

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

IN THE MATTER OF THE APPLICATION OF OXY  
USA WTP LP FOR AN ORDER ESTABLISHING  
WELL LOCATION AND SETBACK RULES FOR  
THE DRILLING OF WILLIAMS FORK FORMATION  
WELLS ON CERTAIN DESCRIBED LANDS IN THE  
GRAND VALLEY FIELD AREA, GARFIELD  
COUNTY, COLORADO

CAUSE NO.

DOCKET NO.

**APPLICATION**

COMES NOW OXY USA WTP LP ("Applicant"), a Texas limited partnership, by its attorneys, Poulson, Odell and Peterson, LLC, and makes application to the Oil and Gas Conservation Commission of the State of Colorado for an order establishing well location and setback rules applicable to the drilling and producing of wells from the Williams Fork Formation of the Mesaverde Group underlying certain described lands in the Grand Valley Field area, Garfield County, Colorado and in support of its application states and alleges as follows:

1. That Applicant is a limited partnership duly authorized to conduct business in the State of Colorado.

2. That Applicant owns the oil and gas mineral estate and/or leasehold interests in the following described lands (hereinafter "Application Lands"):

Township 6 South Range 97 West  
Section 19: E/2W/2NW/4

Township 7 South Range 97 West

Section 8: The E/2 of Tract 39 and 1.26 acres out of the NW corner of Tract 39

Section 17: Tract 89

Section 18: Tracts 89 and 91

Section 21: Lots 112B and 112C

Section 22: Tract 112B

Section 26: Tracts 121C and 121B

3. That the Application Lands are unspaced and subject to the Commission's Rule 318 (formerly Rule 316).

4. That multiple wells have been drilled, tested and completed in the Williams Fork Formation of the Mesaverde Group upon lands in close proximity to the Application lands.

5. That to promote efficient drainage within the Williams Fork Formation of the Mesaverde Group, the Commission should increase the number of wells which can be optionally drilled into and produced from the Williams Fork Formation of the Application Lands to the equivalent of one Williams Fork well per ten (10) acres.

6. That as to the Application Lands, the Commission should allow all future Williams Fork wells drilled thereon to be located downhole anywhere upon such lands but no closer than 100 feet from the outside boundary of the Application Lands (see attached plat) unless such boundary abuts or corners lands in respect of which the Commission has not at the time of the drilling permit application granted the right to drill 10 acre density wells in which event the Williams Fork wells to be drilled upon the Application Lands should be drilled downhole no closer than 200 feet from that portion of the boundary which so abuts or corners the lands in respect of which 10 acre density downhole drilling for Williams Fork wells has not been ordered by the Commission.

7. That, except as previously authorized by order of the Commission, 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 pursuant to application made for such exception.

8. The granting of this application will not promote waste; will not violate correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoir.

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

WHEREFORE, Applicant respectfully requests that this matter be set for hearing in March, 2008, 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.

Dated: January\_\_\_\_\_, 2008.

**POULSON, ODELL AND PETERSON, LLC**

By: \_\_\_\_\_  
William A. Keefe  
1775 Sherman Street, Suite 1400  
Denver, Colorado 80203  
Phone: 303-861-4400

STATE OF TEXAS                                 )  
  )       SS.  
COUNTY OF HARRIS                             )

Donna G. Havins, of lawful age, being first duly sworn upon oath, deposes and says that she is the Regulatory Advisor for OXY USA WTP LP and that she has read the foregoing Application and that the matters therein contained are true to the best of her knowledge, information and belief.

Donna G Havins

Subscribed and sworn to before me this \_\_\_\_\_ day of January, 2008.

Witness my hand and official seal.

My commission expires:

Notary Public

## EXHIBIT A

ADELE RICHSTREW  
860 ALA MOANA BLVD., #1302  
HONOLULU, HI 96815

AUGUST P. ETCHEVERRY AND  
RENNIA M. ETCHEVERRY  
680 RIO DEL MAR BLVD.  
APTOS, CA 95003

BUREAU OF LAND MANAGEMENT  
P.O. BOX 1009  
GLENWOOD SPRINGS, CO 81602-1009

BUREAU OF LAND MANAGEMENT  
2815 H ROAD  
GRAND JUNCTION, CO 81506

CHEVRON USA INC.  
C/O CHEVRON TEXACO  
PROPERTY TAX  
P.O. BOX 285  
HOUSTON, TX 77001

DANIEL W. STROOCK  
55 FROST STREET  
CAMBRIDGE, MA 92140

EDWARD N. JUHAN  
7675 W 14<sup>th</sup> AVE., STE 202  
LAKEWOOD, CO 80214

FEDERAL OIL SHALE LLC  
3520 S. GLENCOE ST.  
DENVER, CO 80237

FRED ETCHEVERRY  
8621 BEECHCRAFT DR.  
RENO, NV 89506

HUNTER FAMILY LTD PARTNERSHIP  
P.O. BOX 6728  
HELENA, MT 59604

PAUL ETCHEVERRY  
P.O. BOX 371  
DEBEQUE, CO 81630

RAYMOND ETCHEVERRY AND ORIEN  
ETCHEVERRY, AS TRUSTEES OF THE  
RAYMOND AND ORIEN ETCHEVERRY  
FAMILY TRUST DATED 5/23/90  
3102 WEST ALPINE  
STOCKTON, CA 91342

