

**Exhibit C**  
to CCRP Operating, Inc. Sumac 1265-13 OGD Application

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

IN THE MATTER OF THE APPLICATION OF CCRP OPERATING, INC FOR AN ORDER TO ESTABLISH AN APPROXIMATE 1,349-ACRE DRILLING AND SPACING UNIT FOR PORTIONS OF SECTIONS 13, 24 AND 25, TOWNSHIP 12 NORTH, RANGE 65 WEST, 6TH P.M. FOR THE DEVELOPMENT AND OPERATION OF FOUR HORIZONTAL WELLS IN THE NIOBRARA, FORT HAYS, CODELL AND CARLILE FORMATIONS WITHIN AN APPROXIMATE 1,353.3-ACRE "SUMAC 1265-13" OIL AND GAS DEVELOPMENT PLAN CONTAINING ONE NEW AND ONE EXISTING OIL AND GAS LOCATIONS, WILDCAT FIELD, WELD COUNTY, COLORADO

CAUSE NO. 535

DOCKET NO. 220600\_\_\_\_

TYPE: SPACING

**APPLICATION**

COMES NOW CCRP Operating, Inc. (Operator No. 10665) ("CCRP" or "Applicant"), by and through its attorneys, Jost Energy Law, P.C., and respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado (the "Commission" or "COGCC") for an order to: 1) vacate the approximate 640-acre drilling and spacing unit established by Order No. 535-725 for Section 25, Township 12 North, Range 65 West, 6th P.M. for the Codell Formation; 2) vacate the approximate 640-acre drilling and spacing unit established by Order No. 535-725 for Section 25, Township 12 North, Range 65 West, 6th P.M. for the Niobrara Formation; and 3) establish an approximate 1,349-acre drilling and spacing unit for the below-described lands ("Application Lands") and approve four new horizontal wells within the proposed unit for the production of oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations, within an approximate 1,353.3-acre Oil and Gas Development Plan (the "Sumac 1265-13 OGD") filed by Applicant concurrently herewith. In support of its Application, Applicant states and alleges as follows:

1. Applicant is a corporation duly organized and authorized to conduct business in the State of Colorado and is a registered operator in good standing with the Commission.

2. Applicant is an "Owner" as defined by the Oil and Gas Conservation Act and COGCC Rules, and owns leasehold interests or holds the right to operate on the following lands (hereafter "Application Lands"):

Township 12 North, Range 65 West, 6<sup>th</sup> P.M.

Section 13: Lots 1 through 4 (approximately 69 acres), being that portion lying within the State of Colorado

Section 24: All

Section 25: All

Weld County, Colorado.

**Nearby Public Crossroads:** C.R. 39 & C.R. 136

A reference map of the Application Lands is attached hereto.

3. With this Application, CCRP is providing a copy of an Assignment of Federal Oil and Gas Leasehold interests for at least one portion of a mineral tract within the Application Lands showing the Applicant's status as an Owner in accordance with COGCC Rule 303.a.(1). See Exhibit B attached and made a part of the Sumac 1265-13 OGDG Application.

4. Rule 401.a. provides that a Well completion 2,500 feet or greater below the surface will be located not less than 600 feet from any lease line and not less than 1,200 feet from any other existing or permitted Well completion in the same common source of supply, unless authorized by order of the Commission or an exception under Rule 401.c is obtained. Portions of the Application Lands are unspaced and subject to Rule 401.a.

5. On April 4, 2011, the Commission entered Order No. 535-5 which, among other things, established an approximate 708.8-acre drilling and spacing unit for Section 13 (Lots 1-4) and Section 24, Township 12 North, Range 65 West, 6th P.M., and approved two horizontal wells for the unit, for the production of oil, gas and associated hydrocarbons from the Niobrara Formation. Order No. 535-5 was vacated by Order No. 535-648.

6. On October 27, 2014, the Commission entered Order No. 535-570 which, among other things, established an approximate 1,349-acre drilling and spacing unit for Section 13 (Lots 1-4) and Sections 24 and 25, Township 12 North, Range 65 West, 6th P.M., and approved one horizontal well within the unit, for the production of oil, gas and associated hydrocarbons from the Codell Formation. Order No. 535-570 was amended by Order No. 535-725.

7. On May 18, 2015, the Commission entered Order No. 535-648 which, among other things, 1) vacated the approximate 708.80-acre drilling and spacing unit established by Order No. 535-5 for Section 13 (Lots 1-4) and Section 24 (All), Township 12 North, Range 65 West, 6th P.M.; 2) established an approximate 1,349-acre drilling and spacing unit for Section 13 (Lots 1-4) and Sections 24 and 25, Township 12 North, Range 65 West, 6th P.M., and approved seven horizontal wells within the unit for the production of oil, gas and associated hydrocarbons from the Niobrara Formation; 3) approved an additional five horizontal wells, for a total of six horizontal wells, in the approximate 1,349-acre drilling and spacing unit established for Section 13 (Lots 1-4) and

Sections 24 and 25, Township 12 North, Range 65 West, 6th P.M., for the production of oil, gas and associated hydrocarbons from the Codell Formation; and 4) required the productive intervals of the wellbore to be not less than 600 feet from the unit boundaries with an inter-well setback of not less than 600 feet from the treated interval of a well producing from the same common source of supply, without exception being granted by the Director. Order No. 535-648 was amended by Order No. 535-725.

