



**Corporate Office**

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March 16, 2012

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

Re: **Rule 318A.a., A.c. Waiver**  
Spaur 31V-214, 31V-204, 31V-404, 31W  
NENE Section 31, T7N, R63W  
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 wells.

The locations were moved to this location outside of a GWA window and are 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