



---

**Corporate Office**

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

Dear Sirs,

PDC Energy requests expedited approval of the APD (400307563) for the Shirk-Miller 3-2 (C NE NW 2 6N 63W 6 PM). The Shirk-Miller is an older DA completion and, while plugged in accordance with COGCC regulations in place at the time of plugging, has been identified as a borehole that re-entry and re-plugging will accord current best management practices.

PDC Energy plans to develop the acreage adjacent to the Shirk-Miller and has been negotiating with COGCC the re-plugging procedure of older boreholes prior to new drilling operations, a situation that will become increasingly common as the horizontal play develops in the Wattenberg area. While developing this procedure with COGCC preparations to drill a new horizontal well have been completed but the Shirk-Miller must first be re-plugging. The time that has passed while preparing the re-plugging procedure has created a need to request this APD be expedited in accordance with COGCC rule 303.I.2, that Due to exigent circumstances, ... significant economic hardship to an operator in the form of drilling standby charges will result.

PDC has received and provided to COGCC waivers of the notification period from the LGD and the surface owner and with this letter requests COGCC expedite and grant the Shirk-Miller 3-2 APD. Form 2A has not been filed because no pits will be constructed for the re-plugging operation.

Best Regards,

  
Jeff Glossa