



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



IN THE MATTER OF THE PROMULGATION)
AND ESTABLISHMENT OF FIELD RULES)
TO GOVERN OPERATIONS IN THE)
HEREFORD FILED, WELD COUNTY,)
COLORADO)

Cause No. 421

Docket No. 1101-SP-03

ORIGINAL

REQUEST FOR APPROVAL OF APPLICATION WITHOUT A HEARING ON THE
MERITS OF A VERIFIED APPLICATION AND SUPPORTING EXHIBITS

EOG Resources, Inc. ("Applicant"), by and through its undersigned attorneys, hereby requests pursuant to Rule 511.a. of the Rules and Regulations of the Colorado Oil and Gas Conservation Commission ("COGCC") for the Director to recommend approval of its October 8, 2010 verified application ("Application") and the supporting exhibits without a hearing.

Applicant requests that the above-captioned matter be approved based upon: (i) the merits of the Application, and (ii) Applicant's sworn written testimony verifying sufficient facts along with exhibits that adequately support the relief requested in the Application. As of January 3, 2011, no protests have been filed.

In the event that this request is denied, Applicant requests that the administrative hearing for this matter occur at a convenient time prior to the Commission hearing on January 13 and 14, 2011.

WHEREFORE, Applicant requests that its request for a recommendation for approval of its Application without a hearing be granted.

DATED this 3rd day of January, 2011.

Respectfully submitted,

EOG RESOURCES, INC.

By: Jamie L. Jost

Jamie L. Jost
Michael J. Wozniak
Beatty & Wozniak, P.C.
Attorneys for Applicant
216 16th Street, Suite 1100
Denver, Colorado 80202
(303) 407-4499

EXHIBIT(s)
FOR
ORDER NO(s).

421 - 4

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EOG RESOURCES, INC.

RECEIVED

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COGCC

ORIGINAL

Cause No. 421, Docket No. 1101-SP-03

EOG RESOURCES, INC.

Jason McLaren – Land Testimony

Docket No 1101-SP-03; Cause 421

Sections 9, 10, 14, 15 & 16 of Township 11 North, Range 63 West, 6th P.M.,
Weld County, Colorado

January 13, 2011 Colorado Oil and Gas Conservation Commission Hearing

My name is Jason McLaren, and I am currently employed as a Landman for EOG Resources, Inc. ("EOG"). I graduated from Emory University in 1995 and received by law degree from the University of Wyoming School of Law in 2000. I have over 8 years experience in oil and gas land and contract work. I am familiar with the lands subject to, and the matters set forth in, the October 8, 2010 verified application ("Application").

In support of EOG's Application in the above-referenced docket, I am submitting four (4) exhibits. The exhibits are attached to my sworn testimony and form the basis for EOG's Application to gain approval to (i) establish three (3) laydown "rolling" 1,280-acre drilling and spacing units, (ii) drill and complete up to two (2) additional horizontal wells in the proposed 1,280-acre drilling and spacing units for the Niobrara Formation as illustrated on Exhibit L-5, and (iii) vacate the existing 640-acre drilling and spacing units on the Application Lands (defined below), but only as the existing 640-acre spacing relates to the additional horizontal well in the proposed "rolling" laydown 1,280-acre drilling and spacing units. The Application covers the following lands (the "Application Lands"):

Township 11 North, Range 63 West, 6th P.M.
Sections 9, 10, 14, 15 & 16

Exhibit L-1: EOG Leasehold Interests.

Exhibit L-1 shows the leasehold interests held by EOG on the Application Lands. EOG holds 100% leasehold ownership interest in the areas shaded in yellow and holds a partial leasehold ownership interest in the yellow-hatched areas. EOG holds 100% leasehold ownership interest in the Application Lands.

Exhibit L-2: Mineral Ownership.

Exhibit L-2 shows the mineral ownership of the Application Lands. A majority of the mineral ownership in the Application Lands is held in fee. Section 16, Township 11 North, Range 63 West is State of Colorado Minerals. There are no Federal minerals on the Application Lands.

Exhibit No. L-3: Surface Ownership.

Exhibit L-3 shows the surface ownership of the Application Lands. A majority of the surface ownership of the Application Lands is owned in fee. Section 16, Township 11 North, Range 63 West is owned by the State of Colorado. EOG shall conform to the request in the Application that the surface location for any horizontal well may be located anywhere within the established 1,280-acre drilling and spacing unit, provided that the initial perforation, lateral, and

terminus of the horizontal wells within the Niobrara Formation shall be located no closer than 600 feet from the boundary of the established drilling and spacing unit (with the interior section line extinguished) and that the lateral within the Niobrara Formation be located no closer than 600 feet from any other wellbore on the Application Lands which has perforated the Niobrara Formation.

Exhibit No. L-4: Topography.

Exhibit L-4 shows the topography of the Application Lands.

Exhibit No. L-5: Map of Application Lands and Well Orientation

Exhibit L-5 shows the existing 640-acre drilling and spacing units as well as the three (3) proposed “rolling” laydown 1,280-acre drilling and spacing units.

The black lines show the existing wells that are referenced in Osman Apaydin’s engineering testimony submitted in support of the Application. The red, green, and blue lines illustrate the proposed additional horizontal wells in the three (3) proposed “rolling” laydown 1,280-acre drilling and spacing units.

For purposes of clarification, EOG requested “up to two (2) additional horizontal wells” in each proposed 1,280-acre drilling and spacing unit only because there are overlapping 1,280-acre drilling and spacing units in Section 15, Township 11 North, Range 63 West. There will be portions of up to three (3) wellbores that will underlie Section 15, Township 11 North, Range 63 West, but EOG will allocate the production for the individual additional horizontal wells according to their respective “rolling” laydown 1,280-acre drilling and spacing unit. A complete discussion on the allocation of production from the horizontal wells located in the 1,280-acre drilling and spacing units is set forth in Osman Apaydin’s testimony submitted in support of the Application.

For further purposes of clarification, it is also EOG’s intent to vacate the existing 640-acre drilling and spacing unit only as it relates to the additional horizontal well located in each “rolling” laydown 1,280-acre drilling and spacing unit. The existing horizontal wells and the established 640-acre drilling and spacing units, as it relates to the existing horizontal wells, shall remain unchanged.

Based upon our examination of relevant documents, and under my direction and control, all of the interested parties included in Exhibit A attached to the Application received proper notice. As of the date of this testimony, EOG has not received any protests or objections to the Application.

The matters described herein were all conducted under my direction and control. To the best of my knowledge and belief, all of the matters set forth herein, my testimony and in the exhibits are true, correct and accurate.

Dated this 30th day of December, 2010.



Jason McLaren, Landman


EOG Resources, Inc.

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

The foregoing instrument was subscribed and sworn to before me this 30th day of December, 2010, by Jason McLaren, Landman, for EOG Resources, Inc.

Witness my hand and official seal.

