

11-4

**FILED**

OCT 17 2019

BEFORE THE CORPORATION COMMISSION OF THE STATE OF OKLAHOMA - OKC  
CORPORATION COMMISSION  
OF OKLAHOMA

APPLICANT: CONTINENTAL RESOURCES, INC.

CAUSE CD NO.

RELIEF SOUGHT: LOCATION EXCEPTION AND  
EXCEPTION TO GENERAL RULE 165:10-3-28(c)(2)(B)

201 905161

LANDS COVERED: SECTIONS 34 AND 33, TOWNSHIP 1  
NORTH, RANGE 1 WEST, GARVIN COUNTY, OKLAHOMA

**APPLICATION**

COMES NOW the Applicant, Continental Resources, Inc., and shows the Honorable Corporation Commission the following:

**1. PARTIES:**

1.1 Applicant is: Continental Resources, Inc.  
P.O. Box 269091  
Oklahoma City, OK 73126

Applicant is the owner of the right to drill a horizontal well to the common sources of supply named below underlying the lands described in the caption hereof.

1.2 Respondents are set out on the Exhibit "A" and "B" attached hereto and made a part hereof.

**2. ALLEGATION OF FACTS:**

2.1 That heretofore by Order No. 494612, this Commission established 640-acre drilling and spacing units for the Sycamore, Woodford Shale and Hunton common sources of supply underlying Section 34-1N-1W, Garvin County, Oklahoma, with the permitted well to be drilled no closer than 1,320 feet from the unit boundary as to the Sycamore, Woodford Shale and Hunton common sources of supply.

2.2 That heretofore by Order No. 161935, this Commission established 640-acre drilling and spacing units for the Sycamore, Woodford Shale and Hunton Lime common sources of supply underlying Section 33-1N-1W, Garvin County, Oklahoma, with the permitted well to be drilled no closer than 1,320 feet from the unit boundary as to the Sycamore, Woodford Shale and Hunton Lime common sources of supply.

OKLA CORP COMM  
RECEIPT 201905161  
Date: 10/17/2019 Time: 10:40  
Case: 201905161 CD Cashier: SSA  
Payer: CONTINENTAL RESOURCES INC  
Check # 78723 \$200.00  
23 O&G FILING FEE

**CONTINENTAL RESOURCES, INC.**

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2.3 Applicant, as Operator, is proposing to drill a multiunit horizontal well, the Blake 1-34-33XHW, under 52 O.S. §87.7, with a portion of the completion interval of such multiunit horizontal well to be located in one or more of the 640-acre drilling and spacing units formed for the Sycamore, Woodford Shale, Hunton and Hunton Lime common sources of supply in Sections 34 and 33-1N-1W, Garvin County, Oklahoma. There is currently pending before the Corporation Commission in Cause CD No. 201~~05100~~, an Application of the Applicant requesting the Commission to approve the multiunit horizontal well and establish a proper allocation factor for allocating the cost of and the production and proceeds from such multiunit horizontal well to each of the units affected thereby. The location of Applicants proposed well will not comply with the location set forth in the spacing orders referenced above. Applicant is proposing to drill the multiunit well as follows:

**Section 34-1N-1W:**

first perforation: no closer than 1,320 feet from the east line and no closer than 330 feet from the north line of Section 34-1N-1W, Garvin County, Oklahoma;

last perforation: no closer than 0 feet from the west line and no closer than 330 feet from the north line of Section 34-1N-1W, Garvin County, Oklahoma;

**Section 33-1N-1W:**

first perforation: no closer than 0 feet from the east line and no closer than 330 feet from the north line of Section 33-1N-1W, Garvin County, Oklahoma;

last perforation: no closer than 150 feet from the west line and no closer than 330 feet from the north line of Section 33-1N-1W, Garvin County, Oklahoma;

and to complete such multiunit horizontal well in and to produce hydrocarbons from the separate common sources of supply. Applicant intends to run casing in the horizontal portion or lateral of the borehole of the multiunit horizontal well and to cement such casing so as to cover and isolate the first and last perforations in such horizontal portion or lateral.

2.4 No downward adjustment in the allowable as allocated to the portion of the proposed well in said Sections 34 and 33 is necessary in order to protect the correlative rights of the parties entitled to share in production from the separate common sources of supply and such well as to such separate common sources of supply in such section should be granted a full allowable, with the right to produce same.

