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

IN THE MATTER OF THE APPLICATION OF CAUSE NO. CONOCOPHILLIPS COMPANY FOR ORDER TO POOL ALL INTERESTS IN TWO (2) WELLS IN AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT ESTABLISHED FOR SECTIONS 26 AND 27, TOWNSHIP 3 SOUTH, RANGE 65 WEST, 6TH P.M., FOR THE DEVELOPMENT AND OPERATION OF THE NIOBRARA FORMATION, UNNAMED FIELD, ADAMS COUNTY, COLORADO

DOCKET NO.

TYPE: POOLING

APPLICATION

COMES NOW ConocoPhillips Company (Operator No. 19160), including its wholly owned subsidiary Burlington Resources Oil & Gas LP (Operator No. 26580) (together, "COPC" or "Applicant"), by its attorneys, Jost Energy Law, P.C., and makes this application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission") for an order to pool all interests within an approximate 1,280-acre drilling and spacing unit established for Sections 26 and 27, Township 3 South, Range 65 West, 6th P.M., and to subject any nonconsenting interests to the cost recovery provisions of §34-60-116(7), C.R.S., for the drilling of the Florida 3-65 27-26 3CH Well, and the Florida 3-65 27-26 3DH Well (API Nos. Pending) (the "Wells") for the development and operation of the Niobrara Formation on the following described lands:

Township 3 South, Range 65 West, 6th P.M.

Section 26: All Section 27: All

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

Hereinafter "Application Lands."

In support thereof, COPC states and alleges as follows:

- COPC is a Delaware corporation duly authorized to conduct business in the State of Colorado, and is a registered operator in good standing with the Commission.
- COPC and/or its subsidiary company Burlington Resources Oil & Gas Company LP are Owners as defined by the Colorado Oil and Gas Conservation Act and the Commission's 100 Series Rules and own certain leasehold interests or the right to operate leasehold interests in the Application Lands.

- 3. Rule 318.a. provides that wells "to be drilled two thousand five hundred (2,500) feet or greater shall be located not less than six hundred (600) feet 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 common source of supply, unless authorized by order of the Commission upon hearing." See Commission Rule 318.a.
- 4. On October 31, 2011, the Commission entered Order No. 535-89 which, among other things, (1) established 18 approximate 640-acre drilling and spacing units, including Section 26, Township 3 South, Range 65 West, 6th P.M., for production of oil, gas and associated hydrocarbons from the Niobrara Formation, (2) approved up to two horizontal wells within each unit, with surface locations being located anywhere within the unit or surrounding lands, and (3) providing that the lateral of such well may not enter the Niobrara Formation any closer than 300 feet from the section line, with the treated interval of the permitted wellbore to be located no closer than 460 feet from the boundary of the unit and no closer than 920 feet from the treated interval of any other well in the unit producing from the Niobrara, without exception being granted by the Director.
- 5. On August 3, 2017, Applicant filed a verified application in Docket No. 171000645 pursuant to §34-60-116, C.R.S. for an order to (1) establish an approximate 1,280-acre drilling and spacing unit for Sections 26 and 27, Township 3 South, Range 65 West, 6th P.M., and allow up to two (2) new 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, (2) providing that the Reserve 3-65 26 #1H well (API No. 05-001-09779) shall be excluded from the 1,280-acre unit and remain subject to the 640-acre drilling and spacing unit established by Order No. 535-89 for purposes of the payment of proceeds, (3) providing that the treated interval of 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 two (2) well pads 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, on the Application Lands. Applicant's Application in Docket No. 171000645 is scheduled to be heard at the Commission's October 30-31, 2017 hearing.
- 6. On August 3, 2017, Applicant filed a verified application in Docket No. 171000646 pursuant to §34-60-116, C.R.S. for an order to pool all interests in the Application Lands underlying an approximate 1,280-acre drilling and spacing unit established for the Application Lands, for the development and operation of the Niobrara Formation; and to subject any non-consenting interests to the cost recovery provisions of §34-60-116(7), C.R.S., effective as of the earlier of the date of the Application, or the date that any of the costs specified in §34-60-116(7)(b), C.R.S., are first incurred for the drilling of the Florida #3-65 27-26 3AH Well and the Florida #3-65 27-26 5H_D Well (API Nos.

