

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

IN THE MATTER OF THE APPLICATION)
OF THE PROMULGATION AND)
ESTABLISHMENT OF FIELD RULES TO) Docket No. *To be assigned*
GOVERN OPERATIONS FOR THE)
NIOBRARA FORMATION, UNNAMED)
FIELD, MOFFAT COUNTY, COLORADO)

APPLICATION

SWN Production Company, LLC (Operator No. 10396) (“SWN”), by and through its attorneys Burns, Figa, & Will, P.C., respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado (the “Commission”) for an order to establish an approximate 1,290.78-acre drilling and spacing unit and to approve up to forty-eight (48) horizontal wells and eight (8) vertical wells within the unit, for the production of oil, gas, and associated hydrocarbons from the Niobrara formation in the following lands:

Township 7 North, Range 91 West, 6th P.M.

Section 22: All

Section 23: All

Moffat County, Colorado, containing approximately 1,290.78 acres (“Application Lands”), depicted in the attached Reference Map.

In support of its Application, SWN states and alleges as follows:

1. SWN is a corporation duly authorized to do business in Colorado and is registered as an operator in good standing with the Commission.
2. SWN is an owner with the right to drill into and produce from the Application Lands.
3. The Application Lands are subject to Commission Rule 318.a., which provides that wells drilled in excess of two thousand five hundred (2,500) feet in depth shall be located not less than six hundred (600) from any lease line, and shall be located not less than one thousand two hundred (1,200) feet from any other producible or drilling oil or gas well when drilling to the same source of supply, unless authorized by order of the Commission upon hearing.

4. On January 26, 2015, the Commission entered Order No. 540-50, which established, among other things: 1) an order to create an approximate 644.35 acre drilling and spacing unit within 7N, R91W, Section 23 ("Original Lands") for the production of oil, gas and associated hydrocarbons from the Niobrara formation and 2) approve up to 24 horizontal and four vertical wells within the unit. The Original Lands are also burdened by Order 540-51, which authorized pooling on the Original Lands. There are no further specific Commission orders applicable to the Application Lands.

5. The top of the stratigraphic interval for the Niobrara formation is approximately 9,500 feet. The Niobrara formation is a common source of supply underlying the Application Lands.

6. The Application Lands contain no producing oil and/or gas wells. The Application Lands do include approved locations and APDs. SWN intends to include these wells within the drilling and spacing unit proposed in this Application. The establishment of the proposed drilling and spacing unit will result in efficient and economic development of the Application Lands.

7. SWN requests that the Commission amend Order 540-50 in order to expand the approximate 644.35-acre drilling and spacing unit comprised of the Original Lands, for production of oil, gas, and associated hydrocarbons from the Niobrara formation, into a larger 1,290.78-acre drilling and spacing unit for the production of oil, gas, and associated hydrocarbons from the Niobrara formation, comprised of the Application Lands. SWN's data indicates that the proposed amended drilling and spacing unit is not smaller than the maximum area that can be economically and efficiently drained by the proposed wells, and will create a unit that will better prevent waste and protect correlative rights.

8. SWN further requests that the Commission approve the drilling and completion of up to forty-eight (48) horizontal, using a North-South orientation, and eight (8) vertical wells within the unit, from locations anywhere within the unit, as necessary to economically and efficiently recover resources from the Niobrara formation, with the treated interval of each well to be located not less than six hundred (600) feet from the unit boundaries, and inter-well setbacks of not less than one hundred and fifty (150) feet from the treated interval of any other well producing from a common source of supply, without exception being granted by the Director. These locations and setbacks will promote economic and efficient drainage, protect correlative rights, and avoid waste.

9. The names and addresses of the interested parties, according to SWN's information and belief, are set forth in the attached Exhibit A, and the undersigned certifies that copies of this Application will be served on each interested party within the next seven days, as required by Rule 503.e.

