



| WSU No. | Application Lands                                                                                                                                                                                                                          | Acres         |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|
| 3       | <u>Township 5 North, Range 62 West</u><br>Section 20: NW $\frac{1}{4}$ SW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 4       | <u>Township 5 North, Range 62 West</u><br>Section 20: SW $\frac{1}{4}$ SW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 5       | <u>Township 5 North, Range 62 West</u><br>Section 20: NW $\frac{1}{4}$ NW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 6       | <u>Township 5 North, Range 62 West</u><br>Section 20: SE $\frac{1}{4}$ NW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 7       | <u>Township 5 North, Range 62 West</u><br>Section 20: NE $\frac{1}{4}$ NW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 8       | <u>Township 5 North, Range 62 West</u><br>Section 20: SW $\frac{1}{4}$ NW $\frac{1}{4}$                                                                                                                                                    | 40            |
| 9       | <u>Township 5 North, Range 62 West</u><br>Section 20: N $\frac{1}{2}$ NW $\frac{1}{4}$<br>Section 17: S $\frac{1}{2}$ SW $\frac{1}{4}$                                                                                                     | <b>160</b> 40 |
| 10      | <u>Township 5 North, Range 62 West</u><br>Section 17: SW $\frac{1}{4}$ SW $\frac{1}{4}$<br>Section 18: SE $\frac{1}{4}$ SE $\frac{1}{4}$<br>Section 19: NE $\frac{1}{4}$ NE $\frac{1}{4}$<br>Section 20: NW $\frac{1}{4}$ NW $\frac{1}{4}$ | 160           |
| 11      | <u>Township 5 North, Range 62 West</u><br>Section <del>19</del> 18: E $\frac{1}{2}$ NE $\frac{1}{4}$<br><b>Section 20: W<math>\frac{1}{2}</math>NW<math>\frac{1}{4}</math></b>                                                             | 160           |
| 12      | <u>Township 5 North, Range 62 West</u><br>Section 20: <del>S<math>\frac{1}{2}</math>SW<math>\frac{1}{4}</math></del> N $\frac{1}{2}$ SW $\frac{1}{4}$<br>Section 29: N $\frac{1}{2}$ NW $\frac{1}{4}$                                      | 160           |

A reference map of the Application Lands is attached as Exhibit B hereto.

3. On April 27, 1988, the Commission adopted Rule 318A, the Greater Wattenberg Area Special Well Location, Spacing and Unit Designation Rule. Rule 318A.a.(4)C. provides, when completing a GWA well to an unspaced formation, the operator shall designate a drilling and spacing unit not smaller than a governmental quarter-quarter section if such well is proposed to be located greater than four hundred sixty (460) feet from the quarter-quarter section boundary in which it is located. If a well is proposed to be located less than four hundred sixty (460) feet from the governmental

quarter-quarter section boundary, a wellbore spacing unit ("wellbore spacing unit") for such well shall be comprised of the governmental quarter-quarter sections that are located less than four hundred sixty (460) feet from the wellbore regardless of section or quarter section lines.

4. Applicant has drilled the following wells in the Application Lands to the Niobrara-Codell Formation. Each well is located in a separate Wellbore Spacing Unit ("WSU"), which correspond to the Application Lands as identified above in paragraph 2, established pursuant to Rule 318A:

| <b>WSU No.</b> | <b>Well Name and API No.</b>                                      | <b>Spud Date</b> |
|----------------|-------------------------------------------------------------------|------------------|
| 1              | Antelope 23-20 (API No. 05-123-33706)                             | 9/24/2011        |
| 2              | Antelope 24-20 (API No. 05-123-33709)                             | 9/19/2011        |
| 3              | Antelope 13-20 (API No. 05-123-33713)                             | 9/13/2011        |
| 4              | Antelope <del>14-20</del> <del>23-20</del> (API No. 05-123-33715) | 9/8/2011         |
| 5              | Antelope <del>11-20</del> <del>23-20</del> (API No. 05-123-34023) | 8/28/2011        |
| 6              | Antelope <del>22-20</del> <del>23-20</del> (API No. 05-123-34042) | 8/23/2011        |
| 7              | Antelope <del>21-20</del> <del>23-20</del> (API No. 05-123-34043) | 8/18/2011        |
| 8              | Antelope <del>12-20</del> <del>23-20</del> (API No. 05-123-34044) | 9/3/2011         |
| 9              | Antelope <del>F-20</del> <del>23-20</del> (API No. 05-123-34909)  | 3/1/2012         |
| 10             | Antelope <del>A-20</del> <del>23-20</del> (API No. 05-123-34911)  | 2/19/2012        |
| 11             | Antelope <del>B-20</del> <del>23-20</del> (API No. 05-123-34912)  | 2/24/2012        |
| 12             | Antelope <del>F-29</del> <del>23-20</del> (API No. 05-123-35241)  | 4/18/2012        |

(collectively, the "Wells").

5. Pursuant to the relevant provisions of Section 34-60-116(6) & (7), C.R.S., as amended, and Commission Rule 530, Applicant seeks an order pooling all interests in the Application Lands for the development and operation of the Niobrara-Codell Formation in WSU Nos. 1 through 12.

6. Applicant certifies that, at least sixty (60) days prior to the date of the hearing for this Application, each owner which Applicant was able to locate, not already leased or voluntarily pooled, was provided with the well proposal and information

required by Section 34-60-116(7), C.R.S. and Commission Rule 530 and tendered a reasonable offer to lease (if an unleased mineral owner), or participate and bear costs associated with the drilling and completion of the Wells.

