

318.A.n GWA Minimum Interwell Distance Variance Waiver

PDC Energy, Inc. as Operator of the following subject well:

Jacobucci 32s-423 to be located in NWSE, Sec. 32 T1N R67W:

Hereby requests a GWA Minimum Interwell Distance waiver from KERR MCGEE OIL & GAS ONSHORE LP the offset operator of the following well that is estimated to be closer than 150' to the subject well.

Howard 24-32 (05-123-33725, SWNE) which is located in Section 32 T1N R67W

Prusuant to the following Colorado Oil and Gas Conservation Commission ("COGCC") Rule 318.A.n.:

Minimum interwell distance. *No horizontal wellbore lateral shall be located less than 150 feet from any existing or permitted (producing, shut-in, or temporarily abandoned) oil or gas wellbore as illustrated in the directional survey for drilled wellbores or as illustrated in the deviated drilling plan for permitted wellbores or as otherwise reflected in the COGCC well records. This requirement may be waived in writing by the operator of the encroached upon well.*

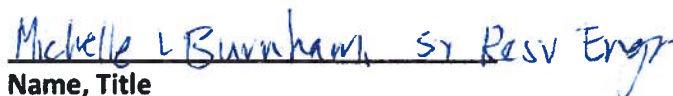
The following BMP will be applied to the permit: *Prior to drilling operations, Operator will perform an anti-collision scan of existing offset wells that have the potential of being within close proximity of the proposed well. This anti-collision scan will include definitive MWD or gyro surveys of the offset wells with included error of uncertainty per survey instrument, and compared against the proposed wellpath with its respective error of uncertainty. If current surveys do not exist for the offset wells, Operator may have gyro surveys conducted to verify bottomhole location. The proposed well will only be drilled if the anti-collision scan results indicate that there is not a risk for collision, or harm to people or the environment. For the proposed well, upon conclusion of drilling operations, an as-constructed gyro survey will be submitted to COGCC with the Form 5.*

As the offset operator or a designated representative thereof, I understand that the subject well will be potentially drilled within 150' of the offset well listed above. I hereby give my consent for PDC to drill the subject well.

OPERATOR: KERR MCGEE OIL & GAS ONSHORE LP


Signature


Date


Name, Title