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

IN THE MATTER OF THE APPLICATION OF HIGHPOINT OPERATING CORPORATION (OPERATOR NO. 10071) FOR AN ORDER TO DENY UPLAND EXPLORATION, LLC'S (OPERATOR NO. 10701) SEVEN (7) FORM 2 APPLICATIONS FOR PERMITS TO DRILL CERTAIN NAMED LITTLE LADY WELLS IN SECTION 22, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6<sup>TH</sup> P.M., WILDCAT FIELD, WELD COUNTY, COLORADO BASED ON RULE 503.b.(10) AND THE COLORADO OIL AND GAS CONSERVATION ACT

CAUSE NO.

DOCKET NO.

TYPE:

#### **APPLICATION**

COMES NOW Highpoint Operating Corporation (Operator No. 10071) ("Highpoint" 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") pursuant to Commission Rule 503.b.(10) and the Colorado Oil and Gas Conservation Act, C.R.S. 34-60-101, et seq., for an order to deny Upland Exploration, LLC's ("Upland") seven (7) Form 2 Applications for Permits to Drill ("APDs") for the Little Lady 22-1NH well (Document No. 401700339), the Little Lady 22-2CH well (Document No. 401700653), the Little Lady 22-3NH well (Document No. 401701056), the Little Lady 22-5NH well (Document No. 401701112), the Little Lady 22-6CH well (Document No. 401700835), and the Little Lady 22-7NH well (Document No. 401700576) (collectively, the "Little Lady Wells" or "Little Lady APDs") located in Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., Wildcat Field, Weld County, Colorado. In support thereof, Applicant states and alleges as follows:

#### A. Factual and Procedural Background

- 1. Applicant is a corporation duly authorized to conduct business in the State of Colorado, and is a registered operator in good standing with the Commission.
- 2. Applicant owns substantial leasehold interests or holds the right to drill and/or operate on the following lands (hereafter "Subject Lands"):

Township 11 North, Range 64 West, 6th P.M.

Section 22: ALL Section 27: ALL

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

- 3. On May 31, 2018, Applicant filed an application (Docket No. 180700572) for an order from the Commission to:
- a. Vacate the approximate 640-acre drilling and spacing unit established by Order No. 421-3 for Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M. for the production of oil, gas and associated hydrocarbons from the Niobrara Formation;
- b. Establish an approximate 1,280-acre drilling and spacing unit (the "DSU" or "Highpoint's Proposed DSU") for the above-referenced Subject Lands and allow up to sixteen (16) new horizontal wells in the unit in order to efficiently and economically develop and operate the Codell, Carlile, Fort Hays and Niobrara Formations in the unit;
- b. Provide that the productive interval of each proposed horizontal well shall be no closer than 150 feet from the boundaries of the unit for the Niobrara and Fort Hays Formations and no closer than 300 feet from the boundaries of the unit for the Codell and Carlile Formations; and all horizontal wells shall be no closer than 150 feet from the treated interval of another well producing from the same supply within the unit, unless an exception is granted by the Director; and
- c. Find that the approximate 1,280-acre drilling and spacing unit for the development and operation of the oil, gas, and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations underlying the Subject Lands will prevent waste, protect correlative rights, and maximize the efficient and economic production of the Codell, Carlile, Fort Hays and Niobrara Formations for the Subject Lands. See Exhibit 1, Highpoint's Application dated May 31, 2018, attached hereto and incorporated by reference herein.
  - 4. Highpoint owns leasehold mineral interests in the Highpoint Proposed DSU.
- 5. Upon information and belief, Upland owns leasehold mineral interests in the Highpoint Proposed DSU.
- 6. Highpoint has been pursuing substantial development plans to drill, complete and operate up to sixteen (16) horizontal wells for the development and operation of the Codell, Carlile, Fort Hays and Niobrara Formations in the Highpoint Proposed DSU.
- 7. On or about July 12, 2018, over one month after the filing of Highpoint's Proposed DSU, Upland filed the seven (7) Little Lady APD's with the Commission which propose to produce from Section 22, Township 11 North, Range 64 West for the Niobrara and Codell Formations. As of the date of this filing, Upland has not filed a Form 2A corresponding to the Little Lady APDs. The Little Lady APD's were filed with express and full knowledge that Highpoint was seeking to vacate the underlying 640-acre drilling and spacing unit for Section 22 as well as full knowledge that Highpoint planned to develop the Highpoint Proposed DSU on a two-mile lateral basis. See Exhibit 2, Upland's Form 2's for the Little Lady APD's dated July 12, 2018, attached hereto and incorporated by

reference herein. See also Exhibit 3, COGIS Map of Upland and surrounding wells, attached hereto and incorporated by reference herein.

- 8. On or about July 13, 2018, Upland protested Highpoint's Proposed DSU Application alleging that Upland has development plans for the W½ of Section 22, Township 11 North, Range 64 West. See Exhibit 4, Upland's Protest to Docket No. 180700572. Upland's position taken in its unsupported protest is entirely contradictory to its recent actions whereby Upland participated in and supported the development Highpoint's two-mile laterals within the vicinity of the Subject Lands. Further, Upland has completely ignored the fact that Highpoint and other operators have produced, and have permitted, two-mile lateral wells on lands directly adjacent to, or within the vicinity of, the Subject Lands and the Little Lady APD filings are nothing more than an obstructionist tactic that should not be allowed.
- 9. If the Little Lady APDs are approved, such approval will adversely affect and aggrieve Highpoint, will result in the irreparable interference with Highpoint's sixteen (16) planned wells within the Highpoint Proposed DSU, causing inefficient development and operation of the Codell and Niobrara Formations resulting in waste and potential harm to correlative rights. The Commission should not countenance abuse of its APD permitting process as an obstruction tactic.
- B. <u>Approval of Upland's Little Lady APDs Have and Will Continued to Directly and Adversely Affect and Aggrieve Highpoint.</u>
- 10. Highpoint submits this Application to the Commission pursuant to Commission Rule 503.b.(10) which provides:
  - "(10) For purposes of seeking relief or a ruling from the Commission on any other matter not described in (1) through (9) above, only persons who can demonstrate that they are directly and adversely affected or aggrieved by the conduct of oil and gas operations or an order of the Commission and that their interest is entitled to legal protection under the Act may be an applicant." See COGCC Rule 503.b.(10).
- 11. Highpoint further submits this Application in accordance with the direct guidance of the COGCC Hearings Staff who informed multiple practitioners on August 15, 2018 that the subject application is the procedural way to proceed with challenges to operator's APDs. While unrelated to this Application, Highpoint and its predecessor Bill Barrett Corporation have been engaged in a series of contested matters surrounding operator APD challenges and the COGCC Director and Hearings Staff have not yet allowed Highpoint to pursue such matters with the full Commission, in violation of the Oil and Gas Conservation Act and Highpoint's due process rights. As such, Highpoint is proceeding on the COGCC Hearing Staff's direct guidance with the filing of this Application.

- 12. Further, the COGCC Director and Staff informed multiple practitioners on August 15, 2018 that once an APD passes completeness then it is a decision by the Staff that it complies with the Act and can be approved. As such, that initial decision can be the trigger for the immediate direct and adverse effect and harm to another operator's development plans and can serve as the basis for this Application.
- 13. As a leasehold interest Owner in the Subject Lands within the Highpoint Proposed DSU, and Applicant in Docket No. 180800572, Highpoint is an interest that is entitled to legal protection under the Colorado Oil and Gas Conservation Act. See COGCC 100 Series Rules, Definition of Owner, and COGCC Rule 503.b.(10).
- 14. Based on the facts set forth above, Highpoint is a proper Applicant under Rule 503.b(10).
- 15. Based on the facts set forth above, approval of any of the Little Lady APDs will directly and adversely affect and aggrieve Highpoint, as well as the mineral interest owners of Highpoint's leasehold. Highpoint, and its leasehold mineral interest owners, will be substantially affected and aggrieved by the approval of the Little Lady APDs due to the known and intentional irreparable interference with Highpoint's planned development of the proposed DSU, which was filed prior to the submission of Upland's APDs.
- C. <u>Approval of Upland's Little Lady APDs Will Cause Waste in Violation of the</u> Colorado Oil and Gas Conservation Act.
- 16. C.R.S. 34-60-107 provides specifically that "[t]he waste of oil and gas in the state of Colorado is prohibited by this article. *See C.R.S. 34-60-107.* 
  - 17. C.R.S. 34-60-103 (13) defines waste as follows:
    - (13) "Waste", in addition to the meanings as set forth in subsections (11) and (12) of this section, means:
      - (a) Physical waste, as that term is generally understood in the oil and gas industry;
      - (b) The locating, spacing, drilling, equipping, operating, or producing of any oil or gas well or wells in a manner which causes or tends to cause reduction in quantity of oil or gas ultimately recoverable from a pool under prudent and proper operations or which causes or tends to cause unnecessary or excessive surface loss or destruction of oil or gas;
      - (c) Abuse of the correlative rights of any owner in a pool due to nonuniform, disproportionate, unratable, or excessive withdrawals of oil or gas therefrom, causing reasonably avoidable drainage

between tracts of land or resulting in one or more producers or owners in such pool producing more than his equitable share of the oil or gas from such pool.

C.R.S. 34-60-103(11), (12) and (13)(emphasis added).

- 18. C.R.S. 34-60-117(a) provides that the "authority to prevent waste and protect correlative rights of all owners in every field or pool, and when necessary shall limit the production of oil and gas in any field or pool in the exercise of this authority." C.R.S. § 34-60-117(a).
- 19. If approval of the Little Lady APDs, and the subsequent drilling of such APDs, are granted by the Commission, then such approval will be in direct violation of the Colorado Oil and Gas Conservation Act C.R.S. 34-60-107 and 34-60-117(a). In fact, even the initial determination by the Commission Staff that the Little Lady APD's can pass completeness is in direct contravention of the Oil and Gas Conservation Act because such determination would immediately confirm that waste will occur on the Subject Lands. This Commission should allow Highpoint the opportunity to present evidence and testimony that the Commission Staff's determination of completeness of the APDs violates the Act.
- 20. The approval of the Little Lady APDs and subsequent drilling of the Little Lady Wells will cause significant physical waste and waste of hydrocarbon resources in violation of the Colorado Oil and Gas Conservation Act. Highpoint has very specific development plans for the Highpoint DSU Lands that cover the locations of the Little Lady APDs. Highpoint has been working with the surface and mineral interest owners for the development of the Highpoint DSU Lands for a period of time. Highpoint's engineering and geological data present configurations that would lead to more resources being developed and more predictable drainage in the Application Lands. This data is clearly set forth in Highpoint's 511 testimony submitted in support of this Application and, upon which, this Commission has granted Highpoint numerous other similar drilling and spacing units for the development of two-mile laterals. Highpoint maintains that its development plan for a 1,280 drilling and spacing unit, with more wells of longer lateral length, will serve to ensure that the mandates of the Oil and Gas Conservation Act, as set forth above, are carried out as Highpoint's development of the lands occurs.
- 21. The wellbore and bottomhole locations of the Little Lady Wells within Highpoint's Proposed DSU will materially impede and interfere with the development and operation of Highpoint's planned horizontal wellbores from Highpoint's surface location in the Subject Lands.
- 22. Highpoint maintains that approval of the Little Lady APDs will create waste. This waste can be avoided if the Commission denies the Little Lady APDs and allows Highpoint to proceed with the comprehensive development and operational plan set forth above to drill and complete up to sixteen (16) wells in the Highpoint Proposed DSU.

- 23. Highpoint maintains that any approval of the Little Lady APDs, at any point in the permitting process, also violates Highpoint's interests and directly and adversely affects Highpoint, and is also in violation of C.R.S. 34-60-107.
- D. <u>Approval of Upland's Little Lady APDs Violates Highpoint's Correlative Rights in Violation of the Colorado Oil and Gas Conservation Act.</u>
- 24. Highpoint further maintains that the issuance of the Little Lady APDs violates Highpoint's correlative rights as to its interests and ability to produce hydrocarbons from the Subject Lands and Highpoint Proposed DSU.
- 25. C.R.S. § 34-60-103(4) defines "correlative rights" to mean "that each owner and producer in a common pool or source of supply of oil and gas shall have an equal opportunity to obtain and produce his just and equitable share of the oil and gas underlying such pool or source of supply."
- 26. Highpoint, as a leasehold interest owner in the Highpoint Proposed DSU, has the right to drill and produce from the Subject Lands and the Highpoint Proposed DSU. Highpoint has its own long-term comprehensive development plan, which Upland has actual knowledge of, to develop and operate its leasehold interests in the Codell, Carlile, Fort Hays and Niobrara Formations on the Subject Lands and has made substantial investments in determining the geology of the area and developing engineering plans to access and efficiently and economically develop the hydrocarbons.
- 27. Any approval of the Little Lady APDs will violate Highpoint's correlative rights.

#### E. Conclusion.

- 28. This Commission should not approve the Little Lady APDs as any approval will result in an irreparable violation of the Oil and Gas Conservation Act as set forth above. Upland's filing of the seven (7) Little Lady APDs will interfere with Highpoint's plan of up to sixteen (16) horizontal wells as set forth in Docket No. 180700574. Further such filings, and the Commission Staff's completeness determination on the Little Lady APDs, will cause (and has already caused) direct harm to Highpoint, will result in waste, and damage to correlative rights by allowing inefficient and uneconomic development of the hydrocarbon pool underlying the Subject Lands and Highpoint's Proposed DSU.
- 29. Applicant certifies that copies of this Application will be served on Upland within seven (7) days of the date hereof, as required by Rule 503.e.
- 30. Based on the foregoing facts and claims set forth herein, Highpoint respectfully requests that, in order to prevent waste, to protect correlative rights, to prevent an express violation of the Colorado Oil and Gas Conservation Act and to prevent direct and adverse effects on Highpoint and the development of the Highpoint Proposed

DSU in Docket No. 180700572, this Commission issue an order denying the Upland Little Lady APDs.

WHEREFORE, based on the foregoing, Applicant respectfully requests that this matter be set for hearing in October 2018, that notice be given as required by law, and that upon such hearing, the Commission enter its order to:

- A. Deny Upland's seven (7) Little Lady APDs;
- B. Allow for a full Commission hearing on this Application; and
- C. For such other findings and orders as the Commission may deem proper or advisable in this matter.

Dated: August 30, 2018.

Respectfully submitted:

HIGHPOINT OPERATING CORPORATION

By:

Jamie L. Jost

Kelsey H. Wasylenky

Jost Energy Law, P.C.

Attorneys for Applicant

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(720) 446-5620

jjost@jostenergylaw.com

kwasylenky@jostenergylaw.com

Kenneth A. Wonstolen

Senior Vice President & General Counsel

**Highpoint Operating Corporation** 

Applicant's Address:

**Highpoint Operating Corporation** 

ATTN: Teale Stone

1099 18th Street, Suite 2300

Denver, CO 80202

## **VERIFICATION**

STATE OF COLORADO	)
CITY AND COUNTY OF DENVER	) SS. )
	est duly sworn upon oath, deposes and says that Operating Corporation, and that he/she has read ers therein contained are true to the best of his/her
the foregoing Application and that the matt	ers therein contained are true to the best of his/her
knowledge, information and belief.	1
	Jalua Ca
Name:	1 1 1
Title: <u>↓</u> Highpo	oint Operating Corporation
Subscribed and sworn to before me this 3	day of <u>August</u> , 2018.
Witness my hand and official seal.	
BRYCE DOTY Notary Public	
State of Colorado Notary ID # 20174002931	
My Commission Expires 01-19-20	021
My commission expires: 1-19-2021	
B. B	
Notary Public	

# RECEIVED MAY 3 1 2018 COGCC

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

IN THE MATTER OF THE APPLICATION OF HIGHPOINT OPERATING CORPORATION FOR AN ORDER TO VACATE THE 640-ACRE UNIT ESTABLISHED BY ORDER NO. 421-3 FOR SECTION 22, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6TH P.M., ESTABLISH AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT FOR SECTIONS 22 AND 27, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6<sup>TH</sup> P.M., APPROVE UP TO SIXTEEN (16) NEW HORIZONTAL WELLS WITHIN THE UNIT, AND **APPROVE** REDUCED **BOUNDARY** OF SETBACKS 150 FEET FOR THE NIOBRARA AND FORT HAYS FORMATIONS, AND 300 FEET FOR THE CODELL AND **CARLILE** FORMATIONS. FOR THE **PRODUCTION** OF OIL. **GAS** AND ASSOCIATED HYDROCARBONS FROM THE CODELL, CARLILE, **FORT** HAYS AND **NIOBRARA** FORMATIONS, **HEREFORD** FIELD, WELD COUNTY, COLORADO

CAUSE NO. 421

DOCKET NO. 180700 572

TYPE: SPACING

Received
JUN U 2018

Jost Energy Law, P.C.

#### **APPLICATION**

HighPoint Operating Corporation (Operator No. 10071) ("HighPoint" or "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: 1) vacate the approximate 640-acre drilling and spacing unit established by Order No. 421-3 for Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., for the production of oil, gas and associated hydrocarbons from the Niobrara Formation; 2) establish an approximate 1,280-acre drilling and spacing unit for Sections 22 and 27, Township 11 North, Range 64 West, 6th P.M., for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations; 3) approve up to sixteen (16) new horizontal wells in the approximate 1,280acre unit; and 4) provide that the productive interval of any horizontal well in the unit shall be no closer than 150 feet from the boundaries of the unit for the Niobrara and Fort Havs Formations and no closer than 300 feet from the unit boundaries for the Codell and Carlile Formations, with 150' inter-well setbacks from any wellbore within the unit, for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations underlying the below-described lands. In support of its Application, Applicant states and alleges as follows:

- 1. Applicant is a corporation duly organized and authorized to conduct business in the State of Colorado, and is a registered operator in good standing with the Commission.
- 2. Applicant is an Owner as defined by the Colorado Oil and Gas Conservation Act and Commission Rules and owns leasehold interests or holds the right to operate on the following lands (hereafter "Application Lands"):

Township 11 North, Range 64 West, 6th P.M.