Pending). Applicant's Application in Docket No. 171000646 is scheduled to be heard at the Commission's October 30-31, 2017 hearing.

- 7. On October 24, 2017, Applicant filed a verified application in Docket No. 180100014 pursuant to §34-60-116, C.R.S., for an order authorizing an additional two (2) horizontal wells, for a total of four (4) horizontal wells in an approximate 1,280-acre drilling and spacing unit established for Sections 26 and 27, Township 3 South, Range 65 West, 6th P.M., in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara Formation in the unit, providing that the treated interval of 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 two well pads in the unit, or adjacent thereto, unless an exception is granted by the Director.
- 8. COPC, pursuant to Commission Rule 530 and/or the provisions of C.R.S. §34-60-116(6) and (7), hereby requests an order to pool all interests in the approximate 1,280-acre drilling and spacing unit established by the pending order in Docket No. 180100014 for the Application Lands for the development and operation of the Wells in the Niobrara Formation, and to subject any nonconsenting interests to the cost recovery provisions of §34-60-116(7), C.R.S., effective as of the earlier of the date of this Application, or the date that the costs specified in C.R.S. § 34-60-116(7)(b) are first incurred for the drilling of the Wells for the development and operation of the Niobrara Formation.
- 9. COPC certifies that copies of this Application will be served on all persons owning an interest in the mineral estate of the tracts to be pooled within seven (7) days of the date hereof, as required by Rule 503.e., and that at least thirty-five (35) days prior to the hearing on this matter, each such interest owner not already leased or voluntarily pooled will be offered the opportunity to lease, or to participate in the drilling of the Wells, and will be provided with the information required by Rule 530 as applicable.
- 10. In order to allow for more efficient reservoir drainage, prevent waste, assure a greater ultimate recovery of hydrocarbons, and to protect correlative rights, all interests in the 1,280-acre drilling and spacing unit should be pooled for the orderly development and operation of the Wells in the Niobrara Formation, including any non-consenting interests therein.

WHEREFORE, COPC requests that this matter be set for hearing on January 29-30, 2018, that notice be given as required by law, and that upon such hearing, the Commission enter its order:

A. Pooling all interests in an approximate 1,280-acre drilling and spacing unit established for the Application Lands for the development and operation of the Florida 3-65 27-26 3CH Well, and the Florida 3-65 27-26 3DH Well (API Nos. Pending) in the Niobrara Formation, effective as of the earlier of the date of the Application, or the date that any of the costs specified in §34-60-116(7)(b)(II), C.R.S., are first incurred for the drilling of the Wells in the Niobrara Formation.

- B. Providing that the production obtained from the Wells shall be allocated to each owner in the unit on the basis of the proportion that the number of acres in such tract bears to the total number of mineral acres within the drilling and spacing unit; each owner of an interest in the drilling and spacing unit shall be entitled to receive its share of the production of the Wells applicable to its interest in the drilling and spacing unit.
- C. Providing that any working interest owner who does not elect to participate in the Well(s) or fails to make a timely election is hereby deemed to be nonconsenting and is subject to the penalties as provided for in §34-60-116(7), C.R.S. The nonconsenting working interest owner must reimburse the consenting owners for his proportionate share of the costs and risks of drilling and operating the Well(s) from his proportionate share of production, subject to non-cost bearing interests, until costs and penalties are recovered as set forth in §34-60-116(7), C.R.S.
- D. Providing that any unleased owner who does not elect to participate in the Well(s) or fails to make a timely election is hereby deemed to be nonconsenting and is subject to the penalties as provided for in §34-60-116(7), C.R.S.
- E. Providing that each nonconsenting unleased owner within the drilling and spacing unit shall be treated as the owner of the landowner's royalty to the extent of 12.5% of its record title interest, whatever that interest may be, until such time as the consenting owners recover, only out of each nonconsenting owner's proportionate 87.5% share of production, the costs specified in §34-60-116(7)(b), C.R.S., as amended. After recovery of such costs, each unleased nonconsenting mineral owner shall then own its proportionate 8/8ths share of the Well, surface facilities and production, and then be liable for its proportionate share of further costs incurred in connection with the Wells as if it had originally agreed to the drilling.
- F. Providing that the operator of the Wells drilled on the above-described drilling and spacing unit shall furnish the nonconsenting owners with a monthly statement of all costs incurred, together with the quantity of oil and gas produced, and the amount of proceeds realized from the sale of production during the preceding month.
- G. For such other findings and orders as the Commission may deem proper or advisable in this matter.

