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COGCC

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

IN THE MATTER OF THE APPLICATION OF  
WHITING OIL AND GAS CORPORATION FOR  
AN ORDER ESTABLISHING WELL LOCATION  
AND SETBACK RULES FOR THE DRILLING  
OF ILES AND SEGO FORMATION WELLS ON  
CERTAIN DESCRIBED LANDS IN RIO  
BLANCO COUNTY, COLORADO

CAUSE NO 527

DOCKET NO

ORIGINAL

APPLICATION

COMES NOW Whiting Oil and Gas Corporation ("Applicant"), a Delaware corporation, by its attorneys, Poulson, Odell and Peterson, LLC, and makes application to the Oil and Gas Conservation Commission of the State of Colorado for an order establishing well location and setback rules applicable to the drilling and producing of wells from the Iles and Segro Formations of the Mesaverde Group underlying certain described lands in Rio Blanco County, Colorado and in support of its application states and alleges as follows

1 That Applicant is a corporation duly authorized to conduct business in the State of Colorado

2 That an affiliated company of Applicant owns oil and gas leasehold interests covering all or a portion of the following described lands (hereinafter "Application Lands")

Township 2 South, Range 98 West  
Section 27 NE/4NE/4

3 That the Application Lands as to the Iles and Segro Formations are unspaced and subject to the Commission's Rule 318 (formerly Rule 316) Further, the Application Lands as to the Williams Fork Formation have been approved for the drilling of ten (10) acre density wells pursuant to the Commission's Order 527-1

4 That, pursuant to the Commission's Order 572-3 dated March 26, 2007, optional ten acre density was granted for the drilling of Iles and Segro Formations Wells on the Application Lands with each such well to be located downhole anywhere upon such lands provided no such well shall be located any closer than 400 feet from the outside boundary of the Application Lands

5 That various wells have been drilled, tested and completed in both the Iles and Segro Formations of the Mesaverde Group upon lands in the same general area as the Application Lands

6 That as to the Application Lands, the Commission should continue to allow Iles and Segro Formation wells to be optionally drilled upon a ten (10) acre density basis but amend the setback rules as set forth in Order 572-3 such that the permitted well may be located downhole anywhere upon the Application Lands but no closer than 100 feet from the outside boundary of the

Application Lands unless such boundary abuts or corners lands in respect of which the Commission has not at the time of the drilling permit application granted the right to drill 10-acre density wells for the Iles and Segó Formations, in which event the Iles and Segó Formation wells to be drilled upon the Application Lands should be drilled downhole no closer than 200 feet from that portion of the boundary which so abuts or corners the lands in respect of which 10-acre density downhole drilling for Iles and Segó Formation wells has not been ordered by the Commission. It is understood that Iles and Segó Formation wells may be drilled and completed only within wellbores drilled to the Williams Fork Formation and may not be drilled as separate wells.

7 That, except as previously authorized by order of the Commission, wells to be drilled under this Application will be drilled from the surface either vertically or directionally from the equivalent of no more than one pad located on a given quarter quarter section unless exception is granted by the by the Director of the Colorado Oil and Gas Conservation Commission pursuant to application made for such exception.

8 The granting of this application will not promote waste, will not violate correlative rights and will assure the greatest ultimate recovery of gas and associated hydrocarbon substances from the reservoir.

9 That the names and addresses of the interested parties according to the information and belief of the Applicant are set forth in Exhibit A attached hereto and made a part hereof.

WHEREFORE, Applicant respectfully requests that this matter be set for hearing in October, 2007, that notice be given as required by law and that upon such hearing this Commission enter its order consistent with Applicant's proposals as set forth above.