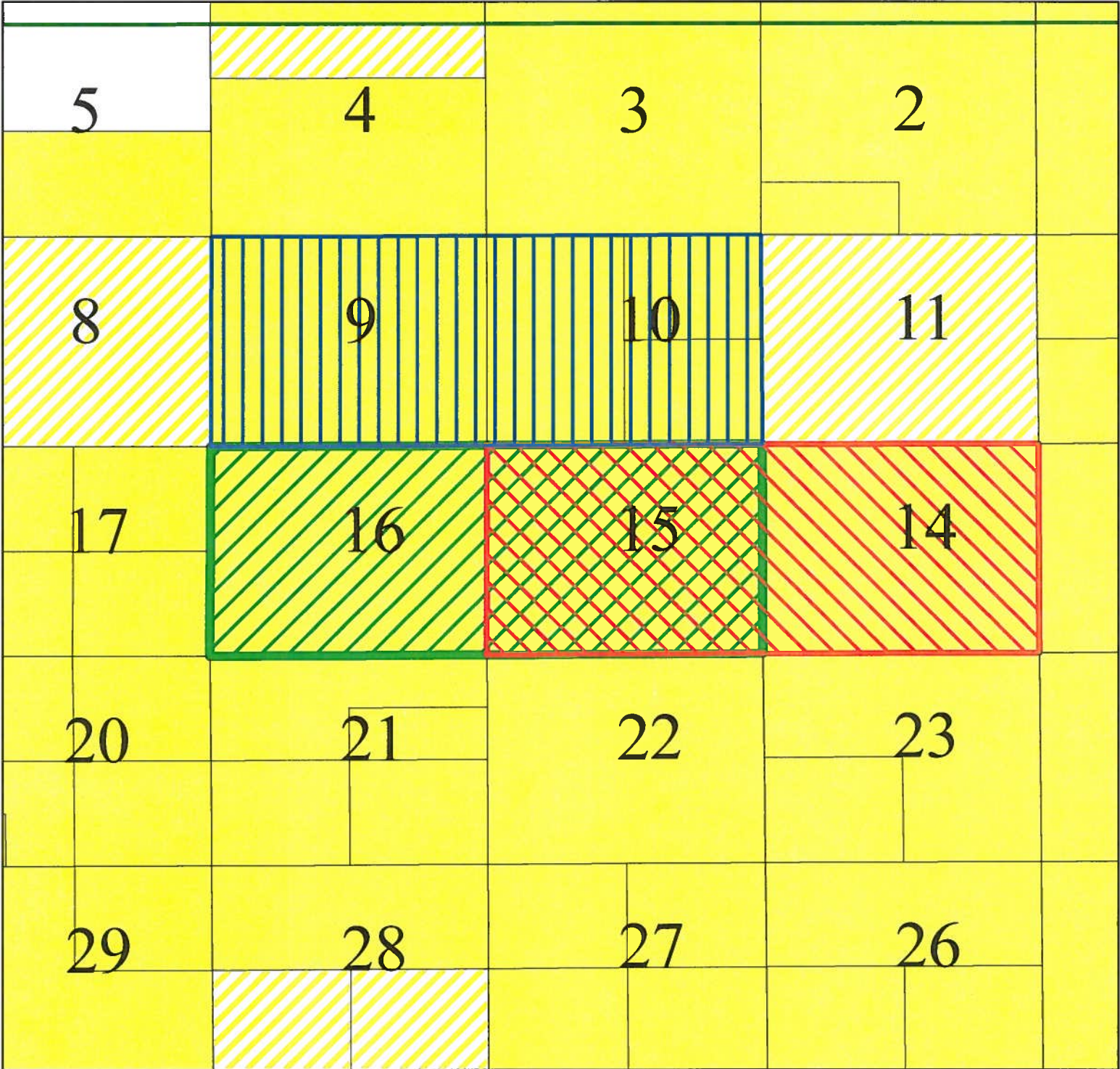
My commission expires: June 25, 2011


Notary Public



Lease Ownership Map
Proposed 1280 acre Spacing Unit

Township 11North,
Range 63 West,
6th PM



Docket No. 1101-SP-03, Cause 421

Legend

Spacing Units

-  Sections 15&14
-  Sections 16 & 15
-  Sections 9 & 10

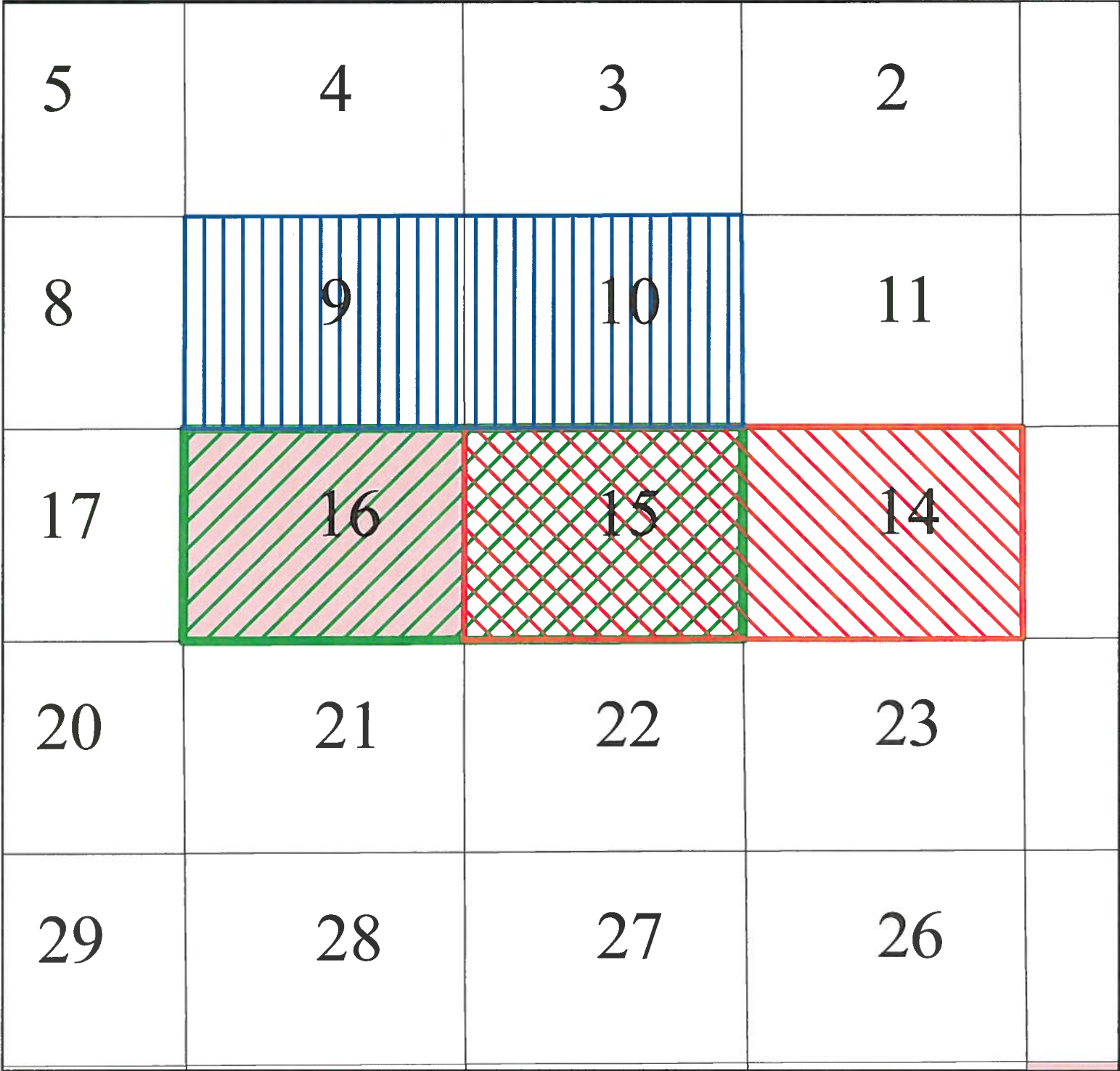
-  EOG Full Interest
-  EOG Partial Interest