Dated: October 24, 2017.

Respectfully submitted:

CONOCOPHILLIPS COMPANY

Ву:

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

COPC's Address:

ConocoPhillips Company Attn: Ashlee Hansen 600 N. Dairy Ashford Road Houston, TX 77079-1069

VERIFICATION

STATE OF TEXAS)
) ss.
COUNTY OF HARRIS)

Ashlee Hansen, of lawful age, being first duly sworn upon oath, deposes and says that she is a Senior Landman for ConocoPhillips Company, and that she has read the foregoing Application and that the matters therein contained are true to the best of her knowledge, information and belief.

Ashlee Hansen Senior Landman ConocoPhillips Company

Subscribed and sworn to before me this 23 day of October, 2017.

Witness my hand and official seal.

[SEAL]

My commission expires:

Notary Public

REGINA M. PAURA
Notary Public, State of Texas
Comm. Expires 08-06-2021
Notary ID 129818167

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 POOL ALL INTERESTS IN TWO (2) WELLS IN AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT ESTABLISHED FOR SECTIONS 26 AND 27, TOWNSHIP 3 SOUTH, RANGE 65 WEST, 6TH P.M., FOR THE DEVELOPMENT AND OPERATION OF THE NIOBRARA FORMATION, UNNAMED FIELD, ADAMS COUNTY, COLORADO

CAUSE NO.

DOCKET NO. 180100015

TYPE: POOLING

AFFIDAVIT OF MAILING

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

The undersigned, of lawful age, and being first duly sworn upon my oath, state and declare that I am the attorney for Bill Barrett Corporation, and that on or before the 26th day of October, 2017, I caused a copy of the 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

Kelsey H. Wasylenky

Subscribed and sworn to before me this $\frac{25}{4}$ day of October, 2017.

Witness my hand and official seal.

[SEAL]

Notary Public

KERRY LEBLEU
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID 19934018734
MY COMMISSION EXPIRES JULY 24, 2021

Exhibit A Florida FP 3-65 27-26

Burlington Resources Oil & Gas Company LP 1600 N. Dairy Ashford Houston, TX 77079

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

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

Anadarko E&P Onshore LLC 1099 18th Street, Suite 1800 Denver, CO 80202-1918

Property Reserve Inc.
Attn: Energy Group Manager
Natural Resource Services
SPD Real Estate
50 East North Temple Street, 12th Floor
Salt Lake City, UT 84150-0012

Herman A. Flader T/U/W fbo Laura Britt, U.S. Bank, N.A., Trustee 950 17th Street, 5th Floor Denver, CO 80202

Elma M. Welch or Heirs of Elma M. Welch Unknown Address

Carrie J. Hildreth Unknown Address

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 POOL ALL INTERESTS IN TWO (2) WELLS IN AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT ESTABLISHED FOR SECTIONS 26 AND 27, TOWNSHIP 3 SOUTH, RANGE 65 WEST, 6TH P.M., FOR THE DEVELOPMENT AND OPERATION OF THE NIOBRARA FORMATION, UNNAMED FIELD, ADAMS COUNTY, COLORADO

CAUSE NO.

DOCKET NO. 180100015

TYPE: POOLING

SUPPLEMENTAL AFFIDAVIT OF MAILING

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

The undersigned, 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 30th day of November, 2017, I caused a copy of the 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 Kelsey H. Wasylenky

Subscribed and sworn to before me this 28th day of November, 2017.

Witness my hand and official seal.

