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**Corporate Office**  
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Denver, Colorado 80203  
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www.pdce.com

December 13, 2017

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

Re: **502.b Variance Request to Rule 605.a.(2)**  
Lory 4N65W33 1-12 (Doc Number 401481912)  
SWSE Section 33, T4N-R65W, 6<sup>th</sup> P.M.  
Weld County, CO

Dear Director:

PDC Energy ("PDC") hereby requests a 502.b Variance to Rule 605.a.(2) for the subject location. Rule 605.a.(2) states tanks shall be located at least two (2) diameters or three hundred fifty (350) feet, whichever is smaller, from the boundary of the property on which it is built. Where the property line is a public way the tanks shall be two thirds (2/3) of the diameter from the nearest side of the public way or easement.

The surface owner and the encroached upon owner are one in the same. The production equipment will not encroach upon a public way or easement. This placement was necessary in order to accommodate the surface owner requests and to maintain a distance of 1000' from the nearest Building Unit to the West. There is also the Platte Valley Canal to East, existing operations to the North and County Road 38 to the South that affected the placement of this location.

This requested variance will not violate the basic intent of the Oil and Gas Conservation Act including, but not limited to, the protection of public health, safety, welfare and environment.

An executed surface owner waiver is attached. If you should have any questions or concerns regarding this request, please contact the undersigned at (303) 318-6102.

Sincerely,

A handwritten signature in blue ink that reads "Venessa Chase".

Venessa Chase  
Permitting Supervisor - Wattenberg  
PDC Energy, Inc.



