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

IN THE MATTER OF AN APPLICATION BY EXTRACTION OIL & GAS INC. FOR, AMONG OTHER THINGS, A HEARING ON OBJECTIONS TO THE DESIGNATED HORIZONTAL WELLBORE SPACING UNITS PROPOSED FOR THE TROTT 7W-20-16N WELL AND THE KENNEDY 1C, 3N, 5N, 7N, 9C, 11N, 13N, 15N, AND 17C WELLS, LOCATED IN CERTAIN PORTIONS OF SECTIONS 12 AND 13, TOWNSHIP 4 NORTH, RANGE 68 WEST, 6TH P.M., FOR DEVELOPMENT OF THE CODELL AND NIOBRARA FORMATIONS, WATTENBERG FIELD, WELD COUNTY, COLORADO

CAUSE NO. 407

DOCKET NO.

TYPE: SPACING

APPLICATION

Extraction Oil & Gas Inc., Operator No. 10459, ("Extraction" or "Applicant"), by and through its attorneys, Beatty & Wozniak, P.C., respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission" or "COGCC") requesting a hearing on objections received for the designated horizontal wellbore spacing units proposed for the Trott 7W-20-16N Well and the Kennedy 1C, 3N, 5N, 7N, 9C, 11N, 13N, 15N, and 17C Wells, to be drilled in certain portions of Sections 12 and 13, Township 4 North, Range 68 West, 6th P.M., for horizontal well development of the Codell and Niobrara Formations. In support of its Application, Applicant states and alleges as follows:

- 1. Applicant is a corporation duly authorized to conduct business in the State of Colorado, and has registered as an operator with the Commission.
 - 2. Applicant is an Owner in the below-listed lands:

Township 4 North, Range 68 West, 6th P.M.

Section 7: S½S½

Section 8: SW1/4SW1/4

Section 17: NW1/4NW1/4

Section 18: N½N½

Township 4 North, Range 69 West, 6th P.M.

Section 12: S½S½

Section 13: N½N½

Wellbore Spacing Unit ("WSU") No. 1

Trott 7W-20-16N Well

720 acres, more or less, Weld County, Colorado

Township 4 North, Range 68 West, 6th P.M.

Section 7:

S½S½

Section 8:

SW1/4SW1/4

Section 17: NW1/4NW1/4

Section 18: N½N½

Township 4 North, Range 69 West, 6th P.M.

Section 12: S½S½

Section 13: N½N½

WSU Nos. 2 and 3

Kennedy 1C and 3N Wells

720 acres, more or less, Weld County, Colorado

Township 4 North, Range 68 West, 6th P.M.

Section 17: NW1/4NW1/4

Section 18: N½N½

Township 4 North, Range 69 West, 6th P.M.

Section 13: N½N½

WSU No. 4

Kennedy 5N Well

360 acres, more or less, Weld County, Colorado

Township 4 North, Range 68 West, 6th P.M.

Section 17: NW1/4NW1/4, SW1/4NW1/4

Section 18: N½

Township 4 North, Range 69 West, 6th P.M.

Section 13: N½

WSU Nos. 5 - 7

Kennedy 7N, 9C, and 11N Wells

720 acres, more or less, Weld County, Colorado

Township 4 North, Range 68 West, 6th P.M.

Section 17: SW1/4NW1/4

Section 18: S½N½

Township 4 North, Range 69 West, 6th P.M.

Section 13: S½N½

WSU No. 8

Kennedy 13N Well 360 acres, more or less, Weld County, Colorado

Township 4 North, Range 68 West, 6th P.M.

Section 17: SW1/4NW1/4, NW1/4SW1/4

Section 18: S½N½; N½S½

Township 4 North, Range 69 West, 6th P.M.

Section 13: S½N½; N½S½

WSU Nos. 9 and 10

Kennedy 15N and 17C Wells 720 acres, more or less, Weld County, Colorado

These lands are hereinafter referred to as the "Application Lands" and depicted in the well plats marked as **Exhibit A-1 through A-10** attached hereto.

- 3. Rule 318A.e.(5) provides for notice and hearing procedures when proposing horizontal wellbore spacing units as described by Rule 318A.a.(4)D. for lands located within the Greater Wattenberg Area.
- 4. Acting pursuant to Rule 318A.e.(5)A., Extraction sent notices by certified mail of the proposed horizontal wellbore spacing units for the Trott 7W-20-16N Well and the Kennedy 1C, 3N, 5N, 7N, 9C, 11N, 13N, 15N, and 17C Wells (sometimes collectively referred to as "Subject Wells"), which were received by the relevant parties between February 10, 2018 through February 14, 2018.
- 5. On March 16, 2018, and within the 30-day Rule 318A.e.(5)B. comment period, Ivar W. Larson, personally and as member of Larson Front Range Farms LLC ("LFRF"), and Donna M. Larson, personally and as member of LFRF, jointly filed a written objection to WSU Nos. 1-10 proposed for the Trott 7W-20-16N Well and the Kennedy 1C, 3N, 5N, 7N, 9C, 11N, 13N, 15N, and 17C Wells ("Objection"). Mr. and Ms. Larson and LFRF are collectively referred to herein as "Larson." As the basis for its Objection, Larson states "that Extraction is not the owner of the mineral estate(s) through which the wellbore penetrates within the target formation. Rather, Larson is the 'owner,' as defined in the Act, of the mineral rights in portions of Section 12 and Section 13 where Extraction intends to propose, drill and operate the above-referenced Trott and Kennedy wells." The Objection is attached hereto as **Exhibit B**.
- 6. As of the date of filing, Extraction has not received notice from the Commission as to whether the Objection has been accepted as valid. However, upon information and belief, COGCC staff has made a decision to interpret the Objection as a valid written objection to the notices issued for the Subject Wells. Extraction respectfully objects to the COGCC's decision to treat the Larson Objection as a valid objection under Rule 318A.e.(5)B., and reserves the right to file a dispositive motion

related to the same.

- 7. As approval of WSU Nos. 1-10 proposed for the Subject Wells is impeded by the Objection described above, Extraction hereby requests a hearing before the Commission on the respective objections pursuant to Rule 318A.e.(5)C.
- 8. Further, Extraction requests the merits of the written objection be first presented to a hearings officer of the Commission pursuant to Rule 318A.e.(5)C.
- 9. That, following an administrative hearing held pursuant to Rule 318A.e.(5)C., the hearing officer recommend dismissing the Objection, as Extraction is an "owner," as defined in the Colorado Oil and Gas Act, WSU Nos. 1-10 are properly configured pursuant to Rule 318A.a.(4)D., were properly noticed pursuant to Rule 318A.e.(5)A., will prevent waste, will increase the ultimate recovery of the reserves, and protect correlative rights.
- 10. That, should the Commission decide not to uphold the recommendation of the hearing officer pursuant to Rule 318A.e.(5)d., the Commission enter an order approving WSU Nos. 1-10.
- 11. The undersigned certifies that copies of this Application will be served on each interested party as required by Rule 507 within seven (7) days of the filing hereof, as required by Rule 503.e.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice be given as required by law and that upon such hearing, this Commission enter its order:

- A. Dismissing the Objection of WSU Nos. 1-10, as applicable, proposed for the Subject Wells.
- B. Approving the designated horizontal wellbore spacing units, comprised of the Application Lands, for the Subject Wells, for the production of oil, gas, and associated hydrocarbons from the Codell and Niobrara Formations.
- C. For such other findings and orders as the Commission may deem proper or advisable in the premises.

DATED this 21st day of March, 2018.

Respectfully submitted,

EXTRACTION OIL & GAS INC.

By:

Jillian Fulcher
James Parrot
Jobediah Rittenhouse
Beatty & Wozniak, P.C.
Attorneys for Applicant
216 16th Street, Suite 1100
Denver, Colorado 80202
(303) 407-4499
jfulcher@bwenergylaw.com
jparrot@bwenergylaw.com
jrittenhouse@bwenergylaw.com

Address of Applicant
Extraction Oil & Gas Inc.
ATTN: Annie Pierini
370 17th Street, Suite 5300
Denver, CO 80202

VERIFICATION

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

HALEY ZEPESKI NOTARY PUBLIC

STATE OF COLORADO NOTARY ID 20184004172 MY COMMISSION EXPIRES JAN 25, 2022

Annie Pierini, Landman for Extraction Oil & Gas Inc., upon oath deposes and says that she has read the foregoing Application and that the statements contained therein are true to the best of her knowledge, information, and belief.

EXTRACTION OIL & GAS INC.

Annie Pierini

Subscribed and sworn to before me this 25 day of March, 2018, by Annie Pierini, Landman for Extraction Oil & Gas Inc.

Witness my hand and official seal.

My commission expires:

Notary Public

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

IN THE MATTER OF AN APPLICATION BY EXTRACTION OIL & GAS INC. FOR, AMONG OTHER THINGS, A HEARING ON OBJECTIONS TO THE DESIGNATED HORIZONTAL WELLBORE SPACING UNITS PROPOSED FOR THE TROTT 7W-20-16N WELL AND THE KENNEDY 1C, 3N, 5N, 7N, 9C, 11N, 13N, 15N, AND 17C WELLS, LOCATED IN CERTAIN PORTIONS OF SECTIONS 12 AND 13, TOWNSHIP 4 NORTH, RANGE 68 WEST, 6TH P.M., FOR DEVELOPMENT OF THE CODELL AND NIOBRARA FORMATIONS, WATTENBERG FIELD, WELD COUNTY, COLORADO

CAUSE NO. 407

DOCKET NO.

TYPE: SPACING

AFFIDAVIT OF MAILING

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

Grace Go-Hoveland, of lawful age, and being first duly sworn upon her oath, states and declares:

That she is a Legal Assistant at Beatty & Wozniak, P.C., attorneys for Extraction Oil & Gas, Inc., and on or before the 28th March, 2018 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 attached hereto.

Grace Go-Hoveland

Suda Sowem

Subscribed and sworn to before me this 215 day of March, 2018.

Witness my hand and official seal.

