

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

IN THE MATTER OF THE APPLICATION OF)
ANADARKO E&P COMPANY LP FOR AN)
ORDER CREATING APPROXIMATE 640)
ACRE DRILLING AND SPACING UNITS FOR)
THE DRILLING OF ONE HORIZONTAL WELL)
AND AN ADDITIONAL OPTIONAL WELL PER)
DRILLING AND SPACING UNIT FOR THE)
PRODUCTION OF OIL AND GAS AND)
ASSOCIATED HYDROCARBONS FROM THE)
NIOBRARA FORMATION, SUCH DRILLING)
AND SPACING UNITS BEING DESCRIBED AS)
SECTIONS 18 AND 26 IN TOWNSHIP 3)
SOUTH, RANGE 64 WEST, 6th P.M.; AND)
SECTIONS 13, 14, 16, 17, 20, 21, 22, 23, 24,)
26, 28, 29, 30, 31, 32, 33 AND 34, IN)
TOWNSHIP 3 SOUTH, RANGE 65 WEST, 6th)
P.M.; IN THE WATTENBERG FIELD, ADAMS)
COUNTY, COLORADO)
)
)
)

Cause No. _____

Docket No. _____

APPLICATION

COMES NOW Anadarko E & P Company LP (referred to herein as “Applicant”), by and through its undersigned attorneys, and makes application to the Oil and Gas Conservation Commission of the State of Colorado (“Commission”), for an order establishing nineteen approximate 640 acre drilling and spacing units for the production of oil, gas, and associated hydrocarbons from the Niobrara Formation, such drilling and spacing units described as follows:

Township 3 South, Range 64 West 6th P.M.

Section 18: All

Section 26: All

Township 3 South, Range 65 West, 6th P.M.

Section 13: All

Section 14: All

Section 16: All

Section 17: All

Sections 20 through 24: All

Section 26: All

Sections 28 through 34: All

Adams County, Colorado (“Application Lands”).

In support thereof, the Applicant states and alleges as follows:

1. Applicant is a limited partnership duly authorized to conduct business in the State of Colorado.
2. Applicant owns all or a portion of the leasehold interests in the Application Lands.
3. The Application Lands are unspaced.
4. Applicant requests that the Commission establish each section of the Application Lands as an approximate 640 acre drilling and spacing unit for the Niobrara Formation pursuant to Rule 503.b.(1) Colorado Revised Statute Section 34-60-116(1).
5. Applicant requests that it be authorized to drill one horizontal Niobrara well in each such drilling and spacing unit and have the option to drill one additional Niobrara well on each of said units.
6. Applicant requests the surface location for any horizontal well drilled within a given unit may be located anywhere within the unit or surrounding lands but the lateral of such well may not enter the Niobrara Formation any closer than 300 feet from the section line and that the treated interval within such lateral may not be closer than 460 feet from the section line. Further such treated interval may be no closer than 920 feet from the treated interval of any other well in the unit producing from the Niobrara Formation.
7. Applicant asserts that establishing approximate 640 acre drilling and spacing units for the Application Lands for the Niobrara Formation will allow for economic and efficient drainage of the Niobrara Formation; will prevent waste; will not adversely affect correlative rights and will assure the greatest ultimate recovery of oil and associated hydrocarbon substances from the reservoirs. A 640 acre drilling and spacing unit is not smaller than the maximum area that can be economically and efficiently drained by one horizontal well in the Niobrara Formation within each such unit.
8. Notice will be provided to the interested parties set forth on Exhibit A pursuant to Rule 503.

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 shall enter its order:

- A. Establishing each section of the Application Lands as an approximate 640 acre drilling and spacing unit for the Niobrara Formation. One horizontal well shall be authorized to be drilled upon each such unit with an optional additional well also being authorized;
- B. The surface location for each well drilled within a given unit may be located anywhere within the unit or adjoining lands; the lateral of a given well may not enter the Niobrara Formation any closer than 300 feet to the section line; the treated interval within the Niobrara Formation may not be located any closer than 460 feet to the section line and the distance between the treated interval of Niobrara wells within a drilling and spacing unit shall not be less than 920 feet;
- C. Finding that approximate 640 acre drilling and spacing units for the Niobrara Formation will prevent waste, protect correlative rights, and will maximize the efficient and economic production of the Niobrara Formation on the Application Lands; and
- D. Granting any other relief necessary to prevent waste and protect correlative rights of the adjacent owners.

Dated this ____ day of August, 2011.

Respectfully submitted,

ANADARKO E&P COMPANY LP

By: _____

William A. Keefe
Kenneth A. Wonstolen
Matthew J. Lepore
Beatty & Wozniak, P.C.
Attorneys for Applicant
216 16th Street, Suite 1100
Denver, Colorado 80202

Applicant's Address:
1099 18th St., Suite 1800
Denver, CO 80202

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COUNTY, COLORADO)
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Docket No. _____

AFFIDAVIT OF MAILING

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

Matthew J. Lepore of lawful age, and being first duly sworn upon his oath, states and declares:

That he is the attorney for Anadarko E&P Company LP, that on or before September ____, 2011, he caused a copy of the attached Application to be deposited in the United States Mail, postage prepaid, addressed to each of the parties listed on Exhibit A to the Application.

