

BEFORE THE CORPORATION COMMISSION  
OF THE STATE OF OKLAHOMA

APPLICANT: COMANCHE EXPLORATION COMPANY, L.L.C.

RELIEF SOUGHT: LOCATION EXCEPTION ) CAUSE CD NO: 201706561  
)  
LEGAL DESCRIPTION: ALL OF SECTION 12, )  
TOWNSHIP 18 NORTH, )  
RANGE 14 WEST, DEWEY ) ORDER NO. **705160**  
COUNTY, OKLAHOMA )

ORDER OF THE COMMISSION

This Cause came on for hearing before Paul Porter, Administrative Law Judge for the Oklahoma Corporation Commission, on the 20th day of August, 2019, at 8:30 a.m., in the Commission's Courtroom, Jim Thorpe Building, Oklahoma City, Oklahoma, pursuant to notice given as required by law and by the rules of the Commission, for the purpose of hearing, taking testimony and reporting his findings and recommendations to the Commission.

John C. Moricoli, Jr., Attorney, appeared for the Applicant, Comanche Exploration Company, L.L.C.; Gregory L. Mahaffey, Attorney appeared for Newfield Exploration Mid-Continent, Inc.; Eric King, Attorney, appeared for PEO Oklahoma, LLC; and Richard J. Gore, Attorney, appeared for Derby Exploration, LLC and Crystal River Operating Company LLC. Prior to this hearing the protests were resolved by the parties.

The Administrative Law Judge heard the Cause and filed his report with the Commission, which report has been considered and the Commission therefore finds as follows:

FINDINGS

1. That this is the Application of Comanche Exploration Company, L.L.C. to grant a well location exception for a well to be drilled and produce from the Mississippian, Woodford and Hunton common sources of supply underlying the unit comprised of all of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma. Said well to be drilled at the following locations:

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**SURFACE LOCATION:** 250' FSL and 1,935' FEL of Section 1, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**MISSISSIPPIAN:**

**TOP:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**FIRST PERFORATION:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**LAST PERFORATION:** No closer than 165' FSL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**WOODFORD:**

**TOP:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**FIRST PERFORATION:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**LAST PERFORATION:** No closer than 165' FSL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**HUNTON:**

**TOP:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

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**FIRST PERFORATION:** No closer than 165' FNL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**LAST PERFORATION:** No closer than 165' FSL and no closer than 330' FWL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**BOTTOM HOLE LOCATION:** 135' FSL and 1,935' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

as an exception to Order No. 684916. That Applicant owns oil and gas interests in the area covered by the Application in this cause which entitle Applicant to drill for and produce oil and gas from the lands covered by the application.

2. That the Commission has jurisdiction over the subject matter and of the persons interested herein. That notice has been given in all respects as required by law and the rules of the Commission.

3. That on the 31st day of December, 2018, the Commission issued Interim Order No. 689017, granting Applicant permission to drill said off-pattern well. Said well was thereafter drilled and directionally controlled to the bottom hole location set forth in the Order below, and an appropriate directional survey has heretofore been submitted to the Commission in accordance with OCC-OGR 165:10-3-27. Said Interim Order No. 689017 should be made final in the determination of this cause.

4. At the time of the final hearing, on Motion of the Applicant, the Application was amended to dismiss the Woodford and Hunton common sources of supply. On further Motion of the applicant the Application was amended to reflect that the Thompson 1-12-1H well has been drilled at the following locations and has encountered the respective common source of supply as shown below:

**SURFACE LOCATION:** 250' FSL and 1,935' FEL of Section 1, Township 18 North, Range 14 West, Dewey County, Oklahoma;

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**MISSISSIPPIAN:**

**TOP:** 349' FSL and 2,013' FEL of Section 1, Township 18 North, Range 14 West, Dewey County, Oklahoma;  
**MEASURED DEPTH:** 9,230'  
**TRUE VERTICAL DEPTH:** 9,048'

**FIRST PERFORATION:** 172' FNL and 2,013' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;  
**MEASURED DEPTH:** 10,093'  
**TRUE VERTICAL DEPTH:** 9,846'

**LAST PERFORATION:** 172' FSL and 1,988' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;  
**MEASURED DEPTH:** 15,034'  
**TRUE VERTICAL DEPTH:** 9,939'

**BOTTOM HOLE LOCATION:** 136' FSL and 1,986' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;  
**MEASURED DEPTH:** 15,071'  
**TRUE VERTICAL DEPTH:** 9,938'

5. That heretofore, by Order No. 684916, this Commission established 640 acre horizontal drilling and spacing unit covering the Mississippian common source of supply underlying all of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma; the permitted well for the Mississippian drilling and spacing unit is required by said Order to be drilled not less than 660 feet from the unit boundary.

6. That from all the evidence, it appears to be in the interest of producing the greatest ultimate recovery of hydrocarbons from such common source of supply, the prevention of waste and the protection of correlative rights, that Applicant should be permitted to drill a well at the location requested.

