

**Surface Location Exception Waiver**  
**(Rule 318A.a. and 318A.c.)**

PDC Energy, Inc. as Operator of the following proposed well(s):

***Gillham 18X-104, Gillham 18X-334, Gillham 18X-234, Gillham 18Y-314, Gillham 18Y-214, Gillham 18X-102,  
Gillham 18X-332, Gillham 18X-232, Gillham 18Y-312, Gillham 18Y-202***

***Township 5N, Range 64 West, 6th P.M.  
Sec. 18: South 1/2 of the South East 1/4  
Tax Parcel Numbers 096318000020  
Weld, Colorado***

Hereby requests a Surface Location Exception Waiver from: Ben L. and Byra F. Gillham, owners of the surface for the aforementioned well location(s).

Pursuant to the following Colorado Oil and Gas Conservation Commission ("COGCC") Rule:

**Rule 318A.a. GWA, GWA wells, GWA windows and unit designations**

COGCC Rule 318A.a designates five "drilling windows" per quarter section of land in the Greater Wattenberg Area (GWA) – 400'x400' boxes in the center of each quarter/quarter section, and an 800'x800' box in the center of the quarter section.

**Rule 318A.c. Surface locations**

COGCC Rule 318A.c. also states that certain well locations must be "twinned" (located within fifty (50) feet of an existing well).

A complete copy of the COGCC rules and policies is available at the following website: <http://cogcc.state.co.us/>.

As the Surface Property Owner(s), I understand that the aforementioned well location(s) fall outside of those drilling areas and are greater than fifty (50) feet from an existing well, and consent to the location(s) as planned. I hereby waive any requirements to comply with COGCC Rule 318A.a. and 318A.c. for the aforementioned well(s).

**Surface Property Owner(s) Name and Address:**

Ben L. Gillham Byra F. Gillham  
Ben L. Gillham and Byra F. Gillham  
27059 County Road 51  
Greeley, Colorado 80631

6-30-15 6-30-15  
Date