AIDA LINDA BOWLIN Notary Public State of Colorado Notary ID 19984012218 My Commission Expires May 1, 2018

Notary Public

EXHIBIT A

INTERESTED PARTIES

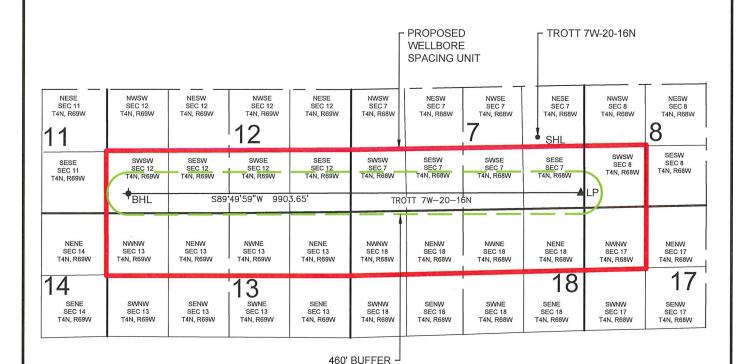
Extraction Oil & Gas 370 17th Street, Suite 5300 Denver, CO 80202

Ivar and Donna Larson 925 N. CR 13 Berthoud, CO 80513

Larson Front Range Farms LLC 925 North County Road 13 Berthoud, CO 80153

TROTT 7-L PAD PROPOSED 318A.a.(4)D. SPACING UNIT

SEC 12 & 7: S2S2 SEC 13 & 18: N2N2 SEC 8: SW4SW4 SEC 17: NW4NW4



TROTT 7W-20-16N WELL TO BE LOCATED 1548' FSL AND 1020' FEL, SEC 7, T4N, R68W



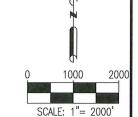
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= LANDING POINT

SHL = SURFACE HOLE LOCATION BHL = BOTTOM HOLE LOCATION

LP = LANDING POINT

DISCLAIMER:
THIS PLOT DOES NOT REPRESENT A MONUMENTED LAND SURVEY AND SHOULD NOT BE
RELIED UPON TO DETERMINE BOUNDARY LINES, PROPERTY OWNERSHIP OR OTHER
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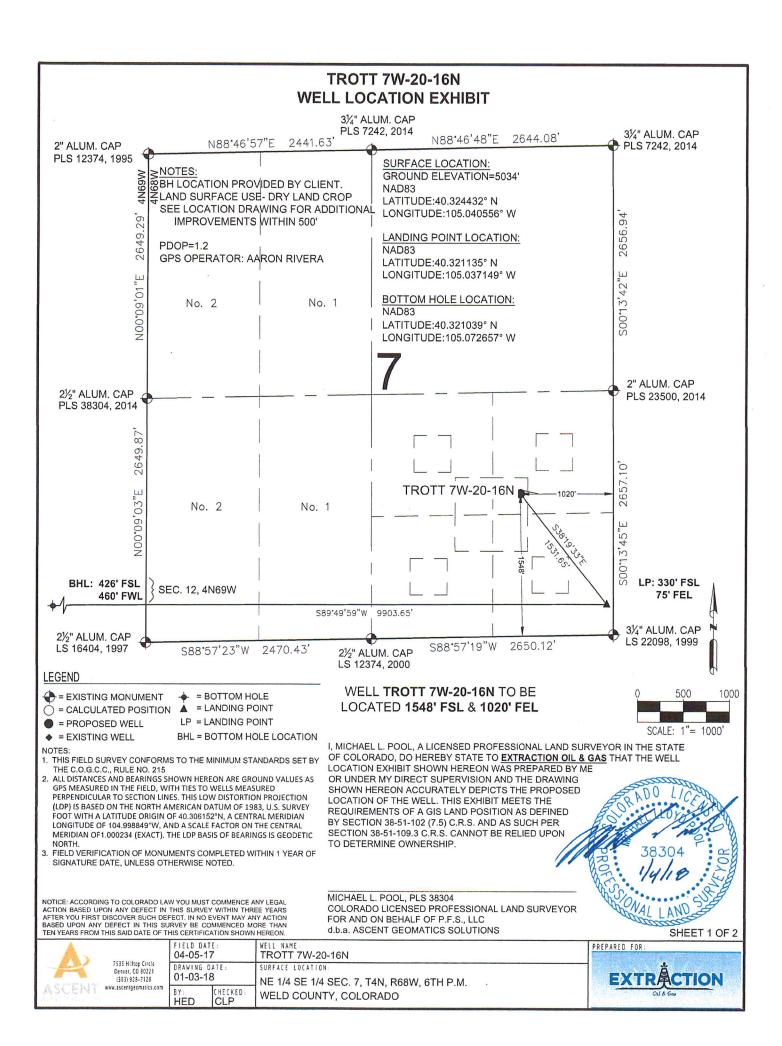
7535 Hilltop Circle Denver, CO 80221 (303) 928-7128 www.ascentgeomatics.com O4-05-17

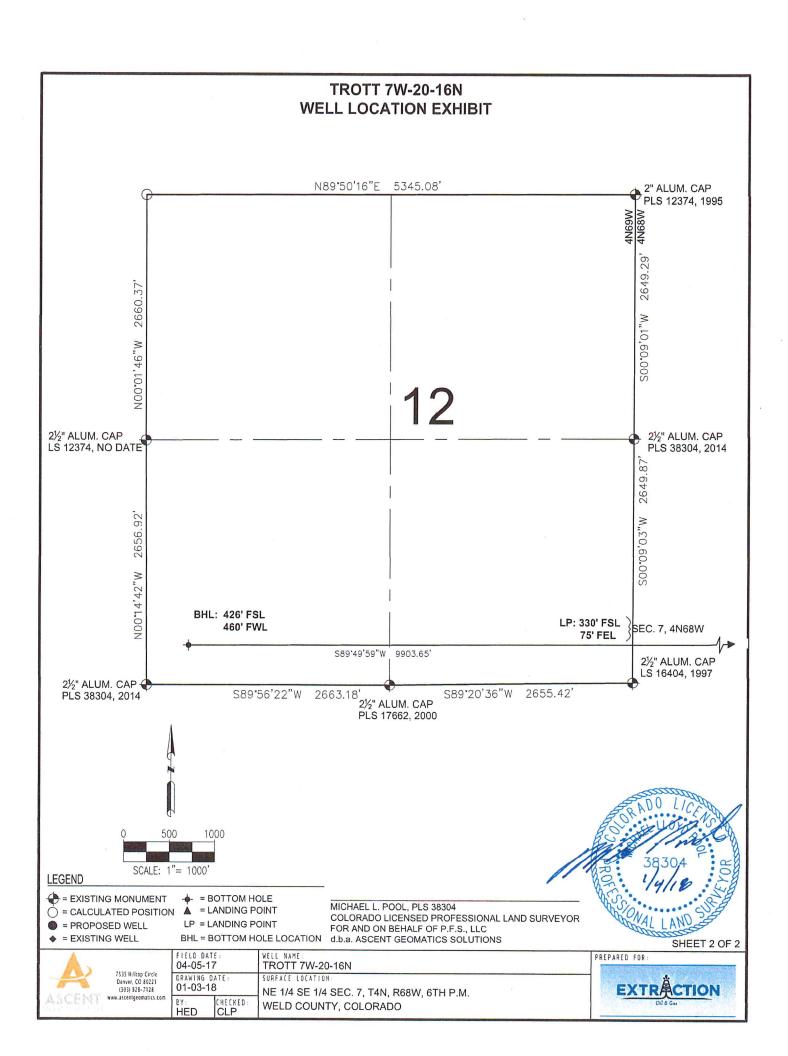
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01-30-18

BY: CHECKED:
DJP CLP

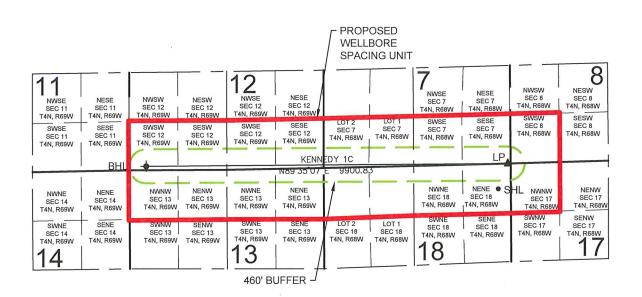
SITE NAME:
TROTT 7-L PAD
SURFACE LOCATION:
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WELD COUNTY, COLORADO



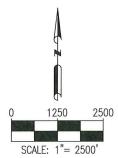




SECS 12 & 7: S2S2 SECS 13 & 18: N2N2 SEC 8: SW4SW4 SEC 17: NW4NW4



KENNEDY 1C WELL TO BE LOCATED 681' FNL AND 342' FEL, SEC 18, T4N, R68W



LEGEND

= PROPOSED WELL

= BOTTOM HOLE = LANDING POINT SHL = SURFACE HOLE LOCATION BHL = BOTTOM HOLE LOCATION

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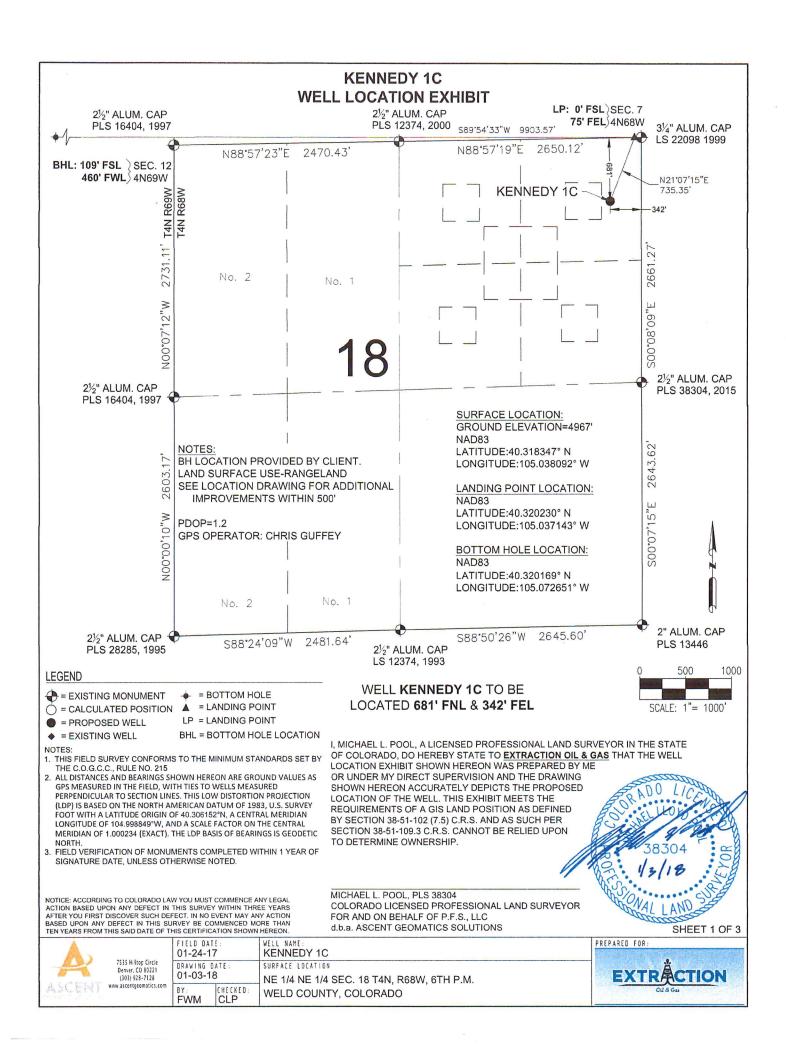