7. That the Thompson 1-12-1H well, at the location requested by Applicant, is necessary to effectively and efficiently drain a portion of the common source of supply

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(reservoir) covered by a drilling and spacing unit comprised of the lands set out in paragraph 1 above, which cannot be adequately and efficiently drained by a well drilled at the permitted well location described in paragraph 4 above.

8. That in the interest of securing the greatest ultimate recovery of petroleum hydrocarbons from said common source of supply (reservoir), the prevention of waste and the protection of correlative rights, this application should be granted.

ORDER

IT IS THEREFORE ORDERED by the Oklahoma Corporation Commission, as follows:

1. That Order No. 684916 be, and it is hereby amended, to grant permission and authority to Comanche Exploration Company, L.L.C., to drill the Thompson 1-12-1H well at the following location:

**SURFACE LOCATION:** 250' FSL and 1,935' FEL of Section 1, Township 18 North, Range 14 West, Dewey County, Oklahoma;

**MISSISSIPPIAN:**

**TOP:** 349' FSL and 2,013' FEL of Section 1, Township 18 North, Range 14 West, Dewey County, Oklahoma;

MEASURED DEPTH: 9,230'

TRUE VERTICAL DEPTH: 9,048'

**FIRST PERFORATION:** 172' FNL and 2,013' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

MEASURED DEPTH: 10,093'

TRUE VERTICAL DEPTH: 9,846'

**LAST PERFORATION:** 172' FSL and 1,988' FEL of Section 12, Township 18 North, Range 14 West, Dewey County, Oklahoma;

MEASURED DEPTH: 15,034'

TRUE VERTICAL DEPTH: 9,939'

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**BOTTOM HOLE LOCATION:** 136' FSL and 1,986' FEL of  
Section 12, Township 18 North, Range 14 West, Dewey  
County, Oklahoma;  
MEASURED DEPTH: 15,071'  
TRUE VERTICAL DEPTH: 9,938'

to test the Mississippian common source of supply.

2. That in the event said well is productively completed, it shall be given a normal allowable.

3. That Interim Order No. 689017 is hereby made final in the determination of this cause.

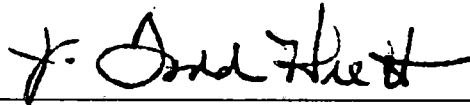
4. That the Thompson 1-12-1H well authorized to be drilled by this Order at the location set forth in paragraph 4 above is necessary to effectively and efficiently drain a portion of the common source of supply (reservoir) covered by the drilling and spacing units comprised of the lands set out in paragraph 4 above, which cannot be effectively and efficiently drained by a well drilled at the permitted well location set forth in said Order listed in paragraph 4 above. That this Order is entered as an exception to Order No. 684916 as subsequently amended and extended, and other applicable well spacing rules.

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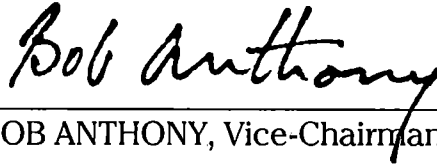
5. As operations for the drilling of the Thompson 1-12-1H well authorized hereby have heretofore been commenced this Order shall therefore terminate when the well is plugged, abandoned or converted in accordance with the terms and provisions of OCC-OG 165:10-1-24(f).

DONE AND PERFORMED this 14 day of November, 2019.

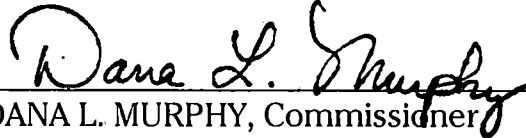
CORPORATION COMMISSION OF OKLAHOMA



J. TODD HIETT, Chairman



BOB ANTHONY, Vice-Chairman



DANA L. MURPHY, Commissioner

ATTEST:



PEGGY MITCHELL, Commission Secretary

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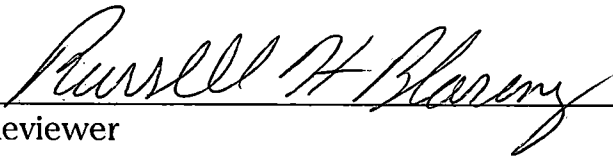
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REPORT OF THE ADMINISTRATIVE LAW JUDGE

The foregoing Findings and Order are the report and recommendation of the Administrative Law Judge.

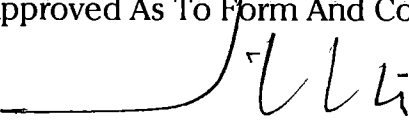
  
\_\_\_\_\_  
Paul Porter, Administrative Law Judge

SEPT. 23, 2019  
Date

  
\_\_\_\_\_  
Reviewer

11/6/19  
Date

Approved As To Form And Content

  
\_\_\_\_\_  
John C. Moricoli, Jr. - OBA No. 6411  
Attorney For Applicant

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