8. On March 7, 2016, the Commission entered Order No. 535-725 which, among other things: 1) amended the approximate 1,349-acre drilling and spacing unit established for certain portions of Section 13, and all of Sections 24 and 25, Township 12 North, Range 65 West, 6th P.M., so that such drilling and spacing unit covers only the approximate 640-acre drilling and spacing unit for Section 25, Township 12 North, Range 65 West, 6th P.M., for the production of oil, gas and associated hydrocarbons from the Codell Formation; 2) amended the approximate 1,349-acre Niobrara Formation drilling and spacing unit established for certain portions of Section 13, and all of Sections 24 and 25, Township 12 North, Range 65 West, 6th P.M., so that such drilling and spacing unit covers only the approximate 640-acre drilling and spacing unit for Section 25, Township 12 North, Range 65 West, 6th P.M., for the production of oil, gas and associated hydrocarbons from the Niobrara Formation; 3) provided that the productive intervals of the wellbore shall be located not less than 600 feet from the unit boundaries, and not less than 150 feet from any other well or productive interval of a well producing from the same formation, without exception being granted by the Director; and 4) provided that sections 13 and 24, Township 12 North, Range 65 West, 6th P.M. will be unspaced and shall revert to Rule 318.a.

9. The records of the Commission reflect that the following Well was drilled but not completed from the Grynberg Stateline Federal 24-12-65-4 Pad (Location ID 441995) located within the Application Lands, operated by Applicant:

Well Name	API Number	Status
Grynberg Stateline Federal # 24-12-65-4-NH	05-123-44404	WO

10. Applicant does not intend to produce the Grynberg Stateline Federal # 24-12-65-4-NH Well (API No. 05-123-44404) and will plug, abandon and reclaim the Grynberg Stateline Federal 24-12-65-4 Pad (Location ID 441995) in accordance with COGCC Rules.

11. The records of the Commission reflect that the following Form 2 APD is currently expired within the Application Lands for the Niobrara Formation from the abandoned RESOLUTION 12-65-25-25-4CH Pad (Location ID 445497) within the Application Lands, operated by Anadarko E&P Onshore LP:

Well Name	API Number
RESOLUTION # 12-65-25-25-5NH	05-123-43082

12. Applicant is unaware of any plans for a new Form 2 or Form 2A for development of the RESOLUTION # 12-65-25-25-5NH Well or associated Location.

13. The True Ranch Fee 2326 East Oil and Gas Location (Location ID 456179) is located adjacent to the Application Lands in the NE $\frac{1}{4}$ NE $\frac{1}{4}$  of Section 23, Township 12 North, Range 65 West, 6<sup>th</sup> P.M. and has the following Abandoned (AL), Temporarily Abandoned (TA), Expired Permit (EP) and Shut-In (SI) Wells on the Location, operated by Applicant:

Well Name	API Number	Status
True Ranch Fee #503-2326H	05-123-47410	AL
True Ranch Fee #202-2326H	05-123-47411	TA
True Ranch Fee #203-2326H	05-123-47412	EP
True Ranch Fee #502-2326H	05-123-47413	SI

14. The above-described Wells and Permits are not included in the Sumac 1265-13 OGDG and will not produce in the Application Lands. Applicant will either workover, recompleat or plug and abandon the True Ranch Fee #202-2326H Well (API No. 05-123-47411) and will return the True Ranch Fee #502-2326H Well (API No. 05-123-47413) to production. Applicant does not intend to produce the abandoned and expired True Ranch Fee #503-2326H Well (API No. 05-123-47410) and True Ranch Fee #203-2326H Well (API No. 05-123-47412). Applicant will drill one new Well from the existing True Ranch Fee 2326 East Oil and Gas Location (Location ID 456179) within the proposed approximate 1,349-acre drilling and spacing unit for the Application Lands.

15. CCRP will utilize the new Sumac 1265-13 Pad located in the Application Lands in the in the SW $\frac{1}{4}$ SE $\frac{1}{4}$  of Section 13, Township 12 North, Range 65 West, 6<sup>th</sup> P.M., for the development of three new horizontal Wells in the proposed approximate 1,349-acre drilling and spacing unit for the Application Lands. With this Application, CCRP submitted sworn testimony pursuant to Rule 505 regarding the criteria listed in Rule 304.b.(2).B that apply to both the existing and the proposed Oil and Gas Locations.