Section 22: All Section 27: All

Weld County, Colorado, 1,280-acres, more or less.

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 27, Township 11 North, Range 64 West, 6<sup>th</sup> P.M. is subject to this Rule for the Codell, Carlile, Fort Hays and Niobrara Formations. Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M. is subject to this Rule for the Codell, Carlile, and Fort Hays Formations.
- 4. On October 21, 2010, the Commission entered Order No. 421-3 which established eighty-three (83) approximate 640-acre drilling and spacing units for certain lands in Townships 10, 11, and 12 North, Ranges 61, 62, 63, and 64 West, 6<sup>th</sup> P.M. (more particularly described below), for the production of oil and gas and associated hydrocarbons from the Niobrara Formation, and allow one horizontal well in each of the units, with the horizontal leg and terminus of the wellbore located not closer than 600 feet from the boundaries of the unit. Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M. is subject to this Rule for the Niobrara Formation.
- 5. The Commission records show that there are no vertical, directional, or horizontal wells in the Application Lands.
- 6. To promote efficient drainage within the Codell, Carlile, Fort Hays and Niobrara Formations of the Application Lands, to protect correlative rights and to avoid waste, the Commission should: 1) vacate an approximate 640-acre drilling and spacing unit established by Order No. 421-3 for Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., for the production of oil, gas and associated hydrocarbons from the Niobrara Formation; 2) establish an approximate 1,280-acre stand-up drilling and spacing unit for Sections 22 and 27, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations; 3) approve up to sixteen (16) new horizontal wells in the approximate 1,280-

acre unit, for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations; and 4) provide that the productive interval of any horizontal well in the unit shall be no closer than 150 feet from the boundaries of the unit for the Niobrara and Fort Hays Formations and no closer than 300 feet from the unit boundaries for the Codell and Carlile Formations, with 150' inter-well setbacks from any wellbore within the unit, for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations underlying the Application Lands.

- 7. The above-proposed drilling and spacing unit will allow efficient drainage of the Codell, Carlile Fort Hays and Niobrara 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 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 wells in the unit.
- 8. The Applicant is requesting to drill and complete up to sixteen (16) new horizontal wells within the unit in order to efficiently and economically recover the oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations within the approximate 1,280-acre drilling and spacing unit composed of the Application Lands and that there will be no adverse effect on correlative rights of adjacent owners.
- 9. The Applicant maintains that the wells proposed for the development of the Application Lands will be drilled from no more than four well pads, unless an exception is granted by the Director.
- 10. The productive interval of each proposed horizontal well shall be no closer than 150 feet from the boundaries of the unit for the Fort Hays and Niobrara Formations, and no closer than 300 feet from the boundaries of the unit for the Codell and Carlile Formations, and all horizontal wells shall be no closer than 150 feet from the productive interval of any other well within the unit, unless an exception is granted by the Director.
- 11. 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 on July 30-31, 2018, that notice be given as required by law, and that upon such hearing this Commission enter its order to:

- A. Vacate the approximate 640-acre drilling and spacing unit established by Order No. 421-3 for Section 22, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., for the production of oil, gas and associated hydrocarbons from the Niobrara Formation;
- B. Establish an approximate 1,280-acre stand-up drilling and spacing unit for Sections 22 and 27, Township 11 North, Range 64 West, 6<sup>th</sup> P.M., for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations; and approve up to sixteen (16) new horizontal wells in the approximate

1,280-acre unit, for the production of oil, gas and associated hydrocarbons from the Codell, Carlile, Fort Hays and Niobrara Formations;

- C. Provide that the productive interval of any horizontal well in the unit shall be no closer than 150 feet from the boundaries of the unit for the Niobrara and Fort Hays Formations and no closer than 300 feet from the unit boundaries for the Codell and Carlile Formations; and not less than 150 feet from the productive interval of any other wellbore within the unit, and authorizing a total of four well pads in the unit, unless an exception is granted by the Director;
- D. Find that an approximate 1,280-acre drilling and spacing unit for the development of the Codell, Carlile, Fort Hays and Niobrara Formations on the Application Lands will prevent waste, protect correlative rights, and maximize the efficient and economic production of the Codell, Carlile, Fort Hays and Niobrara Formations on the Application Lands.
- F. For such other findings and orders as the Commission may deem proper or advisable in this matter.

DATED May 31, 2018.

Respectfully submitted:

**HighPoint Operating Corporation** 

By:

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:

HighPoint Operating Corporation

ATTN: Bryce Doty

1099 18th Street, Suite 2300

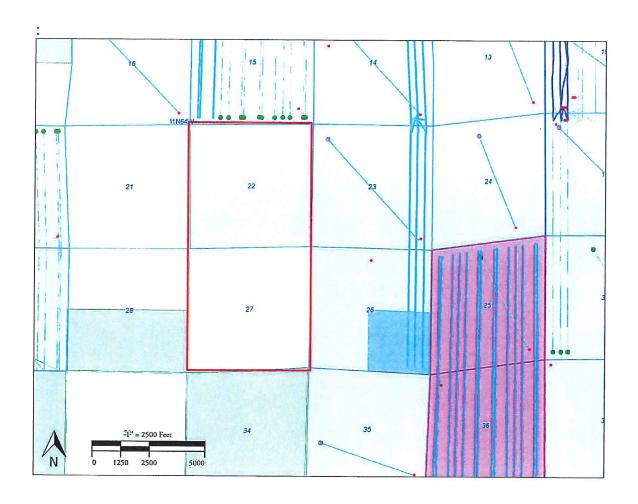
Denver, CO 80202

#### **VERIFICATION**

STATE OF COLORADO	)
CITY AND COUNTY OF DENVER	) ss. )
he is a Landman for HighPoint Operatin	first duly sworn upon oath, deposes and says that g Corporation, and that he has read the foregoing contained are true to the best of his knowledge,
	Bryce Doty Landman HighPoint Operating Corporation
Subscribed and sworn to before me this	<u>್ರೈ</u> day of May, 2018.
Witness my hand and official seal.	
[SEAL]  ARIELLE N POITRA NOTARY PUBLIC STATE OF COLORADO NOTARY ID 201840102 MY COMMISSION EXPIRES MARC	30
My commission expires: March 5,	2022
Milluffaitia Notary Public	

Reference Map

Sections 22 and 27, Township 11 North, Range 64 West, 6<sup>th</sup> P.M.



**FORM** 2

Rev 08/16

## State of Colorado

Oil and Gas Conservation Commission 1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401700339

APPLICATION FOR PERMIT TO:	J 1M V	
▼ Drill   Deepen   Re-enter   Recomplete and Operate		
TYPE OF WELL OIL X GAS COALBED OTHER R	efiling	Date Received:
ZONE TYPE SINGLE ZONE X MULTIPLE ZONES COMMINGLE ZONES Side	etrack -	07/12/2018
Well Name: Little Lady Well Number: 22-1NH		
Name of Operator: UPLAND EXPLORATION LLC COGCC Op	erator Num	ber: 10701
Address: 424 S MAIN ST		
City: BOERNE State: TX Zip: 78006		
Contact Name: Larry Jenkins Phone: (580)716-0535 Fax: ( )		
Email: larry@uplandexploration.com		
		7 (2) (1) (1)
RECLAMATION FINANCIAL ASSURANCE Plugging and Abandonment Bond Surety ID: 20180078		
WELL LOCATION INFORMATION		
QtrQtr: NENW Sec: 22 Twp: 11N Rng: 64W Meridian: 6		•
Latitude: 40.911850 Longitude: -104.532730		
FNL/FSL FEL/FWL Footage at Surface: 645 Feet FNL 2460 Feet FWL		
Field Name: WILDCAT Field Number: 99999		
Ground Elevation: 5417 County: WELD		
GPS Data:		
Date of Measurement: 07/02/2018 PDOP Reading: 1.3 Instrument Operator's Name: Kyle D	aley	
If well is Directional X Horizontal (highly deviated) submit deviated drilling plan.		
Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL	FEL/FW	
330 FNL 330 FWL 330 FSL 330	FWL	
Sec: <u>22</u> Twp: <u>11N</u> Rng: <u>64W</u> Sec: <u>22</u> Twp: <u>11N</u>	Rng:	64W
LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT		
Surface Ownership: 🗵 Fee State Federal Indian		
The Surface Owner is: is the mineral owner beneath the location.		
(check all that apply) is committed to an Oil and Gas Lease.		
has signed the Oil and Gas Lease.		
is the applicant.		
The Mineral Owner beneath this Oil and Gas Location is: 🗵 Fee State Federal	Indian	
The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes		
The right to construct the Oil and Gas Location is granted by:  Bond		
Surface damage assurance if no agreement is in place: Blanket Surface Surety I	D: 201800	77

**FORM** 2 Rev 08/16

# State of Colorado

Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203
Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401700653

1 Holic. (600) 504 2100 Lax. (500) 504 2100	ты	401700033
APPLICATION FOR PERMIT TO:		
▼ Drill   Deepen   Re-enter   Recomplete and Open	perate	Data Basalyadı
TYPE OF WELL OIL 😿 GAS COALBED OTHER	Refiling [	Date Received: 07/12/2018
ZONE TYPE SINGLE ZONE ▼ MULTIPLE ZONES □ COMMINGLE ZONES □	Sidetrack T	
Well Name: Little Lady Well Number: 22-2CH		
Name of Operator: UPLAND EXPLORATION LLC COGC	C Operator Num	ber: 10701
Address: 424 S MAIN ST		
City: BOERNE State: TX Zip: 78006		
Contact Name: Larry Jenkins Phone: (580)716-0535 Fax: ( Email: larry@uplandexploration.com	)	
RECLAMATION FINANCIAL ASSURANCE		
Plugging and Abandonment Bond Surety ID:20180078		
WELL LOCATION INFORMATION  QtrQtr: NENW Sec: 22 Twp: 11N Rng: 64W Meridian: 6  Latitude: 40.911930 Longitude: -104.532730  FNL/FSL FEL/FWL  Footage at Surface: 615 Feet FNL 2460 Feet FWL  Field Name: WILDCAT Field Number: 99999  Ground Elevation: 5419 County: WELD  GPS Data:  Date of Measurement: 07/02/2018 PDOP Reading: 1.3 Instrument Operator's Name: If well is □ Directional ▼ Horizontal (highly deviated) submit deviated drilling plan.  Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL  330 FNL 660 FWL 330 FSL  Sec: 22 Twp: 11N Rng: 64W Sec: 22 Twp:	Kyle Daley FEL/FWI 660 FWL 11N Rng:	
LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT		
Surface Ownership: 👿 Fee State Federal Indian		
The Surface Owner is: is the mineral owner beneath the location.		
(check all that apply) is committed to an Oil and Gas Lease.		
has signed the Oil and Gas Lease.		
is the applicant.		
The Mineral Owner beneath this Oil and Gas Location is: 👿 Fee State 🗀 Federal	Indian	
The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes		
The right to construct the Oil and Gas Location is granted by:  Bond		
Surface damage assurance if no agreement is in place: Blanket Surface S	urety ID: 201800	77

T11N R64W Sec. 22: W2	2				
Total Acres in Described Le	ase: 640	Described Mineral Le	ease is: 👿 Fee	State	e Federal Indian
Federal or State Lease #					
Distance from Completed P	ortion of Wellbore	to Nearest Lease Line of d	escribed lease:	330	Feet
CULTURAL DISTANCI	E INFORMATI	ON			nts shall be provided from center of
Distance to nearest:					ell to nearest of each cultural ibed in Rule 303.a.(5).
		53 Feet			distance greater than 1 mile. est building of any type. If nearest
		Feet			ding Unit, enter same distance for
High Occupancy Buildin		Feet		both.	High Occupancy Building Unit, and
Designated Outside Activity		BO Feet		Designated Outs	side Activity Area - as defined in
,		)2 Feet		100-Series Rules	5.
Above Ground		76 Feet			
		BO Feet			
Propert	ty Line: 23	B9 Feet			
INFORMATION					e - as described in Rule 604.a.(1),
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)	s (required if location Urban Mitigation A Buffer Zone Notifio	Buffer Zone Exception Zone Urban Mitigation Are on is within 1,000 feet of a lacet Notification to Local Greation to Building Unit Own	building unit): overnment:	within 500' of a - Urban Mitigation Rules.	Building Unit. on Area - as defined in 100-Series
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN	s (required if location of the control of the contr	Exception Zone  Urban Mitigation Are on is within 1,000 feet of a lace.  Area Notification to Local Good	building unit): overnment: ers:	- Urban Mitigation Rules.	on Area - as defined in 100-Series
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed po	s (required if location of the control of the contr	Exception Zone  Urban Mitigation Are on is within 1,000 feet of a lace.  Area Notification to Local Good	building unit): overnment: ers:	- Urban Mitigation Rules.	on Area - as defined in 100-Series
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation: 660	e (required if location of the control of the contr	Exception Zone  Urban Mitigation Are on is within 1,000 feet of a lace of the	building unit): overnment: ers:  ted portion of off	- Urban Mitigation Rules.	on Area - as defined in 100-Series
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation: 660  Distance from Completed Posame	c (required if location of the control of Wellbore of the control of Wellbore	Exception Zone  Urban Mitigation Are on is within 1,000 feet of a lace of the	building unit): overnment: ers:  ted portion of off	- Urban Mitigation Rules.	rmitted or completed in the
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation: 660  Distance from Completed Posame Federal or State Unit Name	s (required if location of the	Exception Zone Urban Mitigation Are on is within 1,000 feet of a lateral Notification to Local Greation to Building Unit Own wellbore to nearest complete to Nearest Unit Boundary	building unit): overnment: ers:  ted portion of off	- Urban Mitigation Rules.  Set wellbore per set (Enter 5280 for	rmitted or completed in the
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation: 660  Distance from Completed Posame formation: 660  Federal or State Unit Name  SPACING & FORMATI  Upland is protesting the Formation of th	s (required if location of Urban Mitigation of Buffer Zone Notific NFORMATION ortion of proposed Feet ortion of Wellbore (if appl):  IONS COMME	Exception Zone Urban Mitigation Are on is within 1,000 feet of a laction to Building Unit Own wellbore to nearest completo Nearest Unit Boundary	building unit): overnment: ers:  ted portion of off  330 Fee	- Urban Mitigation Rules.  Set wellbore per set (Enter 5280 for Unit Nur a 320-acre drill	rmitted or completed in the or distance greater than 1 mile.) mber:
Date of Rule 305.a.(2)  SPACING and UNIT IN  Distance from completed posame formation: 660  Distance from Completed Postance from Completed Postance from State Unit Name  SPACING & FORMATI  Upland is protesting the H	required if location of the location of proposed of apply:  IONS COMME  HighPoint applications of the location	Exception Zone Urban Mitigation Are on is within 1,000 feet of a lateral Notification to Local Greation to Building Unit Own wellbore to nearest complete to Nearest Unit Boundary  NTS on (temp. docket # 180700	building unit): overnment: ers:  ted portion of off  330 Fee	- Urban Mitigation Rules.  Set wellbore per set (Enter 5280 for Unit Nur a 320-acre drill	rmitted or completed in the or distance greater than 1 mile.) mber:
Pre-application Notifications Date of Rule 305.a.(1) Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation: 660 Distance from Completed Posame formation SPACING & FORMATI  Upland is protesting the Formation Seven lease well  OBJECTIVE FORMATI	required if location of the location of proposed of apply:  IONS COMME  HighPoint applications of the location	Exception Zone Urban Mitigation Are on is within 1,000 feet of a lateral Notification to Local Greation to Building Unit Own wellbore to nearest complete to Nearest Unit Boundary  NTS on (temp. docket # 180700	building unit): overnment: ers:  ted portion of off  330 Fee	- Urban Mitigation Rules.  Set wellbore per set (Enter 5280 for Unit Nur a 320-acre drill 64W Sec. 22: N	rmitted or completed in the or distance greater than 1 mile.) mber:

DRILLING P	ROGRAM							
Proposed Total Measured Depth: 13265 Feet								
Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:								
Enter distance if less than or equal to 1,500 feet: 667 Feet No well belonging to another operator within 1,500 feet								
Will a closed-	loop drilling sy	stem be used?	Yes					
ls H2S gas re	asonably expe	cted to be encounte	ered during d	rilling operations a	at concentrations	greater than		
or equal to 10	00 ppm?N	o (If Yes, attach	an H2S Drilli	ing Operations Pla	ın)			
Will salt section	ons be encoun	tered during drilling	? No					
Will salt base	d (>15,000 ppr	m Cl) drilling fluids t	oe used?	No				
Will oil based	drilling fluids b	e used? No						
BOP Equipme	ent Type: 🔯 /	Annular Preventor	∇ Double	Ram 😿 Ro	otating Head	None	Э	
GROUNDW	ATER BASE	ELINE SAMPLIN	IG AND M	ONITORING A	ND WATER V	VELL SAMP	LING	
Water well sa	ampling require	ed per Rule 60	9					
DRILLING W	VASTE MAN	IAGEMENT PR	OGRAM			•		
Drilling Fluids	s Disposal: _	OFFSITE	Drilling Flu	ids Disposal Meth	ods: Commercia	l Disposal		
Cuttings Disp	oosal: OFF	SITE	Cutt	tings Disposal Met	hod: Commercia	l Disposal		
Other Dispos	al Description:							
Beneficial	reuse or land a	application plan sub	mitted?					
Pouce Fr	a cilitar IDa							
neuse ra	acility ID:	or Do	cument Num	nber:				
		or Do	ocument Num	hber:				
CASING PR		or Do	ocument Num	nber:	_			
CASING PR	OGRAM Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CASING PR Casing Type SURF	OGRAM Size of Hole 13+1/2	Size of Casing 9+5/8	<u>Wt/Ft</u> 36	Csg/Liner Top	1500	786	1500	Cmt Top
CASING PR Casing Type SURF 1ST	OGRAM <u>Size of Hole</u> 13+1/2  8+3/4	Size of Casing 9+5/8 5+1/2	Wt/Ft	Csg/Liner Top	1			
CASING PR Casing Type SURF 1ST Conductor	OGRAM Size of Hole 13+1/2 8+3/4 Casing is NOT	Size of Casing 9+5/8 5+1/2 planned	<b>Wt/Ft</b> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST X Conductor DESIGNATE	OGRAM Size of Hole 13+1/2 8+3/4 Casing is NOTED SETBAC	Size of Casing 9+5/8 5+1/2	<b>Wt/Ft</b> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a	OGRAM Size of Hole 13+1/2 8+3/4 Casing is NOTED SETBAC	Size of Casing 9+5/8 5+1/2 planned K LOCATION E	<u>Wt/Ft</u> 36 20 XCEPTIOI	Csg/Liner Top 0 0	1500	786	1500	
CASING PR  Casing Type  SURF  1ST  X Conductor  DESIGNATE  Check all that a	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Excepti	Size of Casing 9+5/8 5+1/2 planned	Wt/Ft 36 20  XCEPTIOI	Csg/Liner Top  0 0 NS	1500 13265	786 1725	1500 13265	0
CASING PR  Casing Type  SURF  1ST  X Conductor  DESIGNATE  Check all that a	OGRAM Size of Hole 13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Exception.(1)A. Exception.	Size of Casing 9+5/8 5+1/2 F planned K LOCATION E	Wt/Ft 36 20  XCEPTIOI	Csg/Liner Top  0 0 NS	1500 13265	786 1725	1500 13265	0
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604.	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Exception b.(1)A. Exception a.(1)	Size of Casing  9+5/8 5+1/2  F planned  K LOCATION E  ion Zone (within 500) ion Location (existing the control of the control	Wt/Ft 36 20  XCEPTIOI  O' of Building ag or approve	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Locat	1500 13265	786 1725 Designated Se	1500 13265 atback as a re-	0 sult of
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Construction	OGRAM  Size of Hole  13+1/2  8+3/4  Casing is NOT  ED SETBAC  apply: a.(1)A. Excepti b.(1)A. Excepti a.) b.(1)B. Excepti on after Location	Size of Casing  9+5/8 5+1/2  F planned  K LOCATION E  ion Zone (within 500) ion Location (existing the control of the control	Wt/Ft 36 20  XCEPTION O' of Building ag or approve	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Located Oil & Gas Located	1500 13265 ion now within a ion is within a De	786 1725 Designated Se	1500 13265 otback as a re-	0 sult of
CASING PR  Casing Type  SURF  1ST  Conductor  DESIGNATE  Check all that a  Rule 604.a  Rule 604.a  Rule 604.c  Rule 604.d  Rule 604.d	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Exception b.(1)B. Exception ab.(2) Exception b.(3) Exception	Size of Casing 9+5/8 5+1/2 planned K LOCATION E ion Zone (within 500 ion Location (existing the control of the	Wt/Ft 36 20  EXCEPTION O' of Building ag or approve	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Located Oil & Oil	1500 13265 ion now within a ion is within a De	786 1725 Designated Se esignated Setba	1500 13265 atback as a re- ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor  DESIGNATE Check all that a Rule 604.	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBACE Apply: a.(1)A. Exception b.(1)B. Exception on after Location b.(2) Exception b.(3) Exception ent plan)	Size of Casing 9+5/8 5+1/2 F planned K LOCATION E  Son Zone (within 500 ton Location (existing approval) In Location (SUA or section approval)	Wt/Ft 36 20  XCEPTION O' of Building ag or approve ag or approve site-specific of Units constru	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located Oil & Gas Located After August	1500 13265 ion now within a ion is within a De	786 1725 Designated Se esignated Setba	1500 13265 atback as a re- ack due to Bu	sult of
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CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Construction Rule 604.	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Exception b.(1)A. Exception a.) b.(1)B. Exception b.(2) Exception b.(3) Exception ent plan)  VATTENBE	Size of Casing  9+5/8 5+1/2  F planned  K LOCATION E  Son Zone (within 500 ion Location (existing approval)  n Location (SUA or an Location (Building)	Wt/Ft 36 20  XCEPTION  O' of Building ag or approve ag or approve site-specific of Units constru	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located Oil & Gas Located After August	1500 13265 ion now within a ion is within a De	786 1725 Designated Se esignated Setba	1500 13265 atback as a re- ack due to Bu	sult of
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CASING PR  Casing Type  SURF  1ST  Conductor  DESIGNATE  Check all that a  Rule 604.  Rule 318.4  Rule 318.4	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC  apply: a.(1)A. Exception b.(1)B. Exception after Location b.(2) Exception b.(3) Exception ent plan)  VATTENBE  apply: A.a. Exception A.c. Exception	Size of Casing  9+5/8 5+1/2  F planned  K LOCATION E  Sion Zone (within 500 ion Location (existing approval)  a Location (SUA or an Location (Building approval)  RG AREA LOCA  Location (GWA Wirklocation (GWA Twing))	Wt/Ft 36 20  CXCEPTION  O' of Building ag or approve ag or approve Units construction  ATION EXCEPTION	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located Oil & Gas Located After August	1500 13265 ion now within a ion is within a De	786 1725 Designated Se esignated Setba	1500 13265 atback as a re- ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Construction Rule 604.	OGRAM  Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBACE Apply: a.(1)A. Exception b.(1)A. Exception a.) b.(1)B. Exception b.(2) Exception b.(3) Exception ent plan)  VATTENBE Apply: A.a. Exception A.c. Exception  VARIANCE	Size of Casing  9+5/8 5+1/2  F planned  K LOCATION E  Sion Zone (within 500 ion Location (existing approval)  a Location (SUA or an Location (Building approval)  RG AREA LOCA  Location (GWA Wirklocation (GWA Twing))	Wt/Ft 36 20  XCEPTION O' of Building ng or approve site-specific of Units constru ATION EXC	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ucted after August	ion now within a cion is within a Deexecuted on or be 1, 2013 within se	786 1725 Designated Se esignated Setba	1500 13265 atback as a re- ack due to Bu	sult of

OTHERL	OCATION EXCEPT	UN5
Check all th	nat apply:	
Rule	318.c. Exception Location	n from Rule or Spacing Order Number
Rule	603.a.(2) Exception Loca	tion (Property Line Setback).
	ptions and variances requertifications, SUAs).	ire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.
OPERAT	OR COMMENTS AN	D SUBMITTAL
Comments	Distance from complete measured to the permit	ed portion of the wellbore to nearest wellbore permitted or completed in the same formation was ted Little Lady 22-4CH owned by Upland Exploration Inc. using vertical.
		mitted or existing wellbore belonging to another operator was measured to the permitted Salt , API No. 05-123-47137, operated by CCRP Operating Inc.
This applic	cation is in a Comprehens	ive Drilling PlanNo CDP #:
Location II	D:	
Is this app	olication being submitted v	vith an Oil and Gas Location Assessment application?  Yes
I hereby c	ertify all statements made	in this form are, to the best of my knowledge, true, correct, and complete.
Signed:		Print Name: Kimberly Rodell
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com
	ne information provided he by approved.	erein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders
and io nord	by approvou.	
		7
COGCC Ap		Director of COGCC Date:
COGCC A <sub>F</sub>	oproved: API NUMBER	Director of COGCC Date:  Expiration Date:
		Expiration Date:
All repr	API NUMBER  resentations, stipulati	
All repr	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Expiration Date:  Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constit enforce this Pe	API NUMBER  resentations, stipulati ute representations, seable to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in

Best Management Practices					
No BMP/COA Type	Description				
1 Drilling/Completion Operations	One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.				
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.				

Total: 2 comment(s)

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401700653	FORM 2 SUBMITTED
401700776	OffsetWellEvaluations Data
401700782	DEVIATED DRILLING PLAN
401700784	WELL LOCATION PLAT
401700857	DIRECTIONAL DATA

Total Attach: 5 Files

#### **General Comments**

<u>User Group</u>	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

<u>Public Comments</u>	
The following comments were provided by members of the public and were considered during the technical review of this application.	

No. Comment Date

1 TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor

08/06/2018

Email: john.noto@state.co.us

Doug Andrews, COGCC OGLA Northeast Location Specialist

Email: doug.andrews@state.co.us

FR: Matt Sura, Attorney at Law

DT: 8/6/2018

RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-1NH

Dear COGCC,

These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – "APDs") listed above.

Mr. Richardson urges the COGCC to deny the location for the following reasons:

1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.

2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.

3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.

4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.

According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.

Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.

Thank you for your assistance in this matter.

Sincerely,

Matt Sura

**FORM** 2

## State of Colorado

Oil and Gas Conservation Commission
1120 Lincoln Street, Suite 801, Denver, Colorado 80203



Document Number:

Rev 08/16 1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109	0 👹	401700884
APPLICATION FOR PERMIT TO:	TA V	
▼ Drill   Deepen   Re-enter   Recomplete and Open	erate	
TYPE OF WELL OIL 🔀 GAS COALBED OTHER	Refiling	Date Received: 07/12/2018
ZONE TYPE SINGLE ZONE X MULTIPLE ZONES COMMINGLE ZONES	Sidetrack 🗀	07/12/2018
Well Name: Little Lady Well Number: 22-3NH		_
Name of Operator: UPLAND EXPLORATION LLC COGC	C Operator Num	ber: 10701
Address: 424 S MAIN ST		
City: BOERNE State: TX Zip: 78006		
Contact Name: Larry Jenkins Phone: (580)716-0535 Fax: ( Email: larry@uplandexploration.com	)	
RECLAMATION FINANCIAL ASSURANCE		
Plugging and Abandonment Bond Surety ID:20180078		
WELL LOCATION INFORMATION  QtrQtr: NENW Sec: 22 Twp: 11N Rng: 64W Meridian: 6  Latitude: 40.912020 Longitude: -104.532730  FNL/FSL FEL/FWL  Footage at Surface: 585 Feet FNL 2460 Feet FWL  Field Name: WILDCAT Field Number: 99999  Ground Elevation: 5421 County: WELD  GPS Data:  Date of Measurement: 07/02/2018 PDOP Reading: 1.2 Instrument Operator's Name: Kell Well is □ Directional □ Horizontal (highly deviated) submit deviated drilling plan.  Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL  330 FNL 990 FWL 330 FSL  Sec: 22 Twp: 11N Rng: 64W Sec: 22 Twp:	Kyle Daley FEL/FW 990 FWL 11N Rng:	<del></del>
Surface Ownership:  Fee	Indian  urety ID: <u>201800</u>	77

Using standard QtrQtr, Sec, beneath surface location if p	roduced. Attach s	separate description page o	r map if necessary.)	
T11N R64W SEC. 22: W2				
Total Acres in Described Lea	ase: 640	Described Mineral Lo	ease is: 👿 Fee 📉 Stat	e Federal Indian
Federal or State Lease #		- Control of the Cont		
Distance from Completed Po	ortion of Wellbore	to Nearest Lease Line of d	escribed lease: 330	Feet
CULTURAL DISTANCE	E INFORMATI	ON	INSTRUCTIONS - All measurem	: ents shall be provided from center of
Distance to nearest:			the Proposed \	Vell to nearest of each cultural
Ві	uilding: 12	47 Feet		ribed in Rule 303.a.(5). r distance greater than 1 mile.
Buildin	g Unit: 14	 35 Feet	_	rest building of any type. If nearest ilding Unit, enter same distance for
High Occupancy Buildin	g Unit: 52	B0 Feet	both.	maing offit, effter same distance for
Designated Outside Activity	Area: 52	B0 Feet		High Occupancy Building Unit, and tside Activity Area - as defined in
Public	Road: 5	72 Feet	100-Series Rule	
Above Ground	Utility: 5	46 Feet		
Ra	ilroad: 52	30 Feet		
Propert	y Line:2	39 Feet		
DESIGNATED SETBA INFORMATION Check all that apply. This loo		N Buffer Zone	1,000' of a Buil	ne - as described in Rule 604.a.(1),
oncok ali tilat appiy. Triis lot	auon is within a.	Exception Zone		tion Area - as defined in 100-Series
		Urban Mitigation Are	Rules.	
Dra application Natifications	(required if least	_		
Pre-application Notifications  Data of Rule 305 a (1)	•	Area Notification to Local G	- ,	
		cation to Building Unit Own	<del></del>	
Date of Trule 303.a.(2) i	Julier Zone Noun	Calloff to Building Offic Own		
SPACING and UNIT IN	FORMATION			
Distance from completed po	rtion of proposed	wellbore to nearest comple	ted portion of offset wellbore p	ermitted or completed in the
same formation: 660	Feet			
Distance from Completed Po	ortion of Wellbore	to Nearest Unit Boundary	330 Feet (Enter 5280	for distance greater than 1 mile.)
Federal or State Unit Name	(if appl):		Unit Nu	ımber:
SPACING & FORMATI	ONS COMME	NTS		
			572) and will file a 320-acre dr ill cover T11N R64W Sec. 22:	illing and spacing unit application W2.
OBJECTIVE FORMATI	ONS			
	Formation Code	Spacing Order Number(s)	Unit Acreage Assigned to Well	Unit Configuration (N/2, SE/4, etc.)
	IBRR		320	S.22 T11N R64W: W2

DRILLING PROGRAM						
Proposed Total Measured Depth: 12951 Feet						
Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:						
Enter distance if less than or equal to 1,500 feet: 631 Feet No well belonging to another operator within 1,500 feet						
Will a closed-loop drilling system be used? Yes						
Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than						
or equal to 100 ppm? No (If Yes, attach an H2S Drilling Operations Plan)						
Will salt sections be encountered during drilling?No						
Will salt based (>15,000 ppm Cl) drilling fluids be used? No						
Will oil based drilling fluids be used? No						
BOP Equipment Type: X Annular Preventor X Double Ram X Rotating Head None						
GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING						
Water well sampling required per Rule 609						
DRILLING WASTE MANAGEMENT PROGRAM						
Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal						
Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal						
Other Disposal Description:						
Beneficial reuse or land application plan submitted?						
Reuse Facility ID: or Document Number:						
CACING PROCRAM						
CASING PROGRAM						
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         12951         1677         12951						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         12951         1677         12951           IX         Conductor Casing is NOT planned						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         12951         1677         12951           IX         Conductor Casing is NOT planned    DESIGNATED SETBACK LOCATION EXCEPTIONS						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         12951         1677         12951           IX         Conductor Casing is NOT planned           DESIGNATED SETBACK LOCATION EXCEPTIONS           Check all that apply:						
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         12951         1677         12951           IX         Conductor Casing is NOT planned           DESIGNATED SETBACK LOCATION EXCEPTIONS           Check all that apply:           Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)						
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220012951167712951IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of						
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220012951167712951IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:In Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)In Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)In Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit)						
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220012951167712951IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:In Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)In Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)In Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)						
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220012951167712951IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific						
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0 12951 1677 12951      X Conductor Casing is NOT planned						
Sure of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0  IST 8+3/4 5+1/2 20 0 12951 1677 12951  ▼ Conductor Casing is NOT planned  DESIGNATED SETBACK LOCATION EXCEPTIONS  Check all that apply:  □ Rule 604.b.(1)A. Exception Zone (within 500' of Building Unit)  □ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  □ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  □ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  □ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)  GREATER WATTENBERG AREA LOCATION EXCEPTIONS						
Surf Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1						
Sure Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0  IST 8+3/4 5+1/2 20 0 12951 1677 12951  ▼ Conductor Casing is NOT planned  DESIGNATED SETBACK LOCATION EXCEPTIONS  Check all that apply:  □ Rule 604.a.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  □ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  □ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  □ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)  GREATER WATTENBERG AREA LOCATION EXCEPTIONS  Check all that apply:  □ Rule 318A.a. Exception Location (GWA Windows).						

	OCATION EXCEPTI	
Check all th	at apply:	
Rule	318.c. Exception Location	n from Rule or Spacing Order Number
Rule	603.a.(2) Exception Loca	tion (Property Line Setback).
	ptions and variances requertifications, SUAs).	uire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.
OPERAT	OR COMMENTS AN	D SUBMITTAL
Comments		ed portion of the wellbore to nearest wellbore permitted or completed in the same formation was ted Little Lady 22-5NH owned by Upland Exploration Inc. using vertical.
		rmitted or existing wellbore belonging to another operator was measured to the permitted Salt , API No.05-123-47136, operated by CCRP Operating Inc.
This applic	ation is in a Comprehens	ive Drilling Plan No CDP #:
Location ID	D:	
Is this app	olication being submitted v	with an Oil and Gas Location Assessment application?
I hereby c	ertify all statements made	in this form are, to the best of my knowledge, true, correct, and complete.
Signed:		Print Name: Kimberly Rodell
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com
COGCC Ap	pproved:	Director of COGCC Date:
05	API NUMBER	Expiration Date:
All repr	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in  Description
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in
All repr constitu enforce this Per	esentations, stipulati ute representations, s eable to the same exte rmit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in

Best Management Practices				
No BMP/COA Type	<u>Description</u>			
1 Drilling/Completion Operations	Logging: One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.			
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.			

Total: 2 comment(s)

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401700884	FORM 2 SUBMITTED
401701003	OffsetWellEvaluations Data
401701047	DIRECTIONAL DATA
401701048	DEVIATED DRILLING PLAN
401701055	WELL LOCATION PLAT

Total Attach: 5 Files

#### **General Comments**

<u>User Group</u>	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

Public Comments
The following comments were provided by members of the public and were considered during the technical review of this application.

No. Comment Comment Comment Date

1 TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor

08/06/2018

Email: john.noto@state.co.us

Doug Andrews, COGCC OGLA Northeast Location Specialist

Email: doug.andrews@state.co.us

FR: Matt Sura, Attorney at Law

DT: 8/6/2018

RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-4CH, Little Lady 22-5NH, Little Lady 22-1NH

Dear COGCC,

These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – "APDs") listed above.

Mr. Richardson urges the COGCC to deny the location for the following reasons:

1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.

2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.

3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.

4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.

According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.

Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.

Thank you for your assistance in this matter.

