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October 1, 2014

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

Re: **Letter to the Director, Rule 317.p**  
Jacobucci 1N67W32K Pad, NWSW, Section 32 T1N R67W, Weld County, Colorado  
Wells: 32K-243, 32K-323, 32K-103, 32K-443

Dear Director:

PDC Energy ("PDC") intends to drill and produce the above referenced horizontal oil and gas well(s), to be located as described above. PDC respectfully requests the Director to approve an exception to Rule 317.p for the referenced proposed wells, as suitable gamma ray and resistivity logs exist in the records from prior wells drilled in the vicinity of the surface- hole location of the proposed new well(s).

The logs from the following prior-drilled well are proposed to provide adequate log coverage to characterize the geology of the area.

Well name(s) with Log	API #	Distance to well	Direction to well	Document Numbers	Type of Log
Jacobucci 4	123-09829	575'	SW	985402, 985401	Induction, Density
Jacobucci 13-32	123-20024	633'	SW	1045469, 1068015, 1045468, 1068018	Density, CBL/GR/CCL, Induction, Lithology Strip
David Howard 6	123-09675	902'	NW	974854, 974853	Density, Induction

CBL and gamma logs will be run on the 7" first string, from the top of the curve to surface, on the proposed new well(s), and submitted to COGCC. The horizontal portion of each well on the pad will be logged with a measured-while-drilling Gamma Ray. The Drilling Completion Report- Form 5 submitted for each well will indicate that no open-hole logs were run. PDC hereby requests the Director to grant an exception to Rule 317.p.

If you should have any questions or concerns regarding this permit, please contact the undersigned at (303) 860-5800 or Kelsi.Welch@pdce.com.

Sincerely,

Kelsi Welch  
Regulatory Analyst  
PDC Energy, Inc.