

**FILED**

**SEP 27 2018**

**SECRETARY, BOARD OF  
OIL, GAS & MINING**

**BEFORE THE BOARD OF OIL, GAS AND MINING  
DEPARTMENT OF NATURAL RESOURCES  
STATE OF UTAH**

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IN THE MATTER OF THE REQUEST FOR AGENCY ACTION OF FINLEY RESOURCES INC. FOR AN ORDER ESTABLISHING, ON A PILOT BASIS, OVERLAPPING 40-ACRE, 640-ACRE AND 1,280-ACRE STAND-UP (VERTICAL) DRILLING UNITS FOR THE PRODUCTION OF OIL, GAS AND ASSOCIATED HYDROCARBONS FROM THE EOCENE MIDDLE AND LOWER GREEN RIVER FORMATIONS AND PORTIONS OF THE PALEOCENE WASATCH TRANSITIONAL FORMATIONS, COMPRISED OF SECTIONS 20, 21, 28 AND 29, TOWNSHIP 7 SOUTH, RANGE 20 EAST, SLM, UINTAH COUNTY, UTAH

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**FINDINGS OF FACT,  
CONCLUSIONS OF LAW AND  
ORDER**

Docket No. 2018-015

Cause No. 270-10

This Cause came on for hearing before the Utah Board of Oil, Gas and Mining (the “Board”) on Wednesday, August 22, 2018, at 9:30 a.m., in the Auditorium of the Utah Department of Natural Resources Building in Salt Lake City, Utah. The following Board members were present and participated at the hearing: Chairman Ruland J. Gill, Jr., Carl F. Kendell, Gordon L. Moon, Chris D. Hansen, Michael R. Brown, Susan S. Davis and Richard K. Borden. The Board was represented by Michael Begley, Esq., Assistant Attorney General.

Testifying on behalf of Petitioner Finley Resources Inc. (“Finley”) were Scott Pitzer - Landman, Shea Atkins - Geology Manager, and Pat Porter - Exploitation Manager. The

Board recognized Mr. Atkins as an expert in geology and Mr. Porter as an expert in reservoir engineering for purposes of this Cause. Frederick M. MacDonald, Esq., of and for MacDonald & Miller Mineral Legal Services, PLLC, appeared as attorney for Finley.

The Division of Oil, Gas and Mining (the “Division”) did not file a staff memorandum in this Cause but participated in the hearing. The Division neither provided sworn testimony nor submitted any exhibits. John Rogers, Associate Director - Oil & Gas, Dayne Doucet, Permitting Manager, and Dustin Doucet, Petroleum Engineer, with the Board’s permission, were allowed to ask questions or make statements on behalf of the Division. Emma Whitaker, Esq., Assistant Attorney General, appeared as attorney for the Division. In its summary at the conclusion of the hearing, the Division expressed its support for the granting of Finley’s Request for Agency Action dated July 5, 2018 (the “RAA”), subject to clarifications as to the number of authorized horizontal wells and the lateral setbacks between such wells outlined below.

The Board received two letters in support of granting the RAA: the first, filed on August 15, 2018, from Crescent Point Energy U.S. Corp. (“CPE”), and the second, filed on August 20, 2018, from Robert L. Bayless, Producer LLC (“Bayless”). Both entities are working interest owners within the lands at issue.<sup>1</sup> However, neither party formally appeared at nor participated in the hearing.

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<sup>1</sup> An additional Letter dated August 13, 2018, but not received by the Board until August 27, 2018, from Big West Exploration and Production, LLC, another working interest owner within the lands at issue, expressed support for

No other party filed a response to the RAA and no other party appeared at or participated in the hearing.

The Board, having considered the testimony presented and the exhibits received into evidence at the hearing, being fully advised, hereby makes the following findings of fact, conclusions of law and order in this Cause.

### **FINDINGS OF FACT**

1. Finley is a Texas corporation with its principal place of business in Fort Worth, Texas. Finley is duly qualified to conduct business in the State of Utah, and is fully and appropriately bonded with all relevant Federal and State of Utah agencies.

