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October 1, 2014

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

Re: **Letter to the Director, Rule 317.p**
Jacobucci 1N67W32O Pad, NESW, Section 32 T1N R67W, Weld County, Colorado
Wells: 32O-203, 32O-303, 32O-423, 32O-443

Dear Director:

PDC Energy ("PDC") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as described above. PDC respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as suitable gamma ray and resistivity logs exist in the records from prior wells drilled in the vicinity of the surface- hole location of the proposed new well(s).

The logs from the following prior-drilled well are proposed to provide adequate log coverage to characterize the geology of the area.

Well name(s) with Log	API #	Distance to well	Direction to well	Document Numbers	Type of Log
Jacobucci 23-32	123-21328	365'	SW	1210265, 1332958, 1332960	Cement Bond Log/Gamma Ray/ Collar Correlation, Compensated Density/Compensated Neutron/Gamma Ray, Dual Induction/Guard Log/Gamma Ray
David Howard 3	123-07936	845'	NW	913363, 913361, 913362	Induction, Gamma Ray, Density

CBL and gamma logs will be run on the 7" first string, from the top of the curve to surface, on the proposed new well(s), and submitted to COGCC. The horizontal portion of each well on the pad will be logged with a measured-while-drilling Gamma Ray. The Drilling Completion Report- Form 5 submitted for each well will indicate that no open-hole logs were run. PDC hereby requests the Director to grant an exception to Rule 317.p.

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

Sincerely,

Kelsi Welch
Regulatory Analyst
PDC Energy, Inc.