16. Based on the location of the existing True Ranch Fee 2326 East Pad (Location ID 456179) and the Sumac 1265-13 Pad for development of the Application Lands, Weld County is the jurisdiction with siting authority. CCRP has an approved siting permit from Weld County for the existing True Ranch Fee 2326 East Pad (Location ID 456179). CCRP is concurrently seeking a WOGLA siting permit from Weld County for the siting and the related surface disturbance for the Sumac 1265-13 Pad pursuant to Rule 301.f.

17. CCRP anticipates that it will submit an application to pool all interests, including any non-consent interests, within the Application Lands at a future date. At the time of future pooling, CCRP will present evidence that it owns or has secured the consent of the owners of over 45% leasehold interest in the Application Lands pursuant to the requirements of C.R.S. § 34-60-116(6)(b)(I).

18. The Application Lands include fee and federal minerals. CCRP agrees to obtain a Communitization Agreement with the BLM during the federal permitting process and prior to first production within the Application Lands.

19. CCRP certifies that the approval of an approximate 1,349-acre Drilling and Spacing Unit for the Application Lands will result in development that will protect and minimize adverse impacts to public health, safety, and welfare, the environment, and wildlife resources and will protect against adverse environmental impacts on any air, water, soil or biological resource in compliance with C.R.S. § 34-60-106(2.5)(a). CCRP certifies that its operations in the Application Lands will be conducted in a reasonable manner to protect and minimize adverse impacts to public health, safety, welfare, the environment, and wildlife resources. With this Application, CCRP submitted sworn testimony pursuant to Rule 505 supporting the protection of public health, safety, welfare, the environment and wildlife resources.

20. CCRP further certifies that the approval of an approximate 1,349-acre Drilling and Spacing Unit for the Application Lands prevents waste of oil and gas resources, avoids the drilling of unnecessary Wells, and protects correlative rights. With this Application, CCRP submitted sworn testimony pursuant to Rule 505 supporting the prevention of waste, the avoidance of drilling unnecessary Wells, and the protection of correlative rights.

21. CCRP requests that the spacing order establish 330-foot productive interval setbacks from the northern and southern boundaries of the unit, 600-foot productive interval setbacks from the eastern and western boundaries of the unit, and provide that each horizontal well shall be no closer than 150 feet from the productive interval of any other horizontal well producing from the same formation or common source of supply within the unit. The Wells within the Application Lands will be drilled from a north-south lateral orientation.

22. The undersigned certifies that copies of this Application and the Notice of Hearing will be served on each interested party as required by Rules 504.a. and 504.b.(2).

23. The granting of this Application is in accord with the Oil and Gas Conservation Act, found at §§ 34-60-101 *et seq.*, C.R.S., and the Commission Rules.

24. Applicant requests that relief granted under this Application should be effective on oral order by the Commission, and Applicant hereby agrees to be bound by said oral order.

WHEREFORE, CCRP respectfully requests that this matter be set for hearing in accordance with applicable Commission Rules, that notice be given as required by law, and that upon such hearing this Commission enter its order to:

A. Vacate the approximate 640-acre drilling and spacing unit established by Order No. 535-725 for Section 25, Township 12 North, Range 65 West, 6th P.M. for the Codell Formation;

B. Vacate the approximate 640-acre drilling and spacing unit established by Order No. 535-725 for Section 25, Township 12 North, Range 65 West, 6th P.M. for the Niobrara Formation;

C. Establish an approximate 1,349-acre Drilling and Spacing Unit for the Application Lands for the development and operation of four horizontal Wells for the production of oil, gas, and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations;

D. Provide that the productive interval of the Wells shall be no closer than 330 feet from the northern and southern boundaries of the unit, 600 feet from the eastern and western boundaries of the unit, and the horizontal Wells shall be no closer than 150 feet from the productive interval of any other horizontal well producing from the same formation or common source of supply within the unit;

E. Authorize the existing True Ranch Fee 2326 East Pad (Location ID 456179) adjacent to the unit for the development of one new Well within the Application Lands, and authorize and approve the Sumac 1265-13 Pad within the unit for development of three new Wells within the Application Lands, unless an exception is granted by the Director;

F. Find that the establishment of an approximate 1,349-acre Drilling and Spacing Unit for the Application Lands will prevent waste of oil and gas resources, avoid the drilling of unnecessary Wells, protect correlative rights, and protect public health, safety, welfare, the environment and wildlife resources; and

G. For such other findings and orders as the Commission may deem proper or advisable in this matter.

DATED June 21st, 2022.

Respectfully submitted:

**CCRP Operating, Inc.**



By:

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VERIFICATION

Jesse Martin, of lawful age, being first duly sworn upon oath, deposes and says that he is the VP of Land for CCRP Operating, Inc., 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.

Dated June 20, 2022.

*Jesse Martin*

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Jesse Martin  
VP Land  
CCRP Operating, Inc.



Reference Map  
Wildcat Field, Weld County, Colorado

Township 12 North, Range 65 West, 6<sup>th</sup> P.M.

Section 13: Lots 1 through 4 (approximately 69 acres), being that portion lying within the State of Colorado

Section 24: All

Section 25: All

Weld County, Colorado.

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