

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

IN THE MATTER OF THE APPLICATION OF)
MORNING GUN EXPLORATION LLC FOR AN) CAUSE NO.
ORDER ESTABLISHING AN APPROXIMATE)
1280-ACRE DRILLING AND SPACING UNIT AND) DOCKET NO. 181200899
WELL LOCATION RULES APPLICABLE TO THE)
DRILLING AND PRODUCING OF WELLS FROM) TYPE: SPACING
THE NIOBRARA, FORT HAYS, CODELL AND)
CARLILE FORMATIONS COVERING CERTAIN)
LANDS IN SECTION 1 AND 12, TOWNSHIP 7)
NORTH, RANGE 59 WEST, 6TH P.M.,)
BUCKINGHAM FIELD AND OTHERS, WELD)
COUNTY, COLORADO)

APPLICATION

Morning Gun Exploration LLC ("Applicant"), Operator No. 10656, by and through its attorneys, Akers & Thompson LLC, respectfully submits this Application to the Oil and Gas Conservation Commission of the State of Colorado ("Commission") for approval of an order requesting to: establish an approximate 1280-acre drilling and spacing unit (DSU) in the Application Lands; establish certain well location rules; and drill up to twelve (12) wells within the proposed DSU, for the production of oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations covering certain lands in Weld County, Colorado. In support of its Application, Applicant states as follows:

1. Applicant is a limited liability company duly authorized to conduct business in Colorado.

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

Township 7 North, Range 59 West, 6th P.M.

Section 1: ALL

Section 12: ALL

1280.00 acres, more or less, Weld County, Colorado

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

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

4. To promote efficient drainage of the Niobrara, Fort Hays, Codell and Carlile Formations of the Application Lands, to protect correlative rights, and to avoid waste, the Commission should approve an order requesting to: establish an approximate 1280-acre drilling and spacing unit in the Application Lands; establish certain well location rules; and drill up to twelve (12) wells within the new unit, for the production of oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations.

5. The proposed drilling and spacing unit will allow efficient drainage of the Niobrara, Fort Hays, Codell and Carlile Formations; will prevent waste; will not adversely affect correlative rights and will assure the greatest ultimate recovery of oil, gas and associated hydrocarbon substances from the reservoirs. The proposed drilling and spacing unit is not smaller than the maximum area that can be economically and efficiently drained by the proposed wells in the unit.

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

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

8. The treated interval of each proposed horizontal well shall be no closer than 600 feet from the boundaries of the unit and all horizontal wells shall be no closer than 150 feet from the treated interval of another well producing from the same source of supply within the unit, unless an exception is granted by the Director.

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

WHEREFORE, Applicant respectfully requests that this matter be set for hearing, that notice be given as required by law and that, upon such hearing this Commission enter its order:

A. Establishing an approximate 1280-acre drilling and spacing unit for Sections 1 and 12, Township 7 North, Range 59 West, 6th P.M., and allowing up to twelve (12) horizontal wells in the unit in order to efficiently and economically develop and recover the oil, gas and associated hydrocarbons from the Niobrara, Fort Hays, Codell and Carlile Formations in the unit.

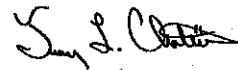
B. Providing that the treated interval of any horizontal well be located no closer than 600 feet from the boundaries of the unit and no closer than 150 feet from the treated interval of another well within the unit, and authorizing up to two (2) well pads in the unit, or legal location adjacent thereto, unless an exception is granted by the Director.

C. Finding that an approximate 1280-acre drilling and spacing unit for the development of Niobrara, Fort Hays, Codell and Carlile Formations on the Application Lands will prevent waste, protect correlative rights, and maximize the efficient and economic production of the Niobrara, Fort Hays, Codell and Carlile Formations in the Application Lands.

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

Dated this 13th day of September, 2018

Respectfully Submitted,
Akers & Thompson, LLC



By: _____

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Sandra J. Carter
Akers & Thompson, LLC
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Denver, CO 80237
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scarter@akersthompsonlaw.com

Address of Applicant
Morning Gun Exploration LLC
1601 Arapahoe Street
Daniels and Fisher Tower, Box 1-4th Floor
Denver, CO 80202

VERIFICATION

STATE OF COLORADO

)
) SS.
)

COUNTY OF DENVER

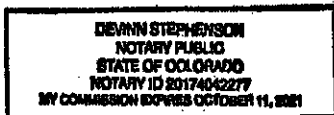
Justin A. Dunn, as Vice President of Morning Gun Exploration LLC, upon oath deposes and says that he has read the foregoing Application and that the statements contained therein are true to the best of his knowledge, information and belief.