WHEREFORE, SWN respectfully requests that this matter be set for hearing at the next available opportunity, that notice be given as required by law, and that the Commission enter an Order to:

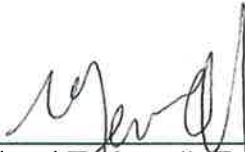
- A. Amend Order 540-50 in order to establish an approximate 1,290.78-acre drilling and spacing unit for the production of oil, gas, and associated hydrocarbons from the Niobrara formation in the Application Lands; and
- B. Approve up to forty-eight (48) horizontal and eight (8) vertical wells within the unit, from locations anywhere within the unit, as necessary to economically and efficiently recover resources from the Niobrara formation, with the treated interval of each well to be located not less than six hundred (600) feet from the unit boundaries, and inter-well setbacks of not less than one hundred and fifty (150) feet from the treated interval of any other well producing from a common source of supply, without exception being granted by the Director.

[CONTINUED ON NEXT PAGE]

DATED this 23rd day of November, 2015.

Respectfully submitted,

SWN PRODUCTION COMPANY, LLC

By: 

Michael T. Jewell, Esq.
License #40902

Burns, Figa & Will, P.C.
6400 S. Fiddler's Green Cir. #1000
Greenwood Village, CO 80111

SWN Production Company, LLC
P.O. Box 12359
Spring, TX 77391-2359

VERIFICATION

STATE OF TEXAS)
)
COUNTY OF HARRIS) ss.

The undersigned, of lawful age, having been first sworn upon his oath, deposes and states that:

1. He is a Staff Landman – New Ventures, for SWN Production Company, LLC, whose address is 10000 Energy Drive, Spring, TX 77389.

2. He has read the attached application, is familiar with the facts set forth therein, and states that said facts are true and correct to the best of his knowledge and belief.

Further Affiant sayeth not.



Bryce Moore, CPL

Subscribed and sworn to before me this 12th day of November, 2015.

Witness my hand and official seal.

My commission expires: October 31, 2016

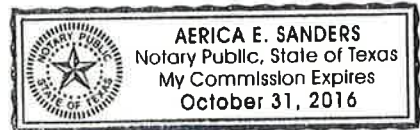




EXHIBIT A

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

United States of America
BLM Colorado State Office
2850 Youngfield Street
Lakewood, Colorado 80215-7093

Michael Warren
Energy Liaison
Colorado Parks and Wildlife
Northwest Regional Office
711 Independent Ave.
Grand Junction, CO 81505

United States of America
BLM White River Field Office
220 East Market Street
Meeker, CO 81641

Jeff Comstock
Natural Resources Director
Moffat County
221 W. Victor Way, Suite 130
Craig, CO 81625

Neko Enterprises, LLC *
HC66 Box 63
Steamboat Springs, Co 80487

Michael T. Jewell
Burns, Figa & Will, P.C.
6400 S. Fiddlers Green Circle – Suite 1000
Greenwood Village, CO 80111

