



Dear Mr. Kerr,

Anadarko Petroleum Corporation, Noble Energy Inc., Encana Oil and Gas (USA) Inc. and Petroleum Development Corporation, d/b/a PDC Energy, have reviewed the amendments proposed by the COGCC Staff to section 318A of the State of Colorado Oil and Gas Conservation rules (the "Rules"), and we wholeheartedly support the proposed amendments. Not only do the proposed amendments provide the necessary framework for the economic and efficient development of the Greater Wattenberg Area (GWA) through the use of horizontal, directional and vertical drilling technology while maintaining the existing limitations on surface locations, but they also will eliminate countless hearings before the Commission on individual horizontal well spacing applications. Furthermore, the proposed amendments provide clarity to the existing 318A.a.(e) notice provisions and provide for stronger safety measures with regard to waste water management.

In addition to the amendments presented by COGCC Staff, we propose that the following language be adopted as a protective measure aimed at the avoidance of potential wellbore collision:

318A."x". **Minimum intrawell distance.** No horizontal wellbore lateral shall be located less than one hundred and fifty (150) feet from any existing or permitted oil or gas wellbore as illustrated in the directional survey for drilled wellbores or as illustrated in the deviated drilling plan for permitted wellbores or as otherwise reflected in the COGCC well records. This requirement may be waived in writing by the operator of the encroached upon well.

Combined, Anadarko Petroleum Corporation, Noble Energy Inc., Encana Oil and Gas (USA) Inc., and Petroleum Development Corporation, d/b/a PDC Energy, represent an overwhelming majority of the leasehold operatorship within the GWA and plan to continue making substantial investments in the GWA through the development that will be facilitated by the COGCC staff's proposed amendments.

Respectfully,

A handwritten signature in blue ink, appearing to read "David Kulmann", written over a horizontal line.

David Kulmann  
Regulatory Affairs Team Lead, Anadarko Petroleum Corporation  
*On behalf of the four companies hereby represented.*