Morning Gun Exploration LLC


Justin A. Dunn, Vice President

Subscribed and sworn to before me this 13th day of ^{September} ~~August~~, 2018, by Justin A. Dunn, as Vice President of Morning Gun Exploration LLC.

Witness my hand and official seal.




Notary Public

EXHIBIT A

Township 7 North, Range 59 West, 6th P.M.

Section 1: ALL

Section 12: ALL

INTERESTED PARTIES

Kelley Trust Dated March 25, 2008

Juli Rae Kelley, Trustee

27 Flaxwood

Irvine, CA 92614

John William Lauer

13670 S.W. 22nd

Beaverton, OR 97008

John William Lauer

18081 SW Arborcrest Ct.

Aloha, OR 97003

James P. Lauer

2033 22nd Ave., Apt. 203

Greeley, CO 80631

James P. Lauer

P.O. Box 336367

Greeley, CO 80633

Edward Lauer

1468 Azalea Dr.

Carpinteria, CA 93013

Edward Lauer

21 E. Lewis St.

Ventura, CA 93001

David Amack

906 Buena Vista Unit B

San Clemente, CA 92672

David Amack

165 NW st. Helens Pl.

Bend, OR 97703

Linda Lee Fagundes
2911 E. Blackburn Rd
Mt. Vernon, WA 98274

Linda Lee Fagundes
1300 Maddox Creek Rd. Unit 2
Mt. Vernon, WA 98274

Charles and Carolyn Brockway Living Trust
c/o Charles Brockway, Jr.
876 Laiqua Ln
Santa Barbara, CA 93110

CoBank
c/o Nancy Morford
245 North Waco, P.O. Box 2940
Wichita, Kansas 67201

DC Minerals LLC
c/o Wade Castor
22791 Hwy 39
Weldona, CO 80653

Ronald K. Castor
889 N. Elkhorn Dr. Apt 212
Wasila, AK 99654

James L. Krager
P.O. Box 15
New Raymer, CO 80742

Markus Production, Inc.
39 Fairway Lane
Littleton, CO 80123

Nerd Gas Corporation
P.O. Box 3003
Casper, WY 82602

Nerd Gas Corporation
441 Landmark Dr.
Casper, WY 82609

Charlotte O'Connell
P.O. Box 1592
Sterling, CO 80571

Barbara Brown
P.O. Box 5168 T.A.
Denver, CO 80217

Cynthia A. E. Zeren
1711 61st Ave. Suite 204
Greeley, CO 80634

Kellner Mineral, LLC
3090 S. Jamaica Ct., Suite 105
Aurora, CO 80014

Margaret Philpott Day Revocable Living Trust
c/o of James Philpott
244 Park St.
Jacksonville, IL 62650

James Philpott
244 Park St.
Jacksonville, IL 62650

Sally P. Munson
225 Walnut St.
Tiskilwa, IL 61368

Jean S. Philpott
2841 Archer St.
Salem, VA 24153

John C. Philpott
6416 Igo Road
King George, VA 22485

Karen Miles
114 Roebling St.
Brooklyn, NY 11211

Freeman Investments
3415 S. Clayton Blvd.
Englewood, CO 80113

George Meacham
4111 Belmont Ave.
Evans, CO 80620

Carmen Louise Schott

4023 Stovall Terrace NE
Atlanta, GA 30342

Joyce Stockstill
333 Mountain View Drive, #84
Talent, OR 97540

W.L. Campbell Jr.
P.O. Box 14006
Spokane, WA 99214

Russel G. Houser, Jr.
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Huntsville, AL 35803

Cindy Houser Bishop
21300 Cotton Creek Dr, Unit C202
Gulf Shores, AL 36542

Cindy Houser Bishop
4313 32nd St.
Meridian, MS 39307

Michael Ducker
10010 E. 142nd Ave.
Brighton, CO 80602

McCulliss Oil and Gas, Inc.
P.O. Box 221515
Denver, CO 80222

Paul L. McCulliss
P.O. Box 3248
Littleton, CO 80161

George G. Vaught
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Denver, CO 80121

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Denver, CO 80202

DPOC, LLC
140016th Street, Suite 300
Denver, CO 80202

DPOC, LLC
140016th Street, Suite 300
Denver, CO 80202

Colorado Department of Public Health & Environment
4300 Cherry Creek Drive South
Denver, CO 80246
Phone: (303) 692.3663
Email: kent.kuster@state.co.us.

