

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

IN THE MATTER OF THE APPLICATION OF
CONOCOPHILLIPS COMPANY FOR AN
ORDER TO VACATE ORDER NO. 535-531
AND ESTABLISH AN APPROXIMATE 1,280-
ACRE DRILLING AND SPACING UNIT FOR
THE DRILLING OF UP TO TWO (2)
HORIZONTAL WELLS WITH WELL LOCATION
RULES FOR THE NIOBRARA FORMATION IN
SECTIONS 32 AND 33, TOWNSHIP 3 SOUTH,
RANGE 64 WEST, 6TH P.M., UNNAMED
FIELD, ADAMS COUNTY, COLORADO

CAUSE NO.

DOCKET NO.

TYPE: SPACING

APPLICATION

ConocoPhillips Company (Operator No. 19160) ("Applicant"), by and through its attorneys, Jost Energy Law, 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 1,280-acre drilling and spacing unit and authorize up to two (2) horizontal wells within the unit in order to efficiently and economically recover the oil, gas and associated hydrocarbons within said 1,280-acre drilling and spacing unit from the Niobrara Formation underlying the below-described lands. In support of its Application, Applicant states and alleges as follows:

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

2. Applicant owns leasehold interests or holds the right to operate on the following lands (hereafter "Application Lands"):

Township 3 South, Range 64 West, 6th P.M.

Section 32: All

Section 33: All

1,280 acres, more or less, Adams County, Colorado.

A reference map of the Application Lands is attached hereto.

3. Rule 318.a. of the Rules and Regulations of the Oil and Gas Conservation Commission requires that, on unspaced lands, wells drilled in excess of 2,500 feet in depth be located not less than 600 feet from any lease line, and located not less than 1,200 feet from any other producible or drilling oil or gas well when drilling to the same common source of supply. Section 33 of the Application Lands is subject to Rule 318.a. for the Niobrara Formation.

4. On September 15, 2014, the Commission entered Order No. 535-531, which, among other things, vacated a well location exception established by Order No. 535-101 for Section 31, Township 3 South, Range 64 West, 6th P.M., established an approximate 1,280-acre exploratory drilling and spacing unit for Sections 31 and 32, Township 3 South, Range 64 West, 6th P.M., approved up to two horizontal wells within the unit, and provided that the productive interval of the wellbore shall be located no closer than 460 feet from the unit boundaries, and no closer than 960 feet from the productive interval of any other wellbore located in the unit, without exception being granted by the Director, for the production of oil, gas, and associated hydrocarbons from the Niobrara Formation.

5. On October 13, 2016, Applicant filed an Application in Docket No. 161200510 for an order to, among other things, vacate an approximate 1280-acre exploratory drilling and spacing unit established by Order No. 535-531 for Sections 31 and 32, Township 3 South, Range 64 West, 6th P.M., vacate an approximate 640-acre drilling and spacing unit established by Order No. 535-702 for Section 36, Township 3 South, Range 65 West, 6th P.M., establish an approximate 1280-acre drilling and spacing unit for Section 36, Township 3 South, Range 65 West, 6th P.M., and Section 31, Township 3 South, Range 64 West, 6th P.M., and allow up to one horizontal well in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara Formation in the unit. Applicant's Application in Docket No. 161200510 is scheduled to be heard at the Commission's March 2017 hearing.

6. On January 19, 2017, Bison Oil & Gas, LLC filed an Application in Docket No. 170300149 for an order vacating Order No. 535-531 and establishing an approximate 640-acre drilling and spacing unit for Section 32, Township 3 South, Range 64 West, 6th P.M., for the drilling of up to sixteen (16) horizontal wells to the Niobrara Formation on no more than three (3) well pads within the unit or from a legal location on adjacent lands, providing that the treated interval of each wellbore be no closer than 150 feet from the treated interval of another wellbore producing from the Niobrara Formation within the unit, and no closer than 460 feet from the unit boundary, without exception being granted by the Director. Docket 170300149 is scheduled for a Commission hearing on March 20-21, 2017. Applicant will be filing a Protest to Bison's Application in Docket No. 170300149, and has submitted comments to Bison's Applications for Permits to Drill filed for the proposed 640-acre unit.