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2.5 In addition, Rule 165:10-3-28 provides that no horizontal well shall be closer than 600 feet to an existing wellbore. Applicant's well could potentially be closer than 600 feet from the following wells:

The Allsup 1-34 well, API #3504900039, which is operated by Topsail Secondary Recovery, LLC, is located in the CNW/4 NW/4 of Section 34-1N-1W, Garvin County, Oklahoma, and produces from the Woodford common source of supply.

Therefore, Applicant requests as part of this location exception an exception to Rule 165:10-3-28(c)(2)(B).

2.7 In order to prevent the various types of waste, protect correlative rights and obtain the greatest ultimate recovery of oil and gas, the Commission should grant an exception to the permitted well location tolerances in the 640-acre drilling and spacing units formed for the separate common sources of supply in said Sections 34 and 33 so as to permit the proposed well to be drilled as described in paragraph 2.3 above, and to be completed in and to produce hydrocarbons from such separate common sources of supply in such section.

3. **LEGAL AUTHORITY.** The relief sought by this application is authorized by 52 O.S. §87.1.

4. **RELIEF SOUGHT.** Applicant requests the Corporation Commission of Oklahoma to enter an order, to be effective as of the date of the execution thereof or as of a date prior thereto, as follows:

- (i) Authorizing and permitting an exception to the permitted well location tolerances in the 640-acre drilling and spacing units in Sections 34 and 33-1N-1W, Garvin County, Oklahoma, for the Sycamore, Woodford Shale, Hunton and Hunton Lime common sources of supply, so as to allow, in part, a well to be drilled as described in paragraph 2.3, above, and to be completed in and to produce hydrocarbons from the above-named separate common sources of supply in said Sections 34 and 33 with such authorization and permission running in favor of Applicant; and
- (ii) Granting a full allowable for the proposed well as to production from the separate common sources of supply in said Sections 34 and 33, with no downward adjustment made thereto; and
- (iii) Granting an exception to Rule 165:10-3-28(c)(2)(B).

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WHEREFORE, Applicant prays that after notice and hearing as required by law, the well location and allowable as requested by Applicant be permitted. Applicant may request that any Order issued in this cause be made effective on a date prior to its signing.

Respectfully submitted,  
HARTZOG CONGER CASON

By: 

David E. Pepper, OBA #7035  
Jessica D. Hatcher, OBA #22586  
201 Robert S. Kerr Avenue, Suite 1600  
Oklahoma City, OK 73102  
(405) 996-3395

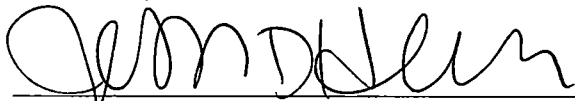
**ATTORNEYS FOR APPLICANT**  
**CONTINENTAL RESOURCES, INC.**

**ADDRESS CHANGE NOTIFICATIONS MAY BE DIRECTED TO JEFF GLENN, REDSKY LAND, 1501 RENAISSANCE BLVD., EDMOND, OK 73013, (405) 470-2015 OR TO DAVID E. PEPPER OR JESSICA D. HATCHER, ATTORNEYS AT AGENT@HARTZOGLAW.COM, (405) 996-3395. FOR ALL OTHER INQUIRIES PLEASE CONTACT JEFF GLENN, REDSKY LAND, 1501 RENAISSANCE BLVD., EDMOND, OK 73013, (405) 470-2015.**

CERTIFICATE OF MAILING

The undersigned, of lawful age, being first duly sworn upon oath, states: I am the Attorney for the above-named Applicant. I certify that on or before the 18<sup>th</sup> day of October, 2019, I mailed by first class United States mail, proper postage prepaid thereof, a copy of the Notice of Hearing on file in this cause and this Application to the respondents, named on the Exhibit "A" attached to this Application, at their respective mailing addresses.

That the Applicant has, with due diligence and after inquiry of every possible source for information, attempted to locate the names and addresses of all respondents that should be receiving notice of this hearing before the Corporation Commission. For respondents that Applicant does not know and cannot ascertain whether an individual respondents are living or deceased, or respondents with a last known address that are no longer deliverable, or whether a corporations or other business entities respondents are existing, Applicant desires to obtain service by publication upon said respondents whose addresses are unknown or are undeliverable.

  
\_\_\_\_\_  
David E. Pepper and/or Jessica D. Hatcher

Subscribed and sworn to before me this 17<sup>th</sup> day of October, 2019.

