

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

IN THE MATTER OF THE APPLICATION OF ENCANA  
OIL & GAS (USA), INC. FOR AN ORDER  
ESTABLISHING WELL LOCATION RULES FOR  
SECTIONS 17 AND 20, TOWNSHIP 7 SOUTH, RANGE  
92 WEST, 6TH P.M., FOR THE WILLIAMS FORK AND  
ILES FORMATIONS OF THE MESAVERDE GROUP,  
GARFIELD COUNTY, COLORADO

CAUSE NO. \_\_\_\_

DOCKET NO. \_\_\_\_

**APPLICATION**

COMES NOW Encana Oil & Gas (USA), Inc. ("Applicant"), by the undersigned attorneys, and makes this application ("Application") to the Oil and Gas Conservation Commission of the State of Colorado ("Commission") for an order establishing well location rules applicable to from two uncommitted sections within the Hunter Mesa Federal Exploratory Unit for the development and operations of the Williams Fork and Iles Formations of the Mesaverde Group covering certain described lands in Garfield County, Colorado and in support of its application states and alleges as follows:

1. That Applicant is a corporation duly authorized to conduct business in the State of Colorado.

2. That Applicant is the operator of the Hunter Mesa Unit, a federal exploratory unit approved on November 30, 1993 by the Bureau of Land Management. The below described lands are two uncommitted tracts within the Hunter Mesa Unit and are subject to individual Communitization Agreements with the Bureau of Land Management:

Township 7 South, Range 92 West, 6<sup>th</sup> P.M.

Section 17: All

Section 20: All

Garfield County, Colorado (hereinafter the "Application Lands").

3. Under the Commission's Rule 318(d)(3), the well location rules otherwise applicable under Rule 318 do not apply to unit operations approved by federal authorities except that no well in excess of two thousand five hundred (2,500) feet in depth shall be located less than six hundred (600) feet from the exterior or interior (if there be one) boundary of the unit area unless otherwise authorized by the order of the Commission after proper notice to owners outside the unit area.

4. That to promote efficient drainage within the Williams Fork and Iles Formations of the Mesaverde Group of the Application Lands, the Commission should establish new setback rules applicable to the development and operation of the Williams Fork and Iles Formations within the uncommitted sections of the Hunter Mesa Unit for the Application Lands such that Williams Fork and/or Iles Formation wells should be located downhole anywhere upon the Application Lands but no closer than 100 feet from the boundaries of the exterior or interior (if applicable) of the uncommitted tract boundary unless such boundary abuts or corners lands where the Commission has not, as of the time of drilling, permit application granted the right to drill 10 acre

density Williams Fork and/or Iles Formation wells in which event the wells should be located downhole no closer than 200 feet from the exterior or interior (as applicable) unit boundary unless exception is granted by the Director.

5. That to promote efficient drainage within the Williams Fork and Iles Formations of the Mesaverde Group of the Application Lands, the Commission should establish new setback rules applicable to the development and operation of the Williams Fork and Iles Formations on the outer boundaries of the uncommitted sections of the Hunter Mesa Unit for the Application Lands such that Williams Fork and/or Iles Formation wells should be located downhole anywhere upon the Application Lands but no closer than 100 feet from the boundaries of the exterior or interior (if applicable) of the uncommitted tract boundary unless such boundary abuts or corners lands where the Commission has not, as of the time of drilling, permit application granted the right to drill 10 acre density Williams Fork and/or Iles Formation wells in which event the wells should be located downhole no closer than 200 feet from the exterior or interior (as applicable) unit boundary unless exception is granted by the Director.

6. That the above-proposed well location rules will allow more efficient drainage of the Williams Fork and Iles Formations of the Mesaverde Group within the Hunter Mesa Unit and the Application Lands; will prevent waste; will protect correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoir.

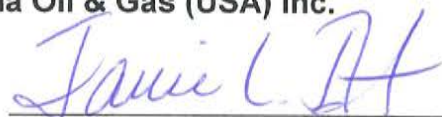
7. That the names and addresses of the interested parties located within the two sections and within one half mile of the outer boundary of the Application Lands according to the information and belief of the Applicant are set forth in Exhibit A attached hereto and made a part hereof.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing in July, 2013, 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: May 30, 2013.

Respectfully submitted:  
**Encana Oil & Gas (USA) Inc.**

By:



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

Applicant's Address:  
Encana Oil & Gas (USA) Inc.  
ATTN: Jessica Sellyei  
370 17th Street, Suite 1700  
Denver, CO 80202



## VERIFICATION

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

Helen M. Capps, of lawful age, being first duly sworn upon oath, deposes and says that she is Attorney-in-Fact for Encana Oil & Gas (USA), Inc. 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.

Helen M. Capps, Attorney-in-Fact  
Encana Oil & Gas (USA), Inc.

Subscribed and sworn to before me this 30 day of May, 2013.

Witness my hand and official seal.

My commission expires: 10-04-19



Teresa L. Peters  
Notary Public

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OF THE STATE OF COLORADO

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GARFIELD COUNTY, COLORADO

CAUSE NO. \_\_\_\_


DOCKET NO. \_\_\_\_

AFFIDAVIT OF MAILING

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

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

That she is the attorney for Encana Oil & Gas (USA), Inc., that on or before June 7 2013, 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 30, 2013.