Sincerely,

Matt Sura

FORM 2 Rev

08/16

# State of Colorado

# Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



**Document Number:** 

01701056

	,	ATION FOR	. ,	). D.		TAL	401701030
···			R PERMIT TO		l-t l O	4 _	
▼ Drill	Deepen	{ h	Re-enter	Hecomp	lete and Op	perate 1	Date Received:
TYPE OF WELL	OIL 💢 GAS	COALBE	D OTHER			Refiling T	07/12/2018
ZONE TYPE S	SINGLE ZONE 🔀	MULTIPLE ZON	NES COM	MINGLE ZONE	s 🗆	Sidetrack	
Well Name: Little I	Lady			Well Numbe	r: 22-4CH		
Name of Operator:	UPLAND EXPLO	RATION LLC			cogo	C Operator Num	ber: 10701
Address: 424 S M	AIN ST						
City: BOERNE		State: TX	Z	ip: 78006	_		
Contact Name: Ke	eith Myers		Phone: (720)	961-4926	Fax: (	)	
Email: kn	nyers@clearcreeki	rp.com					
RECLAMATION	N FINANCIAL A	ASSURANCE	=		ertade tamboure des Mitherstein (de 1911 y Torres)		
Plugging and Aban	donment Bond Su	rety ID: 2018	80078				
L. LOCATIO		TON					
WELL LOCATION  Outright NENW	ON INFORMAT Sec: 22	Twp: 11N	Rng: 64W	Meridian:	6		
	.912100	1Wp. 1114	Longitude: -				
		FNL	/FSL		EL/FWL		
Footage at Sur	face: 555	Feet F	NL 246	D Feet _	FWL		
Field Name: WILI	DCAT		Field Number:	99999			
Ground Elevation:	5423		County: W	ELD			
GPS Data: Date of Measurem	ent: 07/02/2018	PDOP Reading	: 1.4 Instru	ment Operator	's Name: I	Kyle Daley	
If well is Direct	tional 🔽 H	orizontal (highly	*****	nit deviated dri	-		
Footage at Top of F					NL/FSL	FEL/FW	L
	330 FNL		FWL	330	FSL	1320 FWL	
-	Sec: 22 Tv	vp: 11N	Rng: 64W	Sec: 22	Twp:	11N Rng:	64W
LOCATION SU	RFACE & MINI	ERALS & RIC	SHT TO CONS	STRUCT			
Surface Ownership	: Ⅸ Fee	State F	ederal Ind	lian			
The Surface Owner			neath the location				
(check all that apply	ν.)	nitted to an Oil a					
	has sigr	ned the Oil and	Gas Lease.				
		oplicant.					
The Mineral Owner		•	nis: Ⅸ Fee	State	Federal	Indian	
The Minerals benea					es		
The right to constru							,
Surface damage as		J	•		Surface S	 urety ID: 201800	)77
						, <u></u>	

	2					
Total Acres in Described Le	ase: 640	Described Mineral Le	ease is: 🛱 Fee	State	Federal Indian	
ederal or State Lease # _		- American				
Distance from Completed Po	ortion of Wellbore	to Nearest Lease Line of d	escribed lease:	330	Feet	
CULTURAL DISTANCI	E INFORMATI	NC			ents shall be provided from center of	
Distance to nearest:			the Proposed Well to nearest of each cultural feature as described in Rule 303.a.(5).			
Ві	uilding: 12	11 Feet		- Enter 5280 for distance greater than 1 mile		
Buildin		26 Feet			est building of any type. If nearest lding Unit, enter same distance for	
High Occupancy Buildin		30 Feet		both.	ligh Occupancy Puilding Unit and	
Designated Outside Activity		Feet			High Occupancy Building Unit, and side Activity Area - as defined in	
		42 Feet		100-Series Rules	5.	
Above Ground	I Utility: 5	16 Feet				
		BO Feet				
Propert	ty Line: 2	S9 Feet				
Check all that apply. This lo	cation is within a:	Buffer Zone Exception Zone		within 500' of a	e - as described in Rule 604.a.(1), Building Unit. on Area - as defined in 100-Series	
	, ,	Urban Mitigation Are on is within 1,000 feet of a Area Notification to Local G	building unit):			
Date of Rule 305.a.(1)	Urban Mitigation	on is within 1,000 feet of a	building unit): overnment:			
	Urban Mitigation A	on is within 1,000 feet of a Area Notification to Local G	building unit): overnment:			
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN  Distance from completed posame formation: 660  Distance from Completed Posame	Urban Mitigation A Buffer Zone Notifi  NFORMATION ortion of proposed Feet ortion of Wellbore	on is within 1,000 feet of a Area Notification to Local G cation to Building Unit Own  wellbore to nearest comple	building unit): overnment: ers: tted portion of off		ermitted or completed in the or distance greater than 1 mile.)	
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN  Distance from completed potential formation:  660  Distance from Completed Potential formation Completed Potential Federal or State Unit Name	Urban Mitigation A Buffer Zone Notifi  NFORMATION ortion of proposed Feet ortion of Wellbore (if appl):	on is within 1,000 feet of a Area Notification to Local Goation to Building Unit Own wellbore to nearest completo Nearest Unit Boundary	building unit): overnment: ers: tted portion of off	et (Enter 5280 fo	or distance greater than 1 mile.)	
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed posame formation:  660  Distance from Completed Posederal or State Unit Name  SPACING & FORMATI  Upland is protesting the F	Urban Mitigation A Buffer Zone Notifi  NFORMATION ortion of proposed Feet ortion of Wellbore (if appl): IONS COMME	on is within 1,000 feet of a Area Notification to Local Goation to Building Unit Ownwellbore to nearest completo Nearest Unit Boundary	building unit): overnment: ers:  ted portion of off  330 Fee	et (Enter 5280 fo Unit Nui a 320-acre dril	or distance greater than 1 mile.) mber:ling and spacing unit application	
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed potential formation: 660  Distance from Completed Potential or State Unit Name  SPACING & FORMATI  Upland is protesting the F	Urban Mitigation A Buffer Zone Notifi  NFORMATION ortion of proposed Feet ortion of Wellbore (if appl): IONS COMME HighPoint applicat lls. This proposed	on is within 1,000 feet of a Area Notification to Local Greation to Building Unit Own wellbore to nearest completo Nearest Unit Boundary  NTS  on (temp. docket # 180700	building unit): overnment: ers:  ted portion of off  330 Fee	et (Enter 5280 fo Unit Nui a 320-acre dril	or distance greater than 1 mile.) mber:ling and spacing unit application	
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DRILLING PROGRAM					
Proposed Total Measured Depth: 13092 Feet					
Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:					
Enter distance if less than or equal to 1,500 feet: 630 Feet No well belonging to another operator within 1,500 feet					
Will a closed-loop drilling system be used? Yes					
Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than					
or equal to 100 ppm? No (If Yes, attach an H2S Drilling Operations Plan)					
Will salt sections be encountered during drilling?No					
Will salt based (>15,000 ppm Cl) drilling fluids be used? No					
Will oil based drilling fluids be used?No					
BOP Equipment Type: 🗵 Annular Preventor 💢 Double Ram 💢 Rotating Head 🦷 None					
GROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING					
Water well sampling required per Rule 609					
DRILLING WASTE MANAGEMENT PROGRAM					
Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal					
Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal					
Other Disposal Description:					
Beneficial reuse or land application plan submitted?					
Reuse Facility ID: or Document Number:					
CASING PROGRAM					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         13092         1698         13092           ▼ Conductor Casing is NOT planned					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         13092         1698         13092           IX         Conductor Casing is NOT planned    DESIGNATED SETBACK LOCATION EXCEPTIONS					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         13092         1698         13092           IX         Conductor Casing is NOT planned           DESIGNATED SETBACK LOCATION EXCEPTIONS           Check all that apply:					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           1ST         8+3/4         5+1/2         20         0         13092         1698         13092           IX         Conductor Casing is NOT planned    DESIGNATED SETBACK LOCATION EXCEPTIONS					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           IST         8+3/4         5+1/2         20         0         13092         1698         13092           IX         Conductor Casing is NOT planned           DESIGNATED SETBACK LOCATION EXCEPTIONS           Check all that apply:           Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)					
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220013092169813092IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of					
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220013092169813092IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:In Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)In Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)In Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit)					
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220013092169813092IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:In Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)In Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)In Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)					
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220013092169813092IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific					
Casing TypeSize of HoleSize of CasingWt/FtCsg/Liner TopSetting DepthSacks CmtCmt BtmCmt TopSURF13+1/29+5/83601500786150001ST8+3/45+1/220013092169813092IXConductor Casing is NOT plannedDESIGNATED SETBACK LOCATION EXCEPTIONSCheck all that apply:In Rule 604.a. (1)A. Exception Zone (within 500' of Building Unit)In Rule 604.b. (1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)In Rule 604.b. (1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)In Rule 604.b. (2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)In Rule 604.b. (3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)					
Suring Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1					
Sur yet   13+1/2   9+5/8   36   0   1500   786   1500   0   1507     1507					
Surf Type   Size of Hole   Size of Casing   Wt/Ft   Csg/Liner Top   Setting Depth   Sacks Cmt   Cmt Btm   Cmt Top   SURF   13+1/2   9+5/8   36   0   1500   786   1500   0   IST   8+3/4   5+1/2   20   0   13092   1698   13092    ▼ Conductor Casing is NOT planned  DESIGNATED SETBACK LOCATION EXCEPTIONS  Check all that apply:  □ Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit) □ Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  □ Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  □ Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  □ Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)  GREATER WATTENBERG AREA LOCATION EXCEPTIONS  Check all that apply:  □ Rule 318A.a. Exception Location (GWA Windows).					

OTHER L	OCATION EXCEPTI	ONS
Check all th	at apply:	
Rule	318.c. Exception Location	n from Rule or Spacing Order Number
Rule	603.a.(2) Exception Loca	tion (Property Line Setback).
	ptions and variances requestrifications, SUAs).	ire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.
OPERAT	OR COMMENTS AN	D SUBMITTAL
Comments	Distance from complete measured to the permit	ed portion of the wellbore to nearest wellbore permitted or completed in the same formation was ted Little Lady 22-6CH owned by Upland Exploration Inc. using vertical.
		mitted or existing wellbore belonging to another operator was measured to the permitted Salt API No. 05-123-46480, operated by CCRP Operating Inc.
This applic	ation is in a Comprehensi	ve Drilling Plan No CDP #:
Location ID	D:	
Is this app	lication being submitted w	vith an Oil and Gas Location Assessment application? Yes
I hereby co	ertify all statements made	in this form are, to the best of my knowledge, true, correct, and complete.
Signed:		Print Name: Kimberly Rodell
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com
Based on th	o information provided be	
	by approved.	erein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders
	oy approved.	prein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders  Director of COGCC Date:
and is herel	oy approved.	
and is herel	proved:	Director of COGCC Date:
and is herel COGCC Ap 05 All repr constitue	esentations, stipulations, s	Director of COGCC Date:
and is herel COGCC Ap 05 All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
All repr constitue	esentations, stipulations to the same extermit-to-Drill.	Director of COGCC Date:  Expiration Date:  Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in

Best Management Practices			
No BMP/COA Type	<u>Description</u>		
1 Drilling/Completion Operations	Logging: One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.		
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.		

Total: 2 comment(s)

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401701056	FORM 2 SUBMITTED
401701101	OffsetWellEvaluations Data
401701137	DIRECTIONAL DATA
401701138	DEVIATED DRILLING PLAN
401701140	WELL LOCATION PLAT

Total Attach: 5 Files

#### **General Comments**

User Group	Comment	<b>Comment Date</b>
Permit	Passed Completeness.	07/17/2018

Maria William Con		Public Comments		
	No public comments were rec	eived on this application durin	g the comment period.	

#### FORM 2

Rev 08/16

## State of Colorado

## Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401701112

l.						TA V	
	APPLIC	ATION FO	R PERMIT T	<b>O</b> :			
□ Drill	Deepen		Re-enter	Recor	mplete and O <sub>l</sub>	perate	Data Dassivad
TYPE OF WELL OIL	<b>⊠</b> GAS	COALBI	ED OTHE	R		Refiling	Date Received: 07/12/2018
ZONE TYPE SINGLE	E ZONE 🔀	MULTIPLE ZO	NES CC	MMINGLE ZON	NES T	Sidetrack	0//12/2016
Well Name: Little Lady			- Come	Well Numl	ber: 22-5NH		
Name of Operator: UPL	AND EXPLO	RATION LLC			COG	CC Operator Nu	— mber: 10701
Address: 424 S MAIN S	Т				4.000		
City: BOERNE		State: TX		Zip: 78006			
Contact Name: Larry Email: larry@u	Jenkins uplandexplora	tion.com	Phone: (58	0)716-0535	_ Fax: <u>(</u>	)	
RECLAMATION FIN	JANCIAI A	ASSURANC	E		100000	- I describe the first	
Plugging and Abandonm			180078				
WELL LOCATION I			Dn=: 04M	- ئامنى ھالا	n. e		
QtrQtr: NENW Latitude: 40.91218	Sec: 22	Twp:11N	Rng: 64W	Meridia -104.532730	n: 6		
Lautude. 40.31216		FN	L/FSL	101.002700	- FEL/FWL		
Footage at Surface:	525		FNL 24	61 Feet	FWL		
Field Name: WILDCAT	-		Field Number:	999	99		
***********	5425		County: V	VELD			
GPS Data: Date of Measurement: (	07/00/0010	DDOD Boodin	a. 1.4 Inst	rument Opera	torla Nama:	Kulo Dalov	
Date of Measurement.	3770272016					Tryle Daley	
			v doviotod) eu				
If well is Directional		orizontal (highl	_	bmit deviated			4 4 24
Footage at Top of Prod 2	Zone: FNL/FS	L	FEL/FWL Bo	ottom Hole:	FNL/FSL	FEL/F	
Footage at Top of Prod 2	Zone: FNL/FS	1650	FEL/FWL Bo	ottom Hole:	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2	Zone: FNL/FS 30 FNL 22 Tv	sL 1650 vp:11N	FEL/FWL Bo	ottom Hole: 330 Sec: 2	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2	Zone: FNL/FS 30 FNL 22 Tv	sL 1650 vp:11N	FEL/FWL Bo	ottom Hole: 330 Sec: 2	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA	Zone: FNL/FS 30 FNL 22 Tv	1650 vp: 11N ERALS & RI	FEL/FWL Borneller FWL Rng: 64W GHT TO CON	ottom Hole: 330 Sec: 2	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA	Zone: FNL/FS 30 FNL 22 Tv  CE & MINE	1650 vp: 11N ERALS & RI	FEL/FWL Borneller FWL Rng: 64W GHT TO CON	330 Sec: 2  NSTRUCT	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:	Zone: FNL/FS 30 FNL 22 Tv  ACE & MINE  7 Fee is the m	1650 vp: 11N ERALS & RI	FEL/FWL Bo FWL  Rng: 64W  GHT TO CON  Federal I	330 Sec: 2  NSTRUCT	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:  The Surface Owner is:	Zone: FNL/FS 30 FNL 22 Tv  CE & MINE  7 Fee is the m is comm	1650 vp: 11N ERALS & RI	FEL/FWL Boy FWL  Rng: 64W  GHT TO CON  Federal Internet the location and Gas Lease.	330 Sec: 2  NSTRUCT	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:  The Surface Owner is:	Zone: FNL/FS 30 FNL 22 Tv  CE & MINE  7 Fee is the m is comm	ERALS & RI  State  ineral owner benitted to an Oil and the Oil and	FEL/FWL Boy FWL  Rng: 64W  GHT TO CON  Federal Internet the location and Gas Lease.	330 Sec: 2  NSTRUCT	FNL/FSL FSL	1650 FW	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:  The Surface Owner is:	Zone: FNL/FS 30 FNL 22 Tv  ACE & MINE  7 Fee is the m is comm has sign is the ap	State State State on the original owner be need the Oil and opplicant.	FEL/FWL Boy FWL  Rng: 64W  GHT TO CON  Federal Interest the location and Gas Lease.  It Gas Lease.	330 Sec: 2  NSTRUCT	FNL/FSL FSL 2 Twp:	1650 FW 11N Rn	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:  The Surface Owner is: (check all that apply)	Zone: FNL/FS 30 FNL 22 Tv  CE & MINE  Fee is the m is comm has sign is the agenth this Oil and	ERALS & RI State State State of the Oil and opplicant.  The order of the Oil and opplicant.  The order of the Oil and opplicant.  The order of the Oil and opplicant.	FEL/FWL Boy FWL  Rng: 64W  GHT TO CON  Federal Interneath the location and Gas Lease.  Gas Lease.  Gas Lease.	sec: 2  STRUCT  Indian  Ion.	FNL/FSL FSL 2 Twp:	1650 FW 11N Rn	<u>/L</u>
Footage at Top of Prod 2  33  Sec:  LOCATION SURFA  Surface Ownership:  The Surface Owner is: (check all that apply)  The Mineral Owner benefits	Zone: FNL/FS 30 FNL 22 Tv  ACE & MINE  7 Fee is the m is comm has sign is the appeath this Oil and Gastis Oil and Gastis	State	FEL/FWL Bo FWL Rng: 64W  GHT TO CON Federal Interest the location and Gas Lease. If Gas Lease. If Gas Lease be developed by	state of this Well:	FNL/FSL FSL 2 Twp:	1650 FW 11N Rn	<u>/L</u>