2. The following Uintah County lands, which are the subject of the RAA and to which Finley references as the “Pelican Lake Area,” have not yet been the subject of a Board order creating drilling units. Consequently, they have remained subject only to the general well siting rule (Utah Admin. Code Rule R649-3-2):

#### **Township 7 South, Range 20 East, SLM**

Section 20:	All
Section 21:	All
Section 28:	All
Section 29:	All,

all of which are regular 640-acre sections (the “Subject Lands”).

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granting the RAA. However, given its receipt post-hearing, it was not considered by the Board in rendering its decision.

3. The oil, gas and hydrocarbons underlying the Subject Lands are owned by the United States of America and subject to the following oil and gas leases:

<u>Lease</u>	<u>Lands</u>
UTU-75093	Sec. 20: N $\frac{1}{2}$ NE $\frac{1}{4}$ , SE $\frac{1}{4}$ NE $\frac{1}{4}$ , NW $\frac{1}{4}$ Sec. 21: N $\frac{1}{2}$ NE $\frac{1}{4}$ , NW $\frac{1}{4}$ Sec. 28: SE $\frac{1}{4}$ SW $\frac{1}{4}$ Sec. 29: W $\frac{1}{2}$ SW $\frac{1}{4}$ , SE $\frac{1}{4}$ SW $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$
UTU-89145	Sec. 20: S $\frac{1}{2}$ , SW $\frac{1}{4}$ NE $\frac{1}{4}$ Sec. 21: SW $\frac{1}{4}$ , W $\frac{1}{2}$ SE $\frac{1}{4}$ , SE $\frac{1}{4}$ SE $\frac{1}{4}$ Sec. 28: N $\frac{1}{2}$ N $\frac{1}{2}$ Sec. 29: Lands within Right-of-Way UTSL-047698
UTU-74417	Sec. 21: S $\frac{1}{2}$ NE $\frac{1}{4}$ , NE $\frac{1}{4}$ SE $\frac{1}{4}$ Sec. 28: S $\frac{1}{2}$ N $\frac{1}{2}$ , N $\frac{1}{2}$ SW $\frac{1}{4}$ , SW $\frac{1}{4}$ SW $\frac{1}{4}$
UTU-80689	Sec. 28: N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$
UTU-85591	Sec. 28: SE $\frac{1}{4}$ SE $\frac{1}{4}$
UTU-80580	Sec. 29: N $\frac{1}{2}$ <u>less</u> lands within Right-of-Way UTSL-047698
UTU-74837	Sec. 29: NE $\frac{1}{4}$ SW $\frac{1}{4}$ , N $\frac{1}{2}$ SE $\frac{1}{4}$ , SE $\frac{1}{4}$ SE $\frac{1}{4}$

The operating rights in said leases to the Eocene Middle and Lower Green River and the upper 1,000 feet of the Paleocene Wasatch transitional formations, defined for purposes of this Cause as follows:

The stratigraphic equivalent of the interval between the Dual Laterolog depths of 5,018' MD for the top of the Mahogany Bench and 8,638' MD for the base of the Paleocene Wasatch productive zone in the BBC Aurora Federal 4-21D-7-20 (API

No. 43-047-52633), located in the NW $\frac{1}{4}$ NW $\frac{1}{4}$ , Section 21,  
Township 7 South, Range 20 East, U.S.M.,

(the “Subject Formations”), are owned by Lonesome Oil & Gas, LLC (“Lonesome”) on behalf of which Finley serves as its designated operator, Big West Exploration and Production LLC (“Big West”), CPE and Bayless.

4. The following lands and leases are committed to the contracted Aurora (Deep) Federal Unit (the “Unit”) (UTU-82456X), which covers all depths below the Uinta formation including the Subject Formations:

<u>Lease</u>	<u>Lands</u>
UTU-75093	Sec. 20: NW $\frac{1}{4}$ Sec. 21: NW $\frac{1}{4}$
UTU-80689	Sec. 28: N $\frac{1}{2}$ SE $\frac{1}{4}$ , SW $\frac{1}{4}$ SE $\frac{1}{4}$
UTU-85591	Sec. 28: SE $\frac{1}{4}$ SE $\frac{1}{4}$ ,

and are included within the following Unit participating areas (“PA’s”):