[SEAL]

KERRY LEBLEU NOTARY PUBLIC STATE OF COLORADO NOTARY ID 19934018734 MY COMMISSION EXPIRES JULY 24, 2021

Notary Public

Exhibit A Florida ID 3-65 27-26

Burlington Resources Oil & Gas Company LP 1600 N. Dairy Ashford Houston, TX 77079

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

State of Nebraska 555 North Cotner Blvd Lincoln, NE 68505-2353

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

Anadarko E&P Onshore LLC 1099 18th Street, Suite 1800 Denver, CO 80202-1918

Property Reserve Inc.
Attn: Energy Group Manager
Natural Resource Services
SPD Real Estate
50 East North Temple Street, 12th Floor
Salt Lake City, UT 84150-0012

Herman A. Flader T/U/W fbo Laura Britt, U.S. Bank, N.A., Trustee 950 17th Street, 5th Floor Denver, CO 80202

Elma M. Welch or Heirs of Elma M. Welch Unknown Address

Carrie J. Hildreth Unknown Address

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 POOL ALL INTERESTS IN TWO (2) WELLS IN AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT ESTABLISHED FOR SECTIONS 26 AND 27, TOWNSHIP 3 SOUTH, RANGE 65 WEST, 6TH P.M., FOR THE DEVELOPMENT AND OPERATION OF THE NIOBRARA FORMATION, UNNAMED FIELD, ADAMS COUNTY, COLORADO

CAUSE NO. 535

DOCKET NO. 180100015

TYPE: POOLING

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

COMES NOW ConocoPhillips Company (Operator No. 19160) and its wholly owned subsidiary Burlington Resources Oil & Gas LP (Operator No. 26580) (together, "Applicant" or "COPC"), 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 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. provides that wells "to be drilled two thousand five hundred (2,500) feet or greater shall be located not less than six hundred (600) feet 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 common source of supply, unless authorized by order of the Commission upon hearing." See Commission Rule 318.a.
- 4. On October 31, 2011, the Commission entered Order No. 535-89 which, among other things, (1) established 18 approximate 640-acre drilling and spacing units, including Section 26, Township 3 South, Range 65 West, 6th P.M., for production of oil, gas and associated hydrocarbons from the Niobrara Formation, (2) approved up to two horizontal wells within each unit, with surface locations being located anywhere within the unit or surrounding lands, and (3) providing that the lateral of such well may not enter the Niobrara Formation any closer than 300

feet from the section line, with the treated interval of the permitted wellbore to be located no closer than 460 feet from the boundary of the unit and no closer than 920 feet from the treated interval of any other well in the unit producing from the Niobrara, without exception being granted by the Director.

- On August 3, 2017, Applicant filed a verified application in Docket No. 171000645 pursuant to §34-60-116, C.R.S. for an order to (1) establish an approximate 1,280-acre drilling and spacing unit for Sections 26 and 27, Township 3 South, Range 65 West, 6th P.M., and allow up to two (2) new 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, (2) providing that the Reserve 3-65 26 #1H well (API No. 05-001-09779) shall be excluded from the 1,280-acre unit and remain subject to the 640-acre drilling and spacing unit established by Order No. 535-89 for purposes of the payment of proceeds, (3) providing that the treated interval of 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 two (2) well pads 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, on the Application Lands. Applicant's Application in Docket No. 171000645 is scheduled to be heard at the Commission's October 30-31, 2017 hearing.
- 6. On August 3, 2017, Applicant filed a verified application in Docket No. 171000646 pursuant to §34-60-116, C.R.S. for an order to pool all interests in the Application Lands underlying an approximate 1,280-acre drilling and spacing unit established for the Application Lands, for the development and operation of the Niobrara Formation; and to subject any nonconsenting interests to the cost recovery provisions of §34-60-116(7), C.R.S., effective as of the earlier of the date of the Application, or the date that any of the costs specified in §34-60-116(7)(b), C.R.S., are first incurred for the drilling of the Florida #3-65 27-26 3AH Well and the Florida #3-65 27-26 5H_D Well (API Nos. Pending). Applicant's Application in Docket No. 171000646 is scheduled to be heard at the Commission's October 30-31, 2017 hearing.
- 7. On October 24, 2017, Applicant filed a verified application in Docket No. 180100014 pursuant to §34-60-116, C.R.S., for an order authorizing an additional two (2) horizontal wells, for a total of four (4) horizontal wells in an approximate 1,280-acre drilling and spacing unit established for Sections 26 and 27, Township 3 South, Range 65 West, 6th P.M., in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara Formation in the unit, providing that the treated interval ofany 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 two well pads in the unit, or adjacent thereto, unless an exception is granted by the Director.
- 8. On October 24, 2017, COPC filed a verified application pursuant to §34-60-116, C.R.S. in the above-captioned docket for an order to pool all interests in an approximate 1,280-acre drilling and spacing unit established for the Application Lands for the development and

