

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)
ESTABLISHING FIELD RULES GOVERNING)
OPERATIONS IN THE NIOBRARA FORMATION)
ON UNSPACED LANDS IN THE WATTENBERG)
FIELD, ARAPAHOE 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 to reduce lease line setbacks from 600 feet to 460 feet, and to reduce the distance between treated intervals of wellbores from 1200 feet to 920 feet for production of oil, gas, and other hydrocarbons from the Niobrara Formation within certain unspaced lands described as follows:

Township 4 South, Range 64 West 6th P.M.

Section 1: All
Section 3: All
Section 7: All
Section 9: All
Section 19: All

Township 4 South, Range 65 West, 6th P.M.

Section 1: All
Section 13: All
Section 19: All
Section 25: All
Section 27: All
Section 29: All

Arapahoe 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 mineral interests in the Application Lands.
3. The Application Lands are unspaced with respect to the Niobrara formation.
4. Pursuant to Commission Rule 318.a., a well to be drilled two thousand five hundred (2,500) feet or greater in depth shall be located not less than 600 feet from any lease line, and shall be located not less than 1,200 feet from any other producible or drilling oil or gas well when drilling to the same common source of supply, unless authorized by order of the Commission upon hearing.
5. To facilitate completion of one or more horizontal wellbores within the Application Lands, and to maximize the lateral run of such horizontal wells, Application requests the Commission

enter an order allowing the treated interval of any horizontal well completed in the Niobrara Formation within the Application Lands may be located 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 Application Lands producing from the Niobrara Formation.

7. Applicant asserts that reducing the lease line setbacks to 460 feet and reducing the distance between treated intervals of wells to 920 feet in 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.

8. Notice will be provided to the interested parties set forth on Exhibit A pursuant to Rules 503 and 507.b.(5).

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. Providing that the surface location for each horizontal well drilled within a given section of the Application Lands may be located anywhere within the section or on adjoining lands with appropriate surface owner approval; the lateral of a given horizontal well may enter the Niobrara Formation no closer than 300 feet from the section line; the treated interval within the Niobrara Formation may be located not closer than 460 feet from the section line; and the distance between the treated interval of Niobrara wells within the Application Lands shall not be less than 920 feet;

B. Finding that reducing the setbacks and well-to-well distance as requested will prevent waste, protect correlative rights, and will maximize the efficient and economic production of the Niobrara Formation on the Application Lands; and

C. Granting any other relief as may be appropriate.

Dated this ____ day of October, 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:
Anadarko E&P Company LP
Attn: Enrique Nelson
1099 18th St., Suite 1800
Denver, CO 80202

VERIFICATION

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

Enrique Nelson, of lawful age, being first duly sworn upon oath, deposes and says that he _____ for Anadarko E&P Company LP and that he has read the foregoing Application and that the matters therein contained are true to the best of his knowledge, information and belief.

Enrique Nelson

Subscribed and sworn to before this ____ day of October, 2011.

Witness my hand and official seal.

[SEAL]

My commission expires: _____

Notary Public

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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 October ____, 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 October ____, 2011.

Witness my hand and official seal.

My commission expires: _____.

Notary Public

EXHIBIT A

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attn: County Commissioner
Brighton, CO 80601

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Denver, Colorado 80206

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