



**Corporate Office**

1775 Sherman Street, #3000  
Denver, Colorado 80203  
303.860.5800  
www.petd.com

March 16, 2012

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

Re: **Letter to the Director, Rule 318A.m.**  
Spaur 31V-214  
NENE, Section 31, T7N, R63W  
Weld County, Colorado

Dear Director:

Per rule 318A.m., Petroleum Development Corporation doing business as PDC Energy ("PDC") is requesting a GWA Minimum Intra-well Distance waiver for the above-captioned well. The proposed well will be less than 150' to Zahourek 41-31 (API# 123-27287, NENE), Zahourek 31-31 (API# 123-27283, NWNE), Zahourek 11-31 (API# 123-27284, NWNW), and Zahourek 21-31 (API # 123-27285, NENW) which are located in Section 31 T7N R63W and operated by PDC. Since the encroached wells are operated by the same operator as the proposed well, no other waivers are needed.

**Proposed Anti-Collision Mitigation BMP:**

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.

Due to the reasons above, PDC respectfully requests that you approve this request.

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