Witness my hand and official seal.

My commission expires: 10-04-13.



  
\_\_\_\_\_  
Notary Public

## Exhibit A

### Interested Parties

Leo B & Florence Helzel  
Living Trust, Leo B Helzel, Trustee  
5707 Redwood Rd. Suite 6  
Oakland, CA 914619-2400

Barry Craig & Marilyn J. Shideler  
1411 County Road 316  
Silt, CO 81652

2 Quiat LLC Gerald M. Quiat, Manager  
c/o The Quiat Company  
1873 S. Bellaire Street, Suite 900  
Denver, CO 80222

Magic M & R LLC  
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Denver, CO 80222

Mark A. & Cathlyn J. Huttner  
21427 E. Ottawa Circle  
Aurora, CO 80016

Bay Minerals, LLC  
1129 Pennsylvania Street  
Denver, CO 80203

Mimonte LLC  
PO Box 3358  
Englewood, CO 80155

Captiva Resources Inc.  
8001 S. InterPort Blvd., Suite 360  
Englewood, CO 80112

Jacque Couey Burris  
5411 County Road 346  
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Kelly Wilbur Couey  
6275 County Road 315  
Silt, CO 81652

Neil & Susan Wagstrom, JT  
449 Ram Ln  
Silt, CO 81652

Karen L. Miller  
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Chester E. Wittwer  
620 Ford Dr.  
Durango, CO 81301

Anna Laura Norcross  
1620 Hermosa Ave., Suite 46  
Grand Junction, CO 81506

Edward C. Loshbaugh  
662 28 Rd.  
Grand Junction, CO 81506

HHK Wilcox Company Inc, Leo B. Helzel, President  
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Oakland, CA 94619-2400

Bryan Llewellyn Vaughan  
128 Britten Rd.  
Basingstoke, HAM RG22 4HP

Catherine Owen  
Trem Y Gath Poplar Rd.  
Rhydyfelin Pontypridd,  
South Wales, LDN CF 37 5LS

Estate of Stephen J. Brown  
c/o Chris Mahre & Associates  
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HHK Wilcox Company Inc, Leo B. Helzel, President  
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Merced, CA 95340

Laura Luke  
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Grand Junction, CO 81506

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8544 315 Rd.  
Silt, CO 81652

Margaret Mary Sweeny  
3654 Northwood Dr.  
Castro Valley, CA 94546

Montego Minerals LP  
PO Box 2379  
Midland, TX 79702

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Ouray, CO 81427

Sheila Sweeny Fossen  
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Thornton, CO 80241

Spindletop Exploration Company, Inc.  
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Dallas, TX 75225

White Star Energy Inc.  
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Midland, TX 79710

Gary D. & Karen K. Hill  
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J Gentry  
PO Box 1300  
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JAKBEK Ltd.  
5957 Rd 319  
Rifle, CO 81650

Kristine M. Peterson  
5951 Middlefield Rd, Suite 205  
Littleton, CO 80123-7917

Linda Mary Vaughan  
2 Raff Cottages Llwnypia  
Mid Glamorgan County M6  
Porth Rhondda MGM CF40 2JG

MAP2003-NET  
an Oklahoma General Partnership  
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PO Box 268947  
Oklahoma City, OK 73126

Marilyn S. Hajicek  
2980 S. Newcombe Way  
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Morgo Family Ltd Partnership  
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Louisville, CO 80027

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Glenwood Springs, CO 81601

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7223 S. Zephyr Way  
Littleton, CO 80128

Virgina Brown Dunfee Cain  
105 Linda Ct.  
Georgetown, TX 78628

William Alexander Fairweather &  
Norma Fairweather  
12 Pendicke St.  
Southam, WAR CV47 1PF

Ralph Snow  
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Grand Junction, CO 81503

Carol Jo Shideler Bennett  
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American Fork, UT 84003

The Esperanza Corp.  
475 17 St, Suite 980  
Denver, CO 80202

Marshall Quiat Trust  
c/o Nicolette Rounds Trustee  
3773 Cherry Creek Dr. 575  
Denver, CO 80209

Left Hand Resources  
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Boulder, CO 80307

BJJ Partners  
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Denver, CO 80203

Daniels Petroleum Company  
1499 Blake St., Suite 7K  
Denver, CO 80202

United States Department of Interior  
Bureau of Land Management  
2850 Youngfield Street  
Lakewood, CO 80215

Benson Mineral Group, Inc.  
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Denver, CO 80202

Joanne Lisa Couey  
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Silt, CO 81652



Testamentary Trust  
Established by Marvelle P. Couey  
7238 County Road 315  
Silt, CO 81652

Margaret M. Devlin  
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Ft. Collins, CO 80524

James Dodge  
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Glenwood Springs, CO 81601

The Carl and Margaret Wittwer Family Trust  
Attn: Margaret L. Wittwer  
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Carole L. Brown  
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Desert Partners II, LP  
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