Dated August 8, 2007

**POULSON, ODELL AND PETERSON, LLC**

By William A. Keefe  
William A Keefe  
POULSON, ODELL & PETERSON, LLC  
1775 Sherman Street, Suite 1400  
Denver, Colorado 80203  
Phone 303-861-4400

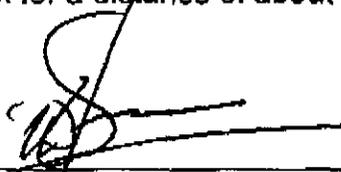
STATE OF COLORADO )  
 ) ss.  
CITY AND COUNTY OF DENVER )

**VERIFIED STATEMENT OF BILL R. MOOMEY**

In support of the request for Director approval of the Verified Application of Whiting Petroleum Corporation in Cause No 527, Docket No. 0708-SP-20, pursuant to Rule 511.b , Bill R. Moomey, Regional Landman of Whiting Petroleum Corporation, upon oath, deposes and states as follows.

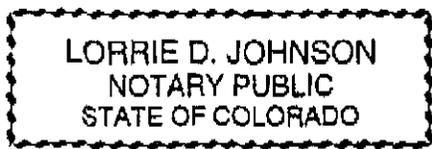
I am currently employed as a Regional Landman of Whiting Petroleum Corporation. I have been and am presently responsible for and have knowledge of the land position related to the Application Lands.

- a I have testified previously as an expert witness in petroleum land matters before the COGCC and before Hearing Officers of the COGCC. Attached is a copy of my resume prepared by me Also attached is Exhibit L-1 which was prepared by me or under my direction and control I have reviewed the exhibit, and to the best of my knowledge and belief, the exhibit is correct and accurate as of the date of this Verified Statement.
- b. Under the Commission's Order 527-1 and Order No. 527-2 in Cause 527, certain lands including the Application Lands were approved by the Commission for one (1) well per 10 acres for the production of gas and associated hydrocarbons from the Williams Fork Formation and lies Formation respectively.
- c. Exhibit L-1 indicates the location of the Application Lands. The lands encompassed within the Application consist of 1,440.47 acres The leasehold ownership interests of these lands are indicated on the plat The lands basically parallel County Road twenty-six for a distance of about seven miles

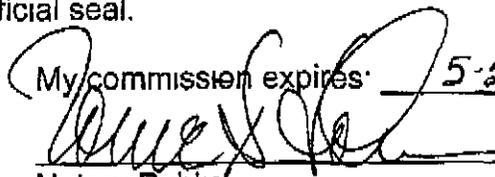
By   
Bill R. Moomey

Subscribed and sworn to before me this 8th day of August, 2007 by Bill R. Moomey, Regional Landman of Whiting Petroleum Corporation.

Witness my hand and official seal.



My Commission Expires 05/23/2010

My commission expires: 5-23-2010  
  
Notary Public



## EXHIBIT A

Mike Neumann  
Rio Blanco County  
Post Office Box 599  
Meeker, CO 81641

Exxon Mobil Corporation  
P O Box 4358  
Houston, TX 77210-4358

Ceres Resource Partners, L P  
3838 Oak Lawn Ave  
Dallas, TX 75219-4541

Rita Energy, Inc  
P.O Box 10209  
Amarillo, TX 79116-0209

E. Roosevelt Limited Partnership  
2626 Cole Ave , Suite 600  
Dallas, TX 75204

Industrial Gas Services, Inc  
4501 Wadsworth Blvd  
Wheatridge, CO 80033

OXY USA WTP LP  
6 Desta Drive, Suite 6000  
Midland, TX 79705-5505

Symbol Energy Inc  
10118 Memorial Drive  
Houston, TX 77024

Hanover Energy Corporation  
40 East South Temple, Suite 300  
Salt Lake City, UT 84111

Palo Production Corp  
621 – 17<sup>th</sup> Street, Suite 1640  
Denver, CO 80293

