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

December 19, 2012

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

Re: **Letter to the Director, Rule 318A.m.**  
Richter 34U-203  
SESE, Section 27, T7N, R64W  
Weld County, Colorado

Dear Director:

Per rule 318A.m., PDC Energy, Inc. ("PDC") is requesting a GWA Minimum Intrawell Distance waiver for the above-captioned well. The proposed well will be less than 150' to Dyer USX AB 35-68-1HN (API # 123-34773, NENE), and Dyer USX AB 35-67-1HN (API # 123-34772, NENE) which are located in Section 34 T7N R64W and operated by PDC. Waiver from the operator of the offset well(s) is attached.

**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 or at [liz.lindow@pdce.com](mailto:liz.lindow@pdce.com).

Sincerely,

A handwritten signature in blue ink, appearing to read "Liz Lindow", written over the word "Sincerely,".

Liz Lindow  
Regulatory Analyst  
PDC Energy, Inc.

## 318(I)A.m. Minimum Intrawell Distance Waiver

PDC Energy, as Operator of the following well:

Richter 34U-203 (104.53766'N and -104.53116'W)

Section 27 T7N R64W 6<sup>th</sup> PM

Weld County, Colorado

Hereby requests a 318(I)A.m. Minimum Intrawell Distance Waiver from NOBLE ENERGY, INC.

*RULE 318(I)A.m. states: No horizontal wellbore lateral shall be located less than one hundred fifty (150) feet from any existing or permitted 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 Richter 34U-203 will come within 150' of Dyer USX AB 35-68-1HN (API # 123-34773, NENE) and Dyer USX AB 35-67-1HN (API # 123-34772, NENE ) which are located in Section 34 T7N R64W and operated by Noble Energy, Inc. ("Noble"). Noble hereby waives any requirements to comply with COGCC Rule 318(I)A.m. for the subject well.



Signature

Gerald T. Sullivan

Name

Sr. Land Negotiator

Title

December 18, 2012

Date

ms  
HAK