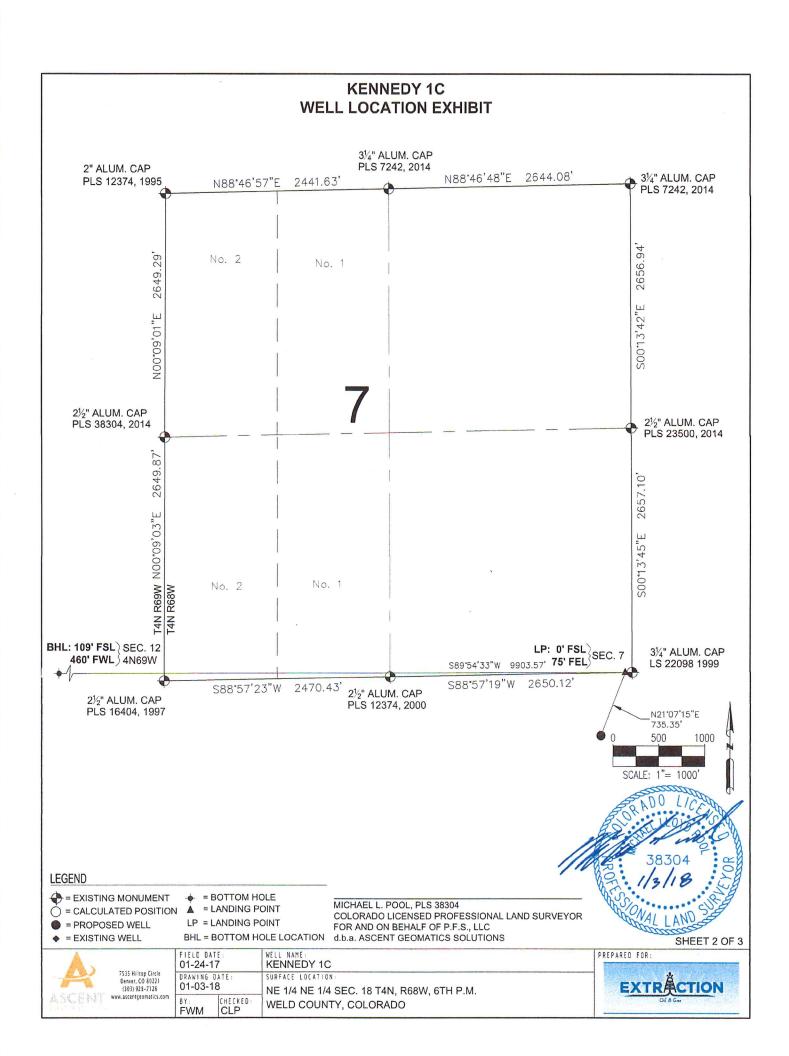
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	FIELD DATE: 01-24-17		
	DRAWING DATE: 01-04-18		
	BY:	CHECKED:	

SITE NAME:
KENNEDY 18-D PAD
SURFACE LOCATION:
NE 1/4 NE 1/4 SEC. 18, T4N, R68W, 6TH P.M.
WELD COUNTY, COLORADO







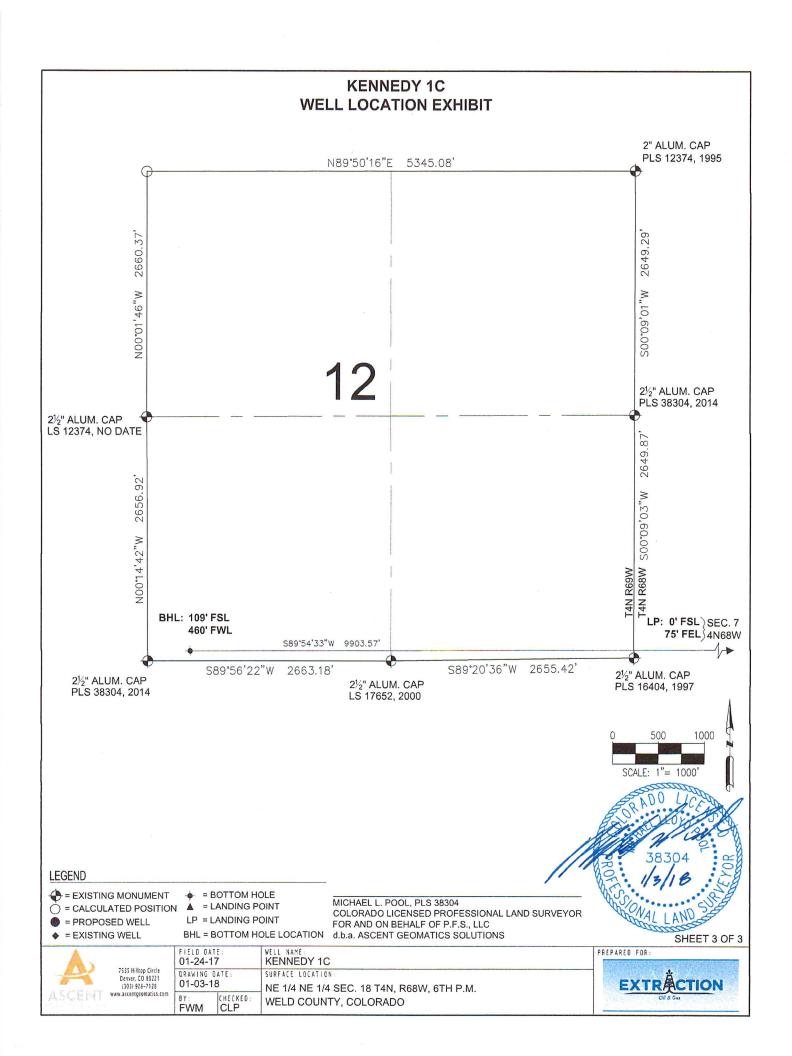
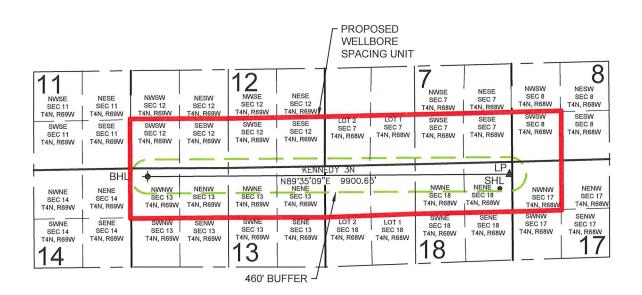


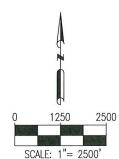
Exhibit A-3

KENNEDY 18-D PAD PROPOSED 318A.a.(4)D. SPACING UNIT

SECS 12 & 7: S2S2 SECS 13 & 18: N2N2 SEC 8: SW4SW4 SEC 17: NW4NW4



KENNEDY 3N WELL TO BE LOCATED 715' FNL AND 342' FEL, SEC 18, T4N, R68W



FGFN

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SITE NAME

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BY:	CHECKED:

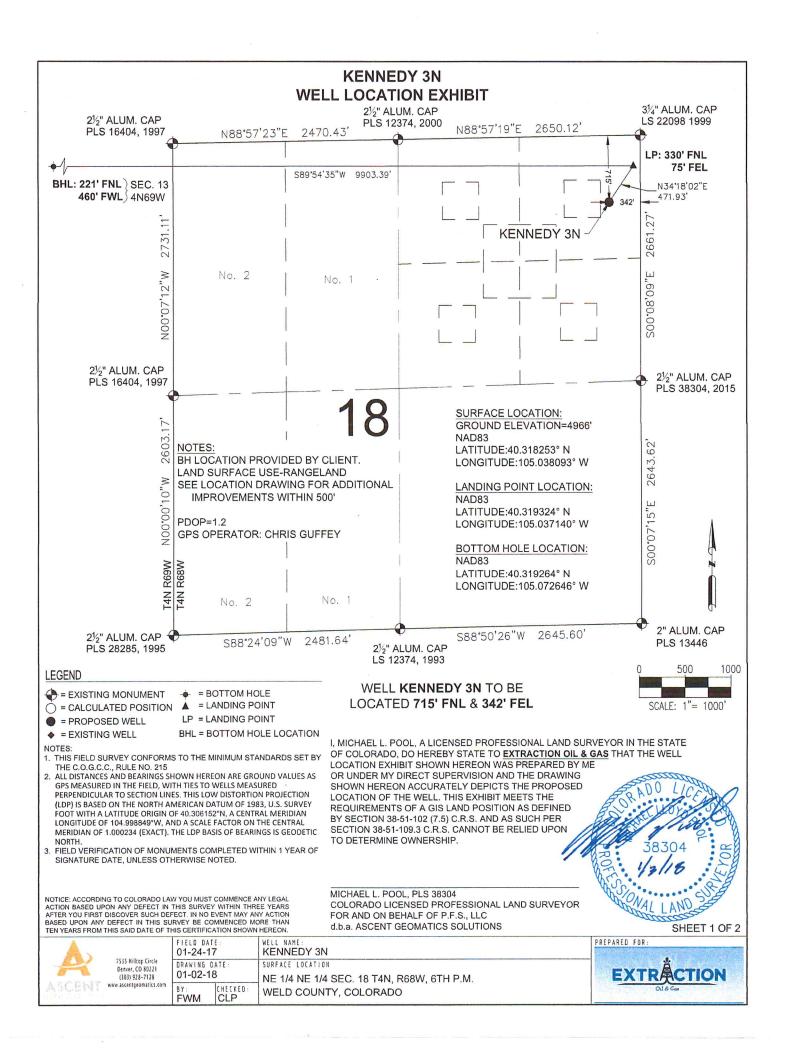
KENNEDY 18-D PAD

SURFACE LOCATION:

NE 1/4 NE 1/4 SEC. 18, T4N, R68W, 6TH P.M.