7. On January 19, 2017, Bison Oil & Gas, LLC filed an Application in Docket No. 170300153 for an order vacating Order No. 535-530 and establishing an approximate 1,280-acre drilling and spacing unit for Sections 33 and 34, Township 3 South, Range 64 West, 6th P.M., for the drilling of up to sixteen (16) horizontal wells to the Niobrara Formation on no more than three (3) well pads within the unit or from a legal location on adjacent lands, providing that the treated interval of each wellbore be no closer than 150 feet from the treated interval of another wellbore producing from the Niobrara Formation within the unit, and no closer than 460 feet from the unit boundary, without exception

being granted by the Director. Docket 170300153 is scheduled for a Commission hearing on March 20-21, 2017. Applicant will be filing a Protest to Bison's Application in Docket No. 170300153, and has submitted comments to Bison's Applications for Permits to Drill filed for the proposed 1,280-acre unit.

8. The records of the Commission reflect that no wells are currently producing from the Niobrara Formation in the Application Lands.

9. To promote efficient drainage within the Niobrara Formation of the Application Lands, to protect correlative rights and to avoid waste, the Commission should vacate Order No. 535-531 in its entirety and establish an approximate 1,280-acre drilling and spacing unit the Application Lands, and approve up to two (2) horizontal wells within the new unit, for the production of oil, gas and associated hydrocarbons from the Niobrara Formation.

10. The above-proposed drilling and spacing unit will allow efficient drainage of the Niobrara Formation; will prevent waste; will not adversely affect correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoirs. The unit of the size and shape specified above is not smaller than the maximum area that can be economically and efficiently drained by the proposed well in the unit.

11. The Applicant is requesting to drill and complete up to two (2) horizontal wells within the unit in order to efficiently and economically recover the oil, gas and associated hydrocarbons from the Niobrara Formation within the Application Lands, and that there will be no adverse effect on correlative rights of adjacent owners.

12. The Applicant maintains that there will be no more than one (1) new well pad in the unit, or adjacent thereto, unless an exception is granted by the Director.

13. The treated interval of each proposed horizontal well shall be no closer than 460 feet from the boundaries of the unit (regardless of the lease lines within the unit) and all horizontal wells shall be no closer than 150 feet from the treated interval of another well producing from the same source of supply within the unit, unless an exception is granted by the Director.

14. The undersigned certifies that copies of this Application will be served on each interested party 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 in May 2017, that notice be given as required by law, and that upon such hearing this Commission enter its order:

A. Vacating Order No. 535-531.

B. Establishing an approximate 1,280-acre drilling and spacing unit for Sections 32 and 33, Township 3 South, Range 64 West, 6th P.M., and allowing up to two (2) horizontal wells in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from of the Niobrara Formation in the unit.

C. Providing that the treated interval any horizontal well shall be no closer than 460 feet from the boundaries of the unit and not less than 150 feet from the treated interval of another well within the unit, and authorizing up to one (1) well pad in the unit, or adjacent thereto, unless an exception is granted by the Director.

D. Finding that an approximate 1,280-acre drilling and spacing unit for the development of the Niobrara Formation on the Application Lands will prevent waste, protect correlative rights, and maximize the efficient and economic production of the Niobrara Formation in the Application Lands.

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

DATED March 2, 2017.

Respectfully submitted:

ConocoPhillips Company

By: _____

Jamie L. Jost

Jamie L. Jost
Kelsey H. Wasylenky
Jost Energy Law, P.C.
Attorneys for Applicant
1401 17th Street, Suite 370
Denver, Colorado 80202
(720) 446-5620

Applicant's Address:
ConocoPhillips Company
Attn: Samuel A. Hamidi
600 N. Dairy Ashford Road
Houston, TX 77079-1069

VERIFICATION

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

Jace McKenzie, Associate Landman with ConocoPhillips Company, upon oath deposes and says that he has read the foregoing Application and that the statements contained therein are true to the best of his knowledge, information and belief.

CONOCOPHILLIPS COMPANY

Jace McKenzie
Jace McKenzie

Subscribed and sworn to before me this 2nd day of March, 2017, by Jace McKenzie, Associate Landman for ConocoPhillips Company.

