

1801 Broadway
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Callie Fiddes
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January 9, 2015

COGCC
1120 Lincoln Street, Suite 801
Denver, CO 80203

Re: Operator Request Letter to Rule 318A.n.
Marcus LD 11-377HC
Section 34, Township 1 North, Range 67 West, 6th P.M.
Weld County, Colorado

Dear Director:

Great Western Operating Company is applying for a drilling permit for the above captioned well. As currently planned, the wellbore(s) of the following well(s) will lie within 150 feet of the horizontal lateral of the captioned well: **Gutherie #11-2 Api#: 05-123-09123**

Prior to drilling operations, the Operator will perform an anti-collision review of existing offset wells that have the potential of being within close proximity of the proposed well. This anti-collision review may include MWD or gyro surveys and surface locations of the offset wells with included error of uncertainty per survey instrument, and compared against the proposed well path with its respective error of uncertainty. If current surveys do not exist for the offset wells, Operator may have gyro surveys conducted to verify BHL. The proposed well will only be drilled if the anti-collision review results indicate that the risk of collision is sufficiently low as defined by the anti-collision plan, with separation factors greater than 1.5, or if the risk of collision has been mitigated through other means including shutting in wells, plugging wells, increased drilling fluid in the event of lost returns or as is appropriate for the specific situation. In the event of an increased risk of collision, that risk will be mitigated to prevent harm to people, the environment or property. For the proposed well, upon conclusion of drilling operations, an as-constructed directional survey will be submitted to COGCC with the Form 5.

Rule 318A.n of the Colorado Oil and Gas Commission's Rules and Regulations does not allow horizontal wells to be drilled within 150' of other wells unless this requirement is waived by the Operator of the encroached upon well(s). As operator of the above mentioned well, Great Western Operating Company respectfully requests the Director to accept this Operator Request Letter to allow the above referenced well to be drilled within 150' of the well(s) listed above.

Sincerely,

Callie Fiddes

Callie Fiddes
Regulatory Technician
Great Western Operating Company, LLC

1801 Broadway
Suite 500
Denver, Colorado 80202



Allison Linz
Regulatory Technician
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regulatorypermitting@gwogco.com

December 15, 2014

Great Western Operating Company
1801 Broadway, Suite 500
Denver, CO 80202

Re: Marcus LD 11-377HC
Section 34, Township 1 North, Range 67 West, 6th P.M.
Weld County, Colorado

Dear Sir/Madam:

Great Western Operating Company is applying for a permit to drill the captioned horizontal well. Pursuant to Rule 318A.n, the COGCC requires that operators proposing horizontal wells obtain waivers from operators of wells within 150 feet of the proposed horizontal wellbore.

As currently planned, the wellbores of the following well(s) which are operated by PDC Energy INC lie within 150 feet from the horizontal lateral of the captioned well:

Guthrie #11-2; API#: 05-123-09123

If PDC Energy INC is in agreement to waive the Rule 318A.n, please sign in the space provided below and return one original copy to the undersigned.

Respectfully,

Allison Linz

Allison Linz
Regulatory Technician
Great Western Operating Company, LLC

As operator of the above referenced well(s) lying within 150 feet of the wellbore of the above captioned well, Great Western Operating Company hereby waives the one hundred and fifty foot (150,) minimum intra-well distance as specified in COGCC Rule 318A.n.

Accepted and agreed to this 23 day of DECEMBER 2014

By: ERIK ROACH

Title: LEAD ENGINEER

ETR

PDC Energy, Inc. agrees to waive the 150ft minimum intra-well distance requirement as stated in COGCC Rule 318A.n, contingent upon the following: "As part of the offset well mitigation plan, Great Western will pay to run a gyro directional survey in the Guthrie #11-2 well. Based on the results of the survey, the lateral well will be adjusted to maintain a minimum separation factor of 50