

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, 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 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 3 South, Range 64 West 6<sup>th</sup> P.M.  
Section 19  
Section 31

Township 3 South, Range 65 West, 6<sup>th</sup> P.M.  
Section 19

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 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 16<sup>th</sup> 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**

Athanasea Constan Stathopoulos  
4014 South Niagara Way  
Denver, Colorado 80237

Aubrey Gene Reynolds  
2772 Gentry Court  
Watkins, Colorado 80137

Barbara S. Heurich  
2962 Haskell Court  
Watkins, Colorado 80137

Bennett Fire Protection District No. 7  
825 Shari Court  
Bennett, Colorado 80102

Box Elder AZ, LLC, First Financial  
Strategies, Inc.  
3101 N. Central Avenue Ste. 1030  
Phoenix, Arizona 85012

Carey Irene and Charles Mark  
Southwell  
2953 Haskell Court  
Watkins, Colorado 80137

Carl E. and Joan F. Metsker  
2943 Fountain Hill Court  
Watkins, Colorado 80137

Charles A. and Patricia G. Winters  
2990 Eclectic Street  
Watkins, Colorado 80137

Chesapeake Exploration, LLC  
PO Box 18496  
Oklahoma City, Oklahoma 73154

Chris Drysdale and Dianna J.  
Hutcherson  
2874 Haskell Court  
Watkins, Colorado 80137

City of Aurora  
15151 East Alameda Parkway, 5th  
Floor  
Aurora, Colorado 80012

Conoco Phillips Company  
3300 North A Street Suite 5-140  
Midland, Texas 79705

Country Manor Properties, LLC

Craig R. Porter  
2881 Gentry Court  
Watkins, Colorado 80137

Dale and Priscilla Fox  
2952 Fountain Hill Court  
Watkins, Colorado 80137

Daniel J. and Marcia J. Gallegos  
3350 East 156th Avenue  
Brighton, Colorado 80602

Daniel M. and Holly J. Cray  
323 Pierce Street  
Lakewood, Colorado 80226

Dean and Darlene Ahlsten  
PO Box 236  
Watkins, Colorado 80137

Dennis R. and Jessica Cabral  
PO Box 51  
Watkins, Colorado 80137

Deutsche Bank National Trust  
Company  
60 Wall Street  
New York, New York 10005

Devon Energy Corporation  
20 North Broadway  
Oklahoma City, Oklahoma 73102

Donald W. and Merri-Lynn Rice  
2950 Hanover Court  
Watkins, Colorado 80137

Dorothy M. and Gerrit A., Trustees  
Van Dyk  
The Gerrit A. Van Dyk and Dorothy  
M. Revocable Trust  
920 Antelope Drive West  
Bennett, Colorado 80102

Duston Hein  
10912 Parker Vista Way  
Parker, Colorado 80138

Elisabeth Wilson  
PO Box 268  
Watkins, Colorado 80137

Ellen S. Harper  
2774 Haskel Court  
Watkins, Colorado 80137

Fairbrook Investments LLC  
P.O. Box 128  
Burlington, Colorado 80807

Floyd R., Trustee Fisher  
The Floyd R. Fisher Revocable Trust  
PO Box 815  
Higley, Arizona 85236

