



---

**Corporate Office**

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

August 10, 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**

Stugart State 6-20 Pad, SENW, Sec. 20, T5N-R66W, Weld County, Colorado

Wells: Stugart State 01N (Doc #402437726), 02C (Doc #402436822)

Stugart 03N (Doc #402437735), 04N (Doc #402437742), 05NA (Doc #402437743), 06N (Doc #402437746), 07N (Doc #402437749), 08N (Doc #402437750), 09C (Doc #402437762), 10N (Doc #402437764), 11N (Doc #402437768), 12N (Doc #402437783), 13NA (Doc #402437785), 14N (Doc #402437851), 15N (Doc #402437860), 16N (Doc #402437861), 17C (Doc #402437865), 18N (Doc #402437867), 19N (Doc #402437877), 20N (Doc #402437878), 21NA (Doc #402437903), 22N (Doc #402437905), 23N (Doc #402437908), 24N (Doc #402437910)

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 favorable in order to drill horizontal wells with sufficient lateral length in the producible zone and build sufficient production facilities on location.

The SUA waives these exceptions for 318A.a and 318A.c and no separate waivers are required. We respectfully request the approval of this exception to reduce impact on surface operations.

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