Page 1 of 7

Total Acres in Described Lea	ase: 640	Described Mineral Le	ase is: 👿 Fee	State	Federal Indian
ederal or State Lease #		agenganisha da			
Distance from Completed Po	ortion of Wellbore	to Nearest Lease Line of de	escribed lease:	330	Feet
CULTURAL DISTANCE	E INFORMATI	ON			nts shall be provided from center o
	ilding	as Foot		feature as descri	bed in Rule 303.a.(5).
		36 Feet			distance greater than 1 mile. est building of any type. If nearest
Building		19 Feet 80 Feet		Building is a Buil	ding Unit, enter same distance for
High Occupancy Building Designated Outside Activity		80 Feet		both.  - Building Unit, H	ligh Occupancy Building Unit, and
Public		12 Feet		Designated Outs 100-Series Rules	ide Activity Area - as defined in
Above Ground		86 Feet		100-Series itures	•
		80 Feet			
Property		39 Feet			
Check all that apply. This loc	(required if locat	Exception Zone Urban Mitigation Are	ouilding unit):	within 500' of a	- as described in Rule 604.a.(1), Building Unit. on Area - as defined in 100-Series
• •	_				
Date of Rule 305.a.(2) F	Buffer Zone Notif	ication to Building Unit Own			
Date of Rule 305.a.(2) ESPACING and UNIT IN Distance from completed posame formation: 660 Distance from Completed Posame Federal or State Unit Name	Buffer Zone Notif	ication to Building Unit Own	ers:		or distance greater than 1 mile.)
Date of Rule 305.a.(2) ESPACING and UNIT IN Distance from completed po- same formation: 660 Distance from Completed Po- Federal or State Unit Name SPACING & FORMATI	Buffer Zone Notif  IFORMATION  rtion of proposed  Feet  ortion of Wellbore  (if appl):	ication to Building Unit Own wellbore to nearest comple to Nearest Unit Boundary	ers:ted portion of of	et (Enter 5280 fo Unit Nur	or distance greater than 1 mile.)
Date of Rule 305.a.(2) ESPACING and UNIT IN Distance from completed posame formation:  660  Distance from Completed Postance from Completed Postance or State Unit Name  SPACING & FORMATI  Upland is protesting the F	Buffer Zone Notif  IFORMATION  Intion of proposed Feet  Ortion of Wellbore  (if appl):  ONS COMME	ication to Building Unit Own wellbore to nearest comple to Nearest Unit Boundary	ers:  ted portion of of  330 Fee  572) and will file	et (Enter 5280 fo Unit Nur a a 320-acre drill	or distance greater than 1 mile.)  nber:  ing and spacing unit application
Date of Rule 305.a.(2) BEPACING and UNIT IN Distance from completed posame formation:  660  Distance from Completed Postance from Completed Postance or State Unit Name  SPACING & FORMATI  Upland is protesting the Formation of t	Buffer Zone Notif  IFORMATION  rtion of proposed  Feet  ortion of Wellbore  (if appl):  ONS COMME  HighPoint applicat  Is. This proposed	wellbore to nearest comple to Nearest Unit Boundary  ENTS  tion (temp. docket # 180700	ers:  ted portion of of  330 Fee  572) and will file	et (Enter 5280 fo Unit Nur a a 320-acre drill	or distance greater than 1 mile.)  nber:  ing and spacing unit application
Date of Rule 305.a.(2) ESPACING and UNIT IN Distance from completed posame formation:  660  Distance from Completed Postance from Completed Postance or State Unit Name  SPACING & FORMATI  Upland is protesting the Formation of t	Buffer Zone Notif  IFORMATION  rtion of proposed  Feet  ortion of Wellbore  (if appl):  ONS COMME  HighPoint applicat  Is. This proposed	wellbore to nearest comple to Nearest Unit Boundary  ENTS  tion (temp. docket # 180700	ers:  ted portion of of  330 Fee  572) and will file	et (Enter 5280 fo Unit Nur e a 320-acre drill 864W Sec. 22: \	or distance greater than 1 mile.)  nber:  ing and spacing unit application

Date Run: 8/23/2018 Doc [#401701112] Well Name: Little Lady 22-5NH

Page 2 of 7

DRILLING F	ROGRAM							
Proposed To	tal Measured D	epth: 12905 F	eet					
Distance from	n the proposed	wellbore to nearest	t existing or բ	proposed wellbore	belonging to and	ther operator,	including plug	ged wells:
Enter distance if less than or equal to 1,500 feet: 631 Feet No well belonging to another operator within 1,500 feet						,500 feet		
Will a closed	-loop drilling sys	stem be used?	Yes					
Is H2S gas re	asonably expe	cted to be encounte	ered during d	drilling operations a	at concentrations	greater than		
or equal to 10	00 ppm?No	(If Yes, attach	an H2S Drill	ing Operations Pla	ın)			
Will salt secti	ons be encount	tered during drilling	? No					
Will salt base	ed (>15,000 ppr	n CI) drilling fluids b	e used?	No				
Will oil based	l drilling fluids b	e used? No						
BOP Equipm	ent Type: 😿 A	Annular Preventor	<b>⊠</b> Double	Ram 🛱 Ro	otating Head	None	e	
GROUNDW	ATER BASE	LINE SAMPLIN	IG AND M	ONITORING A	ND WATER V	VELL SAMP	LING	
Water well s	ampling require	d per Rule 60	9					
DRILLING V	VASTE MAN	AGEMENT PRO	OGRAM					
Drilling Fluid	s Disposal:	OFFSITE	Drilling Flu	uids Disposal Meth	ods: Commercia	l Disposal		
Cuttings Disp	posal: OFF	SITE	Cut	tings Disposal Met	hod: Commercia	l Disposal		
Other Dispos	sal Description:	· · · · · · · · · · · · · · · · · · ·						
Beneficial	reuse or land a	pplication plan sub	mitted?					
Reuse F								
		orian	cument Nur	nher:				
Ticude i		or Do	cument Num	nber:	_			
CASING PR	<del></del>	or Do	cument Num	nber:	_			
	OGRAM		Wt/Ft	Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CASING PR Casing Type SURF	Size of Hole	Size of Casing 9+5/8	<u>Wt/Ft</u> 36	Csg/Liner Top	1500	786	1500	Cmt Top
CASING PR Casing Type SURF 1ST	Size of Hole 13+1/2 8+3/4	Size of Casing 9+5/8 5+1/2	Wt/Ft	Csg/Liner Top	1 1			
CASING PR Casing Type SURF 1ST Conductor	Size of Hole 13+1/2 8+3/4 Casing is NOT	Size of Casing 9+5/8 5+1/2 planned	<u>Wt/Ft</u> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATI	Size of Hole 13+1/2 8+3/4 Casing is NOT	Size of Casing 9+5/8 5+1/2	<u>Wt/Ft</u> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC	Size of Casing 9+5/8 5+1/2 planned K LOCATION E	<u>Wt/Ft</u> 36 20 XCEPTIO	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST X Conductor DESIGNATI Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Excepting	Size of Casing  9+5/8  5+1/2  planned  K LOCATION E  on Zone (within 500	Wt/Ft 36 20  XCEPTIO	Csg/Liner Top  0 0 NS	1500 12905	786 1670	1500 12905	0
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception.	Size of Casing 9+5/8 5+1/2 planned K LOCATION E	Wt/Ft 36 20  XCEPTIO	Csg/Liner Top  0 0 NS	1500 12905	786 1670	1500 12905	0
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exceptib.(1)A. Exceptia.) b.(1)B. Excepti	Size of Casing  9+5/8  5+1/2  planned  K LOCATION E  on Zone (within 500 on Location (existing on Location (ex	Wt/Ft 36 20  XCEPTIO  O' of Building ag or approve	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat	1500 12905	786 1670 Designated Se	1500 12905 etback as a res	0 sult of
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Construction	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception. b.(1)B. Exception after Location	Size of Casing 9+5/8 5+1/2 planned K LOCATION E on Zone (within 500 on Location (existing on approval)	Wt/Ft 36 20  XCEPTIO O' of Building ag or approve	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located	1500 12905 tion now within a	786 1670 Designated Se	1500 12905 etback as a rea	0 sult of
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception on after Location b.(2) Exception	Size of Casing  9+5/8  5+1/2  planned  K LOCATION E  on Zone (within 500 on Location (existing on approval)  Location (SUA or second content on the content on the content on approval)	Wt/Ft 36 20  XCEPTIO  o' of Building ag or approve ag or approve site-specific of the state of t	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located Oil &	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception b.(2) Exception b.(3) Exception	Size of Casing 9+5/8 5+1/2 planned K LOCATION E on Zone (within 500 on Location (existing on approval)	Wt/Ft 36 20  XCEPTIO  o' of Building ag or approve ag or approve site-specific of the state of t	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Located Oil &	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor  DESIGNATE Check all that a Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception on after Location b.(2) Exception b.(3) Exception lent plan)	Size of Casing  9+5/8  5+1/2  planned  K LOCATION E  on Zone (within 500 on Location (existing on approval)  Location (SUA or second content on the content on the content on approval)	Wt/Ft 36 20  XCEPTIO  O' of Building ag or approve ag or approve Site-specific of Units constr	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ructed after August	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor  DESIGNATE Check all that a Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception after Location b.(2) Exception b.(3) Exception ent plan)  WATTENBEI	Size of Casing  9+5/8 5+1/2 planned  K LOCATION E  on Zone (within 500 on Location (existing on Location)  on Location (existing on approval)  Location (SUA or so Location)	Wt/Ft 36 20  XCEPTIO  O' of Building ag or approve ag or approve Site-specific of Units constr	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ructed after August	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Constructi Rule 604. Constructi Rule 604. Constructi Rule 604. Constructi Rule 604. Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)A. Exception a.) b.(1)B. Exception b.(2) Exception b.(3) Exception b.(3) Exception apply:	Size of Casing  9+5/8 5+1/2 planned  K LOCATION E  on Zone (within 500 on Location (existing on Location)  on Location (existing on approval)  Location (SUA or so Location)	Wt/Ft 36 20  XCEPTIO  o' of Building g or approve g or approve site-specific of Units constr	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ructed after August	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Constructi Rule 604. Constructi Rule 604. Rule 318	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception after Location b.(2) Exception b.(3) Exception b.(4) Exception b.(5) Exception b.(6) Exception b.(7) Exception b.(8) Exception b.(9) Exception b.(1) Exception b.(1) Exception b.(2) Exception b.(3) Exception b.(4) Exception b.(5) Exception b.(6) Exception b.(7) Exception b.(8) Exception b.(9) Exception b.(1) Exception b.(1) Exception b.(2) Exception b.(3) Exception b.(4) Exception b.(5) Exception b.(6) Exception b.(7) Exception b.(8) Exception b.(9) Exception b.(1) Exception b.(1) Exception b.(1) Exception b.(1) Exception b.(1) Exception b.(2) Exception b.(3) Exception b.(4) Exception b.(5) Exception b.(6) Exception b.(7) Exception b.(7) Exception b.(7) Exception b.(8) Exception b.(9) Exception b.(1) Exception b.(2) Exception b.(3) Exception b.(4) Exception b.(4) Exception b.(5) Exception b.(6) Exception b.(7) Exception b	Size of Casing  9+5/8 5+1/2  I planned  K LOCATION E  on Zone (within 500 on Location (existing approval)  Location (SUA or a Location (Building)  RG AREA LOCA	Wt/Ft 36 20  XCEPTIO O' of Building ag or approve site-specific of Units construction (Units construction).	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ructed after August	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Constructi Rule 604. Constructi Rule 604. Rule 318	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception after Location b.(2) Exception b.(3) Exception ent plan)  WATTENBEI apply: A.a. Exception I A.c. Exception I	Size of Casing  9+5/8  5+1/2  planned  K LOCATION E  on Zone (within 500 on Location (existing approval)  Location (SUA or see Location (Building)  RG AREA LOCA  Location (GWA Wirland)  Location (GWA Wirland)	Wt/Ft 36 20  XCEPTIO O' of Building ag or approve site-specific of Units construction (Units construction).	Csg/Liner Top  0 0 NS Unit) ed Oil & Gas Locat development plan ructed after August	tion now within a tion is within a De	786 1670  Designated Sesignated Setberser August 1	1500 12905 etback as a res ack due to Bu	sult of

Check all th		
	at apply:	
Rule	318.c. Exception Location	from Rule or Spacing Order Number
Rule	603.a.(2) Exception Locat	ion (Property Line Setback).
	ptions and variances requertifications, SUAs).	ire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.
OPERAT	OR COMMENTS AN	SUBMITTAL
Comments	Distance from complete measured to the permit	d portion of the wellbore to nearest wellbore permitted or completed in the same formation was ed Little Lady 21-7NH owned by Upland Eploration, Inc. using vertical.
	Distance to nearest per Ranch Fee 206-1015H,	mitted or existing wellbore belonging to another operator was measured to the permitted Salt API No. 05-123-46485, operated by CCRP Operating Inc.
	ation is in a Comprehensi	ve Drilling Plan No CDP #:
Location ID		
Is this app	lication being submitted w	ith an Oil and Gas Location Assessment application?  Yes
I hereby co	ertify all statements made	in this form are, to the best of my knowledge, true, correct, and complete.
Signed:		Print Name: Kim Rodell
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com
	e information provided he by approved.	rein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders
COGCC Ap	proved:	Director of COGCC Date:
	API NUMBER	Expiration Date:
05		
		Conditions Of Approval
constituentorce	ite representations, s	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituentorce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constitu enforce this Per	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constitu enforce this Per	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in
constituenforce	ute representations, s able to the same exte mit-to-Drill.	ons and conditions of approval stated in the Form 2A for this location shall tipulations and conditions of approval for this Form 2 Permit-to-Drill and are nt as all other representations, stipulations and conditions of approval stated in

Best Management Practices				
No BMP/COA Type	Description			
1 Drilling/Completion Operations	Logging: One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.			
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.			

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401701112	FORM 2 SUBMITTED
401701142	OffsetWellEvaluations Data
401701170	DEVIATED DRILLING PLAN
401701172	WELL LOCATION PLAT
401701408	DIRECTIONAL DATA

Total Attach: 5 Files

#### **General Comments**

User Group	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

Public Comments
The following comments were provided by members of the public and were considered during the technical review of this application.

No. Comment Comment Comment Date

1 TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor

08/06/2018

Email: john.noto@state.co.us

Doug Andrews, COGCC OGLA Northeast Location Specialist

Email: doug.andrews@state.co.us

FR: Matt Sura, Attorney at Law

DT: 8/6/2018

RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-4CH, Little Lady 22-5NH, Little Lady 22-1NH

Dear COGCC,

These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – "APDs") listed above.

Mr. Richardson urges the COGCC to deny the location for the following reasons:

1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.

2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.

3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.

4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.

According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.

Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.

Thank you for your assistance in this matter.

Sincerely,

Matt Sura

LEASE INFORMATION	N					
Using standard QtrQtr, Sec, beneath surface location if p	Twp, Rng format, produced. Attach s	describe one entire minera eparate description page o	ıl lease that will l r map if necessa	be produced by ary.)	this well (Describe lease	
T11N R64W Sec. 22: W2						
Total Acres in Described Le	ase: 640	Described Mineral Le	ase is: 👿 Fee	State	e Federal Indian	
Federal or State Lease #						
Distance from Completed Po	ortion of Wellbore	to Nearest Lease Line of d	escribed lease:	330	Feet	
CULTURAL DISTANCI	E INFORMATI	ON		INSTRUCTIONS:	ents shall be provided from center of	
Distance to nearest:				'	/ell to nearest of each cultural ribed in Rule 303.a.(5).	
В	uilding: 120	60 Feet		1	distance greater than 1 mile.	
Buildin	ng Unit: 14	52 Feet			est building of any type. If nearest lding Unit, enter same distance for	
High Occupancy Buildin	ng Unit: 528	BO Feet		both.		
Designated Outside Activity	y Area: 528	BO Feet		,	High Occupancy Building Unit, and side Activity Area - as defined in	
Public	Road: 6	32 Feet		100-Series Rule	•	
Above Ground	Utility: 60	6 Feet				
Ra	ailroad: 528	BO Feet				
Propert	ty Line: 23	9 Feet				
DESIGNATED SETBACK LOCATION INFORMATION  Check all that apply. This location is within a:  Buffer Zone  Exception Zone  Urban Mitigation Area				- Buffer Zone — as described in Rule 604.a.(2), within 1,000' of a Building Unit - Exception Zone - as described in Rule 604.a.(1), within 500' of a Building Unit Urban Mitigation Area - as defined in 100-Series Rules.		
• •	Urban Mitigation	on is within 1,000 feet of a l Area Notification to Local G cation to Building Unit Own	overnment:			
SPACING and UNIT IN	IFORMATION					
Distance from completed posame formation: 660  Distance from Completed Posense Unit Name  SPACING & FORMATION	Feet ortion of Wellbore (if appl):	to Nearest Unit Boundary	·	·	or distance greater than 1 mile.)	
Upland is protesting the F	HighPoint applicat				lling and spacing unit application W2.	
OBJECTIVE FORMAT	IONS					
	Formation Code	Spacing Order Number(s)	Unit Acreage As		Unit Configuration (N/2, SE/4, etc.)	
	NBRR		32		S.22 T11N R64W: W2	