ER Family Limited Partnership  
5956 Sherry Lane, Suite 1225  
Dallas, TX 75225

Molehil, Enterprises Ltd , LLC  
2070 ¾ Road  
Grand Junction, CO 81503

William H Spires, Inc  
2195 North State Hwy, Suite 1  
Franktown, CO 80116

Timberline Energy, Inc  
2195 North State Hwy, Suite 1  
Franktown, CO 80116

John O Whitney  
2300 Riverside Drive, Apt 15F  
Tulsa, OK 74114

Richard L. Harris  
2805 E Skelly Drive, Suite 806  
Tulsa, OK 74105

Wayne Johnson  
P O Box 8037  
Colorado Springs, CO 80933

C S Trospen  
P O Box 1238  
Colorado Springs, CO 80901

C E Jacobs  
P O. Drawer 1178  
Albany, TX 76430

Sauvage Gas Company  
P O Box 132  
Oberlin, KS 67749

Guy Caldwell  
818 Citizens National Bank Building  
Abilene, TX 79604

Lee Caldwell  
818 Citizens National Bank Building  
Abilene, TX 79604

CSG Exploration Company  
P O Box 300  
Tulsa, OK 74102

Mike Kahn  
911 West Broadway  
Seminole, OK 74868

Equity Oil Company  
806 American Oil Building  
Salt Lake City, UT 84101

William A. Keefe  
POULSON, ODELL & PETERSON, LLC  
1775 Sherman Street, Suite 1400  
Denver, CO 80203

Bill R. Moomey  
Whiting Petroleum Corporation  
1700 Broadway, Suite 2300  
Denver, CO 80290-2300

Agnes C. Beckham  
P O Box 739  
Abilene, TX 79604

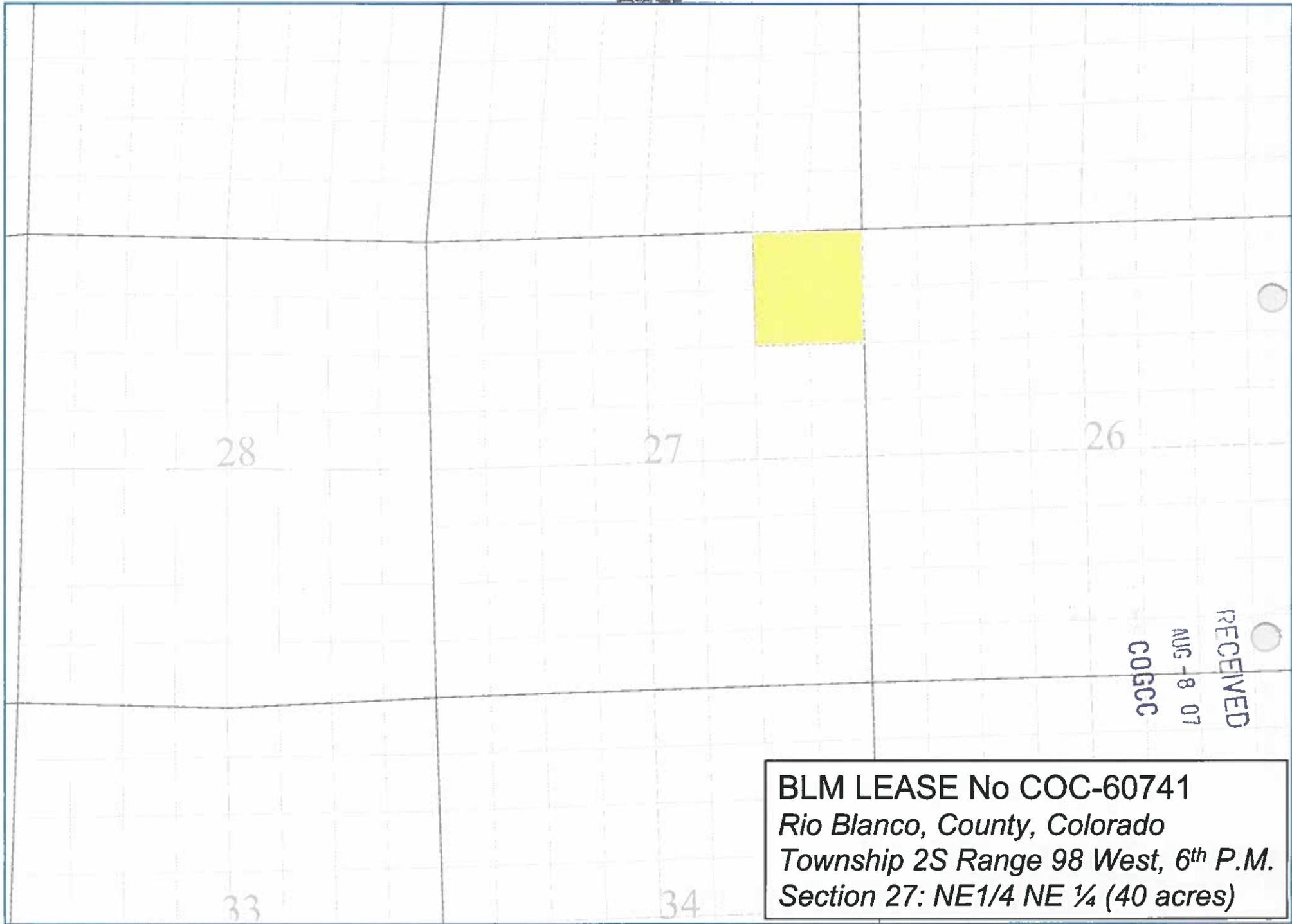
Bob Beckham  
P O Box 739  
Abilene, TX 79604

