



# Petroleum Development Corporation

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November 30, 2009

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

Re: **Rule 318A.a, 318A.c., and 318A.e. Waiver**  
Petroleum Development Corporation  
Binder 100 U - Vertical Location  
Binder 10SD U, 32-10D U, 22-10D U, 10CD U, 10ND U – Directional Locations  
Weld County, Colorado

Dear Director:

COGCC Rule 318A.a. specifies 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.

COGCC Rule 318A.c. specifies that new GWA surface locations must be “twinned”, i.e. located less than 50 (fifty) feet from an existing surface well location, unless the surface owner provides a consent to the exception.

COGCC Rule 318A.e. establishes additional infill and boundary bottom-hole locations for Codell, Niobrara, and J-Sand formations, which shall be reached by utilizing directional drilling techniques from the GWA windows.

The Binder 100 U surface location is located outside of the drilling window, is not located within 50 feet of an existing well, and is being drilled vertically. The surface owner has agreed to the location, as the location fits with their planned use of the property. Please find the waiver attached.

The Binder 10SD U, 32-10D U, 22-10D U, 10CD U, and 10ND U surface locations are located outside of the drilling window and are not located within 50 feet of an existing well. The surface owner has agreed to the location, as the location fits with their planned use of the property. Please find the waiver attached.

Therefore, Unioil (a wholly owned subsidiary of Petroleum Development Corporation) respectfully requests a waiver for the surface location of the above-captioned wells, in the above-captioned location, regarding the rules captioned above.

If you have any questions, please contact Sarah Garrett at 303-860-5800.

Thank you,

Sarah M. Garrett  
Landman  
Petroleum Development Corporation