Brandon Marette-Energy Liaison
Colorado Parks and Wildlife
NE Region Building
6060 Broadway
Denver, CO 80216
Phone: (303) 291-7327
Email: brandon.marette@state.co.us

Catherine Stitt
State of Colorado
State Board of Land Commissioners
1127 Sherman Street, Suite 300
Denver, Colorado 80203

Jason Maxey
Weld County
Local Government Designee
1555 North 17th Ave.
Greeley, CO 80631
Phone: (970) 400- 3579
Email: jmaxey@weldgov.com

Troy Swain
Weld County
Department of Planning Services
1555 North 17th Avenue
Greeley, CO 80631
Phone: (970) 400- 3579
Email: tswain@weld.gov

BLM Colorado State Office
2850 Youngfield St.
Lakewood, CO 80215

Morning Gun Exploration LLC
1601 Arapahoe Street
Daniels and Fisher Tower, Box 1-4th Floor
Denver, CO 80202

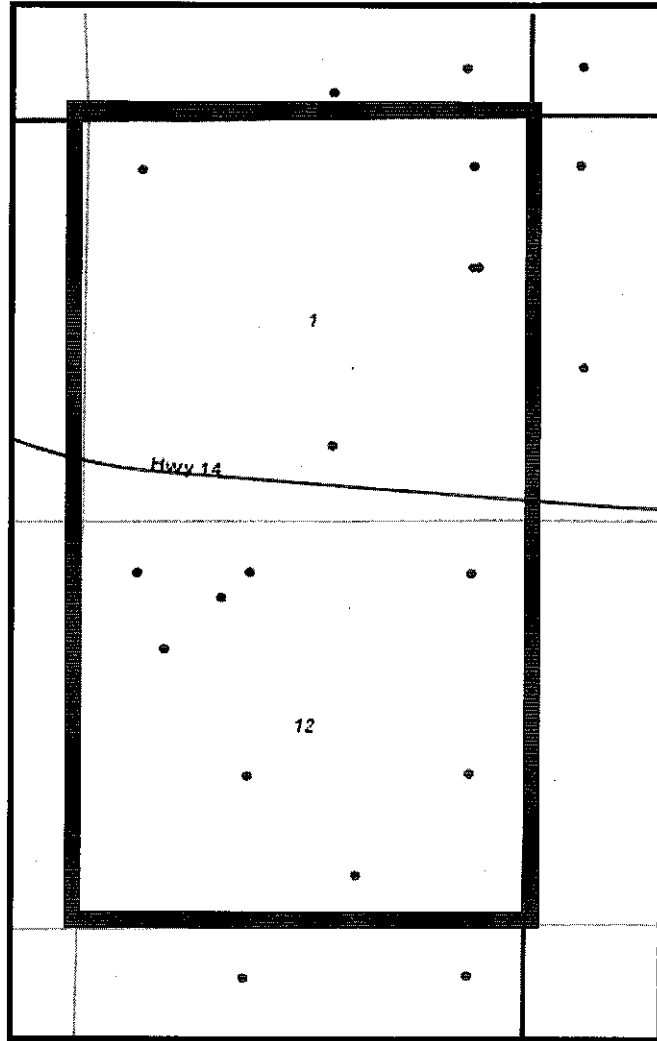
EXHIBIT B

Reference Map for Spacing Application

Township 7 North, Range 59 West, 6th P.M.

Section 1: ALL

Section 12: ALL



= Application Lands

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BUCKINGHAM FIELD AND OTHERS, WELD)
COUNTY, COLORADO)

CAUSE NO.
DOCKET NO. 181200899
TYPE: SPACING

AFFIDAVIT OF MAILING

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

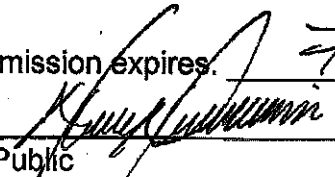
I, Troy L. Chatman II, of lawful age, and being first duly sworn upon my oath, state, and declare that I am the attorney for Morning Gun Exploration LLC, and that on or before September 21, 2018, I caused a copy of the Application to be deposited in the United States Mail, postage prepaid, addressed to the parties listed on Exhibit A to this Affidavit.



Troy L. Chatman II

Subscribed and sworn to before me this September 14th day of August, 2018.

Witness my hand and official seal.

My commission expires. Feb 13, 2021


Notary Public

