

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

IN THE MATTER OF THE APPLICATION)	CAUSE NO. _____
OF ANGUS NATURAL RESOURCES, LLC)	
FOR AN ORDER POOLING ALL INTERESTS)	
IN THE MISSISSIPPIAN, SPERGEN, ST. LOUIS,)	DOCKET NO. _____
WARSAW, OSAGE, MORROW, SHAWNEE,)	
MARMATON, FORT SCOTT AND)	
LANSING-KANSAS CITY FORMATIONS IN A)	
240-ACRE DRILLING AND SPACING UNIT)	
IN SECTION 14, TOWNSHIP 15 SOUTH,)	
RANGE 45 WEST, CHEYENNE COUNTY,)	
COLORADO)	

APPLICATION

Angus Natural Resources, LLC (Operator Number 10423) ("Angus"), through its attorneys, respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado (the "Commission") pursuant to C.R.S. § 34-60-116 for an order to pool all interests in a 240-acre drilling and spacing unit for development, operation and production of oil, gas and associated hydrocarbons from the Mississippian, Spergen, St. Louis, Warsaw, Osage, Morrow, Shawnee, Marmaton, Fort Scott and Lansing-Kansas City Formations covering certain lands in Cheyenne County, Colorado. In support of its Application, Angus states as follows:

1. Angus is a Delaware limited liability company duly organized and authorized to conduct business in the State of Colorado. Angus is an operator in good standing with the Commission.

2. Angus has standing as an owner to pursue this Application because it owns oil and gas leasehold interests in the following lands in Cheyenne County, Colorado:

Township 15 South, Range 45 West, 6th P.M.
Section 14: SW $\frac{1}{4}$ NE $\frac{1}{4}$, SE $\frac{1}{4}$ NW $\frac{1}{4}$, E $\frac{1}{2}$ SW $\frac{1}{4}$, W $\frac{1}{2}$ SE $\frac{1}{4}$

(the "Application Lands"). The Application Lands comprise approximately 240 acres. Reference maps of the Application Lands are attached as Exhibits 1 and 2.

3. Contemporaneous with the filing of this Application, Angus has filed a separate application asking the Commission to establish field rules for the Application Lands and to establish the Application Lands as a single drilling and spacing unit consisting of approximately 240 acres within Section 14, as described above, for the production of oil, gas and associated hydrocarbons from the Mississippian, Spergen, St. Louis, Warsaw, Osage, Morrow, Shawnee, Marmaton, Fort Scott and Lansing-Kansas City Formations.

4. At present, the Application Lands are not subject to any Commission orders establishing field rules. But the Application Lands were subject to orders of the Commission between 1969 and 1991.

5. On October 21, 1969, the Commission issued Order No. 219-1 establishing 80-acre drilling and spacing units and field rules for the Ladder Creek Field. The Ladder Creek Field was defined in Order No. 219-1 to include the Application Lands and lands in approximately 51 other sections.

6. On November 18, 1991, the Commission issued Order No. 219-5 (Corrected). Order No. 219-5 (Corrected) rescinded the rules and regulations of Order No. 219-1 with respect to the Application Lands and certain lands in ten other sections. In lieu of these field rules, the Commission ordered that the Application Lands and these other ten sections should henceforth be subject to the general rules and regulations of the Commission.

7. Angus has proposed the drilling of the Hair 15-45 #1-14 well designed to test and produce oil, gas and associated hydrocarbons from the Mississippian, Spergen, St. Louis, Warsaw, Osage, Morrow, Shawnee, Marmaton, Fort Scott and Lansing-Kansas City Formations underlying the Application Lands.

8. Pursuant to C.R.S. § 34-60-116 and COGCC Rule 530, the Commission should issue an order pooling all interests, including any non-consenting interests, in the Application Lands for the development and operation of the Mississippian, Spergen, St. Louis, Warsaw, Osage, Morrow, Shawnee, Marmaton, Fort Scott and Lansing-Kansas City Formations underlying the Application Lands.

9. Angus certifies that, at least 35 days prior to the date of the scheduled protest deadline for this Application, each locatable owner not already leased will be provided with well proposals and information required by Rule 530 and tendered a reasonable offer to lease (if an unleased mineral owner) or participate and bear costs associated with the drilling of the Hair 15-45 #1-14 well.

