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**Corporate Office**

1775 Sherman Street, #3000  
Denver, Colorado 80203  
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April 5, 2018

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

Re: **Rules 318A.a. and 318A.c. Exception Location Request**  
Paonia 4N65W32 1-12 Pad, SWSE Sec. 32, T4N-R65W, Weld County, Colorado  
Wells: Paonia 1N, 2N, 3N, 4N, 5N, 6N, 7N, 8N, 9N, 10N, 11N, 12N

Dear Director:

PDC Energy, Inc. ("PDC") is requesting an exception to Rule 318A.a. and Rule 318A.c. for the above-captioned well(s).

The location(s) are planned outside of a GWA window and are not within 50' of an existing well. This location is a good location in order to drill horizontal wells with sufficient lateral length in the producible zone and build sufficient production facilities on location.

We respectfully request the approval of this exception to reduce the impact on the surface owner and surface operations. Attached is the Exception Location Waiver signed by the surface owners, William W. Ray, Trustee and Patrica A. Ray, Trustee.

If you have any questions, please contact the undersigned at (303) 831-3931.

Sincerely,

A handwritten signature in black ink, appearing to read "Ally Ota", written over a light gray circular background.

Ally Ota  
Regulatory Technician  
PDC Energy, Inc