

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

IN THE MATTER OF THE APPLICATION OF)	
SAMSON RESOURCES COMPANY FOR AN)	
ORDER ESTABLISHING SPACING AND WELL)	Cause No. 474
LOCATION RULES FOR THE NIOBRARA)	
FORMATION FOR CERTAIN DESCRIBED LANDS)	Docket No. _____
IN CRAIG FIELD, MOFFAT COUNTY,)	
COLORADO)	

APPLICATION

Samson Resources Company ("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 field rules applicable to the drilling and producing of wells from the Niobrara Formation covering certain described lands in the Craig Field, Moffat 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 6 North Range 91 West, 6th P.M
Section 15: S $\frac{1}{2}$ N $\frac{1}{2}$ and N $\frac{1}{2}$ S $\frac{1}{2}$

Moffat County, Colorado.

(hereafter the "Application Lands").

3. That with respect to the Niobrara Formation, the Application Lands are currently subject to Commission Rule 318.a., which requires that wells drilled in excess of two thousand five hundred feet (2,500') in depth be located not less than six hundred feet from any lease line, and located not less than one thousand two hundred feet (1,200') from any other producible or producing oil or gas well when drilling to the same common source of supply, unless authorized by order of the Commission upon hearing.

4. That Applicant proposes to drill the State 33-15 Well in the Niobrara Formation on the Application Lands.

5. That to promote efficient drainage within the Niobrara Formation in the Application Lands, the Commission should establish a 320-acre drilling and spacing unit on the Application Lands.

6. That the above-proposed spacing will allow more efficient drainage of the Niobrara Formation; will prevent waste; will not adversely effect correlative rights and will assure the greatest ultimate recovery of oil and associated hydrocarbon substances from the reservoir.

Such spacing is not smaller than the maximum area that can be efficiently and economically drained from said formation.

7. In addition to the proposed State 33-15 Well, Applicant proposes that an optional additional well in the 320-acre unit be drilled or completed in the operator's discretion with the bottomhole no closer than 660 feet to any outer boundary of the unit and with no setback required to any interior quarter section line.

8. That the names and addresses of the interested parties in this Application according to the information and belief of the Applicant are set forth in Exhibit A hereto, and that Applicant will submit a Certificate of Service of this Application on each interested party within the next seven days as required by Rule 503.d.

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.

Dated this 5th day of January, 2009.

Respectfully submitted,

SAMSON RESOURCES COMPANY

By: _____
Susan L. Aldridge
Beatty & Wozniak, P.C.
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Denver, Colorado 80202
(303) 407-4499

Applicant's Address:
370 17th Street, Suite 300
Denver, Colorado 80202

VERIFICATION

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

Michael Horton, Senior District Landman, 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.

SAMSON RESOURCES COMPANY

By: _____
Michael Horton

Subscribed and sworn to before me this ____ day of November, 2008, by Michael Horton of Samson Resources Company.

Witness my hand and official seal. My commission expires:_____

Notary Public

[SEAL]

EXHIBIT A

Interested Parties

R. Craig Ponder
Ponder Exploration, Ltd.
6560 Fannin Street, Suite 1148
Houston, Texas 77030

Jeff Comstock
Moffat County
221 W. Victor Way, Suite 130
Craig, CO 81625