10. The pooling order issued pursuant to this Application should be made effective as of the earlier of the date of this Application or the date costs specified in C.R.S. § 34-60-116 were first incurred. Any non-consenting interests with whom Angus is unable to secure a lease or other agreement to participate should be ordered to be subject the statutory cost recovery provisions specified in C.R.S. § 34-60-116.

11. Entry of the proposed pooling order will help prevent waste, not adversely affect correlative rights of any owner, assure the greatest ultimate recovery of oil, gas and associated hydrocarbons and otherwise serve the purposes of the Oil and Gas Conservation Act.

12. The names and addresses of the interested persons (persons who own an interest in the mineral estate of the tracts to be pooled aside from the owners of

overriding royalty interests) are listed in Exhibit 3. Within seven days of the filing of this Application, all interested parties as defined in Commission Rules 503.e and 507.b shall be served with a copy of the Application. A certificate attesting to service of the Application together with a list of those persons and entities entitled to notice under Commission rules shall be filed with the Commission within seven days of the filing of this Application.

13. A verification attesting to the Application is attached. A copy of a proposed Notice of Hearing is being submitted electronically to the Commission.

WHEREFORE, Angus respectfully requests this matter be set for hearing, notice be given as required by law and this Commission enter the following order:

a. Pursuant to C.R.S. § 34-60-116 and COGCC Rule 530, the Commission should issue an order pooling all interests in the Application Lands for the development and operation of the Mississippian, Spergen, St. Louis, Warsaw, Osage, Morrow, Shawnee, Marmaton, Fort Scott and Lansing-Kansas City Formations underlying the Application Lands. The pooling order should be made effective as of the earlier of the date of this Application or the date costs specified in C.R.S. § 34-60-116 were first incurred. Any non-consenting interests should be made subject to the statutory cost recovery provisions specified in C.R.S. § 34-60-116.

b. The Commission should enter and issue such other findings and orders, consistent with the requests set forth above, which the Commission may determine to be just and proper.

RESPECTFULLY SUBMITTED this 25th day of November, 2015.

BJORK LINDLEY LITTLE PC

By: 

David R. Little, #13340
1600 Stout Street, Suite 1400
Denver, Colorado 80202
Phone Number: 303-892-1400
Fax Number: 303-892-1401
dlittle@bjorklindley.com

Address of Applicant:
Angus Natural Resources, LLC
(Operator Number 10423)
1323 East 71st Street, Suite 400
Tulsa, Oklahoma 74136

VERIFICATION

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

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

1. I am a Reservoir Engineer for Angus Natural Resources, LLC, 1323 East 71st Street, Suite 400, Tulsa, Oklahoma, 74136.

2. I have read the Application and I have personal knowledge of the facts set forth therein. The facts in the Application are true and correct to the best of my knowledge and belief.

Further Affiant sayeth not.

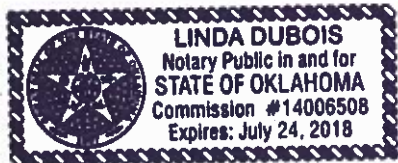


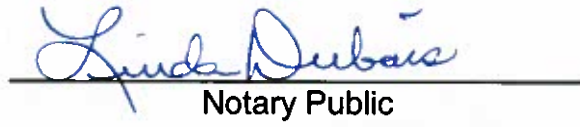
Jose A. Moncayo

Subscribed and sworn to before me this 24th day of November, 2015.

Witness my hand and official seal.

