

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

IN THE MATTER OF THE APPLICATION OF)
MORNING GUN EXPLORATION LLC FOR AN) CAUSE NO. 535
ORDER PARTIALLY VACATING ORDER NO. 535-)
69, ESTABLISHING AN APPROXIMATE 1280-) DOCKET NO. 181000713
ACRE DRILLING AND SPACING UNIT AND WELL)
LOCATION RULES APPLICABLE TO THE) TYPE: SPACING
DRILLING AND PRODUCING OF WELLS FROM)
THE NIOBRARA, FORT HAYS, CODELL AND)
CARLILE FORMATIONS COVERING CERTAIN)
LANDS IN SECTION 14 AND 23, TOWNSHIP 8)
NORTH, RANGE 59 WEST, 6TH P.M., UNNAMED)
FIELD, WELD COUNTY, COLORADO)

APPLICATION

Morning Gun Exploration LLC ("Applicant"), Operator No. 10656, by and through its attorneys, Akers & Thompson, LLC, respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission") for an order partially vacating Order No. 535-69, as to the Niobrara Formation covering Section 14 and Section 23 of Township 8 North, Range 59 West, 6th P.M., establishing an approximate 1280-acre drilling and spacing unit, and establishing well location rules applicable to the drilling of wells and producing of oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations covering certain lands in Weld County, Colorado. In support of its Application, Applicant states as follows:

1. Applicant is a limited liability company duly authorized to conduct business in Colorado.
2. Applicant owns leasehold interests and/or the right to operate in the following lands ("Application Lands"), and is therefore an owner as defined by the Colorado Oil and Gas Conservation Act and Commission Rules:

Township 8 North, Range 59 West, 6th P.M.
Section 14: ALL
Section 23: ALL

1280.00 acres, more or less, Weld County, Colorado

A reference map of the Application Lands is attached hereto.

3. Commission Rule 318.a. requires that wells drilled to a depth of 2,500 feet or greater be located not less than 600 feet from any lease line and be located not less than 1,200 feet from any other producible oil or gas well when drilling to the same common source of supply, unless authorized by the Commission upon hearing. The Application Lands are subject to Rule 318.a. for the Niobrara, Fort Hays, Codell and Carlile Formations.

4. On September 23, 2011, the Commission entered Order No. 535-69, which established 40 approximate 640-acre drilling and spacing units covering the Niobrara Formation in Section 2, 3 and 5, Township 7 North, Range 59 West, 6th P.M; Section 7, 9, 14, 16 through 30, 33 and 35, Township 8 North, Range 59 West, 6th P.M.; Section 9, 14 and 24, Township 8 North, Range 60 West, 6th P.M., Section 22, 23 and 31 through 35, Township 8 North, Range 60 West, 6th P.M.; Section 1, Township 9 North, Range 58 West, 6th P.M.; Sections 11 and 32, Township 9 North, Range 59 West, 6th P.M.; Sections 5, 8, 18 and 20 Township 9 North, Range 60 West, 6th P.M.; and approved two horizontal wells within each unit with the treated interval of the wellbore for the permitted wells to be located no closer than 600 feet from the unit boundaries, and no closer than 150 feet from any existing or permitted oil or gas wellbore, unless an exception is authorized by the Director.

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

6. To promote efficient drainage of the Niobrara, Fort Hays, Codell and Carlile Formations of the Application Lands, to protect correlative rights, and to avoid waste, the Commission should partially vacate Order No. 535-69, as to the Niobrara Formation covering Section 14 and Section 23 of Township 8 North, Range 59 West, 6th P.M, establish an approximate 1280-acre drilling and spacing unit the Application Lands, and approve up to twelve (12) wells within the new unit, for the production of oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations.

7. The proposed drilling and spacing unit will allow efficient drainage of the Niobrara, Fort Hays, Codell and Carlile Formations; 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 proposed drilling and spacing unit is not smaller than the maximum area that can be economically and efficiently drained by the proposed wells in the unit.

8. The Applicant is requesting to drill and complete up to twelve (12) horizontal wells within in the unit in order to efficiently and economically recover the oil, gas, and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations within the Application Lands.

9. The Applicant states that the wells will be drilled from no more than two (2) well pads in the unit, or a legal location adjacent thereto.

10. The treated interval of each proposed horizontal well shall be no closer than 600 feet from the boundaries of 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.

11. The names of the interested parties according to the information and belief of the Applicant are set forth in Exhibit A hereto and made a part hereof, and the undersigned certifies that copies of this Application shall be served on each interested party within seven (7) days after filing of the original application as required by Rules 503.e. and 5076.b.(1).

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. Partially vacating Order No. 535-69 as to the Niobrara Formation covering Section 14 and Section 23 of Township 8 North, Range 59 West, 6th P.M.

B. Establishing an approximate 1280-acre drilling and spacing unit for Sections 14 and 23, Township 8 North, Range 59 West, 6th P.M., and allowing up to twelve (12) horizontal wells in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations in the unit.