WELD COUNTY, COLORADO





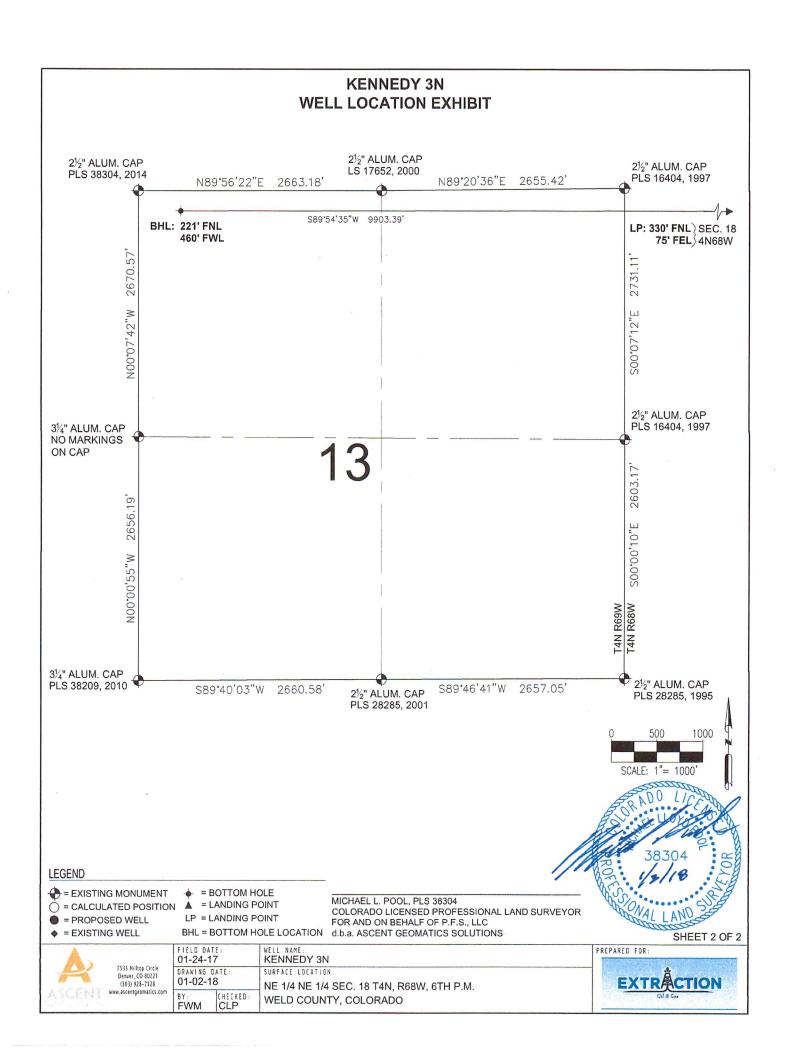
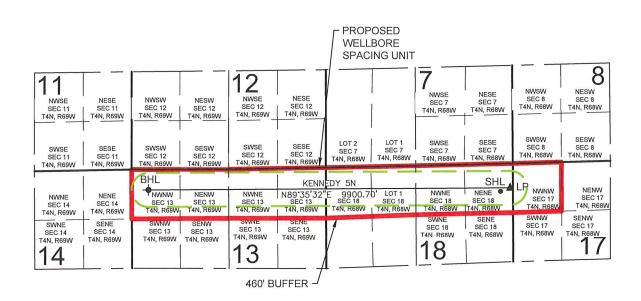


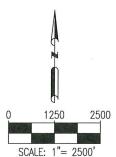
Exhibit A-4

KENNEDY 18-D PAD PROPOSED 318A.a.(4)D. SPACING UNIT

SECS 13 & 18: N2N2 SEC 17: NW4NW4



KENNEDY 5N WELL TO BE LOCATED 749' FNL AND 342' FEL, SEC 18, T4N, R68W



LEGEND

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CHECKED:

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BY: DJP

FIELD DATE: SITE NAME:

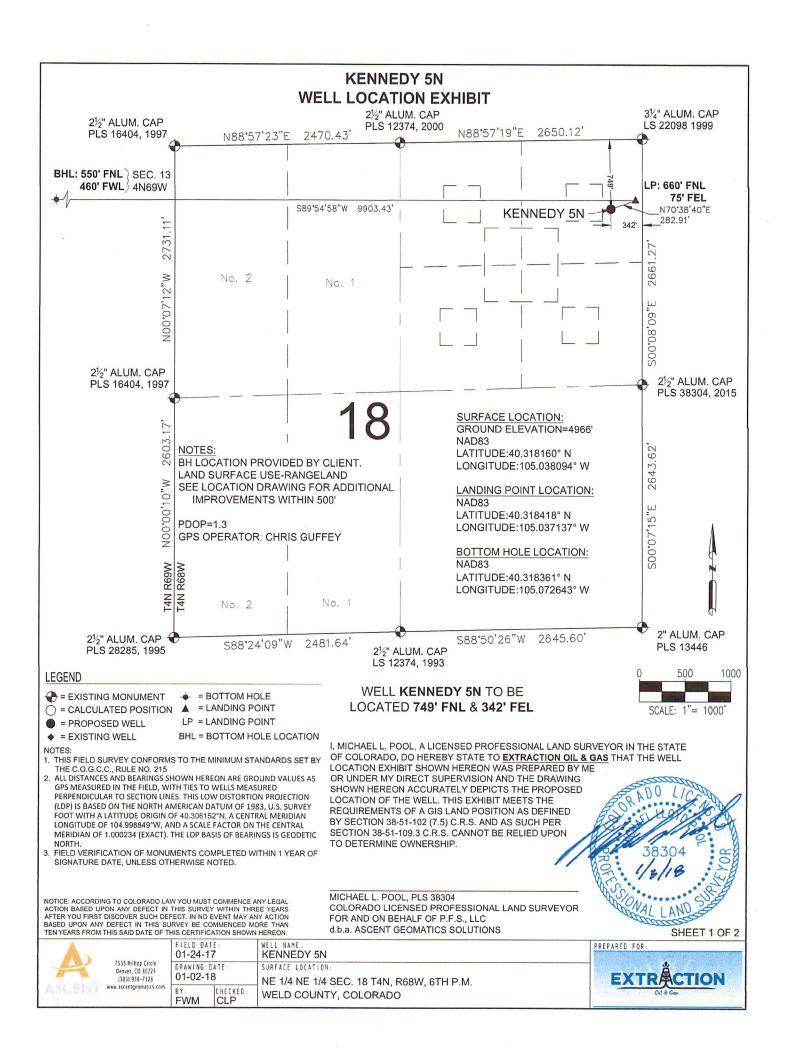
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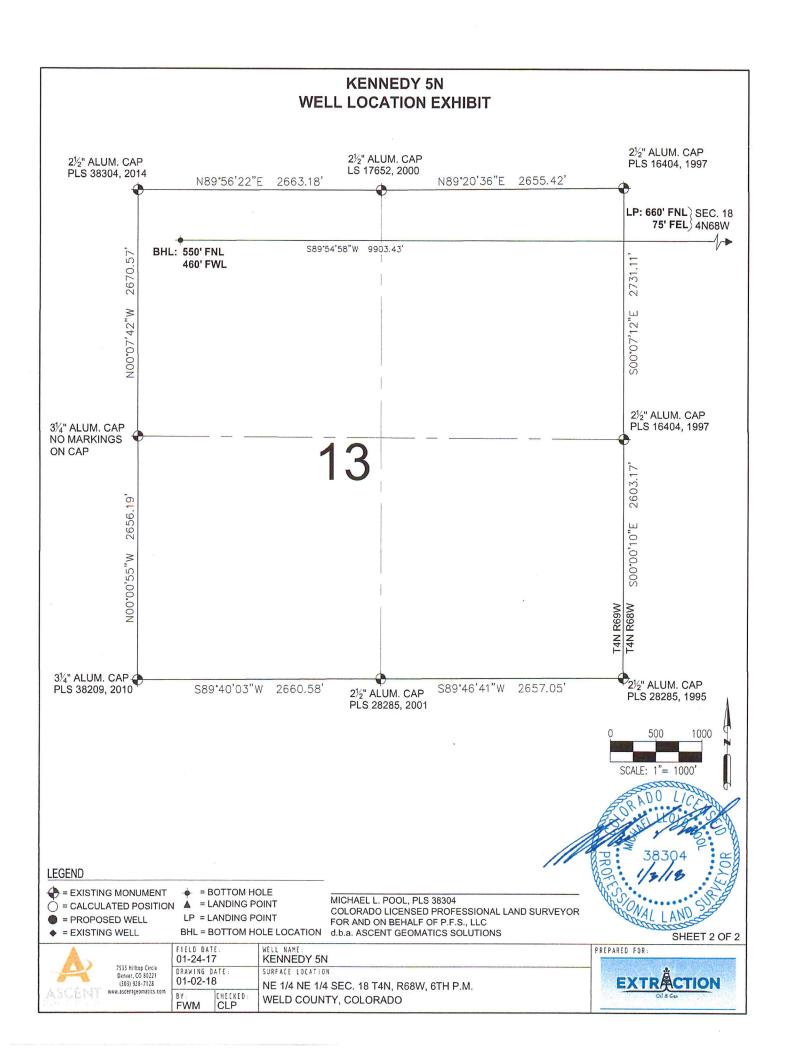
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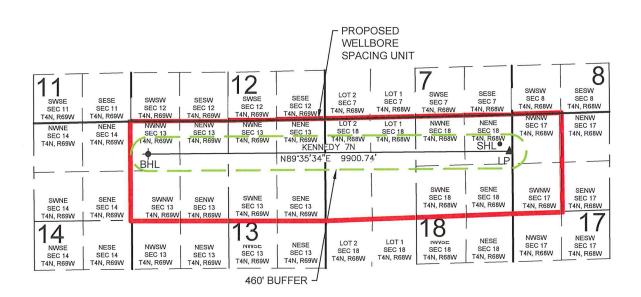
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WELD COUNTY, COLORADO