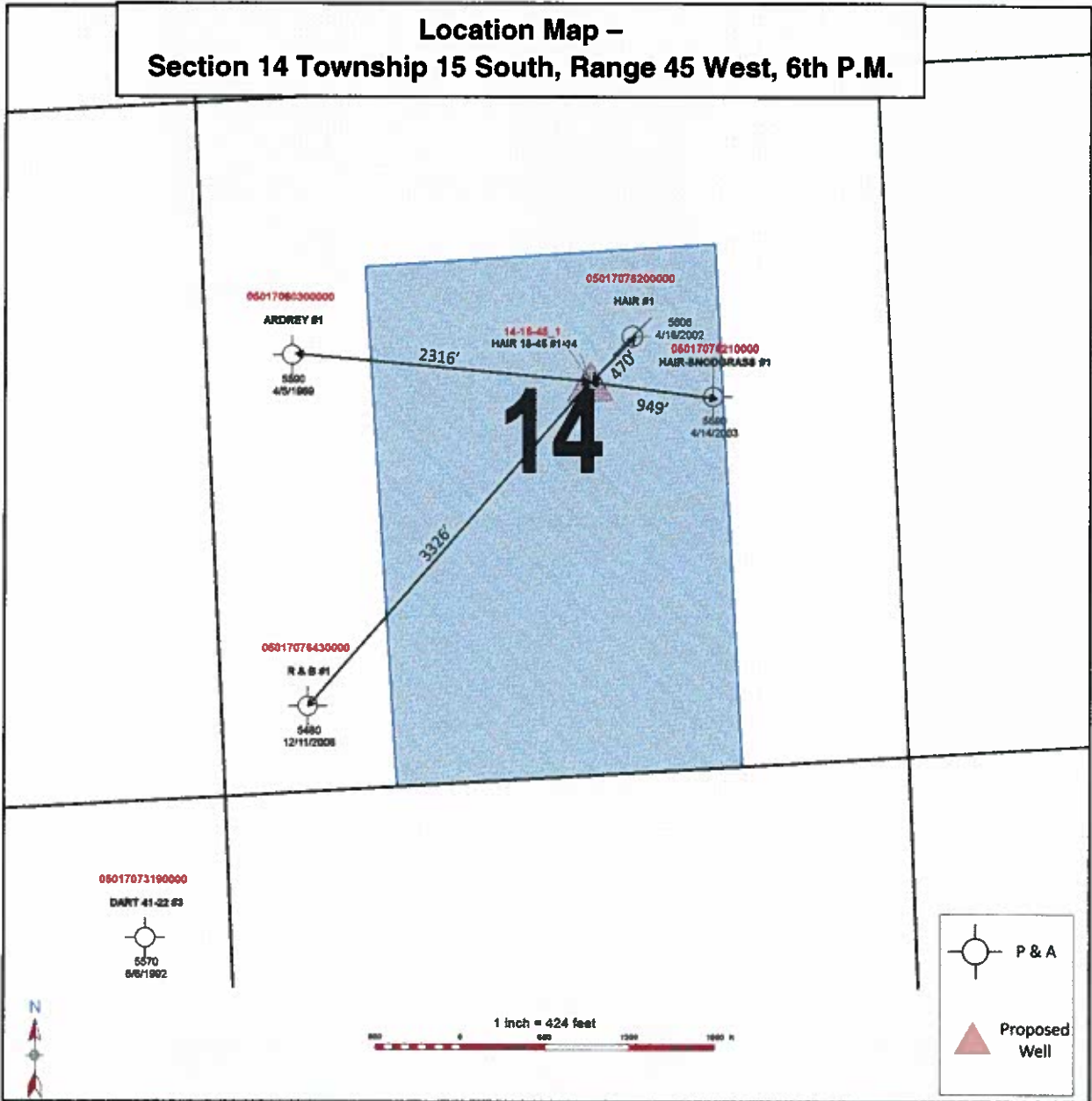
My commission expires: 7/24/18





Notary Public

Exhibit 1	Cause No. _____ Docket No. _____
Scale: 1 inch = 424 feet	Location Map
Applicant: Angus Natural Resources, LLC	Cheyenne County CO/Wildcat
Author: Jose A. Moncayo	



Unit Size: 240 acres

Spacing: Up to 6 wells

Unit (Blue Shaded Area) Legal Description: Section 14, Township 15 South, Range 45 West, SWNE & SENW & E2SW & W2SE

Exhibit 2	Cause No. _____ Docket No. _____
Scale: 1 inch = 1990 feet	Location Map
Applicant: Angus Natural Resources, LLC	Cheyenne County CO/Wildcat
Author: Jose A. Moncayo	

Regional Map
Section 14 Township 15 South, Range 45 West, 6th P.M.

