

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

IN THE MATTER OF THE APPLICATION OF )  
SAMSON RESOURCES COMPANY FOR AN ) Cause No. 112  
ORDER POOLING ALL NONCONSENTING )  
INTERESTS IN THE FRUITLAND COAL ) Docket No. \_\_\_\_\_  
SEAMS IN AN ESTABLISHED DRILLING AND )  
SPACING UNIT LOCATED IN THE IGNACIO )  
BLANCO FIELD, LA PLATA, COLORADO )  
)

APPLICATION

COMES NOW Samson Resources Company (referred to herein as “Applicant”), by and through its undersigned counsel, and makes application to the Oil and Gas Conservation Commission of the State of Colorado (“COGCC”), for an order to pool all non-consenting interests for the drilling of wells in an approximate 320-acre drilling and spacing unit in the Fruitland Coal Seams in the lands more particularly described in Paragraph 3 below located in Township 34 North, Range 7 West, 6<sup>th</sup> N.M.P.M., La Plata County, Colorado. In support thereof, the Applicant states and alleges as follows:

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

2. That the Applicant owns leasehold interests in the unit requested for pooling.

3. That pursuant to COGCC Orders established in Cause No. 112, specifically Order Nos. 112-157, 112-181, and 112-46, an approximate 320-acre drilling and spacing unit for the Fruitland Coal Seams was established, which includes the following lands at issue in this Application:

Township 34 North, Range 7 West, 6<sup>th</sup> N.M.P.M.

Section 12: S½

4. Applicant has drilled the Ute 2-12U Well within the drilling and spacing unit described in paragraph 3 above.

5. That some of the parties listed on Exhibit A hereto own separate leased mineral interests in the referenced drilling and spacing unit located in the S½ of Section 12 encompassed within the drilling and spacing unit, and such parties have been offered the option to participate in the drilling of the wells in the unit, but to date one or more of such parties have refused to participate by bearing their proportionate shares of the costs and risks of drilling or operating the wells. An AFE containing the information required by COGCC Rule 530.a. was sent respecting the wells more than thirty (30) days prior to the date of the hearing on this Application. A copy of an example of such AFE and letter is attached hereto as Exhibit B.

6. Moreover, that with respect to any non-consenting owners of unleased mineral interests listed on Exhibit A, Applicant has made reasonable attempts pursuant to COGCC Rule 530.b. to enter into leases with such parties but has as of yet been unsuccessful in such attempts.

7. That in order to prevent waste, protect correlative rights and in the best interests of conservation, all interests owned by the nonconsenting parties listed on Exhibit A should be pooled in the Fruitland Coal Seams in accordance with C.R.S. § 34-60-116 and Rule 530 of the COGCC.

8. That the names and addresses of the interested parties with respect to this Application are as set forth in Exhibit A hereto and that Applicant certifies that a copy of this Application will be served 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 thereof be given as required by law and that upon such hearing this Commission enter its order:

A. That all leasehold interest owners with whom Applicant has been unable to secure an agreement for the well and all unleased mineral interests owners who refuse to execute a lease as described in paragraphs 4 and 5 be pooled involuntarily with respect to the Fruitland Coal Seams from the Ute 2-12U Well, and that such owners be treated as non-consenting owners under C.R.S. § 34-60-116 and made subject to the terms and penalties provided for therein.

B. For such other findings and orders as the Commission may deem proper or advisable in the premises.

DATED this 5<sup>th</sup> day of January, 2009.

Respectfully submitted,

SAMSON RESOURCES COMPANY

By:

\_\_\_\_\_  
Michael J. Wozniak  
Susan L. Aldridge  
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(303) 407-4499

Applicants' Address:

370 17th Street, Suite 3000  
Denver, CO 80202

VERIFICATION

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

Rebecca Bell, Landman for Samson Resources Company, upon oath, deposes and says that she has read the foregoing Application and that the statements contained therein are true to the best of her knowledge, information and belief.

SAMSON RESOURCES COMPANY

By: \_\_\_\_\_  
Rebecca Bell

Subscribed and sworn to before this \_\_\_\_ day of January, 2009.

Witness my hand and official seal.

My commission expires:

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

[SEAL]

**EXHIBIT A**

**Working Interest & Unleased Mineral Owners**

<u>Consenting</u>	<u>Non-Consenting</u>
<p>Dominic Pellascini 8053 Washington Avenue Sebastopol, CA 95472-3111</p> <p>BP America Production Co. Attn: Craig Ferguson 501 Westlake Park Blvd. Houston, TX 77079-2969</p>	<p>Susan Martin 4000 Parker Hill Road Santa Rosa, CA 95404</p> <p>Sally Nabas 220 Parkham Court San Ramon, CA 94583</p> <p>Jill Palmer 1618 Edgewood Lane Santa Rosa, CA 95401-6016</p> <p>John Brittain Robinett Bank of Oklahoma P.O. Box 1588 Tulsa, OK 74101</p>