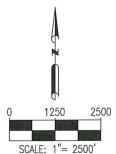




SECS 13 & 18: N2 SEC 17: W2NW4



KENNEDY 7N WELL TO BE LOCATED 783' FNL AND 342' FEL, SEC 18, T4N, R68W



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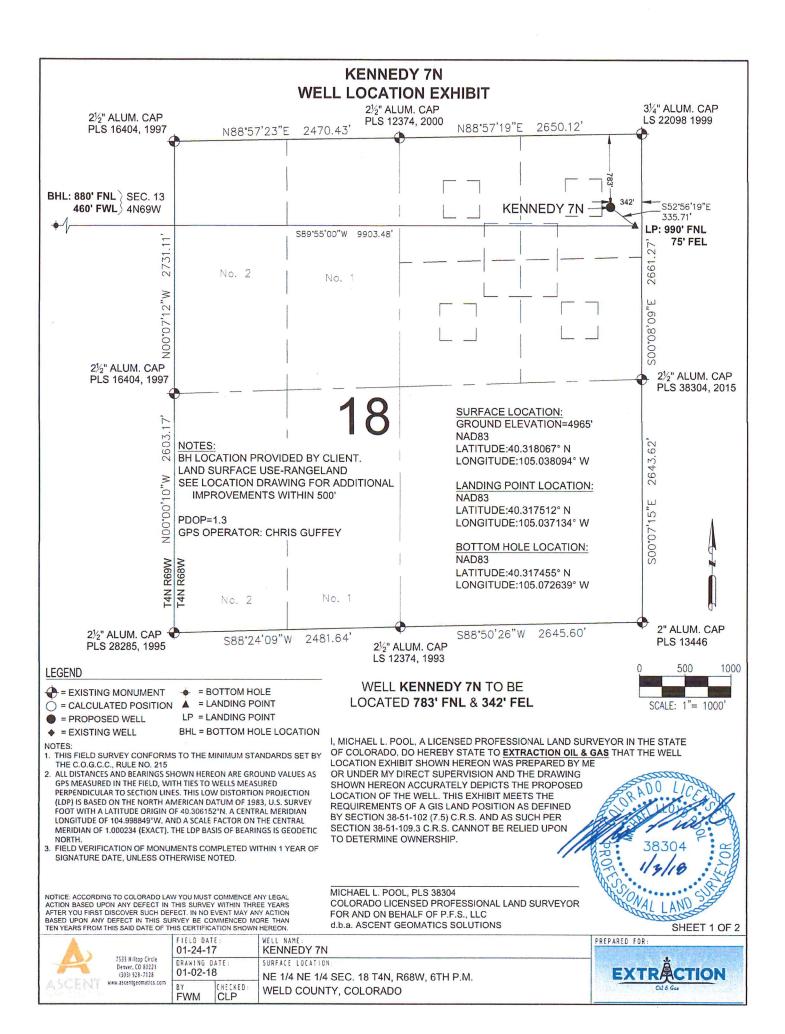
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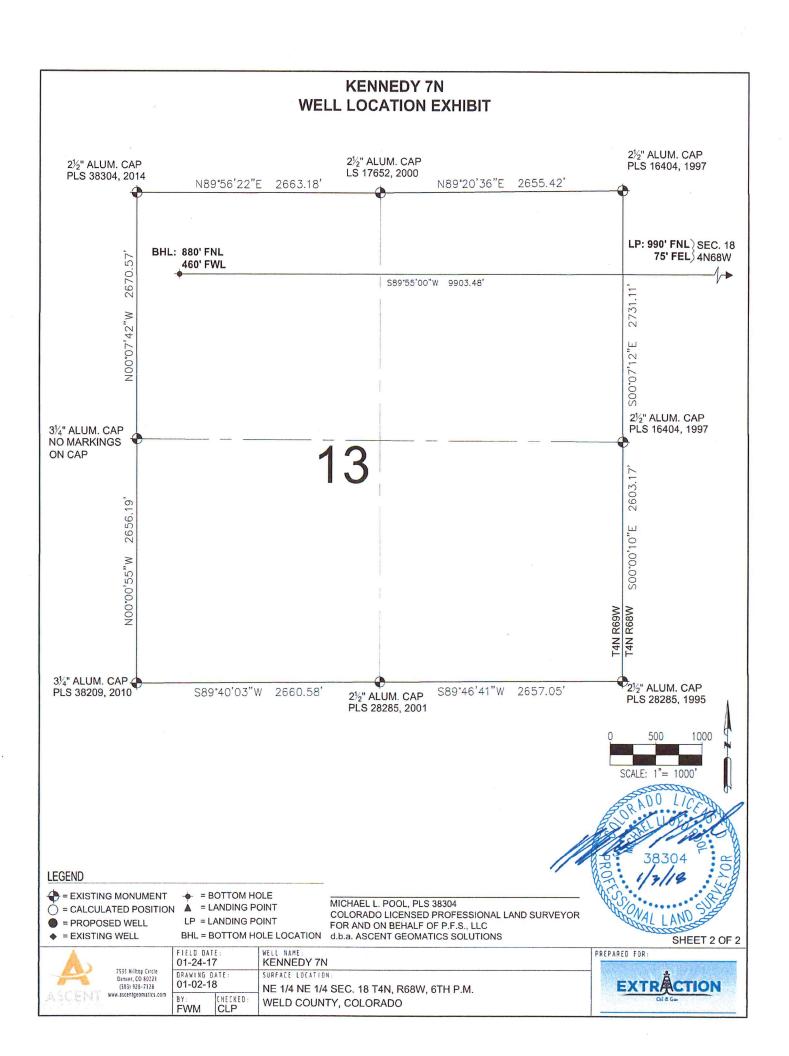
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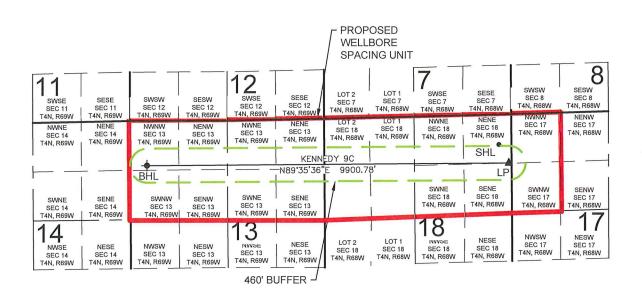
WELD COUNTY, COLORADO



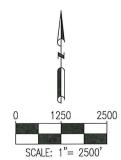




SECS 13 & 18: N2 SEC 17: W2NW4



KENNEDY 9C WELL TO BE LOCATED 817' FNL AND 343' FEL, SEC 18, T4N, R68W



EGEND

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SITE NAME

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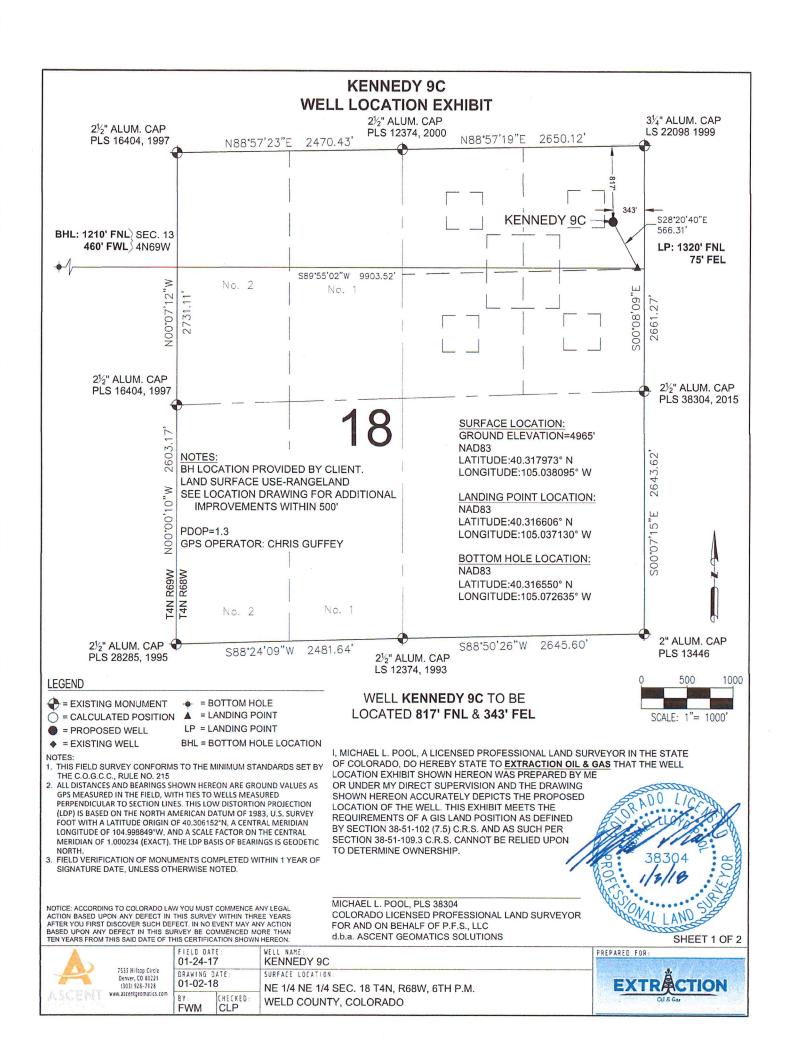
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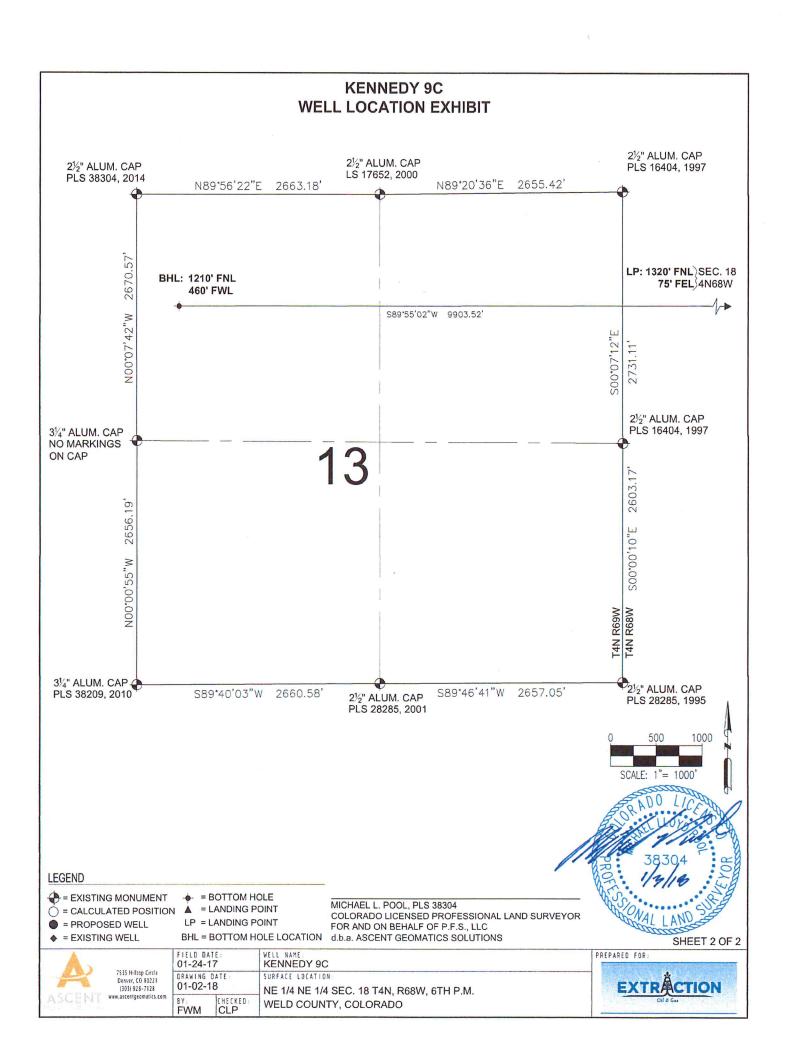
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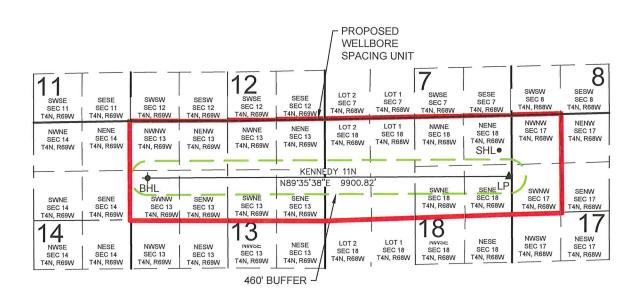
WELD COUNTY, COLORADO



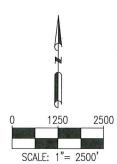




SECS 13 & 18: N2 SEC 17: W2NW4



KENNEDY 11N WELL TO BE LOCATED 936' FNL AND 344' FEL, SEC 18, T4N, R68W



LEGEND

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7535 Hilltop Circle Denver, CO 80221 (303) 928-7128 www.ascentgeomatics.com