<u>PA</u>	<u>Lands (all T7S-R20E)</u>	<u>Total Acreage</u>
Initial Green River-Wasatch PA D (UTU-82456F)	Sec. 28: SE $\frac{1}{4}$	160
2 <sup>nd</sup> Revised Initial Green River-Wasatch PA E (UTU-82456G)	Sec. 17: SW $\frac{1}{4}$ Sec. 19: NE $\frac{1}{4}$ Sec. 20: NW $\frac{1}{4}$	480
Initial Green River-Wasatch PA K (UTU-82456K)	Sec. 16: W $\frac{1}{2}$ , SE $\frac{1}{4}$ Sec. 21: NW $\frac{1}{4}$	640

Production from any portion of the respective participating area is allocated on a pro-rata acreage basis to the entire participating area. Finley serves as current Unit Operator. Big West, Bayless and CPE have also agreed that Finley may serve as operator of the Subject Lands.

5. In accordance not only with Utah Admin. Code Rule R642-3-2 and the other general State operational rules, but also with the governing Unit Agreement, and pursuant to applications for permit to drill (“APD’s”) approved both by the Division and the Bureau of Land Management (“BLM”), Bill Barrett Corporation, Finley’s predecessor as Unit Operator, and/or Finley drilled, and Finley currently operates, the following vertical/directionally drilled (“VDD’s”) oil wells which have productive intervals within the Subject Formations:

<u>Well (API No.)</u>	<u>SHL</u>	<u>BHL</u>	<u>DOFP</u>
Aurora Federal 3-20D-7-20 (43-047-52005)	Sec. 20: NE¼NW¼ (213' FNL/2370' FWL)	Sec. 20: NE¼NW¼ (654' FNL/2203' FWL)	5/5/12
Aurora Federal 4-21D-7-20 (43-047-52633)	Sec. 21: NW¼NW¼ (267' FNL/223' FWL)	Sec. 21: NW¼NW¼ (686' FNL/683' FWL)	8/12/13
Aurora Federal 15-28D-7-20 (43-047-52066)	Sec. 28: SW¼SE¼ (98' FSL/2286' FEL)	Sec. 28: SW¼SE¼ (620' FSL/1960' FEL)	4/16/12
Aurora Federal 6-28D-7-20 (43-047-54511)	Sec. 28: SE¼NW¼ (1931' FNL/2252' FWL)	Sec. 28: SE¼NW¼ (1980' FNL/1980' FWL)	1/5/18
Aurora Federal 13-28D-7-20 (43-047-54512)	Sec. 28: SW¼SW¼ (1300' FSL/253' FWL)	Sec. 28: SW¼SW¼ (642' FSL/728' FWL)	10/18/15

Aurora Federal 7-29D-7-20 (43-047-54851)	Sec. 29: NE $\frac{1}{4}$ SE $\frac{1}{4}$ (2537' FSL/851' FEL)	Sec. 29: SW $\frac{1}{4}$ NE $\frac{1}{4}$ (2016' FNL/2040' FEL)	10/10/15
Aurora Federal 14-29D-7-20 (43-047-54844)	Sec. 29: NE $\frac{1}{4}$ SW $\frac{1}{4}$ (1616' FSL/1532' FWL)	Sec. 29: SE $\frac{1}{4}$ SW $\frac{1}{4}$ (660' FSL/1980' FWL)	6/1/18

(collectively the “Existing Wells”).

6. A large portion of the Subject Lands is covered by Pelican Lake, severely restricting possibly surface locations and which in most instances will require directional or horizontal drilling to recover the remaining resources.

7. Finley has not yet drilled a horizontal well on or in the vicinity of the Subject Lands. However, based on CPE’s drilling of horizontal wells, as authorized by the Board in its Orders in Cause Nos. 131-149 and 131-150, on lands directly west of the Subject Lands, Finley is proposing a pilot program to test the viability of horizontal drilling in conjunction with VDD’s on its prospects.