Witness my hand and official seal.



My commission expires: August 6, 2017

Regina M. Paura
Notary Public

Reference Map
ConocoPhillips Company

Sections 32 and 33, Township 3 South, Range 64 West, 6th P.M.



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

IN THE MATTER OF THE APPLICATION OF
CONOCOPHILLIPS COMPANY FOR AN
ORDER TO VACATE ORDER NO. 535-531
AND ESTABLISH AN APPROXIMATE 1,280-
ACRE DRILLING AND SPACING UNIT FOR
THE DRILLING OF UP TO TWO (2)
HORIZONTAL WELLS WITH WELL LOCATION
RULES FOR THE NIOBRARA FORMATION IN
SECTIONS 32 AND 33, TOWNSHIP 3 SOUTH,
RANGE 64 WEST, 6TH P.M., UNNAMED
FIELD, ADAMS COUNTY, COLORADO

CAUSE NO.

DOCKET NO. 170500294

TYPE: SPACING

AFFIDAVIT OF MAILING

STATE OF COLORADO

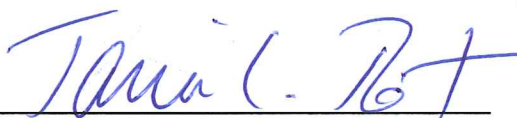
)

)ss.

CITY AND COUNTY OF DENVER

)

I, Jamie L. Jost, of lawful age, and being first duly sworn upon my oath, state and declare that I am the attorney for ConocoPhillips Company, and that on or before the 8th day of March 2017, I 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 this Affidavit.



Jamie L. Jost

Subscribed and sworn to before me this 8th day of March 2017.

Witness my hand and official seal.

[SEAL]

My commission expires: May 6, 2020

Notary Public

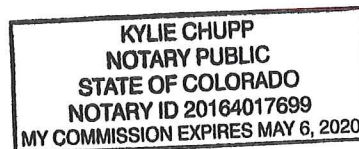


Exhibit A
COPC - Fraser - SP

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

Bennett Fire Protection District, a/k/a Bennett
Fire Protection District No. 7
825 Sharis Court
Bennett, CO 80102

Board of County Commissioners,
Adams County, Colorado
4430 S. Adams County Pkwy, 5th Floor, Suite
C5000A
Brighton, CO 80601

Sandra L. Epperson as Personal Representative
of the Estate of Leonard E. Epperson, Deceased
2 West Northern, Unit 1
Phoenix, AZ 85021

ConocoPhillips Company
600 N. Dairy Ashford
Houston, TX 77079

Bison Oil & Gas, LLC
999 18th Street, Suite 3370
Denver , CO 80202

Bison Exploration, LLC
P.O. Box 1168
Denver , CO 80201

WEP Transport Holdings, LLC
PO BOX 7068
RANCHO SANTA FE, CA 92067

WEP Transport Holdings, LLC
625 East Main St., Suite 1028-303
Aspen, CO 81611

Colorado Maverick Company, LLC
133 W. San Antonio St., Suite 300
San Marcos, TX 78666

Tree Top, LP
133 W. San Antonio St., Suite 300
San Marcos, TX 78666

Mitchel E. Rhoads
4755 W 30 N
Angola, IN 46703

Colorado Department of Transportation
4201 East Arkansas Avenue
Denver, CO 80222

Colorado Department of Transportation
Attn: Alicia Clemons
15285 S. Golden Road
Golden, CO 80401

Burlington Resources Oil & Gas Company LP
600 N. Dairy Ashford
Houston, TX 77079

Anadarko Land Corporation
Attn: Manager/Land Administrator
P.O. Box 173779
Denver, CO 80217-3779

Anadarko E&P Onshore LLC
Attn: John Hasche
1099 18th Street, Suite 1800
Denver , CO 80202

Anadarko Land Corporation
Attn: John Hasche
1099 18th Street, Suite 1800
Denver , CO 80202

Anadarko E&P Onshore LLC
Attn: Manager/Land Administrator
P.O. Box 173779
Denver , CO 80217-3779