01-24-17	
DRAWING DATE:	9
01-04-18	,

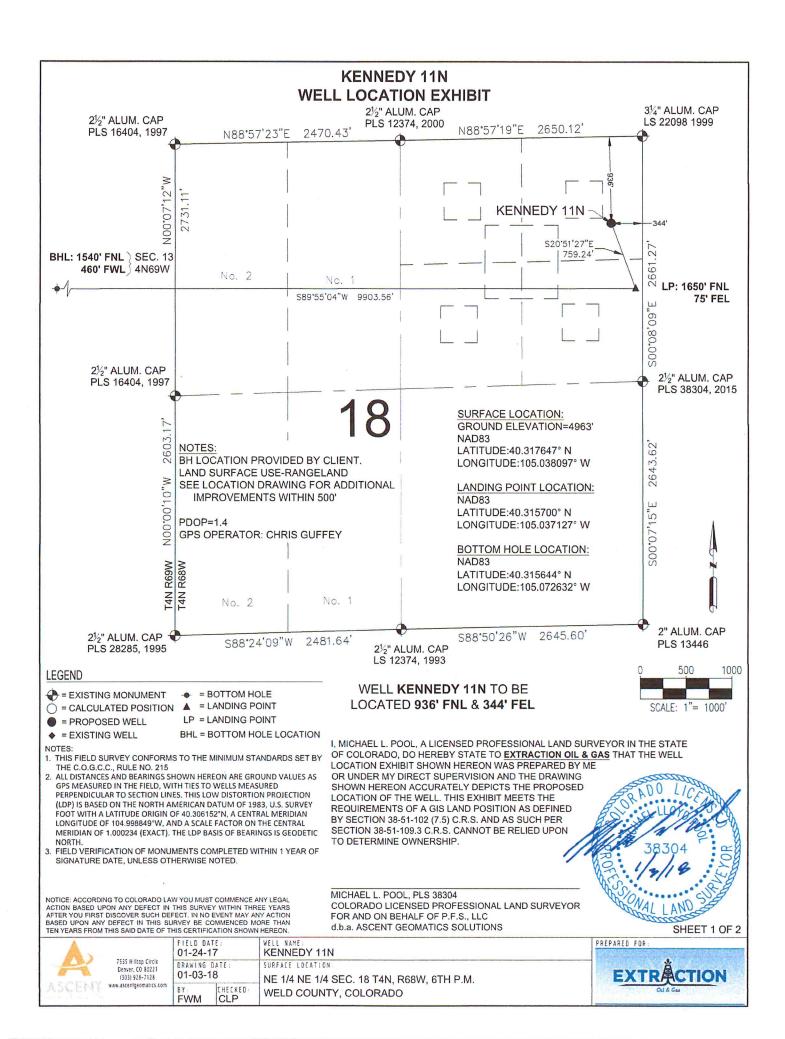
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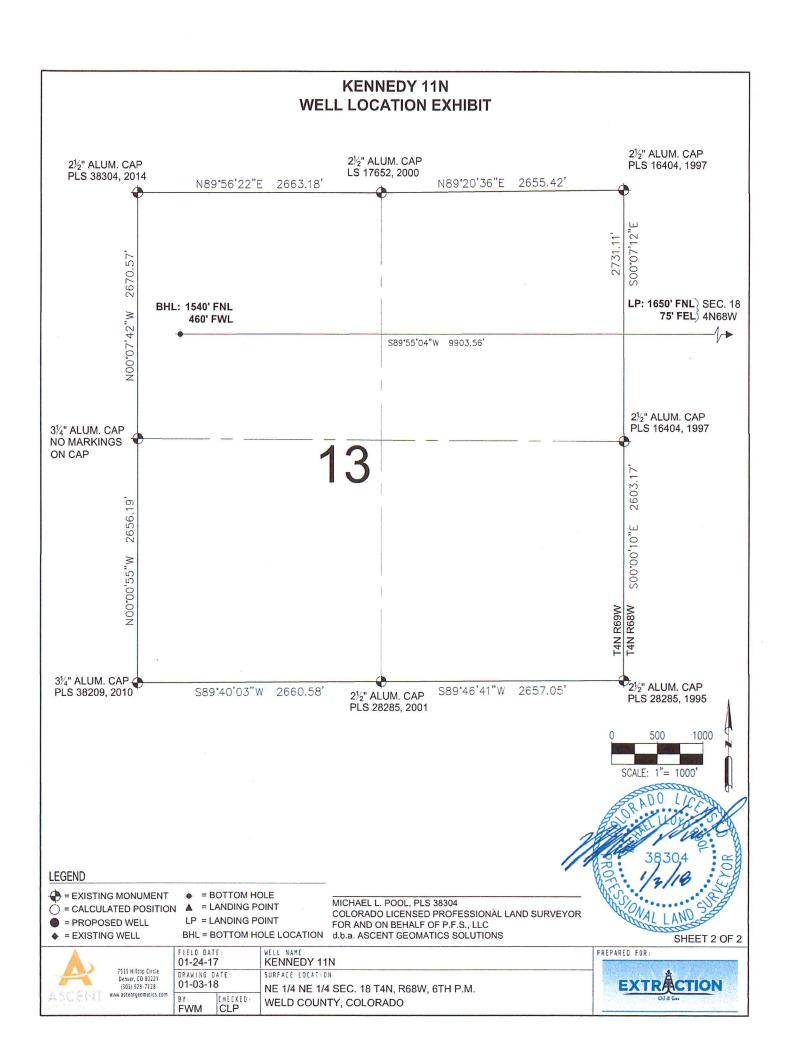
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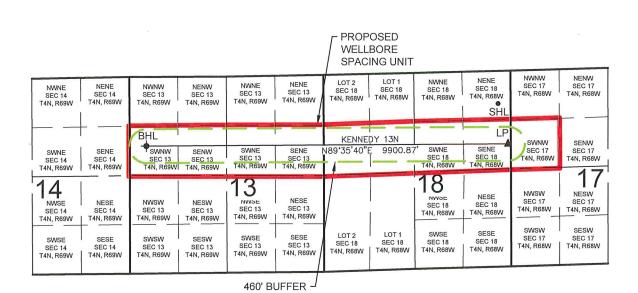
CLP WELD COUNTY, COLORADO



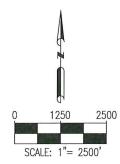




SECS 13 & 18: S2N2 SEC 17: SW4NW4



KENNEDY 13N WELL TO BE LOCATED 885' FNL AND 343' FEL, SEC 18, T4N, R68W



LEGEND

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LP = LANDING POINT

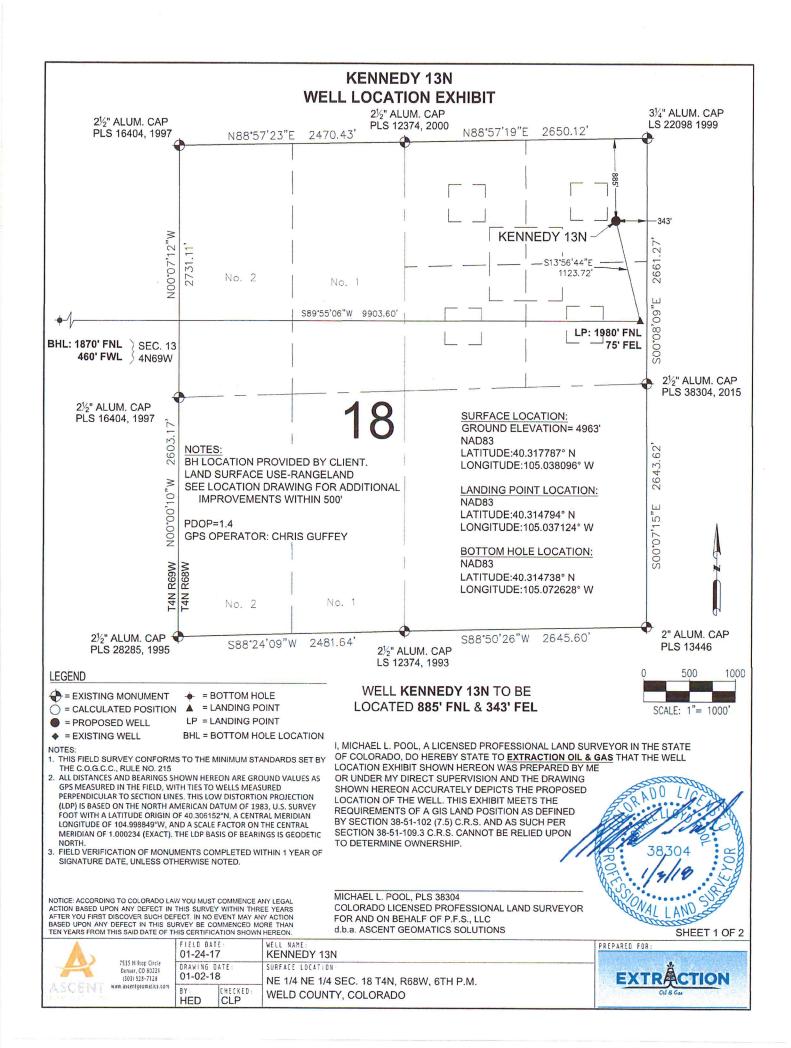
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MAY BE BASED UPON PUBLICLY AVAILABLE DATA THAT ALSO HAS NOT BEEN
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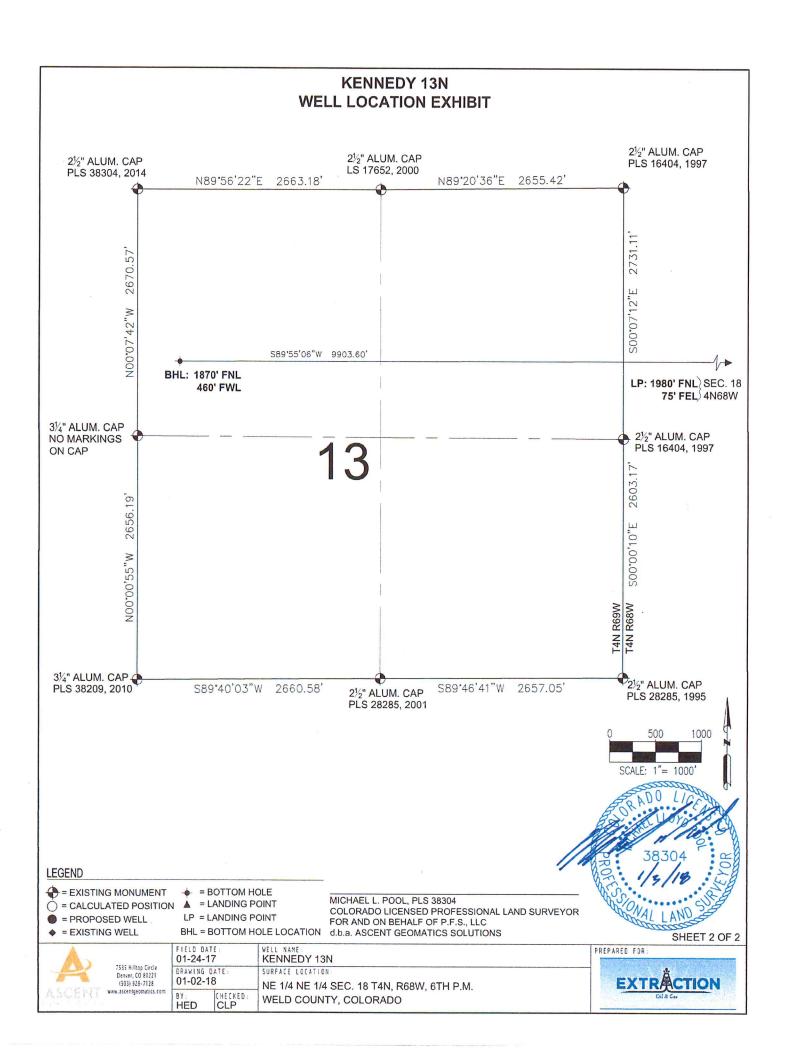