7. Applicant requests that a pooling order be entered as a result of this Application, that it be made effective as of the earlier of the date of this Application, or the date costs specified in Section 34-60-116(7)(b), C.R.S., are first incurred for the drilling of each of the Wells.

8. The granting of this Application would be in accord with the Oil and Gas Conservation Act, found at Section 34-60-101, *et seq.*, C.R.S., as amended, and the Commission Rules.

9. The names of the interested parties (persons who own an interest in the mineral estate of the tracts to be pooled, except owners of overriding royalty interest) are attached hereto and marked Exhibit A. Applicant certifies that copies of this Application will be served on all locatable interested parties within seven (7) days of the date hereof, as required by Commission Rule 507.b.(2).

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. Pooling all interests in the Application Lands for the development and operation of the Niobrara-Codell Formation in WSU Nos. 1 through 12;

B. Providing that the pooling order is made effective as of the date of this Application, or the date that the costs specified in Section 34-60-116(7)(b)(II), C.R.S., were first incurred for the drilling of the Wells identified in paragraph 4 above;

C. Providing that the interests of any owners with whom the Applicant has been unable to secure a lease or other agreement to participate in the drilling of the Wells are pooled by operation of statute, pursuant to Section 34-60-116(7), C.R.S., and made subject to the cost recovery provisions thereof.

D. For such other findings and orders as the Commission may deem proper or advisable in the Application Lands.

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Dated this 21<sup>st</sup> 30th day of **September** ~~August~~, 2018

Respectfully submitted,

WELBORN SULLIVAN MECK & TOOLEY, P.C.

By: 

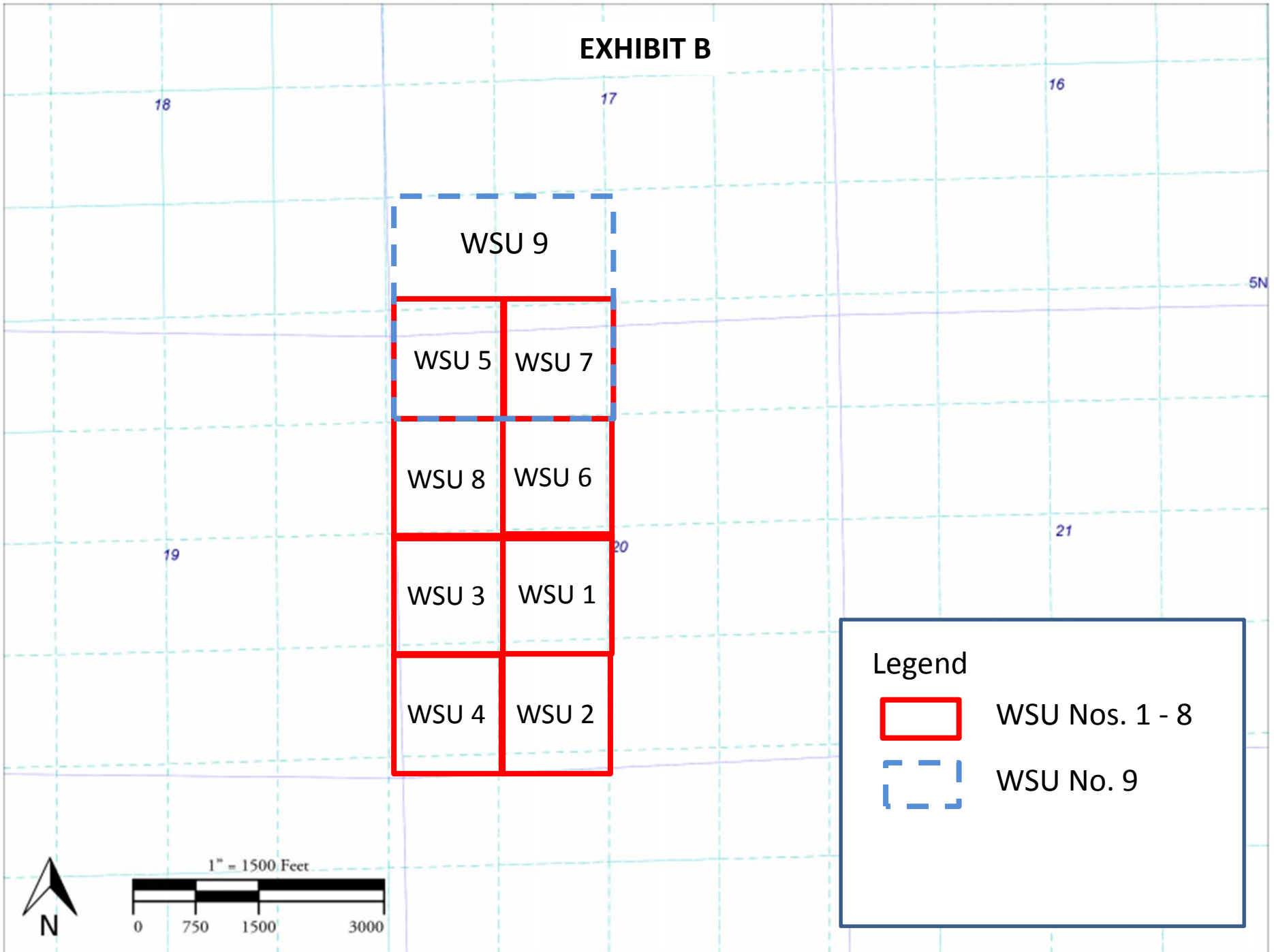
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# EXHIBIT B



## Legend



WSU Nos. 1 - 8



WSU No. 9