  
\_\_\_\_\_  
NOTARY PUBLIC

My Commission Expires:



**CONTINENTAL RESOURCES, INC.**

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**EXHIBIT "A"**

- |   |   |
|---|---|
| 1. Armada Energy Corp<br>5724 NW 135th St<br>Oklahoma City, OK 73142      | 11. Echo Energy Partners I LLC<br>3817 NW Expressway Ste 840<br>Oklahoma City, OK 73112 |
| 2. Baron Energy Inc<br>2600 Clermont Place<br>Oklahoma City, OK 73116     | 12. FD Robinson Properties, LLC<br>1704 E. Britton Rd.<br>Oklahoma City, OK 73131       |
| 3. Beasley Oil Company<br>5724 NW 135th Street<br>Oklahoma City, OK 73142 | 13. Freedom Oil & Gas Corporation<br>PO Box 18502<br>Oklahoma City, OK 73154            |
| 4. Bha LLC<br>PO Box 6605<br>Edmond, OK 73083                             | 14. Gamma Oil and Gas LLC<br>Po Box 7731<br>Edmond, OK 73083                            |
| 5. Biscuit Hill LLC<br>16200 Sonoma Park Dr<br>Edmond, OK 73013           | 15. Grassland Investments LLC<br>2252 N Broadway<br>Moore, OK 73160                     |
| 6. Blackacre Resources, LLC<br>PO Box 1534<br>Oklahoma City, OK 73102     | 16. Heritage Resources-Nonop LLC<br>PO Box 13580<br>Oklahoma City, OK 73113             |
| 7. Christopher W. Moore<br>710 Bayview Way<br>Emerald Hills, CA 94062     | 17. JP Drilling Fund, LLC<br>4101 Hughes Circle<br>Norman, OK 73072                     |
| 8. Clear Creek Investments Inc<br>4101 Hughes Circle<br>Norman, OK 73072  | 18. Lebo Petro LLC<br>5724 NW 135th Street<br>Oklahoma City, OK 73142                   |
| 9. Collins Permian, LP<br>PO Box 27<br>Midland, TX 79702                  | 19. Merit Hugoton, LP<br>PO Box 843727<br>Dallas, TX 75284-3727                         |
| 10. Davis Hudson Inc<br>PO Box 1028<br>Edmond, OK 73083                   | 20. Millspaugh Minerals LLC<br>2121 S Yorktown Ave, Apt 1002<br>Tulsa, OK 74114         |

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| 21. Newfield Exploration Mid-Continent<br>David M Korell - AIF<br>24 Waterway Avenue, Ste 900<br>The Woodlands, TX 77380 | 33. Topsail Secondary Recovery, LLC<br>PO Box 5433<br>Edmond, OK 73083                    |
| 22. Parker Investment Group Inc<br>PO Box 18717<br>Oklahoma City, OK 73154   | 34. Wallace Family Partnership, LP<br>508 W. Wall Street, Suite 1200<br>Midland, TX 79701 |
| 23. Prairie Oil & Gas LLC<br>330 W Gray St, Ste 180<br>Norman, OK 73069  | 35. Warwick-Jupiter LLC<br>6608 N Western Box 417<br>Oklahoma City, OK 73116              |
| 24. Raisa II, LLC<br>PO Box 987<br>Denver, CO 80201  |   |
| 25. River Ranch Resources, LLC<br>PO Box 16458<br>Oklahoma City, OK 73113  |   |
| 26. Roan Holdings LLC<br>320 South Boston, Suite 900<br>Tulsa, OK 74103  |   |
| 27. Samson Exploration, LLC<br>PO Box 731705<br>Dallas, TX 75373-1705  |   |
| 28. Scoop I LP<br>PO Box 779<br>Oklahoma City, OK 73101-0779   |   |
| 29. Selm Energy Investments LLC<br>3376 W 34th Ave<br>Denver, CO 80211   |   |
| 30. Thayer Minerals, LLC<br>82 Lythwaite Farm Lane<br>Wilmington, DE 19803-1545  |   |
| 31. The Don Evans Group, LTD<br>500 W. Texas Ave. #960<br>Midland, TX 79701  |   |
| 32. Thomas N. Berry & Company<br>PO Box 1958<br>Stillwater, OK 74076-1958  |   |

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**EXHIBIT "B"**

1. Topsail Secondary Recovery, LLC  
PO Box 5433  
Edmond, OK 73083