8. The Subject Formations consist of lacustrine fluvial-deltaic deposits in the Green River and alluvial/fluvial fan deltas in the Wasatch. Average porosities in the Green River are 7% to 14% with average permeability of ~ .05 to .1 mD, while average porosity in the Wasatch is approximately 8% with average permeability of less than .05 mD. The upper 1,000 feet of the Wasatch formation should be included because CPE has demonstrated that interval is prospective for horizontal drilling in wells to the west of the Subject Lands. Finley believes there are up to six attractive targets within the Subject

Formations including the Mahogany Bench member, as the Subject Formations constitute one continuous column of hydrocarbon source.

9. From the wells Finley has drilled, and from public data relating to wells drilled by other operators on lands nearby the Subject Lands, Finley has derived the preliminary conclusions:

- (a) The drilling and production of VDD's and horizontal wells should result in production and productivity increases and cost effectiveness, over the drilling and production of conventional VDD's alone, and will allow access to additional resources in the Subject Formations that would not otherwise be recovered;
- (b) With respect to horizontal wells, the average effective hydraulic fracture half lengths and average orientation (N73°W) suggest that horizontal orientation should be in a north-south direction and: (i) producing interval setbacks of 330' laterally from any Existing Well or future VDD; (ii) producing interval setbacks of 330' laterally from the north and south boundaries of each applicable unit; (iii) producing interval setbacks of 460' laterally from the east and west boundaries of each applicable unit; (iv) producing interval setbacks of 330' laterally from the producing interval of any other well; and (v) with respect to stacked horizontal wells, there shall be no inter-well setback distance laterally required provided the stacked horizontal laterals are located at least 100 feet or greater apart in vertical distance, will collectively result in efficient but limited communication between wells and allow greater flexibility in locating future wells upon the Subject Lands, while still protecting correlative rights;
- (c) It is difficult, if not impossible, to establish uniform producing interval setbacks between VDD's and horizontal wells but the same may be required to maximize resource recovery from the Subject Formations, and the separation of individual production intervals within the pool of the Subject Formations discussed below would require separate metering and create additional administrative burdens to either prevent, or effect, the commingling of production from the Subject Formations; and



- (d) In order to maximize the recovery of resources from the Subject Formations: (i) one VDD in each 40-acre unit on the Subject Lands (inclusive of the Existing Wells); (ii) up to 24 short lateral horizontal wells, being less than one mile in length ("SLHZ's") in each 640-acre unit; and (iii) up to 24 long lateral horizontal wells, being more than one mile in length ("LLHZ's") in each 1,280-acre stand-up unit will be necessary to allow flexibility in the drilling of wells and to allow the maximum recovery of resources from all zones and intervals found within the Subject Formations. However, this is not to be construed as authorizing up to 48 horizontal wells. Rather, up to 24 horizontal wells per governmental section are authorized via any combination of SLHZ's and LLHZ's.

10. The economics of Finley's proposed program are at this time speculative and proprietary but, based on public testimony given by CPE and other horizontal operators, Finley believes horizontal wells drilled in the Subject Formations on the Subject Lands will be economic and provide an acceptable rate of return.

11. In Finley's experience, given the federal ownership, the fact that lease lines will be crossed, and the overlap with federal exploratory unit participating areas, conforming communitization agreements will be required for proper allocation of production in accordance with the terms of the Unit Agreement and, whether by regulation and guideline or Federal agency practice, will require a Board order establishing the requested drilling units in order to be approved.

12. A copy of the RAA was mailed, postage pre-paid, certified with return receipt requested, and properly addressed, to all production interest owners within the Subject Lands and in the participating areas of the Unit as described in Findings of Fact No. 4, to the working interest owners (including unleased owners) in the quarter-quarter sections,

adjacent to the Subject Lands, and to the BLM, both State and Vernal Field Offices, being the supervising governmental agencies having jurisdiction over the Federal minerals. The mailings were sent to said parties at their last addresses disclosed by the relevant BLM and Uintah County realty records and/or Finley's internal land records.

13. Notice of the filing of the RAA and of the hearing thereon was duly published in the Salt Lake Tribune and Deseret Morning News on August 5, 2018 and in the Uintah Basin Standard and the Vernal Express on August 7, 2018.

14. The vote of the Board Members present and participating in the hearing on this Cause was unanimous (7-0) in favor of granting the RAA with the clarifications requested by the Division.

