

**BEFORE THE OIL AND GAS CONSERVATION COMMISSION
OF THE STATE OF COLORADO**

IN THE MATTER OF THE APPLICATION OF SAMSON
RESOURCES CORPORATION FOR AN ORDER
ESTABLISHING WELL DENSITY AND WELL
LOCATION RULES FOR THE FRUITLAND COAL
FORMATION FOR CERTAIN DESCRIBED LANDS IN
LA PLATA COUNTY, COLORADO

CAUSE NO.

DOCKET NO.

APPLICATION

COMES NOW Samson Resources Corporation ("Applicant"), by its attorneys, Beatty & Wozniak, P.C., and makes application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission") for an order establishing well density and well location rules for the Fruitland Coal Formation covering certain described lands in La Plata County, Colorado and in support of its application states and alleges as follows:

1. Applicant is duly authorized to conduct business in the State of Colorado.
2. Applicant owns leasehold interests in a substantial portion of the following described lands:

Township 34 North, Range 7 West, N.M.P.M.
Section 1U: Lots 1, 2, 3, and 4
Section 12U: N½

La Plata County, Colorado (hereafter "Application Lands").

3. On August 15, 1998, the Commission entered Order No. 112-61 which, among other things, established that the fractional sections south of the Southern Ute line in Township 34 for all ranges so affected shall be included with the 320-acre drilling and spacing units in the full section to the south, and the units shall be stand up if possible. Pursuant to Order No. 112-61, the following lands comprise a 397.92 drilling and spacing unit upon the Application Lands:

Township 34 North, Range 7 West, N.M.P.M.
Section 1U: Lots 1, 2, 3, and 4
Section 12U: N½

La Plata County, Colorado (hereafter "Drilling and Spacing Unit").

4. On October 20, 1998, the Commission entered Order No. 112-148 which amended Order No. 112-61 which, among other things, and allowed eighteen (18) wells to be drilled as additional wells on certain 320-acre drilling and spacing units for the production of gas and associated hydrocarbons from the Fruitland Coal Formation.

5. On July 11, 2000, the Commission entered Order No. 112-156 which, among other things, amended Order Nos. 112-60, 112-61 and 112-85 and allowed an optional additional well to be drilled in certain 320-acre drilling and spacing units with the permitted well to be located

in any undrilled quarter section no closer than 990 feet to any outer boundary of the unit nor closer than 130 feet to any interior quarter section line. The Application Lands are subject to Order No. 112-156.

6. On July 11, 2000, the Commission entered Order No. 112-157 which, among other things, amended Order Nos. 112-60, 112-61 and 112-85 to allow an optional additional well to be drilled in certain 320-acre drilling and spacing units with the permitted well to be located in any undrilled quarter section no closer than 990 feet to any outer boundary of the unit nor closer than 130 feet to any interior quarter section line. The Application Lands are subject to Order No. 112-157.

7. On October 31, 2005, the Commission entered Order No. 112-181 which, among other things, allowed a total of four (4) wells to be optionally drilled in each 320-acre drilling and spacing unit for certain lands, including the Application Lands, 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 the production of gas from the Fruitland coal seams.

8. On December 9, 2008, the Commission entered Order No. 112-214 which, among other things, allowed up to four (4) optional wells in certain 320-acre drilling and spacing units with the permitted well to be located no closer than 660 feet from the unit boundary and with no setback to any interior section line. The Application Lands are subject to Order No. 112-214.

9. Applicant hereby requests that the Commission establish that a total of up to five (5) wells may be drilled and completed within the Drilling and Spacing Unit comprising the Application Lands for production of gas and associated hydrocarbons from the Fruitland Coal Formation.

10. Applicant submits that three (3) of the four (4) allowed wells have been drilled within the Drilling and Spacing Unit comprising the Application Lands. Applicant seeks Commission approval to drill an additional well in the Drilling and Spacing Unit which will result in a total of five (5) wells in the Application Lands. Applicant confirms that the additional two (2) wells (one allowed, one proposed) shall each be located no closer than 660 feet from the unit boundary and shall be drilled from new pads.

11. The granting of this Application will not promote waste; will not violate correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoir.

12. That the names and addresses of the interested parties according to the information and belief of the Applicant are set forth in Exhibit A attached hereto and made a part hereof.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing in March, 2012, that notice be given as required by law and that upon such hearing this Commission enter its order consistent with Applicant's proposals as set forth above.

Dated: January ____, 2012.

Respectfully submitted:

SAMSON RESOURCES COMPANY

By:

Michael J. Wozniak
Jamie L. Jost
Elizabeth Y. Gallaway
Beatty & Wozniak, P.C.
Attorneys for Applicant
216 16th Street, Suite 1100
Denver, Colorado 80202

Applicant's Address:

Samson Resources Company
ATTN: Rebecca A. Bell
370 17th St., Ste. 3000
Denver, CO 80202

VERIFICATION

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

Rebecca A. Bell, of lawful age, being first duly sworn upon oath, deposes and says that she is Landman for Samson Resources Company and that she has read the foregoing Application and that the matters therein contained are true to the best of her knowledge, information and belief.

Rebecca A. Bell
Samson Resources Company

Subscribed and sworn to before this ____ day of January, 2012.

Witness my hand and official seal.

[SEAL]

My commission expires: _____

EXHIBIT A

NOTICE LIST

Samson Resources Company
Two West Second Street
Tulsa, OK 741033103

BP America Production Company
501 Westlake Park Blvd
Houston, TX 77079

Southern Ute Tribe of Indians
Southern Ute Agency
P.O. Box 315
Ignacio, CO 81137

Kent Kuster
Colorado Department of Public
Health and Environment
4300 Cherry Creek Drive South
Denver, CO 80246-1530

Kim Kaal
Energy Liaison
Colorado Division of Wildlife
711 Independent Ave.
Grand Junction, CO 81505

Courtney Krueger
La Plata County Planning Department
1060 East 2nd Avenue
Durango, CO 81301

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AFFIDAVIT OF MAILING

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

Elizabeth Gallaway of lawful age, and being first duly sworn upon his oath, states and declares:

That she is the attorney for Samson Resources Company, that on or before January _____, 2012, 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.

Elizabeth Y. Gallaway

Subscribed and sworn to before me January _____, 2012.

Witness my hand and official seal.

My commission expires:

Notary Public