Forrest L. and Vida L. Brewer  
33955 East 25th Avenue  
Watkins, Colorado 80137

Frank M. and Mary Q Andaderholt  
PO Box 535  
Watkins, Colorado 80137

Gary L. and Ruth E. Nordahl  
2981 Hanover Court  
Watkins, Colorado 80137

Gayle L. Epperson  
35070 East Colfaxe Avenue  
Watkins, Colorado 80137

Gene T. Jagmin  
2971 Hanover Court  
Watkins, Colorado 80137

GMJ Family Trust  
7025 South Andes Circle  
Centennial, Colorado 80016

Green Valley East LLC  
4908 Tower Road  
Denver, Colorado 80249

Gregory Straight  
2993 Fountain Hill Court  
Watkins, Colorado 80137

GVR King, LLC  
4908 Tower Road  
Denver, Colorado 80249

Henry A. and Darlene A. Elgin  
2805 Haskell Court  
Watkins, Colorado 80137

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

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

James R. and Ruth A. Mewaldt  
2970 Eclectic Street  
Watkins, Colorado 80137

Jeff Drohan 120 South McKenna Poteau, Oklahoma 74953	Mitchell M. and Michelle D. Collins 2752 Gentry Court Watkins, Colorado 80137	Tommy, Trustee Ernades The Joanne Andernandex Trust PO Box 486 Watkins, Colorado 80137
John F. and Jane Person 2991 Eclectic Street Watkins, Colorado 80137	Paul Ennis and Chizuko Dennis 2963 Fountain Hill Court Watkins, Colorado 80137	Transport Industrial Development 2 North Cascade Avenue Ste. 1280 Colorado Springs, Colorado 80903
Joseph M. Barger 2982 Haskell Court Watkins, Colorado 80137	Robert E. Hastings 2950 Eclectic Street Watkins, Colorado 80137	Twin Elms LLC 7315 East Orchard Road Suite e-400 Greenwood Village, Colorado 80110
Joseph William Ardizzone, II 32511 East Colfax Avenue Watkins, Colorado 80137	Robert E. and Linda Maes 2992 Fountain Hill Court Watkins, Colorado 80137	Uncle Jim's LLC 1703 Willow Drive Sandusky, Ohio 44870
Juliette Nichols PO Box 1059 Clarksdale, Mississippi 38614	Ronald F. and Kelly M. Moench 32555 Front Street North Watkins, Colorado 80137	Ursula Eleanor Larato 96 Lookout Mountain Road Golden, Colorado 80401
Kenneth J. Freund, Sr. 1950 Chambers Road Aurora, Colorado 80011	Ruby Mielke 780 Iowa Avenue Stratton, Colorado 80836	Virgil E. and Helen M. Peterson PO Box 187 Watkins, Colorado 80137
Larry K. Jones 2882 Gentry Court Watkins, Colorado 80137	Samuel A. and Kay D. Taylor 2860 Eclipse Street Watkins, Colorado 80137	Walter and Hildegard Neubauer 419 Forest Ridge Drive Kerrville, Texas 78028
Mark M. and Sharon S. Johnson PO Box 141 Watkins, Colorado 80137	Silco Fuels, Inc. Watkins Investment Group, Ltd 4315 Wadsworth Boulevard Wheat Ridge, Colorado 80033	Watkins 80 Co. 7025 South Andes Circle Centennial, Colorado 80016
McVey Family LLC 200 Riverview Drive La Belle, Florida 33935	Stacey and Lori Martin 2983 Haskell Court Watkins, Colorado 80137	Watkins 80 Co. Watkins Elevator, Inc. PO Box 72 Watkins, Colorado 80137
Michael A. and Stacey L. Cranwill 2861 Eclipse Street Watkins, Colorado 80137	Stanley J. Dru 1277 E. Missouri Avenue #214 Phoenix, Arizona 85014	Watkins Elevator, Inc. Silco Fuels, Inc. 181 East 5th Avenue Suite 600 Denver, Colorado 80216
Michael E. Loehrig 18239 East Mexico Place Aurora, Colorado 80017	Terry L. and Sally A. Ogden 33752 East 29th Avenue Watkins, Colorado 80137	Watkins Investment Group, Ltd Country Manor Properties, LLC 32681 East Colfax Avenue Watkins, Colorado 80137
Mitchell M. and Michelle D. Collins 2951 North Hanover Court Watkins, Colorado 80137	The Leonard E. Epperson Revocable Living Trust 2 West Northern Avenue Unit #1 Phoenix, Arizona 85021	