### **CONCLUSIONS OF LAW**

1. Due and regular notice of the time, place and purpose of the hearing was properly given to all parties whose legally protected interests are affected by the RAA in the form and manner as required by law and the rules and regulations of the Board and Division.

2. The Board has jurisdiction over all matters covered by the RAA and all interested parties therein, and has power and authority to render the order herein set forth pursuant to Utah Code Ann. §§ 40-6-5(3)(b) and 40-6-6.

3. The Subject Formations as underlying the Subject Lands constitute a "common source of supply" as that phrase is defined in Utah Code Ann. § 40-6-2(19).

4. Up to one (1) VDD per 40-acre drilling unit, up to 24 SLHZ's per 640-acre drilling unit (inclusive of: (1) any existing or future SLHZ's and (2) any existing or future LLHZ's) and up to 24 LLHZ's per 1280-acre drilling unit (inclusive of: (1) any existing or future SLHZ's and (2) any existing or future LLHZ's) may be required to efficiently and economically drain the Subject Lands and to prevent waste (by leaving resources in the ground).

5. Creation of overlapping 40-acre drilling units for VDD's, 640-acre drilling units for SLHZ's and 1,280-acre stand-up drilling units for LLHZ's for the Subject Formations with the provisos outlined below is fair, reasonable and justified under the circumstances.

6. The relief granted hereby will result in consistent and orderly development and the greatest recovery of oil, gas and associated hydrocarbons from the Subject Formations and underlying the Subject Lands, prevent waste and adequately protect the correlative rights of all affected parties.

7. Finley has sustained its burden of proof, demonstrated good cause, and satisfied all legal requirements for the granting of the RAA.

### **ORDER**

Based upon the RAA, testimony and evidence submitted, and the findings of fact and conclusions of law stated above, the Board hereby orders:

1. The RAA in this Cause is granted with the clarifications outlined below.

2. The following overlapping drilling units for the production of oil, gas and hydrocarbons from the Eocene Middle and Lower Green River and portions of the Paleocene Wasatch transitional formations (as defined above) from the Subject Lands (as defined above) are established:

- (i) 40-acre units for vertical or directionally drilled wells;
- (ii) 640-acre units for short lateral horizontal wells; and
- (iii) 1,280-acre stand-up (vertical) drilling units for long lateral horizontal wells, *i.e.*, Sections 20 and 29 and Sections 21 and 28, respectively.

3. One (1) vertical or directionally drilled well may be drilled and produce on each 40-acre drilling unit so established. The penetration point into the Subject Formation and bottom hole location of the authorized well must be within a 400-ft.<sup>2</sup> window around the center of each such drilling unit, being no closer than 460 feet to a drilling unit boundary and no closer than 920 feet to any other vertical or directionally drilled well producing in the Subject Formations without an exception location approval pursuant to Utah Admin. Code Rule R649-3-3.

4. Up to 24 short lateral horizontal wells may be drilled and produce on each 640-acre drilling unit so established (inclusive of: (1) any existing or future short lateral horizontal wells and (2) any existing or future long lateral horizontal wells); and up to 24 long lateral horizontal wells may be drilled and produce on each 1,280-acre stand-up drilling unit so established (inclusive of: (1) any existing or future short lateral horizontal

wells and (2) any existing or future long lateral horizontal wells); provided, however these authorizations are not to be construed as authorizing a total of 48 horizontal wells. Rather, up to 24 horizontal wells per governmental section are authorized via any combination of short and long lateral horizontal wells.

5. No producing interval of an authorized horizontal well may be located closer than 330 feet laterally to any vertical or directionally drilled well absent an exception location approval in accordance with Utah Admin. Code Rule R649-3-3.

6. No producing interval of an authorized horizontal well may be located closer than 330 feet laterally from the north and south boundaries of the applicable drilling unit so established, no closer than 460 feet to the east and west boundaries of the applicable drilling unit so established, and no closer than 330 feet laterally from another horizontal well within the same applicable drilling unit so established, absent an exception location approval pursuant to Utah Admin. Code Rule R649-3-3.

