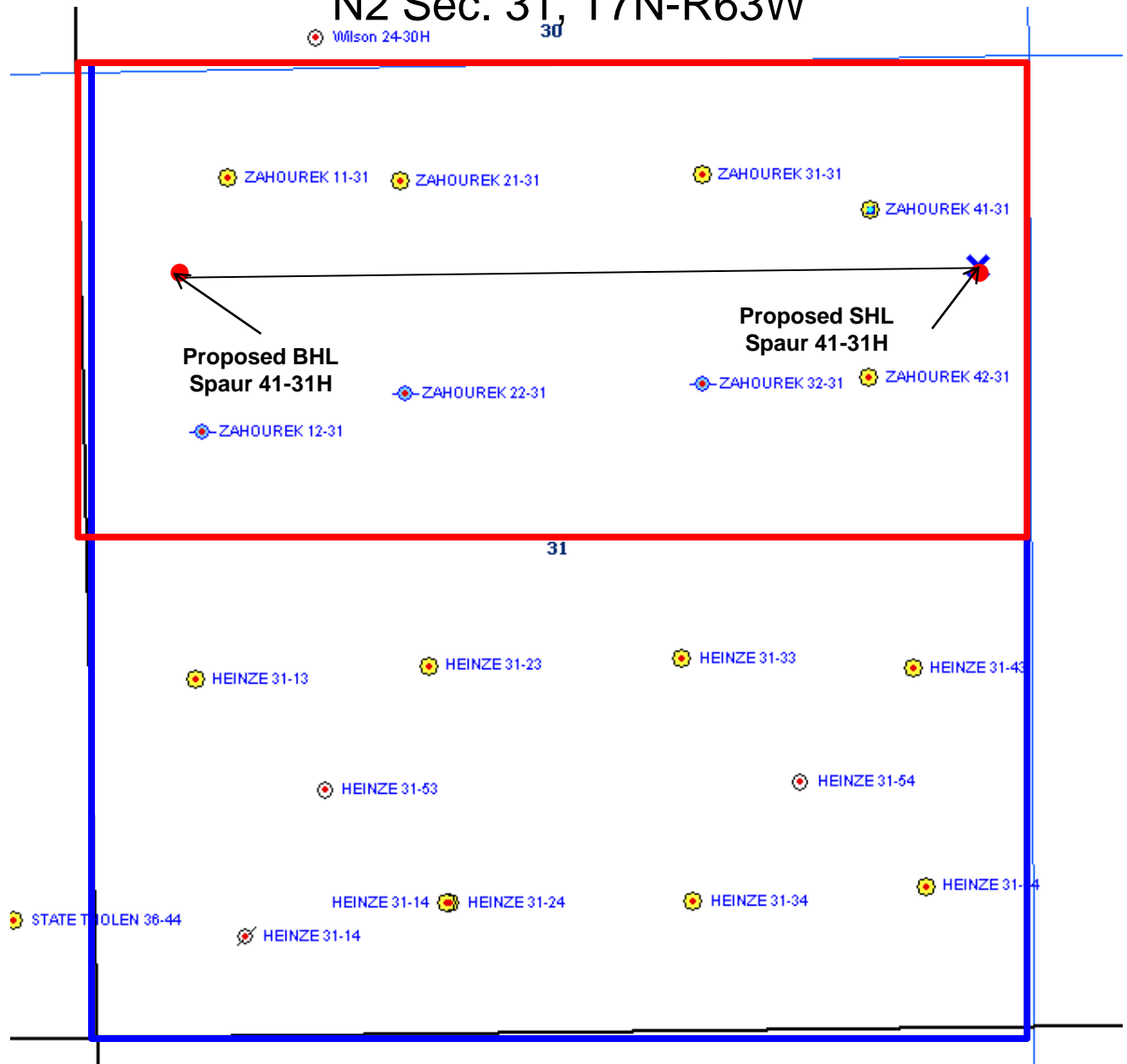
If you should have any questions or concerns regarding this permit, please contact the undersigned at (303) 860-5800.

Sincerely,

A handwritten signature in blue ink, appearing to read "Liz Lindow".

Liz Lindow
Permit Analyst
PDC Energy

Spaur 41-31H N2 Sec. 31, T7N-R63W



Legend



Proposed 320 acre Spacing Unit



Sec. 31, T7N, R63W

The NE $\frac{1}{4}$ and NW $\frac{1}{4}$ of Section 31 will have no more than 8 bottom-hole wells each producing from the Niobrara formation.