

Surface Location Exception Waiver
(Rule 318A.a. and 318A.c.)

PDC Energy, Inc. as Operator of the following proposed well(s):

Fern 11U-204, Fern 11U-434, Fern 11U-334, Fern 11V-214, Fern 11V-304, Fern 11V-204, Fern 11V-334, Fern 11V-234, Fern 11W-314, Fern 11W-214
Township 5 North, Range 65 West, 6th P.M.
Section 11: Northwest Quarter of the Northwest Quarter
Tax Parcel Number(s): 096111000018
Weld County, Colorado

Hereby requests a Surface Location Exception Waiver from: ***Jack L. Allmer and Charles H. Bennett***, owner of the surface for the aforementioned well location(s).

Pursuant to the following Colorado Oil and Gas Conservation Commission ("COGCC") Rule:

Rule 318A.a. GWA, GWA wells, GWA windows and unit designations

COGCC Rule 318A.a designates five "drilling windows" per quarter section of land in the Greater Wattenberg Area (GWA) – 400'x400' boxes in the center of each quarter/quarter section, and an 800'x800' box in the center of the quarter section.

Rule 318A.c. Surface locations

COGCC Rule 318A.c. also states that certain well locations must be "twinned" (located within fifty (50) feet of an existing well).

A complete copy of the COGCC rules and policies is available at the following website: <http://cogcc.state.co.us/>.

Signature Page Follows

