



Corporate Office

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

January 25, 2012

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

Re: **Rule 318A.a., A.c. Waiver**
Thornton 19X-404
NESE, Section 19, T7N, R66W
Weld County, Colorado

Dear Director:

Per rule 318A.a. and 318A.c., Petroleum Development Corporation doing business as PDC Energy ("PDC") is requesting a surface location waiver for the above-captioned well.

The location was moved to this location outside of a GWA window and is 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.

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 the undersigned at 303-860-5800.

Sincerely,

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

Liz Lindow
Regulatory Analyst
PDC Energy