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February 13, 2015

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**
Stroh 13GK-HZ Pad, NESW, Section 13 T4N R67W, Weld County, Colorado
Wells: Stroh 13O-403 (doc# 400792106) and Stroh 13O-223 (doc# 400792065)

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
Stroh O 13-20	05-123-29531	321'	NW	1298755, 128756	Dual Induction/Guard Log/Gamm Ray, Compensated Density/Compensated Neutron Microlog
UPRC 13-11E	05-123-15320	383'	SE	1050035, 1050036	Induction Log, Gamma Ray Log
Stroh O 13-21D	05-123-30040	378'	SE	1542184, 1542183	Cement Bond/Gamma Ray/ Collar Correlation Log, Array Comp/True Resistivity/Spectral Density/ Dual Spaced Neutron Log

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.

Sincerely,

Kelsi Welch
Regulatory Analyst
PDC Energy, Inc.