Isace B. Haviland and Lucile S. Haviland or their
heirs and devisees
507 Lake Shore Drive
Michigan City, IN 46360

Gerrit A. Van Dyk and
Dorothy Margaret Van Dyk
920 Antelope Drive West
Bennett, CO 80102

Gerrit A. Van Dyk and Dorothy M. Van Dyk, as
Trustees of the Gerrit A. Van Dyk and Dorothy
M. Van Dyk Joint Revocable Trust dated August
22, 2011
920 Antelope Drive West
Bennett, CO 80102

Thelma Eugenia Thompson
1506 Newport
San Luis Obispo, CA 93405

Hiline Resources, LLC
PO Box 11389
Denver, CO 80211

Radu Marcu and Floare Marcu
2455 Greenbrier Ct.
Weston, FL 33327

B&D Land Company 600, LLC
11 Cavanaugh Road
Bennett, CO 80102

James C. Talbert
37037 E 12th Pl
Watkins, CO 80137-6827

Jeff L. Becker and
Peg L. Becker, joint tenants
1206 W Fork Way
Watkins, CO 80137-6827

Prosper Farms Investments, LLC
5641 N Broadway
Denver, CO 80216-1021

James M. Sims
1030 Snow Lake Ct
Watkins, CO 80137-6827

Annette L. Chapman
1191 Snow Lake Ct
Watkins, CO 80137-6827

Nicholas Bakarich, Jr. and
Deborah Iliff-Bakarich,, joint tenants
1173 W Fork Way
Watkins, CO 80137-6827

Brandon M. Barnes
1154 W Fork Way
Watkins, CO 80137-6827

Stewart Family Enterprises LLLP
PO Box 2122
Palmer, AK 99645

Hylaine J. Hein
1325 N. Quail Run Rd
Watkins, CO 80137

Simone L. Sante
8959 Greenwich Court
Highlands Ranch, CO 80130

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

Brandon Marette
Energy Liaison
Colorado Parks and Wildlife
Northeast Regional Office
6060 Broadway
Denver, CO 80216

Jennifer Rutter
Adams County
Community & Economic Development
4430 South Adams County Pkwy.
Brighton, CO 80601-8218

IN THE MATTER OF THE APPLICATION OF
CONOCOPHILLIPS COMPANY FOR AN
ORDER TO VACATE ORDER NO. 535-531
AND ESTABLISH AN APPROXIMATE 1,280-
ACRE DRILLING AND SPACING UNIT FOR
THE DRILLING OF UP TO TWO (2)
HORIZONTAL WELLS WITH WELL LOCATION
RULES FOR THE NIOBRARA FORMATION IN
SECTIONS 32 AND 33, TOWNSHIP 3 SOUTH,
RANGE 64 WEST, 6TH P.M., UNNAMED
FIELD, ADAMS COUNTY, COLORADO

TYPE: SPACING

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

Tami C. N.

Subscribed and sworn to before me this 2^{1st} day of March 2017.

My commission expires: May 6, 2020

Yusef Ali

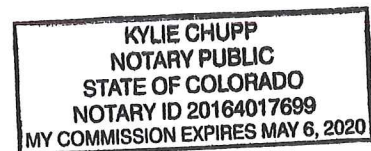


Exhibit A
COPC - Fraser - SP

Floyd M. Cox
2251 Newark Street
Aurora, CO 80010

Floyd M. Cox
1875 S Reed Street
Lakewood, CO 80232

James Howard Wortz, deceased
25030 Loma Prieta Avenue
Los Gatos, CA 95033

James Howard Wortz, deceased
522 Sequoia Drive
Los Altos, CA 94024

Blanche Fellows
8619 Darby Ave.
Northridge, CA, 91325

Harold H. Fink
Box 402
Eldorado, AR 71731

Marie E. Fink
1116 W. 23rd St.
Little Rock, AR 72206

Grace Adams
10331 Zelzah Ave.
Northridge, CA 91326

William K. Rummel
1708 Plummer St.
Northridge, CA

Vivian Fink
1116 W. 23rd St.
Little Rock, AR 72206

Edith Sears
1341 Hillside Dr.
Reno, NV 89503

Madge Vawter
1071 Evans Ave.
Reno, NV 89512

R.L. Fink, a/k/a Robert Lincoln Fink,
deceased
(address unknown)