operation of the Florida 3-65 27-26 3CH Well, and the Florida 3-65 27-26 3DH Well (API Nos. Pending) in the Niobrara Formation, effective as of the earlier of the date of the Application, or the date that any of the costs specified in §34-60-116(7)(b)(II), C.R.S., are first incurred for the drilling of the Wells in the Niobrara Formation on the following lands ("Application Lands"):

Township 3 South, Range 65 West, 6th P.M.

Section 26: All Section 27: All

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

- 9. On or before October 30, 2017, COPC will have served copies of the Application on all interested parties to the Application as defined in Rule 507.b. and pursuant to Rule 503.e. (the "Interested Parties").
- 10. Upon reasonable due diligence, which is further detailed herein, COPC was unable to find address information for two (2) Interested Parties, Elma M. Welch or Heirs of Elma M. Welch and Carrie J. Hildreth (the "Unknown IPs"). COPC listed the contact information for Unknown IPs as "Address Unknown" in its Application.
- 11. 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 the Unknown IPs, COPC utilized the websites Archives.com, Familytreenow.com, Accurint.com, google.com and Ancestry.com in addition to conducting research at Heritage Title Company, the Adams County courthouse, and the probate filings in the Colorado State archives and the Jefferson County archives. As of the date of this Motion, COPC is unable to find a last known address for the Unknown IPs nor is COPC able to find a last known address for any confirmed heirs of the Unknown IPs.

D. Relief Requested

WHEREFORE, COPC respectfully requests the following relief:

1. That the Commission order publication of the process in the above-captioned docket in a newspaper published in Denver County, Colorado.

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: October 24,2017

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: Ashlee Hansen

600 N. Dairy Ashford Road

Houston, TX 77079-1069

VERIFICATION

STATE OF TEXAS)
) ss
COUNTY OF HARRIS)

Ashlee Hansen, Senior Landman with ConocoPhillips Company, upon oath deposes and says that she has read the foregoing Motion for an Order of Service by Publication and that the statements contained therein are true to the best of her knowledge, information and belief.

CONOCOPHILLIPS COMPANY

Ashlee Hansen Senior Landman

Subscribed and sworn to before me this 23 day of 2017, by Ashlee Hansen, Senior Landman for ConocoPhillips Company.

Witness my hand and official seal.

My commission expires:

Notary Public

REGINA M. PAURA Notary Public, State of Texas Comm. Expires 08-06-2021 Notary ID 129515167

CERTIFICATE OF SERVICE

I hereby certify that, on October 24th, 2017, Jost Energy Law, P.C. caused ConocoPhillips Company's Motion for Publication of Summons in Colorado Oil and Gas Conservation Commission Docket No. 180100015 to be served via electronic mail to the Colorado Oil and Gas Conservation Commission pursuant to Rule 509.3.(E), and by U.S. mail at the address listed below.

Colorado Oil and Gas Conservation Commission
Julie Spence Prine, Hearings Manager
Jennifer Hazelton, Hearing Officer
James Rouse, Hearing Officer
Margaret Humecki, Hearings Assistant
1120 Lincoln Street, Suite 810
Denver, CO 80203
Julie.Prine@state.co.us
Jennifer.Hazelton@state.co.us
James.Rouse@state.co.us
Margaret.Humecki@state.co.us