Exhibit L1
December 17, 2010



Mineral Ownership Map
Proposed 1280 acre Spacing Unit

Township 11 North,
Range 63 West,
6th PM



Legend

Spacing Units

- Sections 15&14
- Sections 16 & 15
- Sections 9 & 10

Mineral Ownership

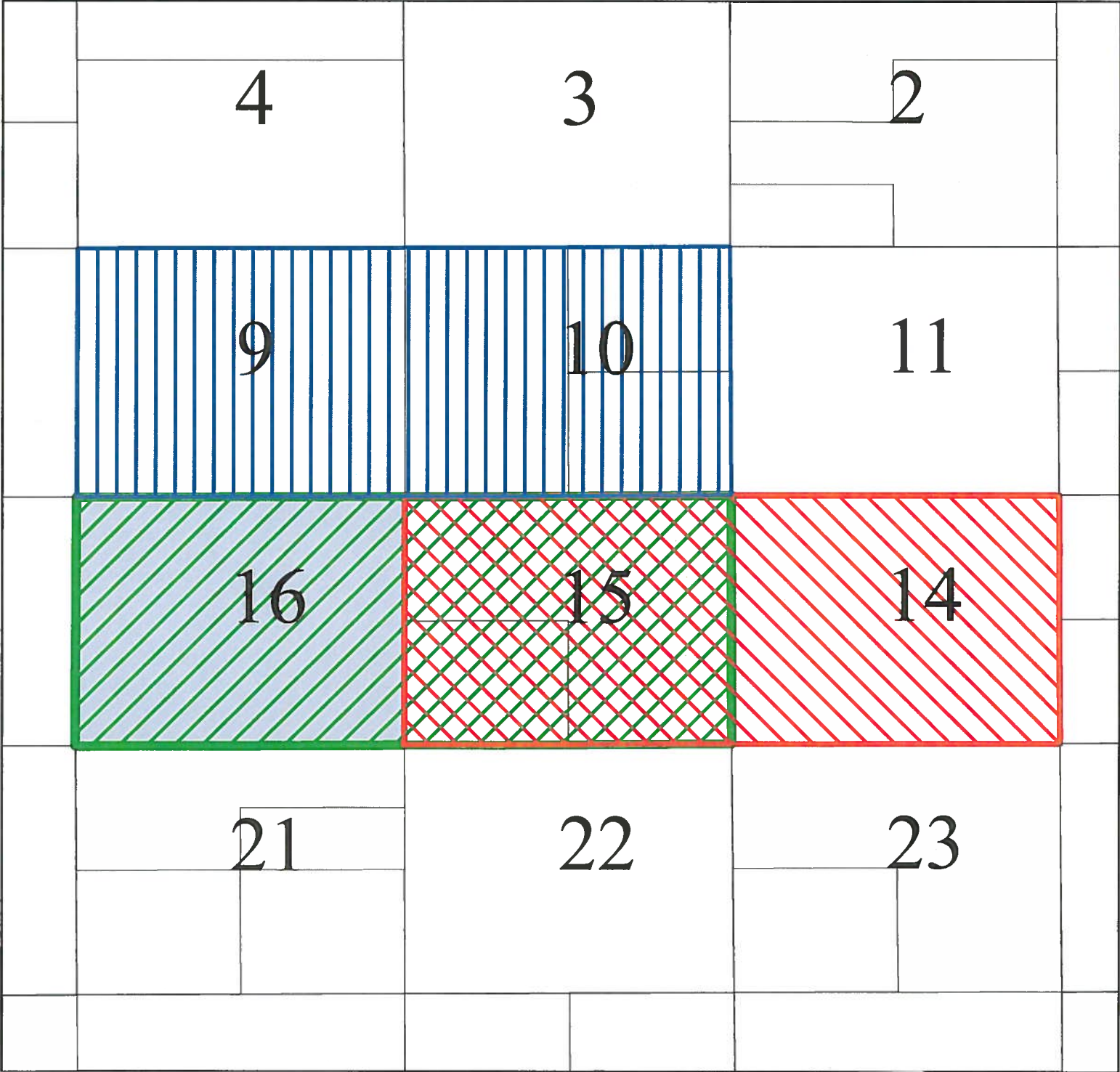
- State Minerals
- Fee Minerals

Docket No. 1101-SP-03, Cause 421
Exhibit L2
December 17, 2010



Surface Ownership Map
Proposed 1280 acre Spacing Unit

Township 11 North,
Range 63 West,
6th PM



Legend

Spacing Unit

- Sections 15&14
- Sections 16 & 15
- Sections 9 & 10

Surface Ownership

- State
- Fee

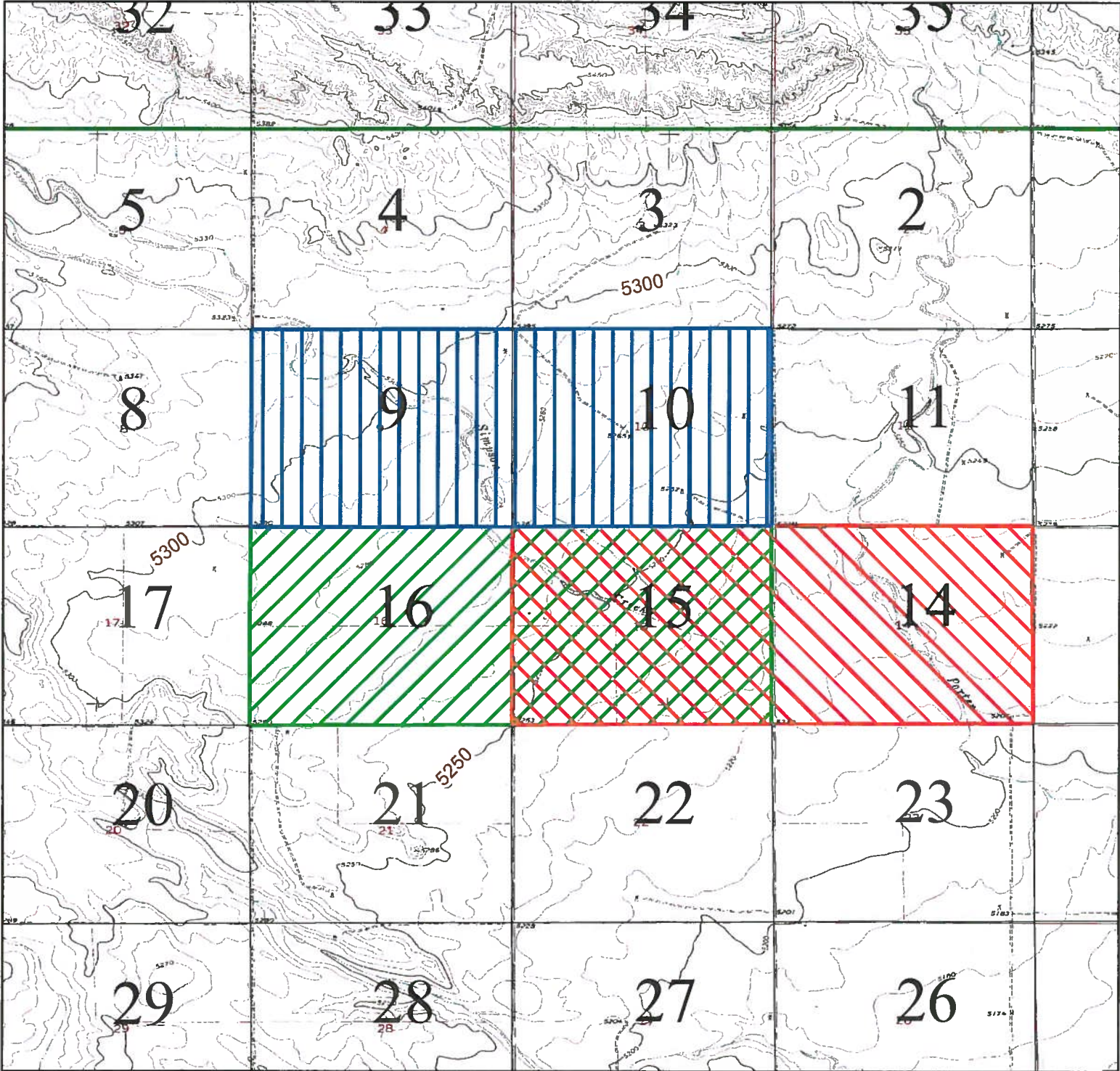
Docket No. 1101-SP-03, Cause 421

Exhibit L3
December 17, 2010






Topographical Map
Proposed 1280 acre Spacing Unit

Township 11 North,
Range 63 West,
6th PM



Legend

Spacing Units

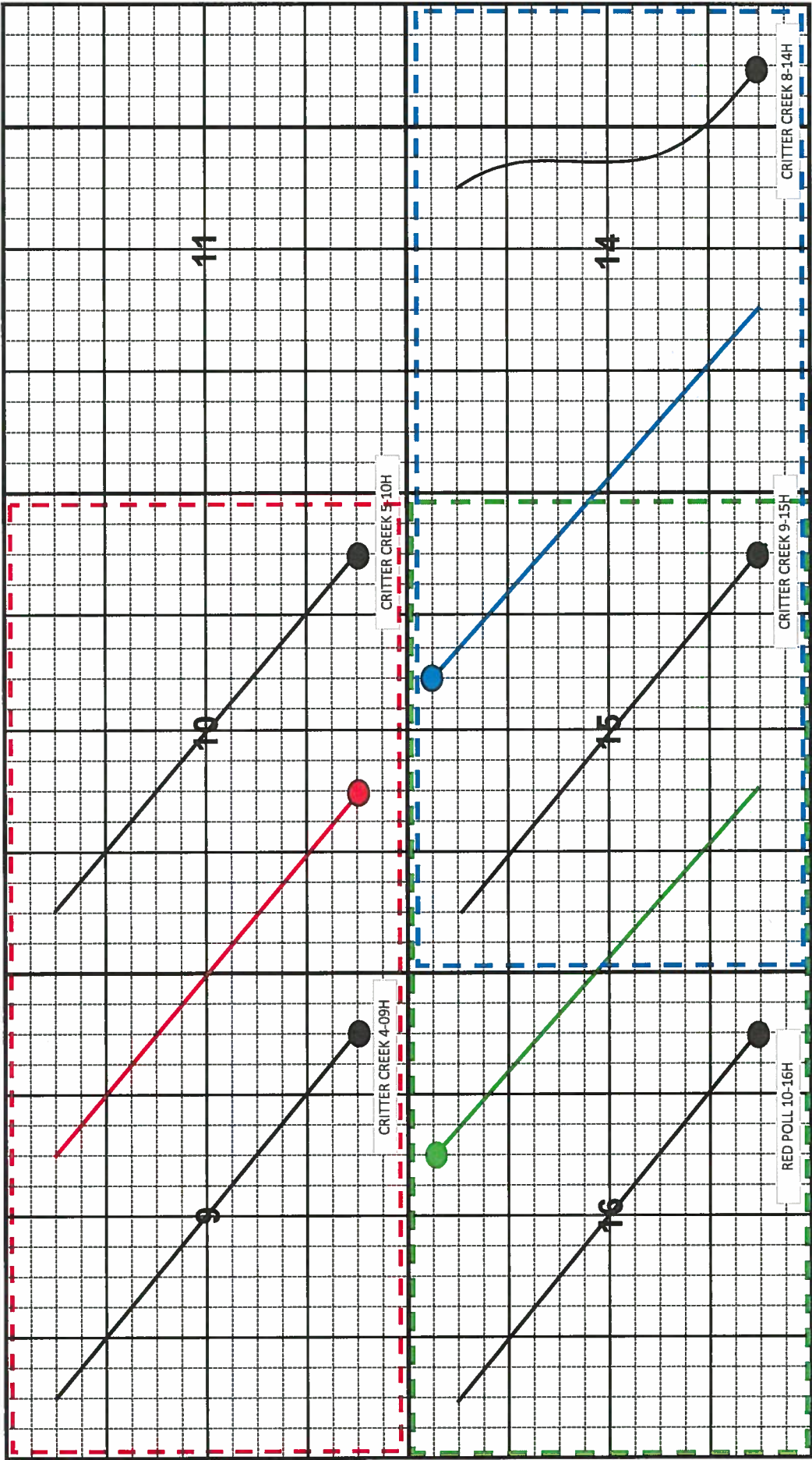
-  Sections 15&14
-  Sections 16 & 15
-  Sections 9 & 10

Docket No. 1101-SP-03, Cause 421

Exhibit L4, 2010
December 17, 2010



TOWNSHIP 11 NORTH, RANGE 63 WEST, 6TH P.M.
WELD COUNTY, COLORADO



EXISTING WELLS DRILLED

PROPOSED WELLS & 1280 ACRE UNITS

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—

SECTIONS 9 & 10

SECTIONS 15 & 16

SECTIONS 14 & 15

APPLICATION AREA



EOG RESOURCES, INC.

John H. Melby, Petroleum Geologist – Geological Testimony

Docket No 1101-SP-03; Cause 421

Sections 9, 10, 14, 15 & 16 of Township 11 North, Range 63 West, 6th P.M.,
Weld County, Colorado

January 13, 2011 Colorado Oil and Gas Conservation Commission Hearing

My name is John H. Melby, and I am currently employed as a Petroleum Geologist for EOG Resources, Inc. ("EOG"). I graduated from the University of Wisconsin with both a Bachelor's (1965) and Master's Degree (1967) in Geology.