DRILLING PROGRAM						
Proposed Total Measured Depth: 13	3163 Feet					
Distance from the proposed wellbore to	o nearest existing or p	proposed wellbore	belonging to and	ther operator,	including plug	ged wells:
Enter distance if less than or equal to 1,500 feet: 631 Feet No well belonging to another operator within 1,500 feet						,500 feet
Will a closed-loop drilling system be us	sed? Yes					
Is H2S gas reasonably expected to be	encountered during d	Irilling operations a	t concentrations	greater than		
or equal to 100 ppm? No (If Ye	s, attach an H2S Drilli	ing Operations Pla	n)			
Will salt sections be encountered during	ng drilling? No					
Will salt based (>15,000 ppm Cl) drillin	ng fluids be used?	No				
Will oil based drilling fluids be used?	No					
BOP Equipment Type: 👿 Annular Pro	eventor 🔀 Double	Ram 🔀 Ro	tating Head	None	9	
GROUNDWATER BASELINE SA	AMPLING AND M	ONITORING AI	ND WATER V	ELL SAMP	LING	
Water well sampling required per Rule	609					
DRILLING WASTE MANAGEME	NT PROGRAM					
Drilling Fluids Disposal: OFFSITE	Drilling Flu	uids Disposal Meth	ods: Commercia	l Disposal		
Cuttings Disposal: OFFSITE	Cut	tings Disposal Met	hod: Commercia	l Disposal		
Other Disposal Description:						
Beneficial reuse or land application	plan submitted?					
Reuse Facility ID:	or Document Num	nber:				
CASING PROGRAM						
CASING PROGRAM  Casing Type Size of Hole Size of C		Csg/Liner Top	Setting Depth	Sacks Cmt	Cmt Btm	Cmt Top
CASING PROGRAM           Casing Type         Size of Hole         Size of Control           SURF         13+1/2         9+5	/8 36		Setting Depth  1500  13163	Sacks Cmt 786 1709	Cmt Btm 1500 13163	Cmt Top
CASING PROGRAM  Casing Type Size of Hole Size of C	/8 36	Csg/Liner Top	1500	786	1500	
CASING PROGRAM           Casing Type         Size of Hole         Size of Control of C	/8 36 /2 20	Csg/Liner Top  0 0	1500	786	1500	
CASING PROGRAM  Casing Type Size of Hole Size of Conductor Casing is NOT planned	/8 36 /2 20	Csg/Liner Top  0 0	1500	786	1500	
CASING PROGRAM  Casing Type Size of Hole Size of Consumption Size of Hole Size of Consumption Surface Size of Consumption Surface Surf		Csg/Liner Top  0 0	1500	786	1500	
CASING PROGRAM  Casing Type Size of Hole Size of Construction  SURF 13+1/2 9+5 1ST 8+3/4 5+1  Conductor Casing is NOT planned  DESIGNATED SETBACK LOCA  Check all that apply:	7/8 36 7/2 20  TION EXCEPTIO  within 500' of Building	Csg/Liner Top  0 0 NS	1500 13163	786 1709	1500 13163	0
CASING PROGRAM  Casing Type Size of Hole Size of Color SURF  13+1/2  9+5  1ST  8+3/4  5+1  Conductor Casing is NOT planned  DESIGNATED SETBACK LOCA  Check all that apply:  Rule 604.a.(1)A. Exception Zone (Color Rule 604.a.)	TION EXCEPTIO  within 500' of Building on (existing or approve	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Locat	1500 13163	786 1709 Designated Se	1500 13163 etback as a res	0 sult of
CASING PROGRAM  Casing Type Size of Hole Size of Control SURF 13+1/2 9+5  1ST 8+3/4 5+1  Conductor Casing is NOT planned  DESIGNATED SETBACK LOCA  Check all that apply:  Rule 604.a.(1)A. Exception Zone (value of Control Survey)  Rule 604.b.(1)A. Exception Location	TION EXCEPTIO  within 500' of Building on (existing or approve	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Locat	1500 13163	786 1709 Designated Se	1500 13163 etback as a res	0 sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company Size	TION EXCEPTIO  within 500' of Building on (existing or approve	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Located Oil & Gas Loca	1500 13163 tion now within a	786 1709 Designated Se	1500 13163 etback as a res	0 sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company Size of Compan	TION EXCEPTIO  within 500' of Building on (existing or approve al)  (SUA or site-specific	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Located Oil & Gas Locate	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company Size of Hole Size of Company Sure of Hole Size of Company Sure of Hole Size of Company Sure of Compan	TION EXCEPTIO  Within 500' of Building on (existing or approve all)  (SUA or site-specific (Building Units constr	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Locat development plan ructed after August	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company S	TION EXCEPTIO  Within 500' of Building on (existing or approve all)  (SUA or site-specific (Building Units constr	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Locat development plan ructed after August	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company S	TION EXCEPTIO  Within 500' of Building on (existing or approve al)  (SUA or site-specific (Building Units construction)	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Locat development plan ructed after August	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of
CASING PROGRAM  Casing Type Size of Hole Size of CSURF 13+1/2 9+5 1ST 8+3/4 5+1  Conductor Casing is NOT planned  DESIGNATED SETBACK LOCA  Check all that apply: Rule 604.a.(1)A. Exception Zone (COMBANDE BOOK) Rule 604.b.(1)B. Exception Location Rule 604.b.(1)B. Exception Location Construction after Location approved Rule 604.b.(2) Exception Location Rule 604.b.(3) Exception Location Construction after Location Loca	TION EXCEPTIO  Within 500' of Building on (existing or approve all)  (SUA or site-specific (Building Units construction (EXCEPTIO) EXECUTED IN (EXECUTED IN EXECUTED IN EXECUT	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Locat development plan ructed after August	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of
CASING PROGRAM  Casing Type Size of Hole Size of Company S	TION EXCEPTION E	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Locat development plan ructed after August	1500 13163 tion now within a tion is within a De	786 1709 Designated Se esignated Setb efore August 1	1500 13163 etback as a res ack due to Bu	sult of

OTHER LO	OCATION EXCEPTION	ONS				
Check all tha	at apply:					
Rule 3	318.c. Exception Location	from Rule or Spacin	ng Order Nur	nber		
Rule 6	603.a.(2) Exception Locat	ion (Property Line S	etback).			
	tions and variances requertifications, SUAs).	re attached Reques	t Letter(s). F	Refer to applicabl	e rule for ad	ditional required attachments (e.g.
OPERATO	OR COMMENTS ANI	SUBMITTAL				
Comments	Distance from the comp was measured to the pe					completed in the same formation using vertical.
	Distance to nearest per Ranch Fee 208-1015H,					measured to the permitted Salt
This applica	ution is in a Comprehensi	ve Drilling Plan	No	CDP #:		-
Location ID	:					
Is this appli	ication being submitted w	ith an Oil and Gas L	ocation Asse	essment applicati	on?	Yes
I hereby ce	rtify all statements made	in this form are, to th	ne best of my	knowledge, true	e, correct, an	nd complete.
Signed:				Print Name: Ki	mberly Rode	ell
Title:	Permit Agent		Date:	7/12/2018	Email:	krodell@upstreampm.com
COGCC App	oroved: API NUMBER		Dire	ctor of COGCC Expir	Date:	
		Con	ditions (	Of Approva	<u>l</u>	
constitu enforcea	te representations, s	tipulations and co	onditions o	of approval for	this Form	A for this location shall 2 Permit-to-Drill and are ditions of approval stated in
COA Type		<u>Description</u>				

Best Management Practices				
No BMP/COA Type	<u>Description</u>			
1 Drilling/Completion Operations	Logging: One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.			
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.			

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401700339	FORM 2 SUBMITTED
401700460	WELL LOCATION PLAT
401700462	DEVIATED DRILLING PLAN
401700465	DIRECTIONAL DATA
401700622	OffsetWellEvaluations Data

Total Attach: 5 Files

#### **General Comments**

<u>User Group</u>	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

Public Comments	
The following comments were provided by members of the public and were considered during the technical review of this application.	

Date Run: 8/23/2018 Doc [#401700339] Well Name: Little Lady 22-1NH

No. Comment Date

1 TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor

08/06/2018

Email: john.noto@state.co.us

Doug Andrews, COGCC OGLA Northeast Location Specialist

Email: doug.andrews@state.co.us

FR: Matt Sura, Attorney at Law

DT: 8/6/2018

RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-4CH, Little Lady 22-5NH, Little Lady 22-1NH

Dear COGCC,

These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – "APDs") listed above.

Mr. Richardson urges the COGCC to deny the location for the following reasons:

- 1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.
- 2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.
- 3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.
- 4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.

According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.

Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.

Thank you for your assistance in this matter.

Sincerely,

Matt Sura

FORM 2

Rev 08/16

#### State of Colorado

### Oil and Gas Conservation Commission

1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401700835

APPLICATION FOR PERMIT TO:
Date Received:
TYPE OF WELL OIL 😿 GAS COALBED OTHER Refiling 07/12/2018
ZONE TYPE SINGLE ZONE  ▼ MULTIPLE ZONES
Well Name: Little Lady Well Number: 22-6CH
Name of Operator: UPLAND EXPLORATION LLC COGCC Operator Number: 10701
Address: 424 S MAIN ST
City: BOERNE State: TX Zip: 78006
Contact Name: Larry Jenkins Phone: (580)716-0535 Fax: ( )
Email: larry@uplandexploration.com
RECLAMATION FINANCIAL ASSURANCE
Plugging and Abandonment Bond Surety ID: 20180078
WELL LOCATION INFORMATION
QtrQtr: NENW Sec: 22 Twp: 11N Rng: 64W Meridian: 6
Latitude: 40.912260 Longitude: -104.532730
FNL/FSL FEL/FWL
Footage at Surface: 495 Feet FNL 2461 Feet FWL
Field Name: WILDCAT Field Number: 99999  Ground Elevation: 5425 County: WELD
GPS Data:
Date of Measurement: 07/02/2018 PDOP Reading: 1.3 Instrument Operator's Name: Kyle Daley
If well is Directional X Horizontal (highly deviated) submit deviated drilling plan.
Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL FEL/FWL
330 FNL 1980 FWL 330 FSL 1980 FWL
Sec: 22 Twp: 11N Rng: 64W Sec: 22 Twp: 11N Rng: 64W
LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT
Surface Ownership: 👿 Fee State Federal Indian
The Surface Owner is: is the mineral owner beneath the location.
(check all that apply) is committed to an Oil and Gas Lease.
has signed the Oil and Gas Lease.
is the applicant.
The Mineral Owner beneath this Oil and Gas Location is: 🗵 Fee State Federal Indian
The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes
The right to construct the Oil and Gas Location is granted by:  Bond
Surface damage assurance if no agreement is in place: Blanket Surface Surety ID: 20180077

	640	Described Mineral Lo	ease is: 😿 Fee 🗀 S	tate Federal Indian
ederal or State Lease #				
Distance from Completed Portio	n of Wellbore	to Nearest Lease Line of d	escribed lease: 330	Feet
CULTURAL DISTANCE IN	IFORMATI	ON	INSTRUCTIO - All measure	NS: ements shall be provided from center of
Distance to nearest:				d Well to nearest of each cultural escribed in Rule 303.a.(5).
Buildi	ng: 12	32 Feet	- Enter 5280	for distance greater than 1 mile.
Building U	nit: 14	12 Feet		earest building of any type. If nearest Building Unit, enter same distance for
High Occupancy Building U	nit: 52	80 Feet	both.	
Designated Outside Activity Are	∍a: <u>52</u>	80 Feet		nit, High Occupancy Building Unit, and Outside Activity Area - as defined in
Public Roa	ad:4	82 Feet	100-Series R	•
Above Ground Util	ity:4	56 Feet		
Railroa	ad: 52	80 Feet	<u> </u>	
Property Li	ne:2	39 Feet		
ESIGNATED SETBACK NFORMATION heck all that apply. This location		Buffer Zone	1,000' of a B - Exception Z within 500' o	e — as described in Rule 604.a.(2), withir iuilding Unit Zone - as described in Rule 604.a.(1), of a Building Unit. gation Area - as defined in 100-Series
		Exception Zone	Rules.	
		Urban Mitigation Are	ea	
re-application Notifications (red	•		- ·	
Date of Rule 305.a.(1) Urba	_			
Date of Rule 305.a.(2) Buff	er Zone Notifi	cation to Building Unit Own	ers:	
	DMATION			
PACING and UNIT INFO	NON AWA			
istance from completed portior	n of proposed	wellbore to nearest comple	eted portion of offset wellbore	e permitted or completed in the
istance from completed portioname formation:660Fee	n of proposed et	·		
istance from completed portioname formation:660Fee	n of proposed et	·		e permitted or completed in the
istance from completed portion ame formation: 660 Fee istance from Completed Portio	n of proposed et n of Wellbore	·	330 Feet (Enter 528	
istance from completed portion ame formation:660Fee istance from Completed Portio ederal or State Unit Name (if a	n of proposed et n of Wellbore ppl):	to Nearest Unit Boundary	330 Feet (Enter 528	30 for distance greater than 1 mile.)
istance from Completed Portio ederal or State Unit Name (if a	n of proposed et n of Wellbore ppl): S COMME	to Nearest Unit Boundary  NTS  ion (temp. docket # 180700	330 Feet (Enter 528 Unit	30 for distance greater than 1 mile.)  Number:  drilling and spacing unit application
istance from completed portion ame formation: 660 Fee istance from Completed Portion ederal or State Unit Name (if a EPACING & FORMATION Upland is protesting the Highlight	n of proposed et n of Wellbore ppl):  IS COMME Point applicat his proposed	to Nearest Unit Boundary  NTS  ion (temp. docket # 180700	330 Feet (Enter 528 Unit	30 for distance greater than 1 mile.)  Number:  drilling and spacing unit application
istance from completed portion ame formation:660Fee istance from Completed Portion ederal or State Unit Name (if a SPACING & FORMATION Upland is protesting the High covering seven lease wells. TOBJECTIVE FORMATION	n of proposed et n of Wellbore ppl):  IS COMME Point applicat his proposed	to Nearest Unit Boundary  NTS  ion (temp. docket # 180700	330 Feet (Enter 528 Unit	Number:drilling and spacing unit application 22: W2.

DRILLING P	ROGRAM							
Proposed Tot	tal Measured D	epth: 12983 F	eet					
Distance fron	n the proposed	wellbore to neares	t existing or p	proposed wellbore	belonging to and	ther operator,	including plug	ged wells:
Enter distance	e if less than o	r equal to 1,500 fee	t: 684	Feet N	o well belonging	to another ope	rator within 1	,500 feet
Will a closed-	loop drilling sy	stem be used?	Yes					
Is H2S gas re	asonably expe	cted to be encounte	ered during d	Irilling operations a	at concentrations	greater than		
or equal to 10	00 ppm? No	o (If Yes, attach	an H2S Drilli	ing Operations Pla	n)			
Will salt secti	ons be encoun	tered during drilling	? <u>No</u>					
Will salt base	d (>15,000 ppr	m CI) drilling fluids b	e used?	No				
Will oil based	drilling fluids b	pe used? No						
BOP Equipm	ent Type: 👿 /	Annular Preventor	<b>⋉</b> Double	Ram 🔀 Ro	tating Head	None	Э	
GROUNDW	ATER BASE	ELINE SAMPLIN	IG AND M	ONITORING A	ND WATER V	VELL SAMP	LING	
Water well sa	ampling require	ed per Rule 60	9					
DRILLING V	VASTE MAN	IAGEMENT PR	OGRAM					
Drilling Fluids	s Disposal:	OFFSITE	Drilling Flu	uids Disposal Meth	ods: Commercia	l Disposal		
Cuttings Disp	oosal: OFF	SITE	Cut	tings Disposal Met	hod: Commercia	l Disposal		
Other Dispos	sal Description:							
Beneficial	reuse or land a	application plan sub	mitted?					
Reuse F	acility ID:	or Do	cument Num	nhar:				
1100001		0, 50	oumont mun	iber.				
		0, 00			_			
CASING PR	OGRAM				_			
CASING PR	OGRAM Size of Hole	Size of Casing	Wt/Ft	Csg/Liner Top	1	Sacks Cmt	Cmt Btm	Cmt Top
CASING PR Casing Type SURF	OGRAM				Setting Depth  1500  12983	Sacks Cmt 786 1682	Cmt Btm 1500 12983	Cmt Top
CASING PR Casing Type SURF 1ST	OGRAM Size of Hole 13+1/2	Size of Casing 9+5/8 5+1/2	<u>Wt/Ft</u> 36	Csg/Liner Top	1500	786	1500	
CASING PR Casing Type SURF 1ST Conductor	Size of Hole 13+1/2 8+3/4 Casing is NOT	Size of Casing 9+5/8 5+1/2	<u>Wt/Ft</u> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST Conductor	Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC	Size of Casing 9+5/8 5+1/2 planned	<u>Wt/Ft</u> 36 20	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST Conductor DESIGNATE Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT  ED SETBAC apply:	Size of Casing 9+5/8 5+1/2 planned	<u>Wt/Ft</u> 36 20 XCEPTIO	Csg/Liner Top 0 0	1500	786	1500	
CASING PR Casing Type SURF 1ST X Conductor DESIGNATE Check all that a	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Excepti	Size of Casing 9+5/8 5+1/2 planned K LOCATION E	Wt/Ft 36 20  XCEPTIO	Csg/Liner Top  0 0 NS	1500 12983	786 1682	1500 12983	0
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CASING PR Casing Type SURF 1ST X Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604.	Size of Hole  13+1/2 8+3/4 Casing is NOT  ED SETBAC apply: a.(1)A. Excepti b.(1)A. Excepti a.)	Size of Casing  9+5/8  5+1/2  T planned  K LOCATION E  ion Zone (within 500) ion Location (existing ion Location (	Wt/Ft 36 20  XCEPTIO	Csg/Liner Top  0 0 NS  Unit) ed Oil & Gas Locat	1500 12983 ion now within a	786 1682 Designated Se	1500 12983 etback as a res	0 sult of
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CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Constructi Rule 604. Constructi Rule 604. Rule 3184	Size of Hole  13+1/2 8+3/4 Casing is NOT ED SETBAC apply: a.(1)A. Exception b.(1)B. Exception after Location b.(2) Exception b.(3) Exception ent plan)  WATTENBE apply: A.a. Exception	Size of Casing 9+5/8 5+1/2 F planned K LOCATION E Son Zone (within 500 son Location (existing approval) In Location (SUA or an Location (Building RG AREA LOCATION)	Wt/Ft 36 20  XCEPTIO  O' of Building ag or approve site-specific of Units construction  ATION EXIMATION EXIMATIONS	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Located Oil & Gas Located After August	1500 12983 ion now within a ion is within a De	786 1682  Designated Sesignated Setbefore August 1	1500 12983 etback as a res ack due to Bu	sult of
CASING PR Casing Type SURF 1ST  Conductor  DESIGNATE Check all that a Rule 604. Rule 604. Rule 604. Rule 604. Rule 604. Constructi Rule 604. Constructi Rule 604. Rule 3184	Size of Hole  13+1/2 8+3/4 Casing is NOTED SETBAC apply: a.(1)A. Exception b.(1)B. Exception b.(2) Exception b.(3) Exception ent plan)  WATTENBE apply: A.a. Exception A.c. Exception	Size of Casing  9+5/8  5+1/2  F planned  K LOCATION E  From Location (existing approval)  In Location (Building approval)  RG AREA LOCA  Location (GWA Wirklocation (GWA Twing)  Location (GWA Twing)	Wt/Ft 36 20  XCEPTIO  O' of Building ag or approve site-specific of Units construction  ATION EXIMATION EXIMATIONS	Csg/Liner Top  0  0  NS  Unit) ed Oil & Gas Located Oil & Gas Located After August	1500 12983 ion now within a ion is within a De	786 1682  Designated Sesignated Setbefore August 1	1500 12983 etback as a res ack due to Bu	sult of

OTHER L	OCATION EXCEPTI	IONS	
Check all the	at apply:		
Rule	318.c. Exception Location	on from Rule or Spacing Order Number	
Rule	603.a.(2) Exception Loca	ation (Property Line Setback).	
	otions and variances requertifications, SUAs).	uire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.	
OPERATO	OR COMMENTS AN	ID SUBMITTAL	
Comments		ed portion of the wellbore to nearest wellbore permitted or completed in the same formation was itted Little Lady 21-4CH owned by Upland Resources Inc. using vertical.	
		rmitted or existing wellbore belonging to another operator was measured to the permitted Salt API No. 05-123-46484, operated by CCRP Operating Inc.	
This applica	ution is in a Comprehensi	sive Drilling Plan No CDP #:	
Location ID	:		
Is this appl	ication being submitted w	with an Oil and Gas Location Assessment application?  Yes	
I hereby ce	rtify all statements made	e in this form are, to the best of my knowledge, true, correct, and complete.	
Signed:		Print Name: Kim Rodell	
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com	
and is hereb	y approved.	erein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders  Director of COGCC Date:  Expiration Date:	
constitu enforce	te representations, s	Conditions Of Approval  ions and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in	
COA Type		<u>Description</u>	

	Best Management Practices
No BMP/COA Type	<u>Description</u>
1 Drilling/Completion Operations	One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401700835	FORM 2 SUBMITTED
401700979	OffsetWellEvaluations Data
401701125	WELL LOCATION PLAT
401701126	DEVIATED DRILLING PLAN
401701132	DIRECTIONAL DATA

Total Attach: 5 Files

#### **General Comments**

User Group	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

Public Comments
No public comments were received on this application during the comment period.

