

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 ALLOWING AN EXCEPTION)	Cause No. _____
LOCATION FOR A WELL TO BE COMPLETED)	
IN THE FRUITLAND COAL FORMATION, LA)	Docket No. _____
PLATA COUNTY, COLORADO)	

APPLICATION

Samson Resources Company ("Applicant"), by and through its attorneys, Beatty & Wozniak, P.C., respectfully submits this Application to the Colorado Oil and Gas Conservation Commission ("Commission") for an order allowing an exception location for a well to be completed to the Fruitland Coal Formation in the NE¼SE¼ of Section 23, Township 33 North, Range 8 West, N.M.P.M., La Plata County, Colorado ("Application Lands"). In support thereof, Applicant states and alleges as follows:

1. The Application Lands are subject to the following Commission Orders:
 - a. Order No. 112-157 allowed, among other things, two (2) wells to be drilled for the production of gas from the Fruitland Coal Formation from each 320-acre drilling and spacing unit with the permitted well to be located in any undrilled quarter section no closer than 990 feet from the boundaries of the quarter section, nor closer than 130 feet to any interior quarter section line.
 - b. Order No. 112-181 amended Order No. 112-157 to allow, among other things, a total of four (4) wells to be optionally drilled in each 320-acre drilling and spacing unit with the permitted well to be located no closer than 660 feet to any outer boundary of the unit with no interior section line setback, utilizing a common or expanded pad with an existing well, for production of gas from the Fruitland coal seams.
2. Applicant has drilled the directional Jaques 33-8-23 #3 Well with a surface hole location of 780' FSL, 1915' FEL in the SW¼SE¼ of Section 23, Township 33 North, Range 8 West and a bottomhole location of 1836.2' FSL, 647.2' FEL in the NE¼SE¼ of Section 23, Township 33 North, Range 8 West, La Plata County, Colorado. Applicant has an approved APD for the Jaques 33-8-23 #3 Well. A reference map reflecting the location of the Jaques 33-8-23 #3 Well is attached hereto.
3. Applicant seeks an exception from the applicable Commission Orders in that it seeks approval for the bottomhole location of the directional well to be located approximately 647.2 feet from the outer unit boundary rather than 660 feet as set forth under the aforementioned Commission Orders.
4. The Jaques 33-8-23 #3 Well shares a common pad with the existing Jaques 33-8-23 #2 Well located in the SW¼SE¼ of Section 23, Township 33 North, Range 8 West.
5. That in order to prevent waste and protect correlative rights of all owners in the area surrounding the proposed location, it is reasonable and equitable to permit an exception location to allow the drilling and completion of a well in the described location. Applicant also asserts that Commission Rule 318.c. provides for exception locations when good cause and other conditions warrant a variance from field rules. Applicant believes, and therefore states, that engineering conditions and other good cause exists that warrants a minimal variance for the location of the Jaques 33-8-23 #3 Well.
6. Applicant asserts the Jaques 33-8-23 #3 Well can be developed in a manner consistent with protection of public health, safety and welfare.
7. Due to their numerosity, contiguous owners of lands toward whom the well is located and are affected by the exception location and have not executed waivers consenting to this exception location are set forth on Exhibit A attached hereto. Applicant is operator of the Application Lands as well as of the offset leases to the proposed exception location and royalty owners comprise

the majority of those parties identified on Exhibit A. There are no additional working interest owners.

8. The undersigned certifies that copies of this Application shall 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 at the next regular hearing date, that notice thereof be given as required by law and that upon such hearing the Commission enter its order:

A. Allowing the Jaques 33-8-23 #3 Well to be drilled and completed from the Fruitland Coal Formation in the Application Lands at the aforesaid location; and

B. Granting any other relief necessary to prevent waste and protect correlative rights of the owners.

DATED this 19th day of May, 2010.

Respectfully submitted,

SAMSON RESOURCES COMPANY

By: _____
Michael J. Wozniak
Jamie L. Jost
Beatty & Wozniak, P.C.
Attorneys for Applicant
216 16th Street, Suite 1100
Denver, Colorado 80202
(303) 407-4499

Applicant's Address:

370 17th Street, Suite 3000
Denver, Colorado 80202

VERIFICATION

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

Rebecca Bell, Landman and Agent/Attorney in Fact, of 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.

Rebecca Bell, Landman
Agent and Attorney-in-Fact

Subscribed and sworn to before this ____ day of May, 2010.

Witness my hand and official seal.

My commission expires:

Notary Public

[SEAL]

EXHIBIT A
INTERESTED PARTIES

Emil Mosbacher
100 Melrose Ave.
Greenwich, CT 06830-6257

Leslie A. Hoerr
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Southern Ute Indian Tribe
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Elko, NV 89801-3124

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315 Cherry Lane
Grand Junction, CO 81503-2055

Patricia Penrose Schieffer
Bank of America, Agent
P.O. Box 2546
Ft. Worth, TX 76113-2546

Donaldson Brown Trusts
Item II (B): 3-25-65
Bny Melton, N.A., Trustee
P.O. Box 1183
Abingdon, MD 21009-6183

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FORMATION, LA PLATA COUNTY,)	
COLORADO)	

AFFIDAVIT OF MAILING

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

Jamie L. Jost, of lawful age, and being first duly sworn upon her oath, states and declares:

That she is the attorney for Samson Resources Company, and that on or before May 26, 2010, she caused a copy of the attached Application to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.

Jamie L. Jost

Subscribed and sworn to before me May 19, 2010.

Witness my hand and official seal.

My commission expires: _____.

Notary Public