I have over 43 years experience in the oil and gas industry. I am familiar with the lands subject to, and the matters set forth in, the January 17, 2011, verified application ("Application").

In support of EOG's Application in the above-referenced docket, I am submitting four (4) exhibits. The exhibits are attached to my sworn testimony and form the basis for EOG's Application to gain approval to drill and complete one (1) horizontal well in each of the requested 1280-acre drilling and spacing units for the Niobrara Formation covering the Application Lands.

The Niobrara Formation is sequence of Chalks, Marls and Limestones that were deposited in the Western Interior Seaway during Cretaceous time. This seaway was vast in extent and covered much of North America from the Gulf of Mexico to the Arctic. These rocks were deposited as deep water sediments and underlie most of the DJ Basin in parts of northeastern Colorado, southeastern Wyoming and southwestern Nebraska.

Four geology exhibits were prepared and presented as follows:

I. Exhibit G-1 – (Structure Map-C.I.=25')

Exhibit G-1 is a subsea structure map constructed on the top of the Niobrara Formation. In the application area, the regional dip is approximately 40'/mile (.5 degree) to the west.

II. Exhibit G-2 – (Isopach Map-C.I.=5')

Exhibit G-2 is an isopach map of the total Niobrara Formation. Total thickness ranges from approximately 265' to 283' under the proposed spaced area with the thickest area in the southern portion of the proposed spaced area.

III. Exhibit G-3 – (Niobrara-Type Log)

Exhibit G-3 is an AIT type log for the Niobrara Formation. The Niobrara consists of two members, the Smoky Hill Chalk and the Ft. Hayes Limestone.

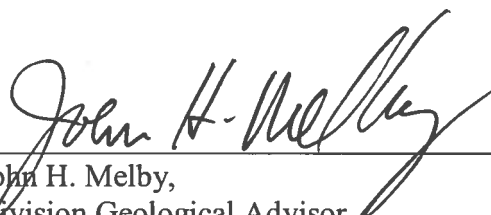
IV. Exhibit G-4 (Cross Section A-A')

Exhibit G-4 is a stratigraphic cross section constructed through nearby wells showing the mapped interval of the Niobrara Formation. This exhibit shows that the Niobrara Formation exists under the proposed spacing area. The location of cross section A-A' is shown on Exhibit G-1 & G-2.

My conclusion is that the Niobrara Formation exists under all of the Application lands.

The matters described herein were all conducted under my direction and control. To the best of my knowledge and belief, all of the matters set forth herein, my testimony and in the exhibits are true, correct and accurate.

Dated this 30th day of December, 2010.



John H. Melby,
Division Geological Advisor
EOG Resources, Inc.

VERIFICATION

)

) SS.

)

John H. Melby, Division Geological Advisor, with EOG Resources, Inc., 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.

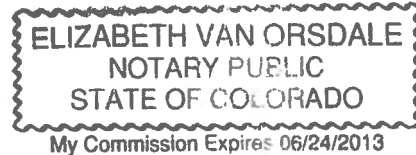
EOG RESOURCES, INC.

John H. Miller

John H. Melby, Division Geological Advisor

Subscribed and sworn to before me this 30th day of December, 2010, by John H. Melby,
Division Geological Advisor for EOG Resources, Inc.

Witness my hand and official seal.