C. Providing that the treated interval of any horizontal well be located no closer than 600 feet from the boundaries of the unit and no closer 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 legal location adjacent thereto, unless an exception is granted by the Director.

D. Finding that an approximate 1280-acre drilling and spacing unit for the development of Niobrara, Fort Hays, Codell and Carlile Formations 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.

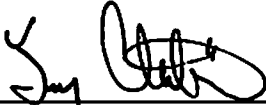
E. For such other findings and orders as the Commission may deem proper or advisable in this matter.

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Dated this 7th day of August, 2018

Respectfully Submitted,

Akers & Thompson, LLC

By:  _____

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EXHIBIT A

Township 8 North, Range 59 West, 6th P.M.

Section 14: ALL

Section 23: ALL

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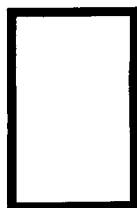
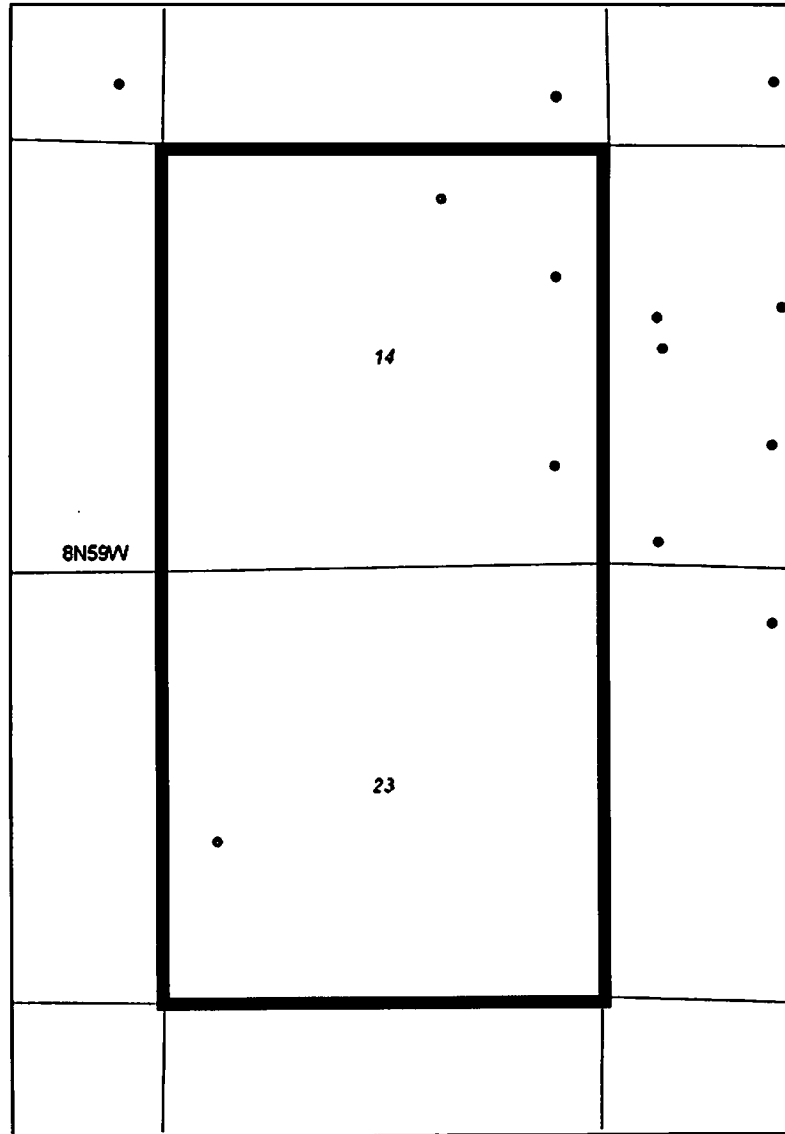
EXHIBIT B

Reference Map for Spacing Application

Township 8 North, Range 59 West, 6th P.M.

Section 14: ALL

Section 23: ALL



= Application Lands

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

IN THE MATTER OF THE APPLICATION OF)
MORNING GUN EXPLORATION LLC FOR AN) CAUSE NO. 535
ORDER PARTIALLY VACATING ORDER NO. 535-)
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LANDS IN SECTION 14 AND 23, TOWNSHIP 8)
NORTH, RANGE 59 WEST, 6TH P.M., UNNAMED)
FIELD, WELD COUNTY, COLORADO)

AFFIDAVIT OF MAILING

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

I, Troy L. Chatman II, of lawful age, and being first duly sworn upon my oath, state, and declare that I am the attorney for Morning Gun Exploration LLC, and that on or before August 14, 2018, 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.



Troy L. Chatman II

Subscribed and sworn to before me this 7th day of August, 2018.

Witness my hand and official seal.

My commission expires: October 15, 2019

Katherine S Moser

Notary Public

