BEFORE THE OIL AND GAS CONSERVATION COMMISSION OF THE STATE OF COLORADO

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IN THE MATTER OF THE APPLICATION OF ENCANA OIL & GAS (USA) INC. FOR AN ORDER ESTABLISHING SPACING AND WELL LOCATION RULES FOR THE ILES FORMATION OF THE MESAVERDE GROUP FOR CERTAIN DESCRIBED LANDS IN THE RULISON FIELD, GARFIELD COUNTY, COLORADO

Cause No. 139 Docket No. ____

APPLICATION

EnCana Oil & Gas (USA) Inc. ("Applicant"), by and through its attorneys, Beatty & Wozniak, P.C., respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado (the "Commission") for an order establishing spacing rules applicable to the drilling and producing of wells from the Iles Formation of the Mesaverde Group covering certain described lands in the Rulison Field, Garfield County, Colorado and in support of its Application states and alleges as follows:

1. Applicant is a corporation duly authorized to conduct business in the State of Colorado.

2. Applicant owns leasehold interests in the following described lands:

Township 8 South, Range 96 West, 6th P.M. Section 3: N/2 SW/4 Section 4: E/2 SE/4

Garfield County, Colorado.

(hereafter the "Application Lands")

3. That with respect to the Iles Formation of the Mesaverde Group, the Application Lands are unspaced and subject to Commission Rule 318.a., which requires that wells dr4illed in excess of two thousand five hundred (2,500) feet in depth be located not less than six hundred (600) feet from any lease line, and located not less than one thousand two hundred (1,200) feet from any other producible or filling oil or gas well when drilling to the same common source of supply.

4. That the Application Lands were recently spaced with respect to the Williams Fork Formation pursuant to Order No. 139-54, which established 40-acre drilling and spacing units and allowed the equivalent of one well per 20 acres, the permitted wells to be located downhole anywhere in the drilling and spacing unit but no closer than 200 feet from the boundaries of the unit and no closer than 400 feet from any existing Williams Fork well, without exception being granted by the Director, and the permitted wells to be frilled from the surface ⁵⁹⁴⁹³ 2007.27</sup> either vertically or directionally from no more than one pad located on a given quarter quarter section unless exception is granted by the Commission.

5. That Applicant has drilled, tested and completed multiple wells in the Iles Formations of the Mesaverde Group upon the Application Lands and/or other nearby lands.

6. That to promote efficient drainage within the Iles Formation of the Mesaverde Group of the Application Lands, the Commission should establish drilling and spacing units consistent with those established for the Williams Fork and also increase the number of wells which can be optionally drilled into and produced from the Iles in each drilling unit to the equivalent of one well per 20 acres, or two wells for each 40-acre drilling and spacing unit.

7. That as to all future lles wells to be drilled upon the Application Lands, each well may be located downhole in the established drilling and spacing unit but no closer than 200 feet from the boundaries of the unit and no closer than 400 feet from any existing lles well without exception being granted by the Director of the Oil and Gas Conservation Commission.

8. Applicant commits that wells to be drilled under this Application will be drilled from the surface either vertically or directionally from no more than one pad located on a given quarter quarter section unless exception is granted by the Director of the Colorado Oil and Gas Conservation Commission, and that both the Williams Fork and Iles formations will be reached from a single wellbore, *i.e.*, separate wells will not be drilled to reach each formation.

9. That the above-proposed spacing and well location rules will allow more efficient drainage of the Iles Formation of the Mesaverde Group; will prevent waste; will not adversely affect correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoir.

10. That the names and addresses of the interested parties according to the information and belief of the Applicant are set forth in <u>Exhibit A</u> attached hereto and made a part hereof.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice be given as required by law and that upon such hearing this Commission enter its order consistent with Applicant's proposals as set forth above.

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Dated this 17th day of April, 2006.

Respectfully submitted,

ENCANA OIL & GAS (USA) INC.

By:_

Erika Zimmer Enger Beatty & Wozniak, P.C. Attorneys for Applicant 216 16th Street, Suite 1100 Denver, Colorado 80202 Telephone (303) 407-4499 Facsimile (303) 407-4494

Applicant's Address: 370 17th Street, Suite 1700 Denver, CO 80202

VERIFICATION

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STATE OF COLORADO

CITY & COUNTY OF DENVER

Francois Goyer, Land Negotiator of EnCana Oil & Gas (USA) Inc., upon oath deposes and says that he has read the foregoing Application and that the statements contained therein are true to the best of his knowledge, information and belief.

ENCANA OIL & GAS (USA) INC.

By: Francois Goyer

Subscribed and sworn to before me this ____ day of April, 2006, by Francois Goyer of EnCana Oil & Gas (USA) Inc.

Witness my hand and official seal. My commission expires:

Notary Public

EXHIBIT A

INTERESTED PARTIES

IN THE MATTER OF THE APPLICATION OF) ENCANA OIL & GAS (USA) INC. FOR AN ORDER) ESTABLISHING SPACING AND WELL) LOCATION RULES FOR THE ILES FORMATION) OF THE MESAVERDE GROUP FOR CERTAIN Cause No. 139) DESCRIBED LANDS IN THE RULISON FIELD, Docket No.) GARFIELD COUNTY, COLORADO)) ABO Petroleum Corporation MAB Resources, LLC Myco Industries, Inc. 105 S. 4th Street 1660 Lincoln Street, Suite 1900 105 S. 4th Street Artesia, NM 88210 Denver, CO 80264 Artesia, NM 88210 Williams Production RMT Company Yates Drilling Company Yates Petroleum 1515 Arapahoe St, Tower 3, 105 S. 4th Street Corporation Suite 1000 Artesia, NM 88210 105 S. 4th Street Denver, CO 80202

Apollo Energy, LLC 1557 Ogden St, Suite 300 Denver, CO 80218

Steven W. & Sherry L. Keinath PO Box 5628 Minneapolis, MN 55440-5628

Henry H. Gordon 10858 E. Berry Place Englewood, CO 80111

Artesia, NM 88210

Pamela Morris Cooper 920 Meeker Street Fort Morgan, CO 80701