RODERICK B. POTTER  
14337 N COPPERSTONE Dr.  
ORO VALLEY, AZ 85755

ROLAND ETCHEVERRY  
540 WEDGE LANE  
FERNLEY, NV 89408

SAVAGE LIMITED PARTNERSHIP 1  
5953 COUNTY ROAD 320  
RIFLE, CO 81650

SHELL OIL COMPANY  
P.O. BOX 576,  
HOUSTON, TEXAS 77001

SUE STUART MORTIMORE ERPH  
VANDE BOVENKAMP  
c/o LOEB PARTNERS  
41 WALL STREET  
NEW YORK, NY 10005

ENCANA OIL AND GAS (USA) INC.  
370 17th ST. #1700  
DENVER, CO 80202

LARAMIE ENERGY LLC  
730 17th ST. STE 405  
DENVER, CO 80202

PLAINS EXPLORATION & PRODUCTION  
COMPANY  
607 28 1/2 ROAD, SUITE 105  
GRAND JUNCTION, CO 81506

JEANNE HILL  
1304 LORIMER ROAD  
RALEIGH, NC 27606

JOAN L. SAVAGE  
5953 COUNTY ROAD 320  
RIFLE, CO 81650

JOHN ETCHEVERRY  
1180 PINE VISTA LANE  
COLFAX, CA 95713

JRMD, LLC  
P.O. BOX 1926  
RIFLE, CO 81650-1926

JUHAN LTD PARTNERSHIP  
2440 N COYOTE DR., STE 121  
TUCSON, AZ 85745

MARY EDITH LOGAN ESTATE  
1311 W. RIVERSIDE  
CARLSBAD, NEW MEXICO 88220

OPAL C. LATHAM  
PO BOX 127  
DEBEQUE, CO 81630-0127

PATRICIA P. COYNE  
2 VISTA CLIFF PLACE, APT. 221  
RICHARDSON, TX 75080

PATRICIA DUNN  
625 SIERRA COURT  
GRAND JUNCTION, CO 81501

JUDITH H. JORDAN  
GARFIELD COUNTY  
144 E. 3RD ST., SUITE 203  
RIFLE, CO 81650

JOAN L. SAVAGE  
5953 COUNTY ROAD 320  
RIFLE, CO 81650

THOMAS ETCHEVERRY  
P.O. BOX 44  
DEBEQUE, CO 81630

THE GEORGE M. ANDERSON TRUST, c/o  
GEORGE M. ANDERSON TRUSTEE  
P.O. BOX 37  
DEBEQUE, CO 81630

WILLIAMS PRODUCTION RMT CO  
1515 ARAPAHOE ST., TWR 3, STE1000  
DENVER, CO 80202

PUCKETT LAND COMPANY  
5460 S QUEBEC ST STE 250  
GREENWOOD VLG, CO 80111-1917

MARATHON OIL COMPANY  
5555 SAN FELIPE ROAD  
HOUSTON, TX 77056

SHELL FRONTIER OIL AND GAS INC.  
C/O SHELL OIL COMPANY  
P.O. BOX 301445  
HOUSTON, TX 77054

WILLIAM A. KEEFE  
POULSON, ODELL & PETERSON, LLC  
1775 SHERMAN ST., SUITE 1400  
DENVER, CO 80203

DONNA G. HAVINS  
OCCIDENTAL OIL AND GAS  
5 GREENWAY PLAZA, SUITE 110  
P.O. BOX 27757  
HOUSTON, TX 77027-7757

DAVID BAKER (DECEASED-UNKNOWN  
ADDRESS)

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OF THE STATE OF COLORADO

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**AFFIDAVIT OF MAILING**

STATE OF COLORADO                     )  
  )  
CITY AND COUNTY OF DENVER        )           ss.

William A. Keefe of lawful age, and being first duly sworn upon his oath, states and declares:

That he is the attorney for OXY USA WTP LP, that on January \_\_\_\_, 2008, he caused a copy of the attached Application in the subject docket to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.

\_\_\_\_\_  
William A. Keefe

Subscribed and sworn to before me on January\_\_\_\_\_, 2008.

Witness my hand and official seal.

My commission expires: July 22, 2011.

\_\_\_\_\_  
Notary Public