Fred Fink
(address unknown)

Maud Staats
(address unknown)

Olive Parrish
(address unknown)

Ward Staats
(address unknown)

Cora L. Fink
(address unknown)

Virginia Shively, a/k/a Virginia Shively,
deceased
(address unknown)

Merideth Wortz, a/k/a Merideth Worts
(address unknown)

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

IN THE MATTER OF THE APPLICATION OF
CONOCOPHILLIPS COMPANY FOR AN ORDER TO
VACATE ORDER NO. 535-531 AND ESTABLISH AN
APPROXIMATE 1,280-ACRE DRILLING AND
SPACING UNIT FOR THE DRILLING OF UP TO TWO
(2) HORIZONTAL WELLS WITH WELL LOCATION
RULES FOR THE NIOBRARA FORMATION IN
SECTIONS 32 AND 33, TOWNSHIP 3 SOUTH,
RANGE 64 WEST, 6TH P.M., UNNAMED FIELD,
ADAMS COUNTY, COLORADO

CAUSE NO.

DOCKET NO. 170500294

TYPE: SPACING

**CONOCOPHILLIPS COMPANY'S MOTION FOR AN ORDER OF SERVICE BY
PUBLICATION**

COMES NOW ConocoPhillips Company, Operator No. 19160 ("COPC" or "Applicant"), by its attorneys, Jost Energy Law, P.C., and files this motion for an order of service by publication ("Motion") to the Colorado Oil and Gas Conservation Commission ("Commission" or "COGCC"). In support of its Motion, COPC states the following:

A. Factual and Procedural History.

1. COPC, as Applicant herein, is a corporation duly authorized to conduct business in the State of Colorado, is a registered operator in good standing with the Commission, and is an interested party in the subject matter of the above-referenced Docket as the applicant and owner of certain leasehold interests and/or operator in the Application Lands described below.

2. The Commission has jurisdiction over the subject matter embraced in said Docket, and of the parties interested therein, and jurisdiction to promulgate the hereinafter prescribed order pursuant to the Oil and Gas Conservation Act.

3. Rule 318.a. of the Rules and Regulations of the Oil and Gas Conservation Commission requires that, on unspaced lands, wells drilled in excess of 2,500 feet in depth be located not less than 600 feet from any lease line, and located not less than 1,200 feet from any other producible or drilling oil or gas well when drilling to the same common source of supply. The Application Lands are subject to Rule 318.a. for the Niobrara Formation.

4. On September 15, 2014, the Commission entered Order No. 535-531, which, among other things, vacated a well location exception established by Order No. 535-101 for Section 31, Township 3 South, Range 64 West, 6th P.M., established an approximate 1,280-acre exploratory drilling and spacing unit for Sections 31 and 32, Township 3 South, Range 64 West, 6th P.M., approved up to two horizontal wells within the unit, and provided that the productive interval of the wellbore shall be located no closer than 460 feet from the unit boundaries, and no

closer than 960 feet from the productive interval of any other wellbore located in the unit, without exception being granted by the Director, for the production of oil, gas, and associated hydrocarbons from the Niobrara Formation.

5. On October 13, 2016, Applicant filed an Application in Docket No. 161200510 for an order to, among other things, vacate an approximate 1280-acre exploratory drilling and spacing unit established by Order No. 535-531 for Sections 31 and 32, Township 3 South, Range 64 West, 6th P.M., vacate an approximate 640-acre drilling and spacing unit established by Order No. 535-702 for Section 36, Township 3 South, Range 65 West, 6th P.M., establish an approximate 1280-acre drilling and spacing unit for Section 36, Township 3 South, Range 65 West, 6th P.M., and Section 31, Township 3 South, Range 64 West, 6th P.M., and allow up to one horizontal well in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara Formation in the unit. Applicant's Application in Docket No. 161200510 is scheduled to be heard at the Commission's March 2017 hearing.