Matthew J. Lepore

Subscribed and sworn to before me on September ____, 2011.

Witness my hand and official seal.

My commission expires: _____.

Notary Public

EXHIBIT A

ACP DIA 1287 Investors LLC,
C Properties Inc
4530 E Shea Blvd, Suite 100
Phoenix, AR 85028-6066

American Storage Centers, Inc.
7452 South Gallup Way
Littleton, CO 80120

Aurora Crossroads Investors
990 Highland Dr., #204
Solana Beach, California 92075-2427

Auto Facilities Real Estate Trust
Address Unknown

Beluah O.Rosander
6341 Milhaven Dr.
Shawnee Mission, Kansas 66202-4207

Box Elder Farms Co.
c/o L.C. Fulenwider, Inc.
1125 - 17th Street, Suite 2500
Denver, Colorado 80202

Box Elder Investment Co,
9600 E. Arapahoe Road, Suite 260
Englewood, Colorado 80112

Chesapeake Exploration, LLC
P.O. Box 18496
Oklahoma City, Oklahoma 73154

City & County of Denver
1525 Sherman Street
Denver Colorado 80203-1714

City of Aurora
15151 East Alameda Parkway
Aurora, Colorado 80012

Claude C. Craig Trust
Route 3, Box 343
Aurora, Colorado 80011

Clifford Wayne McCoy
185 Four Wheel Drive
Denver, Colorado 81303

Colfax Land Co.
232 West 13th Avenue
Denver, Colorado 80204

Collin Equities, Inc.
211 E. 7th St., Suite 620
Austin, Texas 78701

Colorado Department of Transportation
4201 East Arkansas Avenue
Denver, Colorado 80202

Colorado Interstate Gas Company
P.O. Box 1087
Colorado Springs, Colorado 80903

Colorado National Bank of Denver,
Executor of the Estate of William
Burghardt, deceased
Address Unknown

ConocoPhillips Company
3300 North A. Street
Midland, Texas 79707

CX/Limited Partnership
Star Route 75 A
Byers, Colorado 80103

Danford-Champlin Farms, LTD
P.O. Box 98
5097 Imboden Mile Road
Watkins, Colorado 80137

Davene King Schuh
8725 E. Via Del Arbor Drive
Scottsdale, Arizona 85258

Dayton A. Mast
2530 Hillside Dr
Dallas, Texas 75214

Don & Erma Marie Holliday
22883 East Heritage Parkway
Aurora, Colorado 80016

Eagle Land Services
4508 Colleyville Blvd.
Colleyville, Texas 76340

Edward R.Perret
23955 East 26th Ave
Aurora, Colorado 80019

Edwin J. Wittelshofer
Denver County
Address Unknown

Elma M. Welch
Address Unknown

Exterra Resources
518 17th St. Suite 1015
Denver, Colorado 80202

Fairbrook Investments, LLC
1493 Senters Street
Burlington, Colorado 80807

Federal Aviation Administration
1601 W. Lind Avenue SW , Suite 570
Renton, Washington 98055-4056

Foxridge Mobile Home Park Associates
LLL
2 W. Dry Creek Cir , #200
Littleton, Colorado 80210

FR Harvest, LLC
C/O Barry P. Marcus
50 North Water Street
Norwalk, Connecticut 06854

Frank N. Bancroft
Address Unknown

Front Range Airport Authority
5200 Front Range Parkway
Watkins, Colorado 80137

Furniture Row Colorado LLC
5641 North Broadway
Denver, Colorado 80216

Green Valley East LLC
4908 Tower Road
Denver , Colorado 80249

GVR King, LLC
4908 Tower Road
Denver, Colorado 80249

Harry D. and Linda J. Richardson
5555 S. Monaco Street
Englewood, Colorado 80111

Harvey B. Alpert
7900 East Union Avenue, Suite 700
Denver, Colorado 80237

Henry W. Grimm, Jr., et ux
647 Laredo St.
Aurora, Colorado 80011

Herbert H. Champlin Revocable Trust
P.O. Drawer 3488
Enid, Oklahoma 73702

Hertal Properties LLC
6731 East 50th Avenue
Commerce City, Colorado 80022

Hezekiah Epperson
Address Unknown

Hilcorp Energy
1201 Louisiana Street, Suite 1400
Houston, Texas 77002

ICG Leaseback Fund, LLC
25900 West 11 Mile Rd., Suite 260
Southfield, Minnesota 48034

Icon Land I LLC
7100 E. Bellevue Avenue, Suite 350
Greenwood Village, Colorado 80111

International Trust Company Trust
450 S. Fourth Avenue
Brighton, Colorado 80601

Interstate 70, Ltd
c/o Land Services
7200 S. Blackhawk St. , Suite 201
Englewood, Colorado 80112

James C. Wallace
Address Unknown

John Bauer
1703 Willow Drive
Sandusky, Ohio 44870

John R. Cline
Address Unknown

Jose Ricardo Santoya
23955 East 26th Ave
Aurora, Colorado 80019

Kristine Kneib Trust
6333 La Jolla Blvd., Unit 376
La Jolla, California 92037-6622