#### **FORM** 2

Rev 08/16

#### State of Colorado

Oil and Gas Conservation Commission 1120 Lincoln Street, Suite 801, Denver, Colorado 80203 Phone: (303) 894-2100 Fax: (303) 894-2109



Document Number:

401700576

Date of Measurement: 07/02/2018 PDOP Reading: 1.3 Instrument Operator's Name: Kyle Daley  If well is □ Directional □ Horizontal (highly deviated) submit deviated drilling plan.  Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL FEL/FWL 330 FSL 2310 FWL Sec: 22 Twp: 11N Rng: 64W Sec: 22 Twp: 11N Rng: 64W  LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT		APPLICA	TION FOR PERM	IT TO:	TM V	
Type   Of Well   Of   Control   Control   Of   Of   Of   Of   Of   Of   Of   O	▼ Drill	Deepen	Re-enter	Recomplete and Op	perate	
Moli Name: Little Lady	TYPE OF WELL C	DIL 💢 GAS	COALBED O	THER	Refiling -	
Name of Operator: UPLAND EXPLORATION LLC	ZONE TYPE SIN	IGLE ZONE 🔀	MULTIPLE ZONES	COMMINGLE ZONES	Sidetrack	07/12/2018
Address: 424 \$ MAIN \$T  City: BOERNE	Well Name: Little La	dy		Well Number: 22-7NH	<u> </u>	
Contact Name: Larry	Name of Operator: \	JPLAND EXPLOR	ATION LLC	COGC	C Operator Num	- ber: 10701
RECLAMATION FINANCIAL ASSURANCE   Plugging and Abandonment Bond Surety ID:   2018/0078     2018/00			State: TX	Zip: _78006		
				(580)716-0535 Fax: (	)	
Chirch   Nen   Sec   22   Twp   11N   Rng   64W   Meridian   6						
Ground Elevation: 5426	QtrQtr: NENW  Latitude: 40.91  Footage at Surfa	Sec: 22 12350 ce: 465	Twp: 11N Rng: 0 Longitud FNL/FSL Feet FNL	le: -104.532730 FEL/FWL 2461 Feet FWL		
GPS Data:  Date of Measurement: 07/02/2018 PDOP Reading: 1.3 Instrument Operator's Name: Kyle Daley  If well is Directional IX Horizontal (highly deviated) submit deviated drilling plan.  Footage at Top of Prod Zone: FNL/FSL FEL/FWL Bottom Hole: FNL/FSL 2310 FWL  330 FNL 2310 FWL 330 FSL 2310 FWL  Sec: 22 Twp: 11N Rng: 64W Sec: 22 Twp: 11N Rng: 64W  LOCATION SURFACE & MINERALS & RIGHT TO CONSTRUCT  Surface Ownership: IX Fee State Federal Indian  The Surface Owner is: is the mineral owner beneath the location. (check all that apply)  is committed to an Oil and Gas Lease.  has signed the Oil and Gas Lease.  is the applicant.  The Mineral Owner beneath this Oil and Gas Location will be developed by this Well: Yes  The right to construct the Oil and Gas Location is granted by: Bond			<del></del>			
Footage at Top of Prod Zone: FNL/FSL	GPS Data:	<u> </u>			Kyle Daley	
Surface Ownership:  Fee  State  Federal  Indian  The Surface Owner is:  is the mineral owner beneath the location. (check all that apply)  is committed to an Oil and Gas Lease.	Footage at Top of Pro	od Zone: FNL/FSL	FEL/FWL 2310 FWL	Bottom Hole: FNL/FSL  330 FSL	2310 FWL	
is the mineral owner beneath the location. (check all that apply) is committed to an Oil and Gas Lease. has signed the Oil and Gas Lease. is the applicant.  The Mineral Owner beneath this Oil and Gas Location is: X Fee State Federal Indian  The Minerals beneath this Oil and Gas Location will be developed by this Well: Yes  The right to construct the Oil and Gas Location is granted by: Bond	LOCATION SUR	FACE & MINEI	RALS & RIGHT TO (	CONSTRUCT		
The Minerals beneath this Oil and Gas Location will be developed by this Well:  The right to construct the Oil and Gas Location is granted by:  Bond		is the min is commit has signe	eral owner beneath the loted to an Oil and Gas Lead the Oil and Gas Lease.	ocation. ase.		
The right to construct the Oil and Gas Location is granted by:  Bond	The Mineral Owner be	eneath this Oil and	Gas Location is: 🗵 Fe	ee State Federal	Indian	
	The Minerals beneath	this Oil and Gas	ocation will be develope	d by this Well: Yes		
Surface damage assurance if no agreement is in place: Blanket Surface Surety ID: 20180077	The right to construct	the Oil and Gas L	ocation is granted by:	Bond		
	Surface damage assu	ırance if no agreer	nent is in place: Blank	et Surface St	urety ID: _201800	77

Total Acres in Described Lea	ase: 640	Described Mineral Le	ase is: 👿 Fee	State	Federal Indian
ederal or State Lease #					
Pistance from Completed Po	ortion of Wellbore	to Nearest Lease Line of de	escribed lease:	330	Feet
CULTURAL DISTANCE	E INFORMATI	NC	-		nts shall be provided from center c
istance to nearest:				•	ibed in Rule 303.a.(5).
	-	Egg Feet	1		distance greater than 1 mile. est building of any type. If nearest
Buildin		D6 Feet			ding Unit, enter same distance for
High Occupancy Buildin		BO Feet	1	ooth. - Building Unit. F	ligh Occupancy Building Unit, and
Designated Outside Activity	-	Feet	l	Designated Out	side Activity Area - as defined in
		52 Feet		100-Series Rules	<b>5.</b>
Above Ground		26 Feet			
		30 Feet			
Propert	y Line: 2	S9 Feet			
DESIGNATED SETBA NFORMATION Check all that apply. This loo		N Buffer Zone	1	1,000' of a Build	e - as described in Rule 604.a.(1),
леск ан шагарру. Тив ю	cation is within a.	Exception Zone	1		on Area - as defined in 100-Series
		Urban Mitigation Are	1.	Rules.	
		-			
un anniinatian Natifiaatiana					
	•				
Date of Rule 305.a.(1)	Urban Mitigation	Area Notification to Local Go	overnment:		
Date of Rule 305.a.(1)	Urban Mitigation		overnment:		
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)	Urban Mitigation <i>i</i> Buffer Zone Notifi	Area Notification to Local Go	overnment:		
Date of Rule 305.a.(1) Date of Rule 305.a.(2)	Urban Mitigation ABuffer Zone Notifi	Area Notification to Local Go	overnment:	set wellbore pe	rmitted or completed in the
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN  Distance from completed po	Urban Mitigation ABuffer Zone Notifi	Area Notification to Local Gocation to Building Unit Owne	overnment:	set wellbore pe	rmitted or completed in the
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  BPACING and UNIT IN  Distance from completed po  ame formation: 660	Urban Mitigation A Buffer Zone Notifi  IFORMATION  Irtion of proposed  Feet	Area Notification to Local Gocation to Building Unit Owne	ers:ers	·	rmitted or completed in the or distance greater than 1 mile.)
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN  Distance from completed polymer formation: 660  Distance from Completed Polymer from Comple	Urban Mitigation A Buffer Zone Notifi  IFORMATION  rtion of proposed  Feet  ortion of Wellbore	Area Notification to Local Gocation to Building Unit Owne	ers:ers	·	or distance greater than 1 mile.)
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  BPACING and UNIT IN Distance from completed po ame formation: 660  Distance from Completed Po Gederal or State Unit Name	Urban Mitigation A Buffer Zone Notifi  IFORMATION ortion of proposed Feet  ortion of Wellbore (if appl):	Area Notification to Local Gocation to Building Unit Owned Wellbore to nearest complete to Nearest Unit Boundary	ers:ers	: (Enter 5280 fo	or distance greater than 1 mile.)
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed postame formation: 660  Distance from Completed Postance from Completed Postance or State Unit Name  SPACING & FORMATI  Upland is protesting the F	Urban Mitigation A Buffer Zone Notifi  IFORMATION  ortion of proposed  Feet  ortion of Wellbore  (if appl):  IONS COMME	Area Notification to Local Gocation to Building Unit Owner wellbore to nearest complet to Nearest Unit Boundary	ers:ers:ed portion of offs330 Feet572) and will file a	(Enter 5280 fo Unit Nui a 320-acre dril	or distance greater than 1 mile.)  mber:  ling and spacing unit application
Date of Rule 305.a.(1)  Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed po ame formation: 660  Distance from Completed Po Federal or State Unit Name  SPACING & FORMATI  Upland is protesting the F covering seven lease well	Urban Mitigation A Buffer Zone Notifi  IFORMATION  Irtion of proposed Feet  Ortion of Wellbore  (if appl):  IONS COMME  HighPoint applicat Is. This proposed	Area Notification to Local Gocation to Building Unit Owner wellbore to nearest complet to Nearest Unit Boundary  NTS  on (temp. docket # 1807008	ers:ers:ed portion of offs330 Feet572) and will file a	(Enter 5280 fo Unit Nui a 320-acre dril	or distance greater than 1 mile.)  mber:  ling and spacing unit application
Date of Rule 305.a.(2)  SPACING and UNIT IN Distance from completed potential from Completed Potential or State Unit Name SPACING & FORMATI  Upland is protesting the Formation seven lease well DBJECTIVE FORMATI	Urban Mitigation A Buffer Zone Notifi  IFORMATION  Irtion of proposed Feet  Ortion of Wellbore  (if appl):  IONS COMME  HighPoint applicat Is. This proposed	Area Notification to Local Gocation to Building Unit Owner wellbore to nearest complet to Nearest Unit Boundary  NTS  on (temp. docket # 1807008	ers:ers:ed portion of offs330 Feet572) and will file a	(Enter 5280 fo Unit Nur a 320-acre dril 4W Sec. 22:	or distance greater than 1 mile.)  mber:  ling and spacing unit application

RILLING PROGRAM					
Proposed Total Measured Depth: 12729 Feet					
Distance from the proposed wellbore to nearest existing or proposed wellbore belonging to another operator, including plugged wells:					
Enter distance if less than or equal to 1,500 feet: 632 Feet No well belonging to another operator within 1,500 feet					
Will a closed-loop drilling system be used? Yes					
Is H2S gas reasonably expected to be encountered during drilling operations at concentrations greater than					
or equal to 100 ppm? No (If Yes, attach an H2S Drilling Operations Plan)					
Will salt sections be encountered during drilling? No					
Will salt based (>15,000 ppm Cl) drilling fluids be used? No					
Will oil based drilling fluids be used? No					
BOP Equipment Type: 🔀 Annular Preventor 💢 Double Ram 💢 Rotating Head None					
ROUNDWATER BASELINE SAMPLING AND MONITORING AND WATER WELL SAMPLING					
Water well sampling required per Rule609					
RILLING WASTE MANAGEMENT PROGRAM					
Drilling Fluids Disposal: OFFSITE Drilling Fluids Disposal Methods: Commercial Disposal					
Cuttings Disposal: OFFSITE Cuttings Disposal Method: Commercial Disposal					
Other Disposal Description:					
Beneficial reuse or land application plan submitted?					
Reuse Facility ID: or Document Number:					
ASING PROGRAM					
ASING PROGRAM Casing Type, Size of Hole, Size of Casing, Wt/Ft, Csg/Liner Top, Setting Depth, Sacks Cmt, Cmt Btm, Cmt Top,					
CASING PROGRAM           Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           URF         13+1/2         9+5/8         36         0         1500         786         1500         0					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           ST         8+3/4         5+1/2         20         0         12729         7705         12729         7705					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           SURF         13+1/2         9+5/8         36         0         1500         786         1500         0           ST         8+3/4         5+1/2         20         0         12729         7705         12729         7705           X         Conductor Casing is NOT planned					
Casing Type         Size of Hole         Size of Casing         Wt/Ft         Csg/Liner Top         Setting Depth         Sacks Cmt         Cmt Btm         Cmt Top           BURF         13+1/2         9+5/8         36         0         1500         786         1500         0           ST         8+3/4         5+1/2         20         0         12729         7705         12729         7705           X Conductor Casing is NOT planned         ESIGNATED SETBACK LOCATION EXCEPTIONS           heck all that apply:           Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  X Conductor Casing is NOT planned SESIGNATED SETBACK LOCATION EXCEPTIONS heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  Conductor Casing is NOT planned SESIGNATED SETBACK LOCATION EXCEPTIONS heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  X Conductor Casing is NOT planned SESIGNATED SETBACK LOCATION EXCEPTIONS heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  Conductor Casing is NOT planned  PESIGNATED SETBACK LOCATION EXCEPTIONS  The Hole 604.a. (1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b. (1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  Rule 604.b. (1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit)  Rule 604.b. (1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  Conductor Casing is NOT planned SESIGNATED SETBACK LOCATION EXCEPTIONS heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top SURF 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  **Conductor Casing is NOT planned**  **ESIGNATED SETBACK LOCATION EXCEPTIONS**  heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific					
Casing Type   Size of Hole   Size of Casing   Wt/Ft   Csg/Liner Top   Setting Depth   Sacks Cmt   Cmt Btm   Cmt Top    IURF   13+1/2   9+5/8   36   0   1500   786   1500   0    ST   8+3/4   5+1/2   20   0   12729   7705   12729   7705    Conductor Casing is NOT planned  ESIGNATED SETBACK LOCATION EXCEPTIONS  heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0 ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705  Conductor Casing is NOT planned  ESIGNATED SETBACK LOCATION EXCEPTIONS  Theck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit)  Rule 604.b.(1)A. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.a.)  Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top ST 13+1/2 9+5/8 36 0 1500 786 1500 0   ST 8+3/4 5+1/2 20 0 12729 7705 12729 7705    Conductor Casing is NOT planned    ESIGNATED SETBACK LOCATION EXCEPTIONS heck all that apply:  Rule 604.a.(1)A. Exception Zone (within 500' of Building Unit) Rule 604.a.)  Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location now within a Designated Setback as a result of Rule 604.b.(1)B. Exception Location (existing or approved Oil & Gas Location is within a Designated Setback due to Building Unit construction after Location approval)  Rule 604.b.(2) Exception Location (SUA or site-specific development plan executed on or before August 1, 2013)  Rule 604.b.(3) Exception Location (Building Units constructed after August 1, 2013 within setback per an SUA or site-specific development plan)  REATER WATTENBERG AREA LOCATION EXCEPTIONS heck all that apply:					
Casing Type Size of Hole Size of Casing Wt/Ft Csg/Liner Top Setting Depth Sacks Cmt Cmt Btm Cmt Top 13+1/2 9+5/8 36 0 1500 786 1500 0					

OTHER LOCATION EXCEPTIONS					
Check all that apply:					
Rule 318.c. Exception Location from Rule or Spacing Order Number					
Rule 603.a.(2) Exception Location (Property Line Setback).					
	ptions and variances requertifications, SUAs).	uire attached Request Letter(s). Refer to applicable rule for additional required attachments (e.g.			
OPERAT	OR COMMENTS AN	D SUBMITTAL			
Comments		Distance from completed portion of the wellbore to nearest wellbore permitted or completed in the same formation was measured to the permitted Little Lady 21-5NH owned by Upland Exploration Inc. using vertical.			
		rmitted or existing wellbore belonging to another operator was measured to the permitted Salt , API No. 05-123-46478, operated by CCRP Operating Inc.			
This applic	ation is in a Comprehens	ive Drilling Plan No CDP #:			
Location ID	):				
Is this app	lication being submitted v	with an Oil and Gas Location Assessment application?  Yes			
I hereby co	ertify all statements made	in this form are, to the best of my knowledge, true, correct, and complete.			
Signed:		Print Name: Kim Rodell			
Title:	Permit Agent	Date: 7/12/2018 Email: krodell@upstreampm.com			
Based on th	ne information provided he	erein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders			
Based on the information provided herein, this Application for Permit-to-Drill complies with COGCC Rules and applicable orders and is hereby approved.					
	by approved.				
COGCC Ap		Director of COGCC Date:			
		Director of COGCC Date:  Expiration Date:			
	proved:				
COGCC Ap	proved:				
COGCC Ap	proved:	Expiration Date:			
COGCC Ap	proved: API NUMBER	Expiration Date:  Conditions Of Approval			
OGCC Ap	proved:  API NUMBER  esentations, stipulations, stipulatio	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are			
OGCC Ap  05  All representations and approximately approxi	proved:  API NUMBER  esentations, stipulations, stipulatio	Expiration Date:  Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall			
OGCC Ap  05  All representations and approximately approxi	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			
All representations of this Per	esentations, stipulations to the same extermit-to-Drill.	Conditions Of Approval  ons and conditions of approval stated in the Form 2A for this location shall stipulations and conditions of approval for this Form 2 Permit-to-Drill and are ent as all other representations, stipulations and conditions of approval stated in			

Best Management Practices					
No BMP/COA Type	<u>Description</u>				
1 Drilling/Completion Operations	Logging: One of the first wells drilled on the pad will be logged with open-hole Resistivity Log and Gamma Ray Log from the kick-off point into the surface casing. All wells on the pad will have a cement bond log with gamma-ray run on production casing (or on intermediate casing if production liner is run) into the surface casing. The horizontal portion of every well will be logged with a measured-while-drilling gamma-ray log. The Form 5, Completion Report, for each well on the pad will list all logs run and have those logs attached. The Form 5 for a well without open-hole logs shall clearly state "No open-hole logs were run" and shall clearly identify (by API#, well name & number) the well in which open-hole logs were run.				
2 Drilling/Completion Operations	Anti-Collision: Upland will perform an anti-collision evaluation of all active (producing, shut in, or temporarily abandoned) offset wellbores that have the potential of being within 150 feet of a proposed well prior to drilling operations for the proposed well. Notice will be given to all offset operators within 150 feet prior to drilling.				