7535 Hilltop Circle Denver, CO 80221 (303) 928-7128 www.ascentgeomatics.com

FIELD DATE:		SITE NAME:
01-24-17		KENNEDY 18-D PAD
DRAWING DATE:		SURFACE LOCATION:
01-04-18		NE 1/4 NE 1/4 SEC. 18, T4N, R68W, 6TH P.M.
BY: DJP	CHECKED:	WELD COUNTY, COLORADO



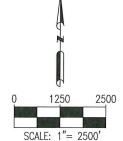




SECS 13 & 18: S2N2, N2S2 SEC 17: SW4NW4, NW4SW4

PROPOSED WELLBORE SPACING UNIT NWNW NENW LOT 2 SEC 18 T4N, R68W LOT 1 NENE NENE SEC 13 NWNE NWNE SEC 14 T4N, R69W NENE SEC 14 T4N, R69W NWNW SEC 13 T4N, R69W NENW SEC 13 T4N, R69W NWNE SEC 17 T4N, R68W **SEC 18** SEC 18 T4N, R68W **SEC 18** SEC 13 T4N, R69W T4N, R68W T4N, R68W T4N, R69W SHI SENW SWNE SENE SEC 17 T4N, R68W SEC 17 T4N, R68W SENE SEC 14 T4N, R69W SEC 13 T4N, R69W SEC 18 T4N, R68W SEC 18 T4N, R68W SEC 13 T4N, R69W **SEC 14** SEC 13 4N, R69W SEC 13 T4N, R69W T4N, R69W KENNEDY 15N N89'35'42 9900.91 LP BHL 18 13 14 NWSW NESW NESE SEC 18 NWSE SEC 14 T4N, R69W NWSW SEC 13 T4N, R69W NESE NESW SEC 13 SEC 17 T4N, R68W SEC 17 **SEC 18** SEC 14 T4N, R69W SEC 13 T4N, R69W SEC 13 T4N, R68W T4N, R68W T4N, R69W T4N, R69W swsw SESW LOT 1 SEC 18 T4N, R68W LOT 2 SEC 18 SWSF SESE SWSE SEC 13 T4N, R69W SESE SEC 17 T4N, R68W SESE SEC 14 swsw SEC 17 T4N, R68W SWSE SEC 18 T4N, R68W SEC 18 T4N, R68W SEC 13 T4N, R69W SEC 13 T4N, R69W **SEC 14** SEC 13 T4N, R69W **T4N R68W** T4N, R69W T4N, R69W 460' BUFFER

KENNEDY 15N WELL TO BE LOCATED 919' FNL AND 343' FEL, SEC 18, T4N, R68W



LEGENE

= PROPOSED WELL

= BOTTOM HOLE = LANDING POINT SHL = SURFACE HOLE LOCATION BHL = BOTTOM HOLE LOCATION

LP = LANDING POINT

DISCLAIMER:
THIS PLOT DOES NOT REPRESENT A MONUMENTED LAND SURVEY AND SHOULD NOT BE
RELIED UPON TO DETERMINE BOUNDARY LINES, PROPERTY OWNERSHIP OR OTHER
PROPERTY INTERESTS, PARCEL LINES, IF DEPICTED HAVE NOT BEEN FIELD VERIFIED AND
MAY BE BASED UPON PUBLICLY AVAILABLE DATA THAT ALSO HAS NOT BEEN
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FIELD DATE:

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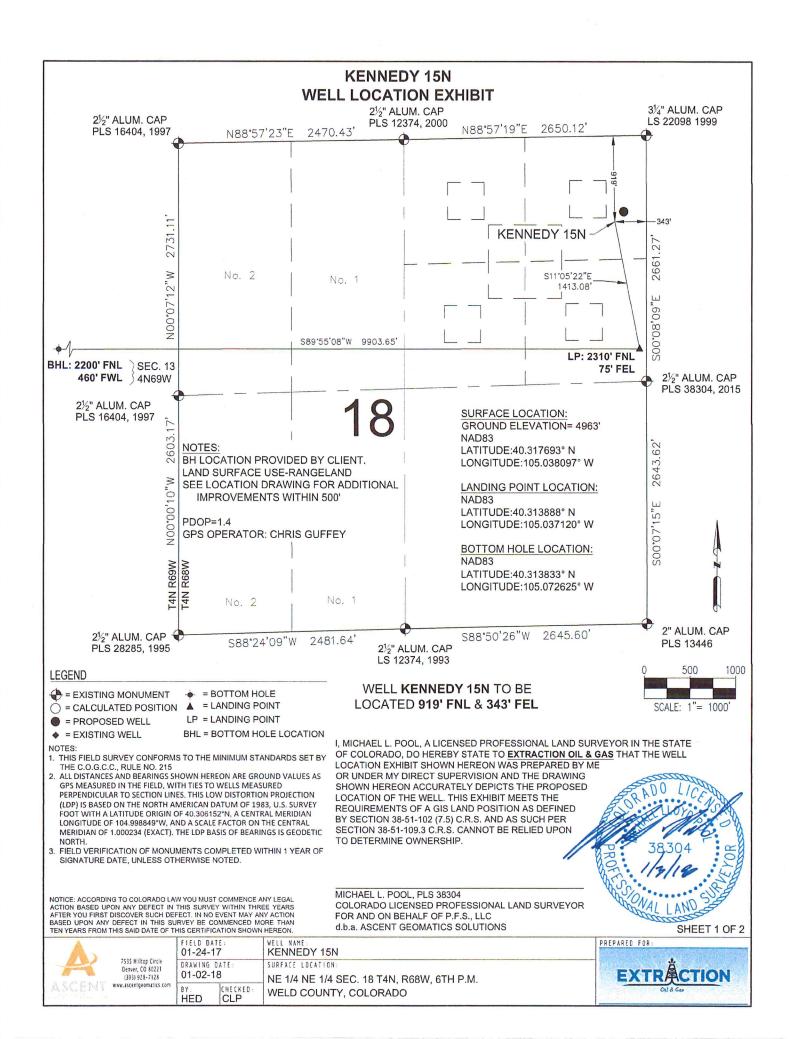
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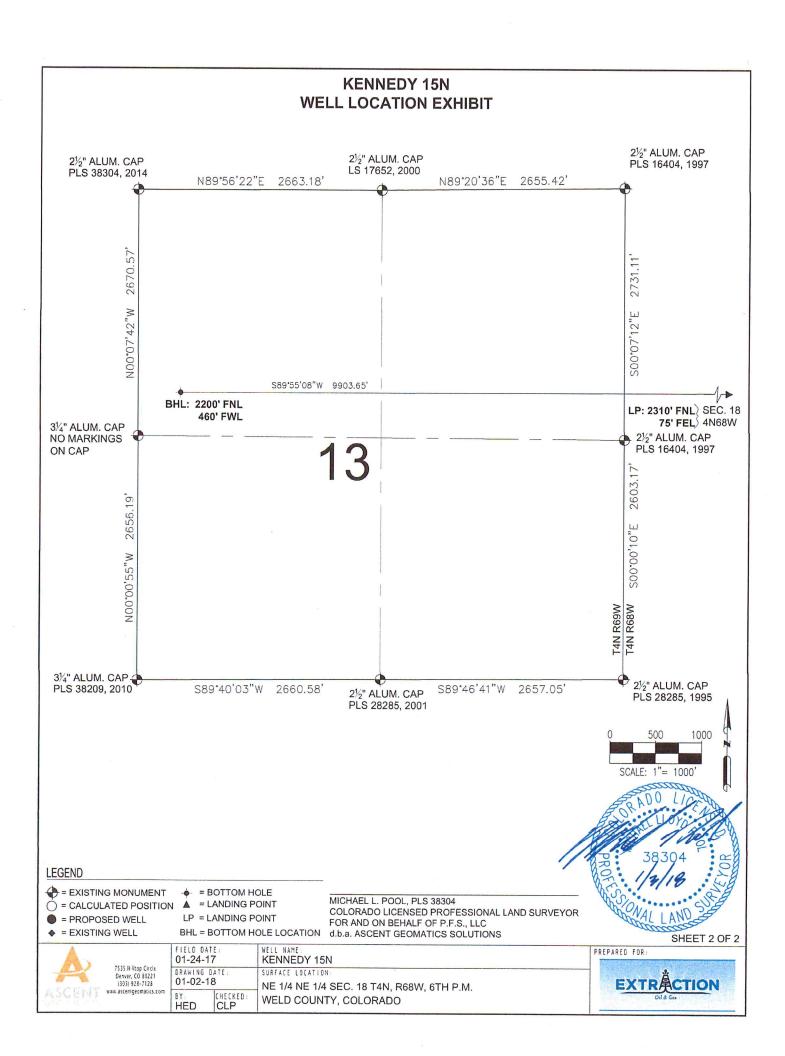
SURFACE LOCATION:

DRAWING DATE:
01-04-18
NE 1/4 NE 1/4 SEC. 18, T4N, R68W, 6TH P.M.