My commission expires: 6-24-2013

Alan Qader

Notary Public

APPLICATION AREA

— Existing Wells Drilled

**PROPOSED WELLS & 1280
ACRE UNITS**

Sections 9 & 10

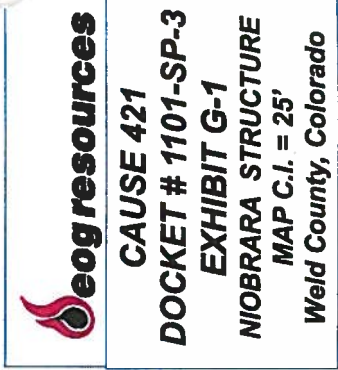
Sections 15 & 16

Sections 14 & 15

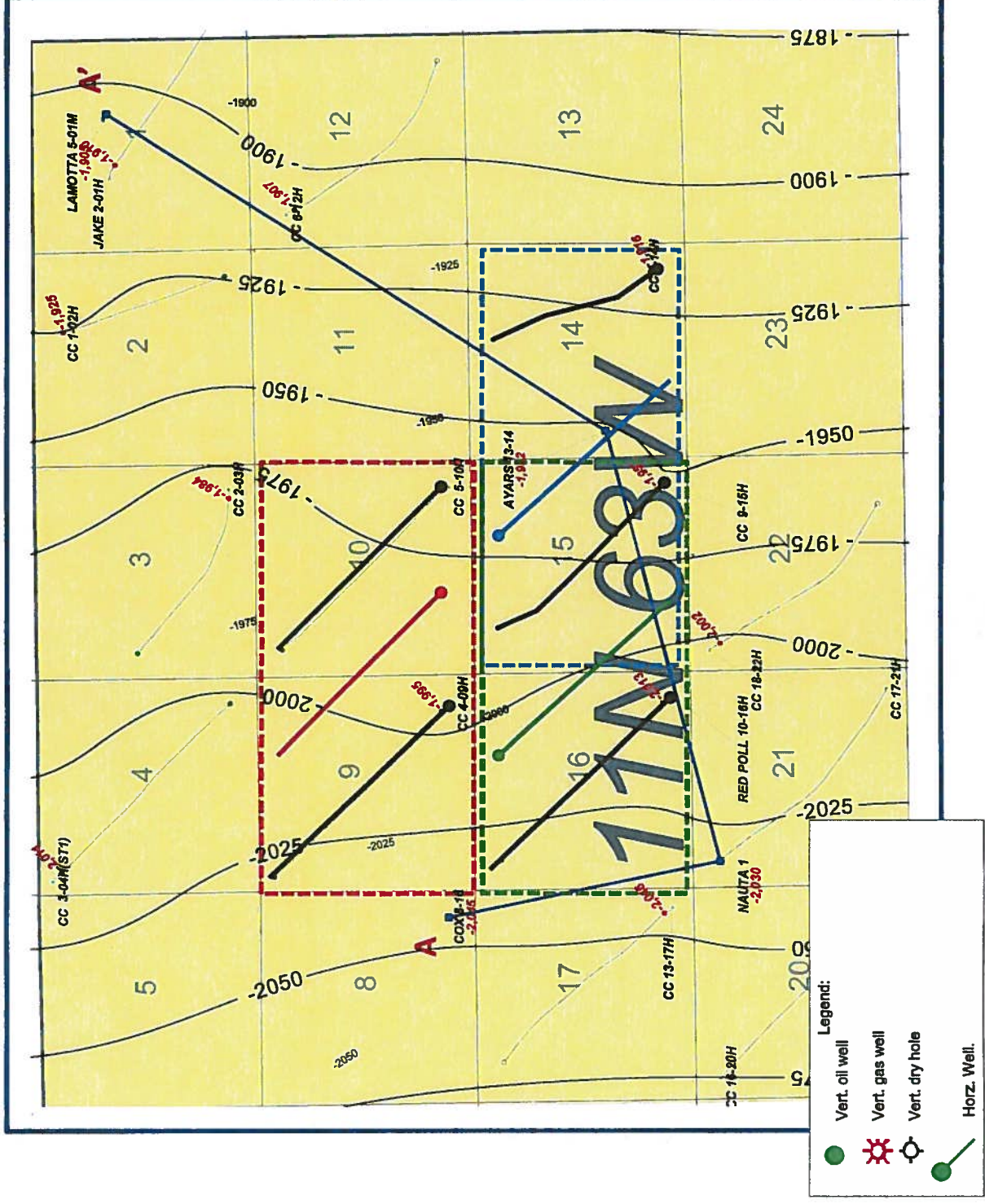
**PROPOSED WELLS & 1280
ACRE UNITS**

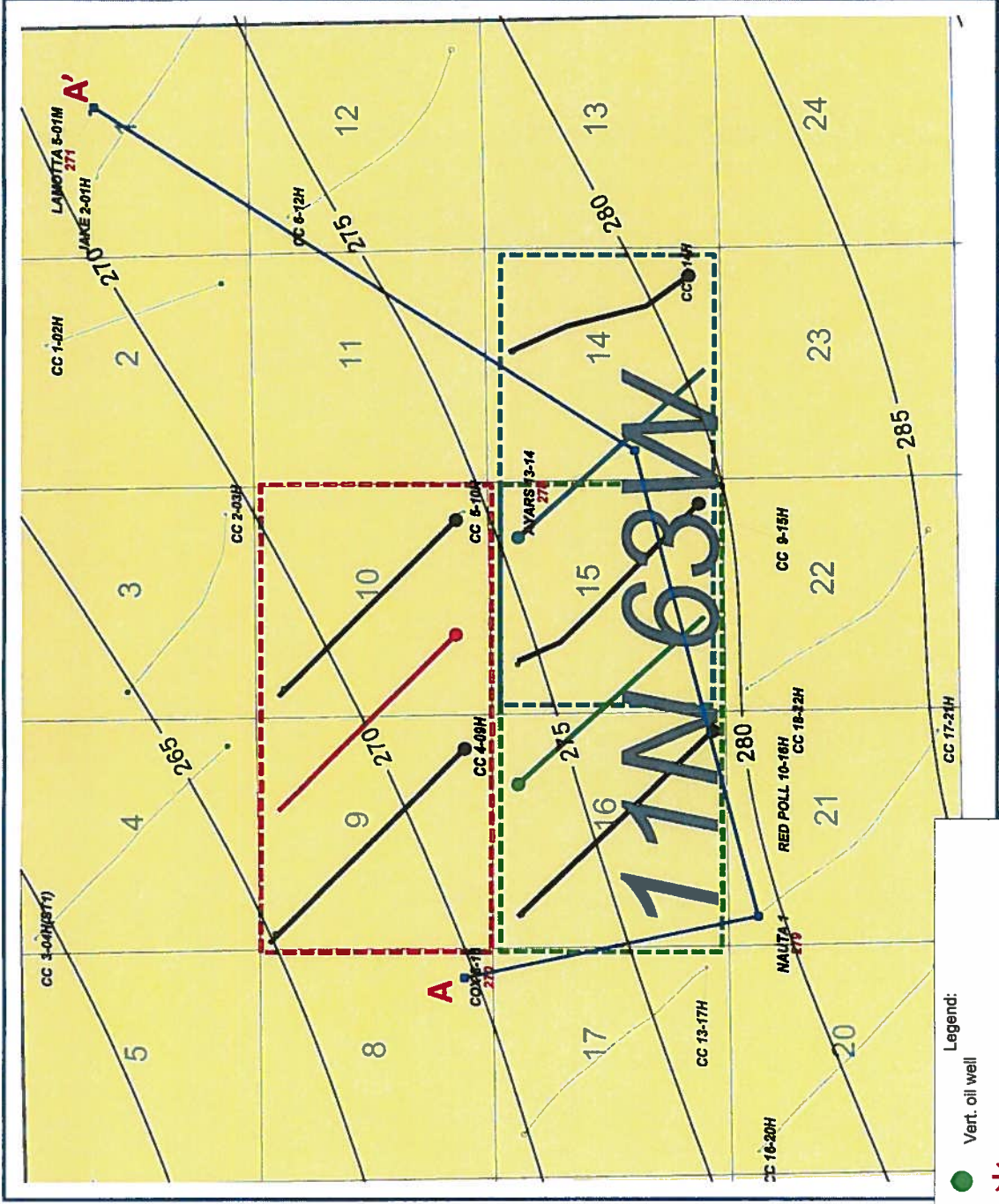
- Sections 9 & 10
- Sections 15 & 16
- Sections 14 & 15

**Well Name Plotted at SHL
NBRR Top Plotted at Intersection of HZ
Well Bore.**



CAUSE 421
DOCKET # 1101-SP-3
EXHIBIT G-1
NIOBRARA STRUCTURE
MAP C.I. = 25'
Weld County, Colorado





APPLICATION AREA

- Existing Wells Drilled

PROPOSED WELLS & 1280 ACRE UNITS

- Sections 9 & 10
- Sections 15 & 16
- Sections 14 & 15

Well Name Plotted at SHL

CAUSE 421

DOCKET # 1101-SP-3

EXHIBIT G-2

NIOBRARA ISOPACH MAP
C.I. = 5'

Weld County, Colorado

Legend:

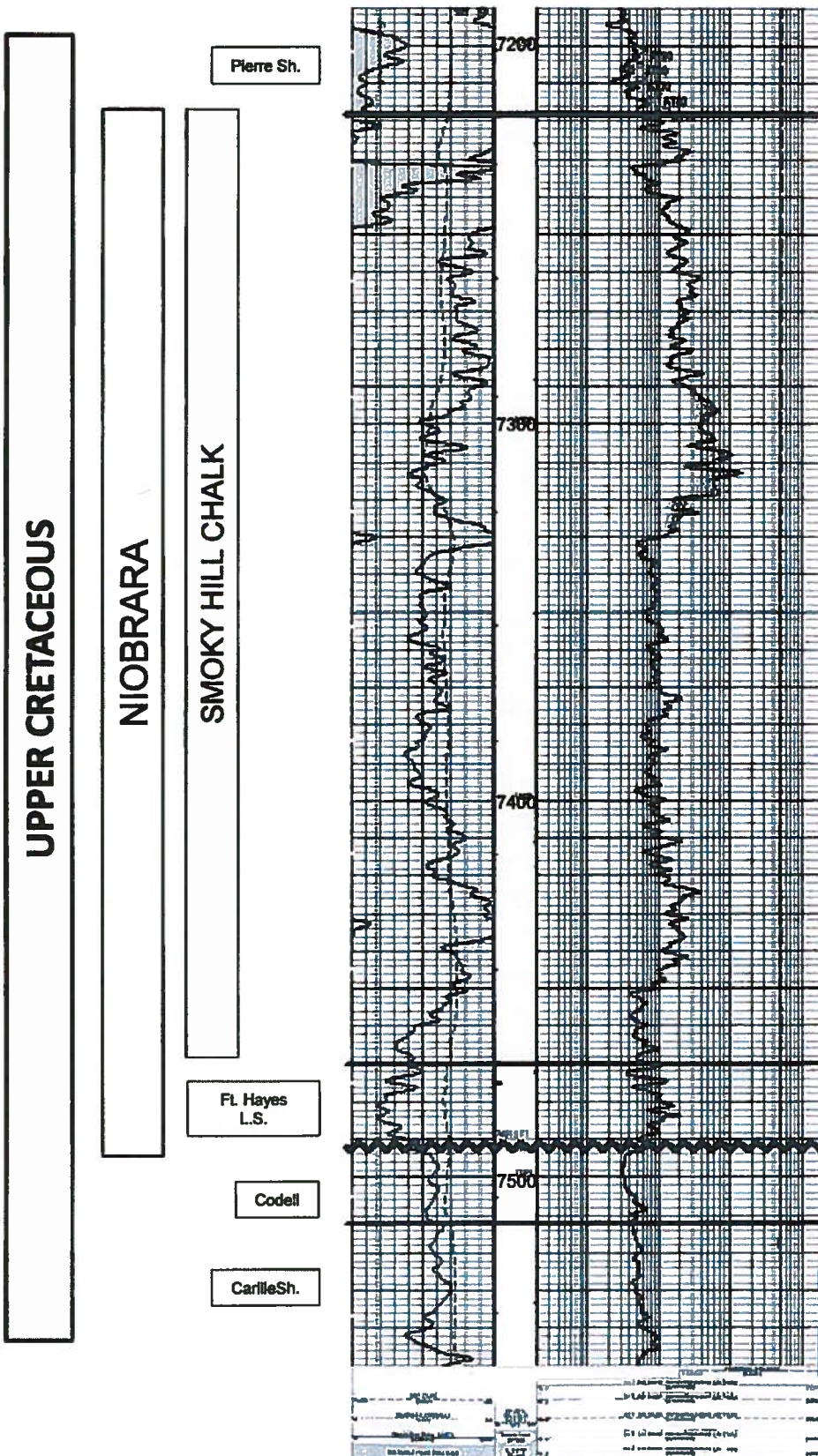
Vert. oil well

Vert. gas well

Vert. dry hole

Horz. Well.

EOGR
LAMOTTA 5-01M
T11N-R63W-1
Weld Co., Colo.



NIOBRARA TYPE LOG



CAUSE 421
DOCKET # 1101-SP-3
EXHIBIT G-3

A

COLE JACK A
CDX 6-16
T11N R2E S8E
E2 SE SE
WELD
5.310
3/13/1985
05123123230000

<6.748FT>

GROSE & TODD
NAUTA 1 821
T11N R2E S8E
E2 NW NW
WELD
5.276
16/1970
05123071350000

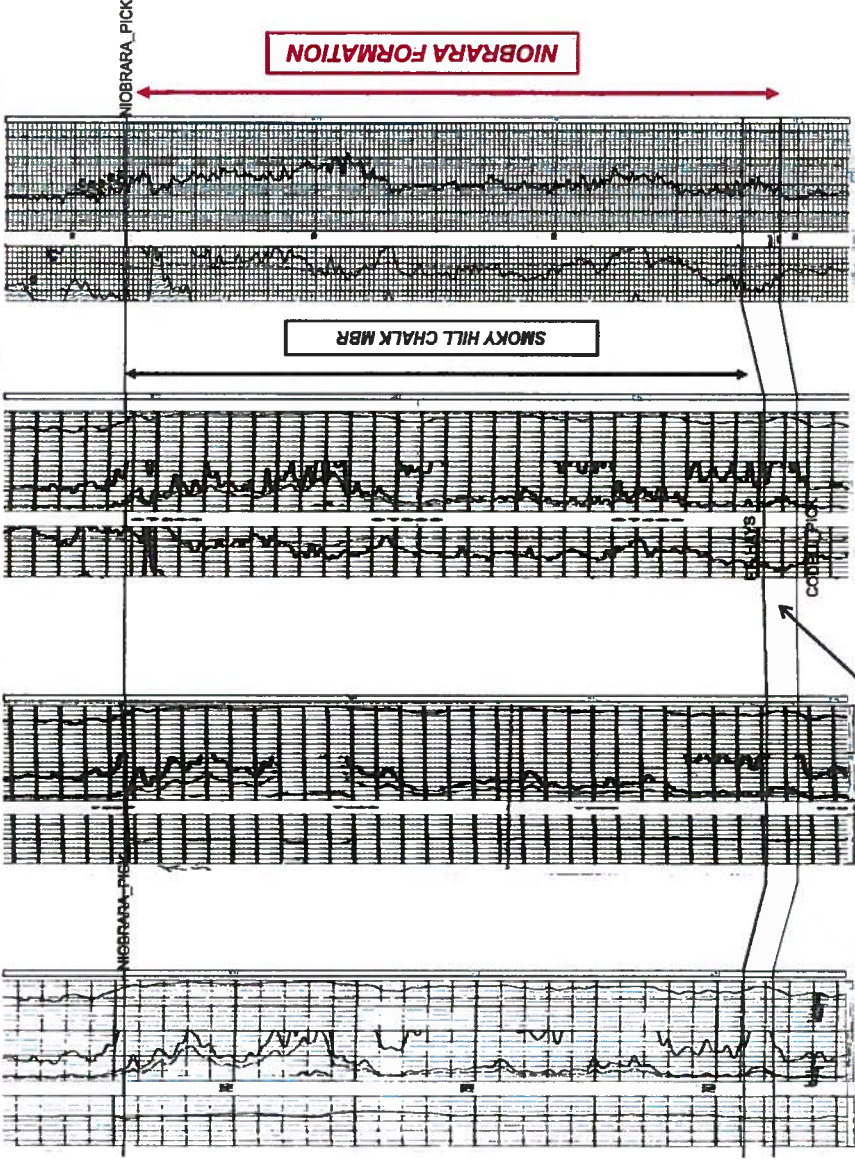
<10.855FT>

TRUE OIL LLC
AYARS 13-14
T11N R2E S8E
E2 NW NW
WELD
5.236
7/5/1986
0512313130760000

<14.387FT>

EDGR
LAMOTTA 5-01M
T11N R2E S8E
E2 NW NW
WELD
5.316
8/6/2009
05123305580000

A'



CAUSE 421

DOCKET # 1101-SP-3

EXHIBIT G-4

A'-A' NIOBRARA CROSS

SECTION

Weld County, Colorado

EOG RESOURCES, INC.

Osman Apaydin, Reservoir Engineer – Engineering Testimony

Docket No 1101-SP-03; Cause 421

Sections 9, 10, 14, 15 & 16 of Township 11 North, Range 63 West, 6th P.M.,
Weld County, Colorado

January 13, 2011 Colorado Oil and Gas Conservation Commission Hearing

My name is Osman Apaydin. I am currently employed as a reservoir engineer with EOG Resources, Inc. I have over 10 years experience in reservoir engineering, production operations, facility engineering and related matters and am familiar with the engineering conditions with respect to the Application Lands and the matters set forth in the October 8, 2010 verified application ("Application").