Dennis Stoddard *
c/o James M. Stoddard
P.O. Box 1209
Craig, CO 81625

SWN Production Company, LLC
P.O. Box 12359
Spring, TX 77391-2359

Dennis Stoddard *
10165 Calle Maria Street
Reno, NV 89508

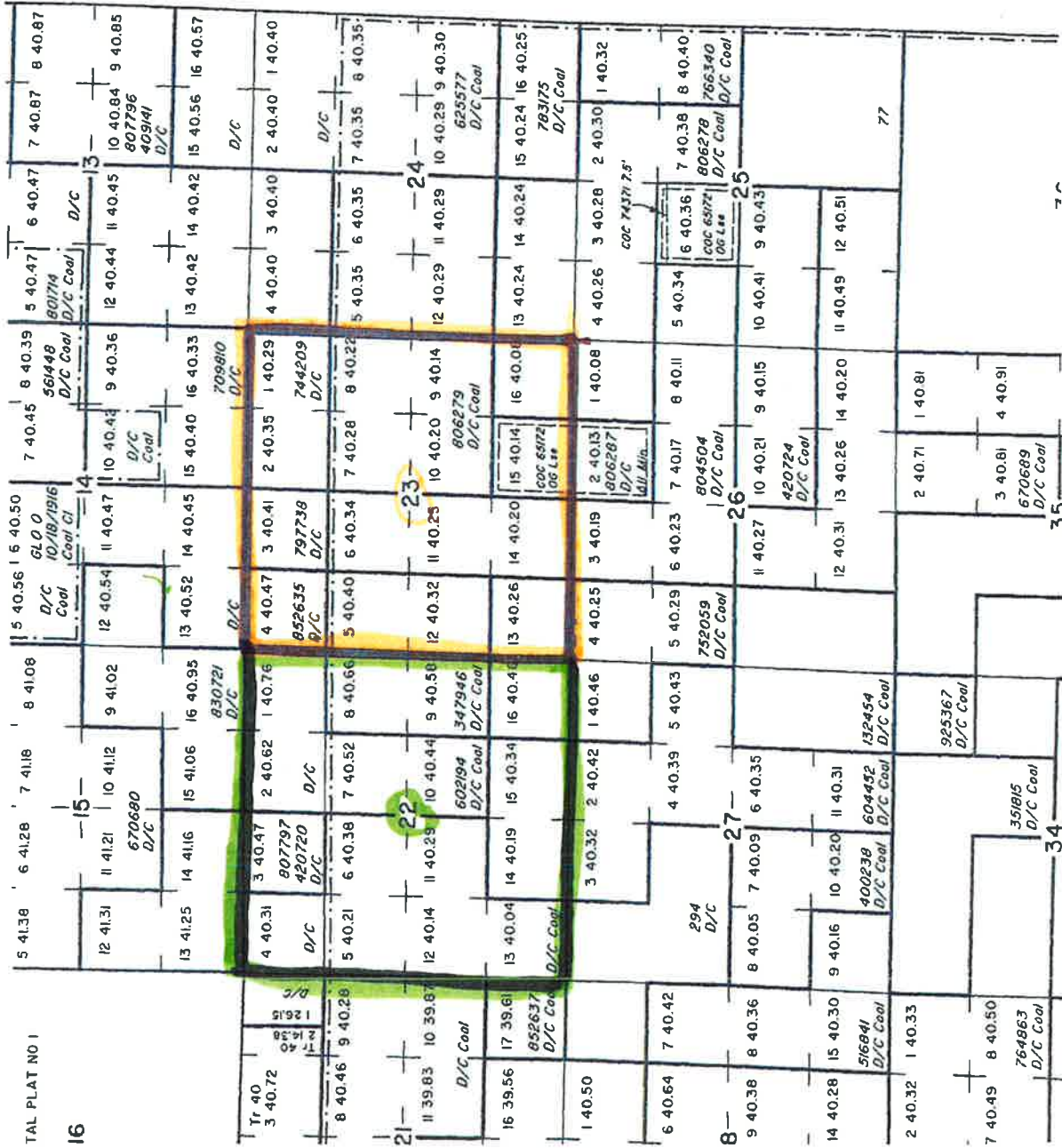
EXHIBIT B

Reference Map

SEE ATTACHED

TAL PLAT NO 1

16



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

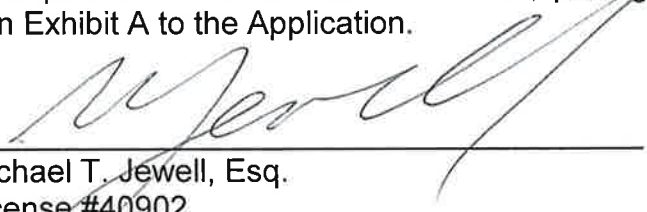
IN THE MATTER OF THE APPLICATION)
OF THE PROMULGATION AND)
ESTABLISHMENT OF FIELD RULES TO)
GOVERN OPERATIONS FOR THE)
NIOBRARA AND MANCOS)
FORMATIONS, UNNAMED FIELD,)
MOFFAT COUNTY, COLORADO)

Docket No. *To be assigned*

CERTIFICATE OF SERVICE

Michael T. Jewell, of lawful age, and being first duly sworn upon his oath, states and declares:

That he is the attorney for SWN Production Company, LLC, and that on or before November 30, 2015, he caused a copy of the Application for spacing submitted to COGCC on November 23, 2015, to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit A to the Application.

By: 
Michael T. Jewell, Esq.
License #40902

Burns, Figa & Will, P.C.
6400 S. Fiddler's Green Cir. #1000
Greenwood Village, CO 80111

STATE OF COLORADO)
) SS.
COUNTY OF ARAPAHOE)

Subscribed and sworn to before me this 23rd day of November, 2015

My commission expires: June 3, 2019

**PARASIA OLEKSIUK
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 20154021765
MY COMMISSION EXPIRES JUNE 3, 2019**