#### **Applicable Policies and Notices to Operators**

Notice Concerning Operating Requirements for Wildlife Protection. http://cogcc.state.co.us/documents/reg/Policies/Wildlife\_Notice.pdf

#### **Attachment Check List**

Att Doc Num	<u>Name</u>
401700576	FORM 2 SUBMITTED
401700661	DEVIATED DRILLING PLAN
401700662	WELL LOCATION PLAT
401700672	DIRECTIONAL DATA
401700676	OffsetWellEvaluations Data

Total Attach: 5 Files

#### **General Comments**

<u>User Group</u>	Comment	Comment Date
Permit	Passed Completeness.	07/17/2018

Public Comments				
The following comments were provided by members of the public and were considered during the technical review of this application.				

No. Comment Date

1 TO: John Noto, COGCC Oil and Gas Location Assessment Supervisor

08/06/2018

Email: john.noto@state.co.us

Doug Andrews, COGCC OGLA Northeast Location Specialist

Email: doug.andrews@state.co.us

FR: Matt Sura, Attorney at Law

DT: 8/6/2018

RE: Comment on Form 2s: Little Lady 22-7NH, Little Lady 22-2CH, Little Lady 22-6CH, Little Lady 22-3NH, Little Lady 22-4CH, Little Lady 22-5NH, Little Lady 22-1NH

Dear COGCC,

These comments are being made on behalf of the Surface Owner, Gerald Richardson. Mr. Richardson opposes the proposed oil and gas development on his property located on W/2 Section 22 Township 11N, Range 64W in Weld County, Colorado. Please accept this comment for all seven proposed Form 2s (Applications for Permit to Drill – "APDs") listed above.

Mr. Richardson urges the COGCC to deny the location for the following reasons:

1)The Operator, Upland Exploration, does not have a surface use agreement with Mr. Richardson.

2)Upland Exploration has failed to consult with Mr. Richardson in good faith regarding the location of wells, facilities, roads, and flowlines, as required by Commission Rule 306.a.

3)Upland Resources is proposing oil and gas development from a location that will result in waste and is in conflict with a spacing application that is on file with the COGCC: Docket No. 180700572.

4)Upland Exploration lacks legal authority to drill from the location proposed in this pending application. The accommodation doctrine limits Upland Exploration's use of the surface to that which is reasonable and necessary. C.R.S. 34-60-127(c). As proposed, Upland Exploration seeks unnecessary surface locations.

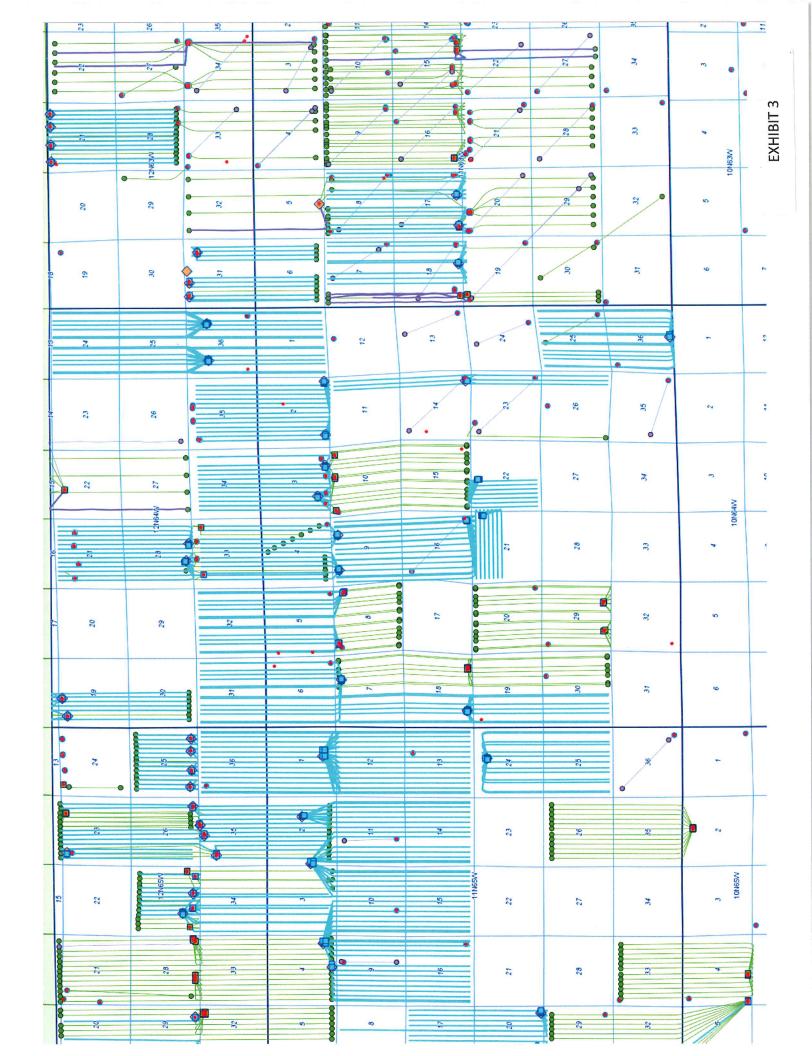
According to COGCC public records, the Operator has not proposed a Form 2A location assessment for the surface location. The Surface Owner respectfully requests that staff review of the Little Lady wells be delayed until the Form 2A has been submitted and is deemed complete.

Furthermore, Mr. Richardson requests that the undersigned be immediately notified of any decision on these applications so he may consider a request for a hearing on this application pursuant to COGCC Rule 503.b.(7)C. In the event he is not notified of an approval of these APDs, please accept this comment letter as a formal and timely request for a hearing on the applications.

Thank you for your assistance in this matter.

Sincerely,

Matt Sura



Received

JUL 1 7 2018

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

Jost Energy Law. P.C.

IN THE MATTER OF THE APPLICATION OF HIGHPOINT OPERATING CORPORATION FOR AN ORDER TO VACATE THE 640-ACRE UNIT ESTABLISHED BY ORDER NO. 421-3 FOR SECTION 22, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6TH P.M., **ESTABLISH AN APPROXIMATE 1.280-**ACRE DRILLING AND SPACING UNIT FOR SECTIONS 22 AND 27, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6TH P.M., APPROVE UP TO SIXTEEN (16) NEW HORIZONTAL WELLS WITHIN THE UNIT. AND APPROVE REDUCED BOUNDARY SETBACKS OF 150 FEET FOR THE NIOBRARA AND FORT HAYS FORMATIONS, AND 300 FEET FOR THE CODELL AND CARLILE FORMATIONS. FOR THE PRODUCTION OF OIL, GAS AND ASSOCIATED HYDROCARBONS FROM THE CODELL, CARLILE, FORT HAYS AND NIOBRARA FORMATIONS. HEREFORD FIELD, WELD COUNTY, COLORADO

CAUSE NO. 421

DOCKET NO. 1

180700572

TYPE: SPACING

#### PROTEST OF UPLAND EXPLORATION, LLC

Upland Exploration, LLC ("Upland"), successor in interest to Upland Exploration, Inc., pursuant to Rule 509 of the Rules of the Colorado Oil and Gas Conservation Commission ("Commission"), files this protest against HighPoint Operating Corporation's ("HighPoint") application to vacate a 640-acre drilling and spacing unit for Section 22, Township 11 North, Range 64 West, 6th P.M. established by Order No. 421-3, and to establish a 1,280-acre drilling and spacing unit for Sections 22 and 27, Township 11 North, Range 64 West, 6th P.M. ("Application Lands"), Docket No. 180700572.

The Application should be denied because it interferes with Upland's right to develop its own oil and gas leasehold interests within the Application Lands. Upland is the Owner of 100% of the oil and gas leasehold working interest in the W1/2 of Section 22, Township 11 North, Range 64 West, 6th P.M. ("W1/2 of Section 22") in the Application Lands. Upland has an established development plan and pending applications for permits to drill ("APD") its own wells on a lease basis in the W1/2 of Section 22. Upland's development plan provides for efficient and economic

development of oil, gas and other hydrocarbons, minimizes surface impacts, prevents waste, and protects correlative rights in accordance with the Oil and Gas Conservation Act, C.R.S. § 34-60-101, et seq. ("Act"). HighPoint's proposed development plan and requested drilling and spacing unit will interfere with such rights and lead to waste. Accordingly, Upland requests that the Commission deny HighPoint's Application.

#### I. General Statement of Factual and/or Legal Basis for Protest

Upland is an "Owner," as defined by the Act, of 100% of the oil and gas leasehold rights in the W1/2 of Section 22, within the Application Lands. Upland is a proper "Protestant," as defined by the 100 Series of the Commission Rules, because Upland "would be directly and adversely affected or aggrieved by the Commission's ruling in the proceeding" and "any injury or threat of injury sustained would be entitled to legal protection under the Act."

The Act grants the Commission authority to prevent waste and protect correlative rights of all oil and gas interest owners in a pool or field. *Id.* § 34-60-117(1). The Act protects correlative rights by providing that "each owner and producer in a common pool or source of supply of oil and gas shall have an equal opportunity to obtain and produce his just and equitable share of the oil and gas underlying such pool or source of supply." *Id.* § 34-60-103(4) (emphasis added).

The Act defines "waste" as applied to oil, as including "underground waste; inefficient, excessive, or improper use or dissipation of reservoir energy, including gas energy and water drive; [and] surface waste," among other things. *Id.* § 34-60-103(12). The Act further defines "waste" as "[t]he locating, spacing, drilling, equipping, operating, or producing of any oil or gas well or wells in a manner which causes or tends to cause reduction in quantity of oil or gas ultimately recoverable from a pool under prudent and proper operations or which causes or tends to cause unnecessary or excessive surface loss or destruction of oil or gas . . ." *Id.* § 34-60-103(13)(b).

Pursuant to the Act, in establishing a drilling unit, the acreage to be embraced within each unit and the shape thereof shall be determined by the Commission from the evidence introduced at the hearing; except that, when found to be necessary to prevent waste and protect correlative rights, the Commission is authorized to divide any pool into zones and establish drilling units for each zone, which units may differ in size and shape from those established in any other zone, so that the pool as a whole will be efficiently and economically developed. *Id.* § 34-60-116(1)-(2). However, no drilling unit shall be smaller than the maximum area that can be efficiently and economically drained by one well. *Id.* § 34-60-116(2).

Wells drilled to the Niobrara, Fort Hays, Codell and Carlile formations in northeastern Weld County in the vicinity of the Application Lands show a much lower Gas to Oil Ratio (GOR) than the GORs seen in other parts of the Greater Wattenberg Area. These lower GORs equate to lower reservoir energy, which necessitates that wells be placed on rod pump very early in the life of a well and, for mechanical

efficiency, necessitates a minimum of one well pad per 320 acres. As will be shown at the hearing, horizontal well performance from units developed in northeastern Weld County suggests that shorter lateral lengths result in greater projected ultimate recoveries than the almost two-mile laterals proposed by HighPoint in a 1280-acre drilling unit. Based on a review of Commission records available on the Commission's website, it appears that, to date, no horizontal well with a two-mile lateral has been drilled in Township 11 North, Range 64 West, 6th P.M.

Upland's correlative rights will be directly and adversely affected if the Commission approves HighPoint's Application. Upland has paid significant consideration for its leasehold exploration and development rights and has drilling and development plans for its leasehold acreage in the Applications, including the lands at issue in Docket No. 180700574. On July 13, 2018, Upland filed with the Commission APDs to drill the Little Lady 1NH-7NH wells in the W1/2 of Section 22.

HighPoint's proposed 1,280-acre spacing unit with almost two-mile laterals will not efficiently drain the reservoir, leading to waste. Upland will present evidence at the hearing that its plan of development for the W1/2 of Section 22 on a 320-acre basis will ensure compliance with the mandates of the Act. Upland's plan of development provides for efficient and economic development of oil and gas, reduction in surface impacts, prevention of waste, and protection of Upland's and the mineral owner's correlative rights in the W1/2 of Section 22, as required by the Act.

#### II. Request for Relief

Upland request that the Commission deny HighPoint's Application.

#### III. Description of the Intended Presentation and Proposed Witnesses

Upland intends to present opening and closing statements in support of this Protest and conduct direct and cross examination of witnesses in support of this Protest. Upland proposes the following witnesses:

- David Watts
- Thomas Taylor
- Larry Jenkins

#### IV. Time Estimate to Hear the Protest

Upland estimates that it needs approximately one hour to present its Protest and examine its witness.

Upland reserves the right to amend or supplement its presentation, proposed witness, or time estimates prior to the hearing on this matter.

Dated: July 13, 2018

John F. Shepherd, P.C.

Janet N. Harris

Tina R. Van Bockern Holland & Hart LLP 555 17th Street, Suite 3200

Denver, CO 80202 (303) 295-8309

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trvanbockern@hollandhart.com

ATTORNEYS FOR UPLAND EXPLORATION, LLC

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

IN THE MATTER OF THE APPLICATION OF HIGHPOINT OPERATING CORPORATION FOR AN ORDER TO VACATE THE 640-ACRE UNIT ESTABLISHED BY ORDER NO. 421-3 FOR SECTION 22, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6TH P.M., ESTABLISH AN APPROXIMATE 1,280-ACRE DRILLING AND SPACING UNIT FOR SECTIONS 22 AND 27, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6TH P.M., APPROVE UP TO SIXTEEN (16) NEW HORIZONTAL WELLS WITHIN THE UNIT, AND APPROVE REDUCED BOUNDARY SETBACKS OF 150 FEET FOR THE NIOBRARA AND FORT HAYS FORMATIONS, AND 300 FEET FOR THE CODELL AND CARLILE FORMATIONS, FOR THE PRODUCTION OF OIL, GAS AND ASSOCIATED HYDROCARBONS FROM THE CODELL, CARLILE, FORT HAYS AND NIOBRARA FORMATIONS, HEREFORD FIELD, WELD COUNTY, COLORADO

CAUSE NO. 421

DOCKET NO. 180700572

TYPE: SPACING

#### **CERTIFICATE OF SERVICE**

I hereby certify that on July 13, 2018, a true and correct copy of the PROTEST OF UPLAND EXPLORATION, LLC has been served, at least 14 business days prior to the first hearing date on this matter, via E-Mail and U.S. mail, postage pre-paid, to the following parties:

Jamie L. Jost Kelsey H. Wasylenky Jost Energy Law, P.C. 1401 17th Street, Suite 370 Denver, Colorado 80202 jjost@jostenergylaw.com kwasylenky@jostenergylaw.com And via E-Mail and hand delivery to the following parties:

Julie Murphy Colorado Oil & Gas Conservation Commission 1120 Lincoln Street, Suite 801 Denver, Colorado 80203 cogcc.hearings\_unit@state.co.us, julie.murphy@state.co.us

DATED this 13th day of July, 2018.

Fachleen O'Riley

Holland and Hart, LLP Attn: John F. Shepherd, P.C. 555 17th Street, Suite 3200 Denver, CO 80202

ATTORNEYS FOR UPLAND EXPLORATION, LLC

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

IN THE MATTER OF THE APPLICATION OF HIGHPOINT OPERATING CORPORATION (OPERATOR NO. 10071) FOR AN ORDER TO DENY UPLAND EXPLORATION, LLC'S (OPERATOR NO. 10701) SEVEN (7) FORM 2 APPLICATIONS FOR PERMITS TO DRILL CERTAIN NAMED LITTLE LADY WELLS IN SECTION 22, TOWNSHIP 11 NORTH, RANGE 64 WEST, 6<sup>TH</sup> P.M., WILDCAT FIELD, WELD COUNTY, COLORADO BASED ON RULE 503.b.(10) AND THE COLORADO OIL AND GAS CONSERVATION ACT

CAUSE NO.

DOCKET NO. 181000808

TYPE:

#### **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 HighPoint Operating Corporation, and that on or before the 5<sup>th</sup> day of September, 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.

Jamie L. Jost

Kelsey H. Wasylenky

Subscribed and sworn to before me this 4<sup>th</sup> day of September, 2018.

Witness my hand and official seal.

Notary Public

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

# EXHIBIT A HIGHPOINT - App to Deny Upland Little Lady Sec. 22 APDs

Upland Exploration, Inc. 3303 Cypress Creek Pkwy # 145 Houston, TX 77068

John Shephard and Janet Harris Holland & Hart 555 17th Street, Suite 3200 Denver, CO 80202

HighPoint Operating Corporation ATTN: Leslie Mann 1099 18th Street, Suite 2300 Denver, CO 80202