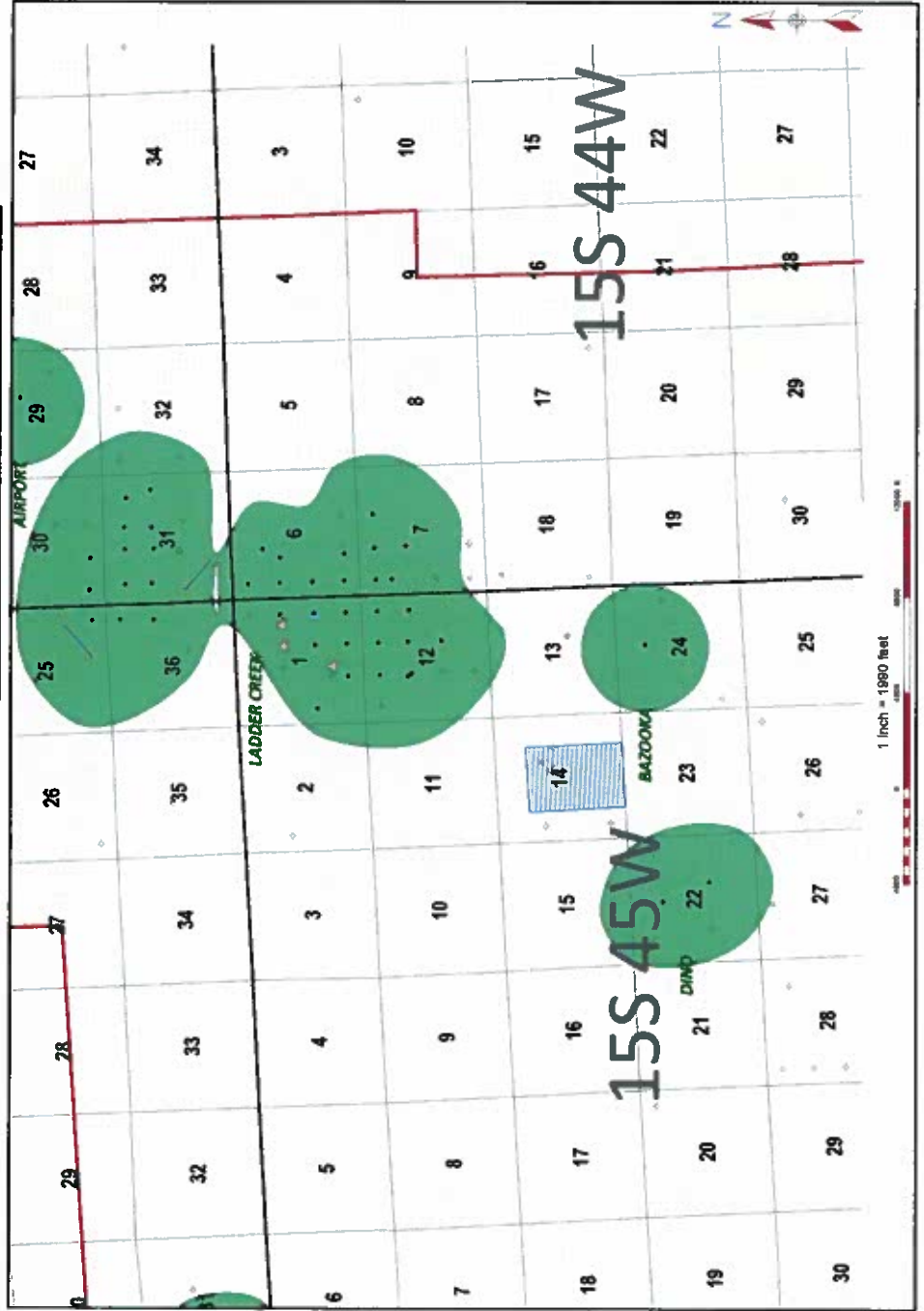


EXHIBIT 3 – INTERESTED PARTIES

COGCC Application of Angus Natural Resources, LLC (Pooling)
T15S-R45W, Sec. 14: SW¼NE¼, SE¼NW¼, E½SW¼, W½SE¼
Cheyenne County, Colorado

Angus Natural Resources, LLC
(Operator Number 10423)
1323 East 71st Street, Suite 400
Tulsa, Oklahoma 74136

Linda L. Arfsten
301 Magin St. SE
Albuquerque, NM 87123

Government Representatives

Rod Pelton
Local Government Designee
Cheyenne County
P. O. Box 567
Cheyenne Wells CO 80810

The Estate of Donald Dean Ardrey
c/o Anna Mae Ardrey
633 West Main Street
Lincoln, MO 65338

Anna Mae Ardrey
633 West Main Street
Lincoln, MO 65338

Al Trujillo
Southeast Region Office
Energy Liaison – Colorado Parks and
Wildlife
4255 Sinton Road
Colorado Springs, CO 80907

Danny Paul Ardrey, Trustee of the
Danny Paul Ardrey Estate Trust
13777 County Road 102
Elbert, CO 80106