6. On March 2, 2017, COPC filed a verified application in Docket No. 170500294 pursuant to §34-60-116, C.R.S. for an order (1) vacating Order No. 535-531, (2) establishing an approximate 1,280-acre drilling and spacing unit for Sections 32 and 33, Township 3 South, Range 64 West, 6th P.M., and allowing up to two (2) horizontal wells in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from of the Niobrara Formation in the unit, (3) providing that the treated interval any horizontal well shall be no closer than 460 feet from the boundaries of the unit and not less than 150 feet from the treated interval of another well within the unit, and authorizing up to one (1) well pad in the unit, or adjacent thereto, unless an exception is granted by the Director, (4) finding that an approximate 1,280-acre drilling and spacing unit for the development of the Niobrara Formation on the Application Lands will prevent waste, protect correlative rights, and maximize the efficient and economic production of the Niobrara Formation in the Application Lands, and (5) for such other findings and orders as the Commission may deem proper or advisable in this matter.

7. On or before March 8, 2017, COPC served copies of the Application on the interested parties to the Application as defined in Rule 507.b.(1) and pursuant to Rule 503.e. (the "Interested Parties" or individually "Interested Party").

8. Upon reasonable due diligence, which is further detailed herein, COPC was unable to find address information for the following eight (8) Interested Parties: (1) R.L. Fink, a/k/a Robert Lincoln Fink, (2) Virginia Shivly, a/k/a Virginia Shively, (3) Fred Fink, (4) Maud Staats, (5) Olive Parrish, (6) Ward Staats, and (7) Cora L. Fink (together, the "Fink Heirs"), and (8) Meredith Wortz, a/k/a Meredith Worts (the Fink Heirs and Meredith Wortz, a/k/a Meredith Worts are hereinafter referred to collectively as the "Unknown IPs").

9. The Commission has determined that in order for publication by notice to be effective as to persons with unknown addresses, the Applicant must first comply with Colorado Rule of Civil Procedure 4(g), which authorizes service of process by publication only after the Applicant files a verified motion with the Commission detailing Applicant's attempts to provide actual notice of the proceedings and the Commission grants the motion.

B. Standard of Review.

1. C.R.S. 34-60-108(4) provides:

“Any notice required by this article, except as provided in this section, shall be given by the commission either by mailing a copy thereof, postage prepaid, to the last known mailing address of the person to be given notice, or by personal service. In addition, the commission shall cause one publication of such notice, at least ten days prior to the hearing, in a newspaper of general circulation in the city and county of Denver and in a newspaper of general circulation in the county where the land affected, or some part thereof, is situated...In all cases where there is an application for the entry of a pooling order or unitization order...notice of the hearing to be held on such application or complaint shall be served on the interested parties either by mail as provided in this subsection (4) or in the same manner as is provided in the Colorado rules of civil procedure for the service of process in civil actions in the district courts of this state.”

2. Commission Rule 519 states that “[t]he Colorado Rules of Civil Procedure apply to Commission proceedings unless they are inconsistent with Commission Rules or the Colorado Oil and Gas Conservation Act.”

3. C.R.C.P. Rule 4(g) provides:

“Except as otherwise provided by law, service by mail or publication shall be allowed only in actions affecting specific property or status or other proceedings in rem. When service is by publication, the complaint need not be published with the summons. The party desiring service of process by mail or publication under this section (g) shall file a motion verified by the oath of such party or of someone in the party's behalf for an order of service by mail or publication. It shall state the facts authorizing such service, and shall show the efforts, if any, that have been made to obtain personal service and shall give the address, or last known address, of each person to be served or shall state that the address and last known address are unknown. The court, if satisfied that due diligence has been used to obtain personal service or that efforts to obtain the same would have been to no avail, shall:

(1) Order the party to send by registered or certified mail a copy of the process addressed to such person at such address, requesting a return receipt signed by the addressee only. Such service shall be complete on the date of the filing of proof thereof, together with such return receipt attached thereto signed by such addressee, or

(2) Order publication of the process in a newspaper published in the county in which the action is pending. Such publication shall be made once each week for five successive weeks. Within 14 days after the order the party shall mail a copy of the process to each person whose address or last known

address has been stated in the motion and file proof thereof. Service shall be complete on the day of the last publication. If no newspaper is published in the county, the court shall designate one in some adjoining county.”