7. Stacked horizontal wells shall have no inter-well setback distance laterally between such wells within the same applicable drilling unit so established, but no producing interval of such a well shall be located closer than 100 feet vertically from another such stacked well within the same applicable drilling unit so established, absent an exception location approval pursuant to Utah Admin. Code Rule R649-3-3.

8. Surface locations may be off-drilling unit so established presuming proper surface and sub-surface written authorization for such a location has been obtained from

the owners and any well will be cased and cemented to the setbacks set forth above, both to be evidenced and satisfied by a self-certification to such effect executed by the operator of said drilling unit and filed with the Division, and the other setbacks set forth above are maintained.

9. The Existing Wells (as identified in Findings of Fact No. 5 above) are declared to be at legal locations notwithstanding the foregoing.

10. Except as addressed in (11) below, the allocation of proceeds from the production of oil, gas and associated hydrocarbons on the Subject Lands shall be effected in a manner that is tied to drilling unit establishment for specific well types, *i.e.*, production from vertical or directionally drilled wells shall be allocated to each such well's specific 40-acre drilling unit so established; production from short lateral horizontal wells shall be allocated to each such well's specific 640-acre drilling unit so established; and production from long lateral horizontal wells shall be allocated to each such well's specific 1,280-acre stand-up drilling unit so established.

11. As to any tract in a drilling unit which is also committed to the Aurora (Deep) Federal Unit, production allocation to said tract shall instead be allocated to the Unit participating area inclusive of any portion of the Subject Formations and of said tract in accordance with the terms of the governing Unit Agreement.

12. Not more than one year after the anniversary of the entry of the Board's Order, and upon each of the four anniversaries of the same thereafter, the operator shall

report back to the Board on the available results of its operations on the Subject Lands pursuant to this Order. This reporting requirement may be met by filing a written report with the Division and Board, and may require an oral report at one or more Board hearings at the discretion of the Board.

13. This Order shall expire for all purposes five years from the date of its issuance, unless otherwise extended, amended and/or modified by the Board.

14. Notice re: Right to Seek Judicial Review by the Utah Supreme Court or to Request Board Reconsideration: As required by Utah Code Ann. § 63G-4-208(1)(e) - (g), the Board hereby notifies all parties in interest that they have the right to seek judicial review of this final Board Order in this formal adjudication by filing a timely appeal with the Utah Supreme Court within 30 days after the date that this Order issued. Utah Code Ann. §§ 63G-4-401(3)(a) and 403. As an alternative to seeking immediate judicial review, and not as a prerequisite to seeking judicial review, the Board also hereby notifies parties that they may elect to request that the Board reconsider this Order, which constitutes a final agency action of the Board. Utah Code Ann. § 63G-4-302, entitled, “Agency Review – Reconsideration,” states:

(1)(a) Within 20 days after the date that an order is issued for which review by the agency or by a superior agency under Section 63G-4-301 is unavailable, and if the order would otherwise constitute final agency action, any party may file a written request for reconsideration with the agency, stating the specific grounds upon which relief is requested.

(b) Unless otherwise provided by statute, the filing of the request is not a prerequisite for seeking judicial review of the order.

(2) The request for reconsideration shall be filed with the agency and one copy shall be sent by mail to each party by the person making the request.

(3)(a) The agency head, or a person designated for that purpose, shall issue a written order granting the request or denying the request.

(b) If the agency head or the person designated for that purpose does not issue an order within 20 days after the filing of the request, the request for reconsideration shall be considered to be denied.

*Id.* The Board also hereby notifies the parties that Utah Admin. Code Rule R641-110-100, which is part of a group of Board rules entitled, “Rehearing and Modification of Existing Orders,” states:

Any person affected by a final order or decision of the Board may file a petition for rehearing. Unless otherwise provided, a petition for rehearing must be filed no later than the 10<sup>th</sup> day of the month following the date of signing of the final order or decision for which the rehearing is sought. A copy of such petition will be served on each other party to the proceeding no later than the 15<sup>th</sup> day of the month.

*Id.* See Utah Admin. Code Rule R641-110-200 for the required contents of a petition for rehearing. If there is any conflict between the deadline in Utah Code Ann. § 63G-4-302 and the deadline in Utah Admin. Code Rule R641-110-100 for moving to rehear this matter, the Board hereby rules that the later of the two deadlines shall be available to any



party moving to rehear this matter. If the Board later denies a timely petition for rehearing, the party may still seek judicial review of the Order by perfecting a timely appeal with the Utah Supreme Court within 30 days thereafter.

