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www.nobleenergyinc.com



August 28, 2012

Colorado Oil and Gas Conservation Commission  
The Chancery Building  
1120 Lincoln Street, Suite 801  
Denver, CO 80203  
Attn: Mr. Matt Lepore, Director

RE: **Request to the Director for 318A.m. GWA Minimum Intrawell Distance Exception  
Wells Ranch State USX AA16-63-1HNL**  
Niobrara New Drill  
Township 6 North, Range 63 West, 6th P.M.  
Section 14: SW/4SW/4: 703' FSL & 247' FWL (Surface Location)  
Weld County, Colorado

Dear Director:

Noble Energy Inc. (NEI) is planning to drill the above mentioned well to the Niobrara formation(s).

The lateral path of NEI's proposed horizontal well will be less than the 150' minimum distance from another well(s) as required by Rule 318A.m. (see wells listed below). Noble is not the Operator of the encroached upon wells; waiver attached. Please see Noble's Anti-Collision Mitigation BMP noted below.

Wells Ranch 44-15  
API No. 05-123-23138  
Operator: PDC  
SESE 15 6N 63W 6PM

Wells Ranch 34-15  
API No. 05-123-23140  
Operator: PDC  
SWSE 15 6N 63W 6PM

Wells Ranch 24-15  
API No. 05-123-23142  
Operator: PDC  
SESW 15 6N 63W 6PM

**Anti-collision:**

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.

Noble respectfully requests that the COGCC review the enclosed information and approve the requested exception location Application for Permit to Drill the captioned well.

Respectfully,

Justin Garrett  
Regulatory Specialist

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Suite 2200  
Denver, Colorado 80202  
Tel: 303.228.4000  
Fax: 303.228.4280



August 30, 2012

Certified Mail Article # 7011 3500 0000 7189 3656<sub>(2)</sub>

PDC Energy, Inc.  
Attn: Mr. Eric Swenson  
1775 Sherman Street, Suite 3000  
Denver, CO 80203

RE: Minimum Intra-Well Distance Waiver – COGCC Rule 318A m.  
Wells Ranch State USX AA16-63-1HNL Horizontal Well  
Section 15 T6N-R63W, 6<sup>th</sup> P.M.  
Weld County, Colorado

Dear Mr. Swenson:

Noble Energy Inc. ("Noble") plans to drill the Wells Ranch State USX AA16-63-1HNL Horizontal Well (the "Well"), with a wellbore lateral as depicted on the enclosed plat.

Our records indicate that PDC Energy, Inc. operates the following wells which may be located within 150' from our proposed horizontal wellbore lateral:

**Wells Ranch 24-15   Wells Ranch 44-15   Wells Ranch 34-15**

Colorado Oil and Gas Conservation Commission ("COGCC") Rule 318A m. provides that no horizontal wellbore lateral shall be located less than one hundred fifty (150') feet from any existing or permitted oil or gas wellbore, but this requirement may be waived in writing by the operator of the encroached upon well.

Noble respectfully requests that PDC Energy, Inc. waive this requirement and allow Noble to drill the Well as proposed. Accordingly, by executing this letter, Petroleum Development Corporation waives COGCC Rule 318A m. and grants its consent to allow Noble to drill the Well within the 150' minimum intra-well distance provided for in said rule.

If you have any questions or need any additional information, please call me at (720) 587-2237.

Very truly yours,  
**NOBLE ENERGY, INC.**



Matthew R. Campbell  
Land Negotiator

Enclosure

**PDC ENERGY, INC.**


By:

Printed

Name:

Title:

Date:

  
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*Eric Swenson*  
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*Regional Landman*  
\_\_\_\_\_  
*9-10-12*