C. COPC’s Due Diligence in Attempting to Locate the Unknown IPs.

In attempting to locate a last known address for the Fink Heirs, COPC reviewed a probate file and Decree of Final Settlement recorded in Boulder County, Colorado, in addition to recorded documents obtained from the Adams County Clerk and Recorder’s office from 1944 (the last date that R.L. Fink a/k/a Robert Lincoln Fink appeared in title) to present. In addition, COPC utilized the website LexisNexis Accurint public record search service, and a general internet search. As of the date of this Motion, COPC is unable to find a last known address for the Fink Heirs.

In attempting to locate a last known address for Meredith Wortz, a/k/a Meredith Worts, COPC reviewed the Last Will and Testament of Maud B. Worts recorded in the Adams County Clerk and Recorder’s office in addition to recorded documents obtained from the Adams County Clerk and Recorder’s office from 1965 (the last date that Merideth Worts appeared in title) to present. In addition, COPC utilized the website LexisNexis Accurint public search service, and a general internet search. As of the date of this Motion, COPC is unable to find a last known address for Meredith Wortz, a/k/a Meredith Worts.

D. Relief Requested

WHEREFORE, COPC respectfully requests the following relief:

1. That the Commission order publication of the process in the Application subject to the above-referenced Docket in a newspaper published in Denver County, Colorado.
2. For such other findings and orders as the Commission may deem proper or advisable in this matter.

E. Reservation of Rights

COPC reserves its right to supplement this Motion.

Dated: March 21, 2017

Respectfully submitted,

CONOCOPHILLIPS COMPANY



Jamie L. Jost
Kelsey H. Wasylenky
Jost Energy Law, P.C.
1401 17th Street, Suite 370
Denver, CO 80202
720-362-0875
jjost@jostenergylaw.com
kwasylenky@jostenergylaw.com

Applicant's Address:
ConocoPhillips Company
Attn: Jace McKenzie
600 N. Dairy Ashford Road
Houston, TX 77079-1069

VERIFICATION

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

Jace McKenzie, Associate Landman with ConocoPhillips Company, upon oath deposes and says that he has read the foregoing Motion for an Order of Service by Publication and that the statements contained therein are true to the best of his knowledge, information and belief.

CONOCOPHILLIPS COMPANY



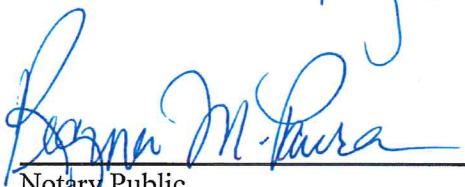
Jace McKenzie
Associate Landman

Subscribed and sworn to before me this 21st day of March, 2017, by Jace McKenzie, Associate Landman for ConocoPhillips Company.

Witness my hand and official seal.

My commission expires:

August 6, 2017



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that, on March 21, 2017, Jost Energy Law, P.C. caused ConocoPhillips Company's Motion for an Order of Service by Publication in Colorado Oil and Gas Conservation Commission Docket No. 170500294 to be served via electronic mail to the Colorado Oil and Gas Conservation Commission pursuant to the applicable rules and by courier/U.S. mail at the addresses listed below:

Via courier:

Colorado Oil and Gas Conservation Commission

ATTN: Julie Murphy, Margaret Humecki, Jill Dorancy and James Rouse

1120 Lincoln Street, Suite 801

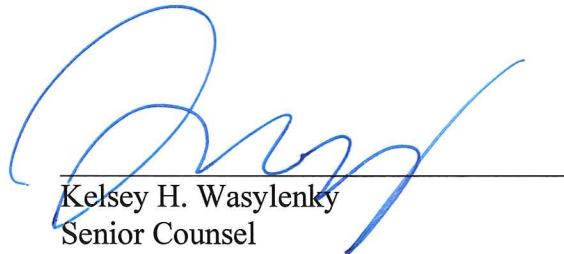
Denver, CO 80203

Julie.murphy@state.co.us

Margaret.humecki@state.co.us

Jill.Dorancy@state.co.us

James.Rouse@state.co.us



Kelsey H. Wasylenky
Senior Counsel