15. The Board retains continuing jurisdiction over all the parties and over the subject matter of this cause, except to the extent said jurisdiction may be divested by the filing of a timely appeal to seek judicial review of this order by the Utah Supreme Court.

16. For all purposes, the Chairman's signature on an electronic version or a faxed copy of this Order shall be deemed the equivalent of a signed original.

DATED this 27th day of September, 2018.

**STATE OF UTAH  
BOARD OF OIL, GAS AND MINING**

By:

  
Ruland J. Gill, Jr., Chairman

**CERTIFICATE OF SERVICE**

I hereby certify that on this 28th day of September, 2018, I caused a true and correct copy of the foregoing **FINDINGS OF FACT, CONCLUSIONS OF LAW AND ORDER** for Docket No. 2018-015, Cause No. 270-10, to be mailed via E-mail, or First Class Mail with postage prepaid, to the following:

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Raymond & Rita Clark Trust  
Raymond & Rita Clark, Trustees  
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Keith Steven Henderson  
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Wasco, CA 93280-9810

James H. Jordan Revocable Trust  
James H. Jordan, Trustee  
4602 Jasmine Ln  
Albany, OR 97322-7329

Mary Edna Jordan  
308 Florida Blvd  
New Orleans, LA 70124-1806

Garey E. & Terry S. Kelley Rev Living Trust  
Garey E. & Terry S. Kelley, Trustees  
PO Box 1393  
Myrtle Creek, OR 97457-0135

Kelley Joint Trust DTD 01/07/2013  
Michael C. & Jary Anne Kelley, Trustees  
PO Box 219  
Glendale, OR 97442-0219

Velma P. Lane  
6121 Falcon Ln  
Morrison, CO 80465-3103

Calvin R. Marshall  
439 N 750 E  
Orem, UT 84097-4238

Eleanor Marshall TR  
2847 W 1000 N  
Vernal, UT 84078-8227

Craig McSorley  
4517 Hazelton Dr  
Woodbridge, VA 22193-5110

Mark A. McSorley  
13176 Oak Farm Dr  
Woodbridge, VA 22192-3817

Newfield Production Company  
24 Waterway Ave Ste 900  
The Woodlands, TX 77380-3197

William Olsen Family Living Trust  
54 E 350 N  
Orem, UT 84057-4720

Wendy Sue Pack  
474 Mini Hooves Rd  
Cana, VA 24317-4266

Rhodes Living Trust DTD 04/19/2005  
Jan M. Rhodes, Trustee  
48303 20<sup>th</sup> St W SPC 21  
Lancaster, CA 93534-7405

Dan Roberts  
3351 S Raquel Cir  
West Valley, UT 84120-1778

Roosevelt Baptist Church  
PO Box 133  
Roosevelt, UT 84066-0133

Norma E. Stroud  
1702 Cresthaven Dr  
Pantego, TX 76013-3233

United States of America  
c/o Bureau of Land Management  
440 W 200 S Ste 500  
Salt Lake City, UT 84101-1345

Ouray Park Irrigation Company, Inc.  
PO Box 395  
Roosevelt, UT 84066-0395

Lyle C. Pickup  
8322 S Romaine Dr  
Sandy, UT 84070-0442

Robert L. Bayless Producer, LLC  
621 17<sup>th</sup> St Ste 2300  
Denver, CO 80293-2023

The Afton J. Rogers Family Living Trust  
Afton J. Rogers, Trustee  
PO Box 661  
Fort Duchesne, UT 84026-0661  
**[Address updated 8/13/2018]**

State of Utah  
Division of Forestry, Fire & State Land  
1594 W North Temple Ste 3520  
Salt Lake City, UT 84114-5103

Douglas G. Swain  
1222 S Chadbourne St  
San Angelo, TX 76903-7508

UPL Three Rivers Holdings, LLC  
c/o Ultra Resources Inc.  
116 Inverness Drive E Ste 400  
Englewood, CO 80112-5125

  
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