Robert M. Smith  
3510 Clubheights Dr  
Colorado Springs, CO 80906

Williams Production Rmt Co  
Tower 3, Suite 1000  
1515 Arapahoe Street  
Denver, CO 80202

Bureau Of Land Management  
White River Field Office  
73544 Highway 64  
Meeker, CO 81641

Samuel Gary, Jr & Associates, Inc  
1670 Broadway, Suite 3300  
Denver, CO 80202-4801



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**BLM LEASE No COC-60741**  
*Rio Blanco, County, Colorado*  
*Township 2S Range 98 West, 6<sup>th</sup> P.M.*  
**Section 27: NE1/4 NE 1/4 (40 acres)**

LAW OFFICES  
POULSON, ODELL & PETERSON, LLC

SUITE 1400  
1775 SHERMAN STREET  
DENVER, COLORADO 80203-4319

TELEPHONE (303) 861-4400  
FACSIMILE (303) 861-1225  
WEBSITE www.poplpc.com

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ROBERT D. POULSON  
1927-2001

C. M. PETERSON  
1923-2001

OF COUNSEL  
G. DONOHUE KANE

WILLIAM G. ODELL \*  
RANDALL M. CASE \*\*  
STEPHEN M. THOMPSON LL.M. \*\*  
SCOTT M. CAMPBELL \*\*  
WILLIAM A. KEEFE \*\*\*  
PAUL E. UPSONS \*\*  
ESTEE A. SANCHEZ \*\*\*\*  
GREG CREER LL.M. \*\*\*\*\*  
NICK A. SWARTZENDRUBER \*\*

\* ALSO ADMITTED IN OKLAHOMA AND MONTANA  
\*\* ALSO ADMITTED IN WYOMING  
\*\*\* ALSO ADMITTED IN CALIFORNIA, TEXAS AND WYOMING  
\*\*\*\* ALSO ADMITTED IN KANSAS AND WYOMING  
\*\*\*\*\* ALSO ADMITTED IN IOWA, WISCONSIN AND WYOMING

August 8, 2007

VIA HAND DELIVERY

Patricia Beaver  
Colorado Oil & Gas  
Conservation Commission  
1120 Lincoln Street, Suite 801  
Denver, Colorado 80203

Re Application of Whiting Oil and Gas Corporation

Dear Tricia

Please find enclosed an original and twelve (12) copies of an application being filed on behalf of Whiting Oil and Gas Corporation. We understand that this matter will be placed upon the Commission's October Docket.

Also, please find enclosed one (1) copy of the plat for this application.

If there are any questions concerning this application, please give me a call.

Very truly yours,

POULSON, ODELL & PETERSON, LLC



William A. Keefe

WAK/klh  
Enclosures