Kent Kuster
Oil and Gas Consultant Coordinator
CDPHE
4300 Cherry Creek Drive South
Denver, CO 80246-1500

Janette L. Sharp
9892 E. Exposition Ave.
Denver, CO 80247

Sheli Jean Ellsworth
1180 Pan Ct.
Thousand Oaks, CA 91320

Royalty Interest Owners

Lavern W. and Vienna C. Snodgrass
Revocable Trust
90 Charlie Walker Rd.
Picayune, MS 39466

Eric Jonigan
3419 S. Coulter, Ste. 4B
Amarillo, TX 79109

Orville J. Hair Living Trust
c/o Orville J. Hair and Willa Hair, Co-
Trustees
19999 AA Road
Brownell, KS 67521

DeWyatt Lucky Apple
18485 SW Pacific Dr., #77
Tualatin, OR 97062

Danneal Brian Russell
430 Los Santos Dr.
Garland, TX 75043

Cecilia Darlene Russell
773A-10 Knickerbocker Road
Big Bear Lake, CA 92315

Francis Darwin Russell
3921 Mack Ave.
Klamath Falls, OR 97603

Corinne Dawn Russell Crank
8154 E. Farm Road 170
Rogersville, MO 65742

LaNelle Gum Revel
1710 8th Avenue
Canyon, TX 79015

Ona Grace Francis Morris
10409 S. 68th East Ave.
Tulsa, OK 74133

The Estate of Lucille Apple
c/o Corinne Russell Crank
8154 E. Farm Road 170
Rogersville, MO 65742

Darla Colleen Adams, as Trustee for
Darla Colleen Adams Estate Trust
7725 E. Woodrow Road
Slaton, TX 79364

Gerald Glenn Ardrey
24021 Main Street
Elbert, CO 80106

Billy Ray Ardrey
2019 Pollen Court
San Jose, CA 95131

Working Interest Owners

Kimmeridge Arch, LLC
40 Worth Street, 10th Floor
New York, NY 10013

Chesapeake Exploration, LLC
P.O. Box 18496
Oklahoma City, OK 73154-0496

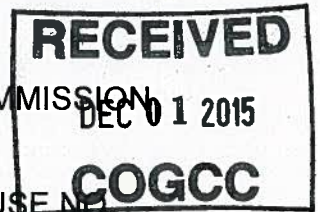
Unleased Mineral Owners

Ray D. Francis Trust Agreement
c/o Richard David Francis, Co-Trustee
515 Wildindigo Run
Westerville, OH 43081

Ray D. Francis Trust Agreement
c/o Randol D. Francis, Co-Trustee
Zhong Guan Yuan N. Street 126, Apt. 4
Haidian District
Beijing, China 100871

Roy Herbert Francis
98 Hawthorne Ln
Poplar Bluff, MO 63901

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IN SECTION 14, TOWNSHIP 15 SOUTH,)
RANGE 45 WEST, CHEYENNE COUNTY,)
COLORADO)

CAUSE NO. _____
DOCKET NO. 160100070

CERTIFICATE OF SERVICE

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

David R. Little, of lawful age and being first duly sworn upon his oath, states and declares:

I am counsel of record in this matter. Upon behalf of the Applicant, I certify that on November 25, 2015, I caused a copy of the Pooling Application filed in this matter to be deposited in the United States Mail, first class postage prepaid, addressed to the interested parties listed in Exhibit 3 attached to the Application. Exhibit 3 lists all persons presently known to the Applicant who are entitled to notice pursuant to the rules of the Commission. This certificate of service is made upon personal knowledge.

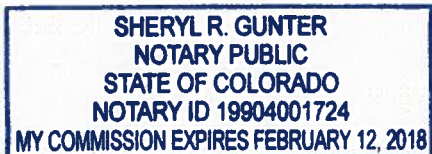


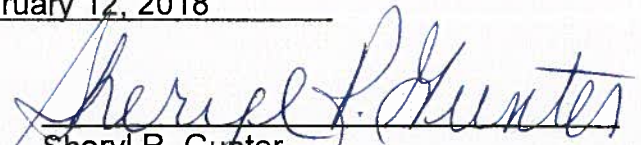
David R. Little

Subscribed and sworn to before me this 1st day of December, 2015.

Witness my hand and official seal.

My commission expires: February 12, 2018





Sheryl R. Gunter
Notary Public