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**Corporate Office**  
1775 Sherman Street, #3000  
Denver, Colorado 80203  
303.860.5800  
www.pdce.com

March 3, 2020

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

**Re: Rules 318A.a. and 318A.c. Exception Location Request**

Grays Federal 5N65W27 1-10 Pad, Pt. S2NW, Pt. N2SE, and S2NE (Lands best described in Exhibit A attached to SUA), Sec. 27, T5N-R65W, Weld County, Colorado  
Wells: Grays Federal 1N (Doc 402329269), 2N (Doc 402329271), 3N (Doc 402329609), 4N (Doc 402329610), 5N (Doc 402329636), 6N (Doc 402329639), 7N (Doc 402329644), 8N (Doc 402329647), 9N (Doc 402329650), 10N (Doc 402139517)

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 owner, Michael J. Boulter, President of Michael Boulter Farms .

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".

Ally Ota  
Regulatory Analyst  
PDC Energy, Inc