In support of EOG's Application in the above-referenced docket, I am submitting one (1) exhibit. The exhibit forms the basis for EOG's Application to gain approval to (i) establish three (3) laydown "rolling" 1,280-acre drilling and spacing units, (ii) drill and complete up to two (2) additional horizontal wells in the proposed 1,280-acre drilling and spacing units for the Niobrara Formation as illustrated on Exhibit L-5, and (iii) vacate the existing 640-acre drilling and spacing units on the Application Lands (defined below), but only as the existing 640-acre spacing relates to the additional horizontal well in the proposed "rolling" laydown 1,280-acre drilling and spacing units. Please refer to Exhibit L-5 and Exhibit G-1 for an illustration of the Application Lands and the orientation of the additional horizontal wells in each of the proposed "rolling" 1,280-acre drilling and spacing units.

Drainage and Economic Calculations

EOG Resources has drilled and stimulated the first exploratory well, Jake 2-01H in the 3rd quarter of 2009 with a 3,800ft lateral. It delivered a maximum rate of 1,588 Bopd rate and has flowed over 90,000 barrels to date. The Jake 2-01H Well is not in any of the proposed 1,280-acre drilling and spacing units. Since then, EOG Resources has drilled approximately 27 additional wells. Five of the 27 additional wells are discussed below and are within the Application Lands.

The Red Poll 10-16H, located in Section 16, Township 11 North, Range 63 West, was tested unstimulated openhole. This well came on flowing at a max rate of 1,100 Bopd. This well has produced 53,000 barrels to date, the majority being produced since the well was put on continuous production in late July.

The Critter Creek 4-09H, located in Section 9, Township 11 North, Range 63 West, well was put on production late June with a maximum rate of 600 Bopd at managed restricted rate and has produced approximately 82,000 barrels to date.

The Critter Creek 5-10H well, located in Section 10, Township 11 North, Range 63 West, was put on production at the beginning of September with a maximum rate of 550 Bopd and has produced approximately 33,000 barrels to date.

The Critter Creek 8-14H well, located in Section 14, Township 11 North, Range 63 West, was put on production at the beginning of November with a maximum rate of 348 Bopd and has produced approximately 7,800 barrels to date.

The Critter Creek 9-15H, located in Section 15, Township 11 North, Range 63 West, well was put on production at the end of September with a maximum rate of 600 Bopd at managed restricted rate and has produced approximately 38,000 barrels to date.

Production for the existing wellbores on the previously established 640 acre spacing shall remain in place. Production for horizontal wells drilled within the proposed "rolling" laydown 1,280-acre drilling and spacing units, shall be allocated on a 1280-acre basis. The "rolling" (overlapping) nature of the 1280-acre drilling and spacing units spacing provides that the interest of each mineral owner in one 640 acre section will, potentially, participate in two 1280-acre drilling and spacing units.


Horizontal drilling and completing of the Niobrara is complex. EOG Resources is utilizing managed pressure drilling equipment when drilling these laterals. The play may be a high rate fracture play only, or may have an additional matrix contribution to the complex fracture network. As a result, EOG Resources has been extensively testing multiple completion techniques, to maximize the recoverable reserves. This application is part of that effort by testing tighter spacing in an area where production response with these various techniques has been variable and indicates that down spacing could be warranted. With the current application, EOG Resources is proposing to drill an additional well on the proposed 1,280-acre drilling and spacing units.

Exhibit E-1 reflects the original oil in place, estimated ultimate recovery, porosity and calculated drainage area for a number of wells within the Hereford Field Area, which covers the Application Lands that are subject to the current Application. Vertical well oil production performance is highly variable from the Niobrara Formation and there is no known vertical well production in the Application Lands. EUR estimates for the EOG Resources drilled horizontal wells, with limited production history, vary between 130,000 to 285,000 barrels. Estimated original oil in place is between 2,600,000 and 5,700,000 BBL. This range yields estimated drainage areas between 92 acres to 202 acres. The current application is requesting permission for wells crossing the section lines between already producing 640-acre spaced horizontal wells in limited 1,280-acre drilling and spacing units for testing purposes. Drainage area ranges presented in this testimony support these infill wells.

Based upon my engineering analysis, the additional well in the proposed 1,280-acre drilling and spacing units will promote efficient drainage, will protect correlative rights, will avoid waste, and will lead to an increase in the ultimate recovery of hydrocarbons. EOG does not believe that granting this Application will adversely affect correlative rights.

The matters described herein were all conducted under my direction and control. To the best of my knowledge and belief, all of the matters set forth herein, my testimony and in the exhibits are true, correct and accurate.

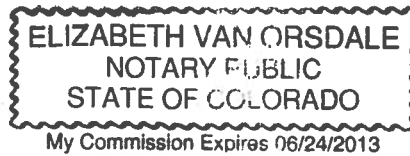
Dated this 29th day of December, 2010.


Osman Apaydin, Reservoir Engineer
EOG Resources, Inc.

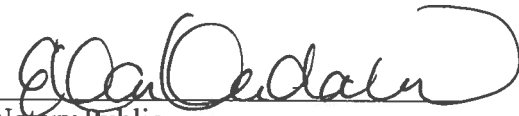
STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

The foregoing instrument was subscribed and sworn to before me this 29th day of December, 2010, by Osman Apaydin, Reservoir Engineer, for EOG Resources, Inc.

Witness my hand and official seal.



My commission expires: 6-24-2013


Notary Public

Niobrara Formation Drilling & Spacing Unit Application
Hereford Field
Drainage Calculations

WELL NAME	API NO	Well Orientation	FIELD	SEC.	TSHP.	RGE.	EUR OIL (BBL)	OOIP(BBL)	h(ft)	Porosity	Calculated Drainage Area (Acres)
JAKE 2-01H	5123305740000	Horizontal	HEREFORD	1.0	11N	63W	245,000	4,900,000	80	0.10	174
RED POLL 10-16H	5123307490000	Horizontal	HEREFORD	16.0	11N	63W	198,000	3,960,000	80	0.10	140
CRITTER CREEK 4-09H	5123310530000	Horizontal	HEREFORD	9.0	11N	63W	285,000	5,700,000	80	0.10	202
CRITTER CREEK 5-10H	5123312750000	Horizontal	HEREFORD	10.0	11N	63W	180,000	3,600,000	80	0.10	127
CRITTER CREEK 8-14H	5123312220000	Horizontal	HEREFORD	14.0	11N	63W	130,000	2,600,000	80	0.10	92
CRITTER CREEK 9-15H	5123311810000	Horizontal	HEREFORD	15.0	11N	63W	250,000	5,000,000	80	0.10	177

B_o= 1.4 rvb/STB (from Observed API Gravity and GOR data)
S_w = 0.35 fraction (calculated from Archie S_w calculation)
RF = 0.05 fraction (assumed)

Equations used:

OOIP = EUR / RF
Area = OOIP * B_o / 7758 / h / por / (1-S_w)

where:

- OOIP = original oil in place (BBL)
- EUR = estimated ultimate recovery (BBL)
- RF = recovery factor (fraction)
- Area = drainage area (acres)
- B_o = formation volume factor (rbv/STB)
- h = thickness, (ft)
- por = porosity (fraction)
- S_w = water saturation (fraction)