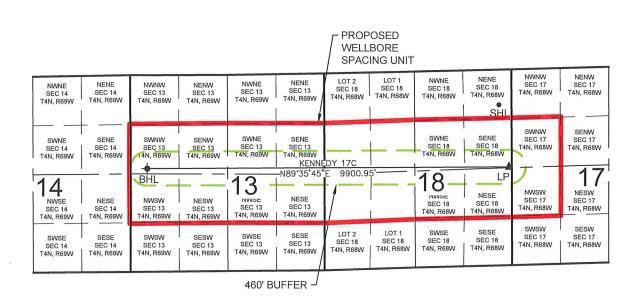
Y: CHECKED: WELD COUNTY, COLORADO



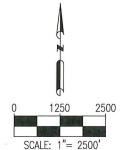




SECS 13 & 18: S2N2, N2S2 SEC 17: SW4NW4, NW4SW4



KENNEDY 17C WELL TO BE LOCATED 953' FNL AND 344' FEL, SEC 18, T4N, R68W



LEGEND

= PROPOSED WELL = BOTTOM HOLE

= LANDING POINT

SHL = SURFACE HOLE LOCATION

CHECKED:

BHL = BOTTOM HOLE LOCATION LP = LANDING POINT DISCLAIMER:
THIS PLOT DOES NOT REPRESENT A MONUMENTED LAND SURVEY AND SHOULD NOT BE
RELIED UPON TO DETERMINE BOUNDARY LINES, PROPERTY OWNERSHIP OR OTHER
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BY:

FIELD DATE:

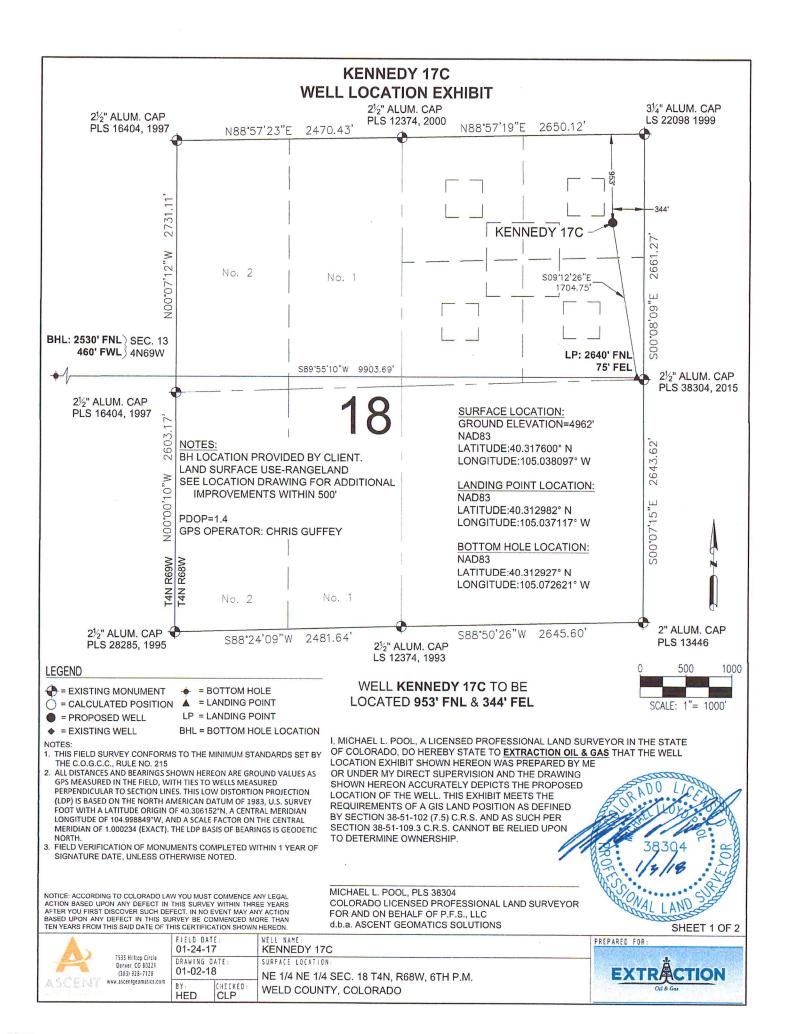
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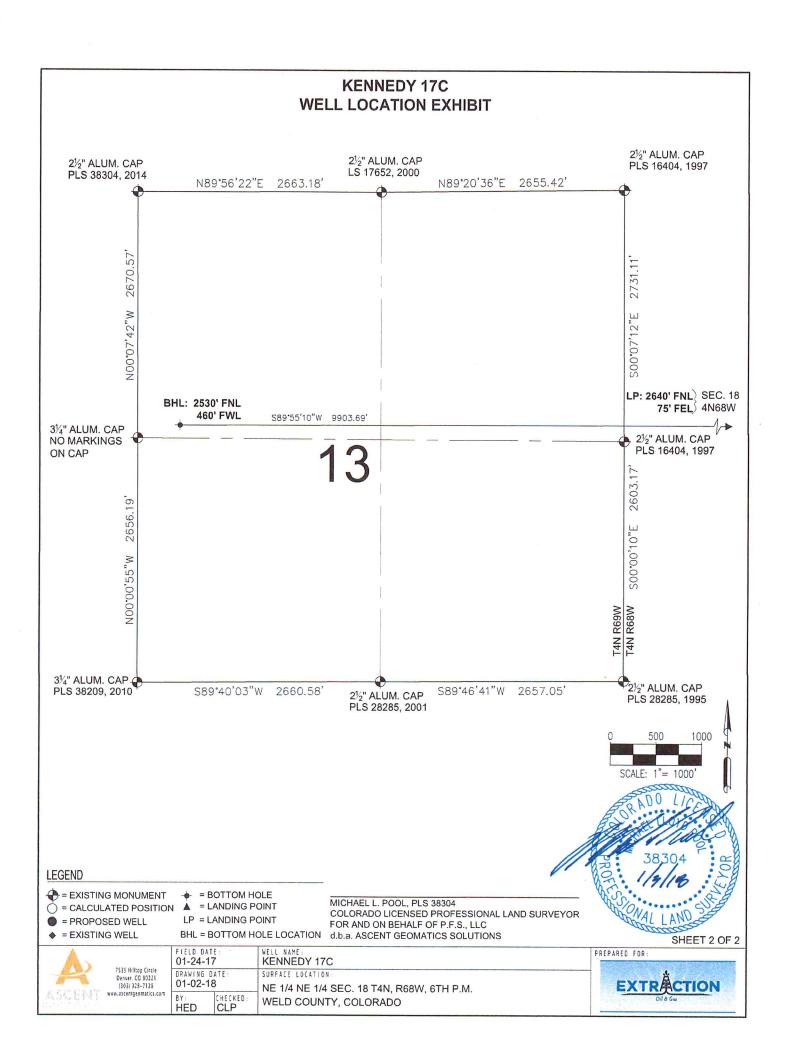
DRAWING DATE:

SITE NAME:
KENNEDY 18-D PAD
SURFACE LOCATION:

SURFACE LOCATION:
NE 1/4 NE 1/4 SEC. 18, T4N, R68W, 6TH P.M.
WELD COUNTY, COLORADO









THOMAS J. WOLF 303.628.3670 (direct) twolf@irelandstapleton.com

March 12, 2018

VIA CERTIFIED MAIL

Extraction Oil & Gas, Inc. 370 17th Street, Suite 5300 Denver, CO 80202

Colorado Oil & Gas Conservation Commission Attn: Jane Stanczyk 1120 Lincoln St., Suite 801 Denver, CO 80203

Re: Objection to Proposed Rule 318A.a.(4)D Horizontal Wells

Dear Extraction Oil & Gas, Inc., and Colorado Oil & Gas Conservation Commission:

Our firm represents Larson Front Range Farms, LLC ("LFRF"), Ivar W. Larson, personally and as a member of LFRF, and Donna M. Larson, personally and as a member of LFRF (collectively, "Larson").

Larson received six (6) Notices of Intent to Propose Rule 318A.a.(4)D Horizontal Wells from Extraction Oil & Gas, Inc., ("Extraction"), on February 10, 2018 and February 14, 2018. Pursuant to the instructions in Extraction's Notices, and pursuant to Commission Rule 318A.e.(5)B, Larson has thirty (30) days from receipt of the Notices to object in writing to the operator. The purpose of this letter is to notify you of Larson's objection.

Larson hereby objects to the proposed Rule 318A.a.(4)D Horizontal Wells as described in each of the following Extraction Notices:

- 1. Extraction Notice re: Trott 7W-20-16N Well; Dated February 1, 2018;
- 2. Extraction Notice re: Kennedy 5N Well; Dated February 6, 2018;
- 3. Extraction Notice re: Kennedy 13N Well; Dated February 6, 2018;
- 4. Extraction Notice re: Kennedy 7N, Kennedy 9C & Kennedy 11N Wells; Dated February 6, 2018;

- 5. Extraction Notice re: Kennedy 1C & Kennedy 3N Wells; Dated February 7, 2018; and
- 6. Extraction Notice re: Kennedy 15N & Kennedy 17C Wells; Dated February 7, 2018.

Notwithstanding any dates written by Extraction on the Notices, the Notices were all received by Larson on February 10, 2018 and February 14, 2018. Therefore, Larson's objections are being timely filed with Extraction and the Commission within thirty (30) days of receipt. Copies of the Notices to which Larson is objecting and Larson's contemporaneous date stamp of receipt are enclosed as **Exhibit 1**.

Pursuant to the Extraction Notices and Commission Rule 318A.e.(5)B, a valid objection may be based on three (3) separate grounds, including "that the operator is not an 'owner', as defined in the Act, of the mineral estate(s) through which the wellbore penetrates within the target formation." Under the Colorado Oil and Gas Conservation Act, an Owner means "the person who has the right to drill into and produce from a pool and to appropriate the oil or gas he produces therefrom either for himself or others or for himself and others, including the owner of a well capable of producing oil or gas, or both." C.R.S. § 34-60-103(7).

Larson hereby objects to each of the above-referenced six (6) Extraction Notices on the grounds that Extraction is not the owner of the mineral estate(s) through which the wellbore penetrates within the target formation. Rather, Larson is the "owner," as defined in the Act, of the mineral rights in portions of Section 12 and Section 13 where Extraction intends to propose, drill and operate the above-referenced Trott and Kennedy wells.

For the purpose of stating specific facts forming the basis for this objection, and without waiving any rights or making any factual stipulations for the purpose of any forthcoming Commission proceedings, LFRF is the owner of the following mineral rights:

- Trott 7W-20-16N Well Section 12: S2S2; Section 13: N2N2
- Kennedy 1C & Kennedy 3N Wells Section 12: S2S2; Section 13: N2N2
- Kennedy 5N Well Section 13: N2N2
- Kennedy 7N, Kennedy 9C & Kennedy 11N Wells Section 13: N2
- Kennedy 13N Well Section 13: S2N2;
- Kennedy 15N & Kennedy 17C Wells Section 13: S2N2; and

Ivar W. Larson and Donna M. Larson are the owners of the following mineral rights:

• Kennedy 15N & Kennedy 17C Wells – Section 13: N2S2.

Copies of deeds demonstrating LFRF's and Mr. and Mrs. Larson's ownership of the above-refered mineral rights are enclosed as $\underline{\text{Exhibits A} - \text{I}}$. If Extraction requests a hearing before the Commission regarding this objection, pursuant to Commission Rule 318A.e.(5)C, Larson will present testimony and documentary evidence demonstrating LFRF's and Mr. and Mrs. Larson's ownership.

Further, in connection with Extraction's ongoing proposals for the Trott and Kennedy wells, if Larson becomes aware of additional information indicating that waste will be caused, or Larson's correlative rights will be adversely affected, Larson reserves the right to fully investigate such information and provide written objections to Extraction and the Commission on those grounds, in accordance with Commission Rule 318A.e.(5).

Thank you for your attention to this objection. If any Commission proceedings are requested or scheduled regarding this objection, please direct all relevant communication to my office. If you have any questions or would like to discuss this matter, please contact me at 303-628-3670 or twolf@irelandstapleton.com.

Sincerely,

Thomas J. Wolf

Enclosure