L & S Capital, Ltd.
800 US Hwy 36
Byers, Colorado 80103

L. C. Fulenwider, Inc.
1125 17th Street, Suite 2500
Denver, Colorado 80202

Larry Allen Goldhirsch
7900 East Union Avenue, Suite 700
Denver, Colorado 80237

Leland J. Alpert
7900 East Union Ave.
Tower 3, Suite 700
Denver, Colorado 80237

Lloyd H. and Shirley A. Linnebur
800 Highway 36
Byers, Colorado 80103

Lottie B. Peak
Address Unknown

Lowell D. Piland
43651 E 38th Ave.
Bennett, Colorado 80102

Mary Foley Heron
621 Seventeenth
Denver, Colorado 80293

Mary V. Cloud
506 Cedar Avenue
Long Beach, California 90802

McEniry Ventures, LLC
16612 East Prentice Circle
Centennial, Colorado 80051

McVey Family LLC
200 Riverview Drive
La Belle, Florida 33935

McVey Living Trust, dated
September 23, 1997
1705 Quince Ave
Boulder, Colorado 80304

Michael McVey
P.O. Box 2135
La Belle, Florida 33935

Michael A. Sheldon
7900 East Union Avenue, Suite 700
Denver, Colorado 80237

Neil O'Blenness
6007 Denny Avenue
North Hollywood, California 91606

Ozark Automotive Distributors, Inc.
c/o Thomson Reuters
P.O. Box 06116
Chicago, Illinois 60606

Patricia Blakeslee
4811 Lawn Ave.
Western Springs, Illinois 60558-1730

Patricia Ann Fischahs
6756 East Exposition Avenue
Denver, Colorado 80224

PCY Holdings LLC
1490 Lafayette Street, Suite 203
Denver, Colorado 80218

People's Bank & Trust
Address Unknown

Phillips Family Trust
Address Unknown

Pierce Hardy, LP
1019 Route 519
Eighty Four, Pennsylvania 15330

Prologis Park 70 Land Venture, LLC
1125 17th Street, Suite 1575
Denver, Colorado 80202

Property Reserve, Inc.
60 East South Temple, Suite 780
Salt Lake City, Utah 84111

Public Service Company of Colorado
P.O. Box 840
Denver, Colorado 80201

Redstone LLC
2010 N Memorial Dr
Tulsa, Oklahoma 74115-3833

Richard A. Webster
P.O. Box 255
Glen Arbor, Michigan 49636-0255

Robert W. Webster
4735 Grand Ave.
Western Springs, Illinois 60558-1738

Ruth A. Bell
PO Box 24
Rye, Colorado 81069

Sally McVey
429 Terry Street
Longmont, Colorado 80501

Sharon Lee Dowhan
27450 East Colfax Avenue
Aurora, Colorado 80018

Shirley I. Craig
Route 3, Box 343
Aurora, Colorado 80011

SJSA Investments, LLC
250 Pilot Road, Suite 140
Las Vegas, Nevada 89119

State of Colorado
1127 Sherman St., Suite 300
Denver, Colorado 80203

Summit Investments, Inc.,
930 Utica Drive
Castle Rock, Colorado 80108

Sun Empire II Ltd.
2 Adams Street, No. 601
Denver, Colorado 80206

Sun Empire VI LLC
2 Adams Street, No. 601
Denver, Colorado 80206

Sun Empire VIII LLC
2 Adams Street, No. 601
Denver, Colorado 80206

Sun Hui Warren
22551 E. Euclid Place
Aurora , Colorado 80016

Terrance G. King
4136 South Quatar Street
Aurora, Colorado 80014

The Department of Highways
State of Colorado
4201 East Arkansas Ave.
Denver, Colorado 80222

The Estate of Jack DeWayne Danford
a/k/a/ Jack D. Danford
5097 Imboden Mile Road
Watkins, Colorado 80137

The Phillips Family Trust
c/o Toni V. Phillips-Todd
23855 E. 26th Ave.
Aurora, Colorado 80019

Theodore J. Alpert
7900 East Union Avenue, Suite 700
Denver, Colorado 80237

Thomas M. Webster, Sr. and Judith S.
Webster Family Trust
3439 Shady Spring Lane
Mountain View, California 84040-4542

Transport Industrial Development Ltd.
2 N Cascade Ave., Suite 1280
Colorado Springs, Colorado 80903

TTX Enterprises, LLC
10655 Six Pines Dr., Suite 150
The Woodlands, TX 77380

Twin Elms, LLC
7315 East Orchard Road, Suite E-400
Greenwood Village, Colorado 80111

Van Schaack Holdings, Ltd.
288 Clayton St., Suite 305
Denver, Colorado 80206

Vicki McVey
200 Riverview Drive
La Belle, Florida 33935

Westcott White
7900 East Union Avenue, Suite 700
Denver, Colorado 80237

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4955 E. 74th Ave.
Commerce City, CO 80022

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Denver, CO 80216

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and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530