

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

IN THE MATTER OF AN APPLICATION BY 8 NORTH,))	
LLC FOR AN ORDER AUTHORIZING AN)	
ADDITIONAL THIRTY-ONE (31) HORIZONTAL)	CAUSE NO. 407
WELLS, FOR A TOTAL OF THIRTY-TWO (32))	
HORIZONTAL WELLS, FOR PRODUCTION FROM)	
THE CODELL AND NIOBRARA FORMATIONS IN)	DOCKET NO. 171200774
AN APPROXIMATE 2,720-ACRE DRILLING AND)	
SPACING UNIT PROPOSED FOR SECTIONS)	
13, 14, 23, AND 24, TOWNSHIP 2 NORTH, RANGE 69)	TYPE: DENSITY
WEST, 6 TH P.M. AND SECTION 18 TOWNSHIP 2)	
NORTH, RANGE 68 WEST, 6 TH P.M., WATTENBERG)	
FIELD, BOULDER AND WELD COUNTIES,)	
COLORADO)	

PROTEST AND INTERVENTION BY THE CITY OF LONGMONT

Pursuant to Commission Rule 509, the City of Longmont (the “City”), by its undersigned counsel, files this protest and intervention to the above-referenced Application submitted on September 25, 2017, by 8 North, LLC (“Applicant”).

1. The City is a home rule city established under the Constitution and laws of the State of Colorado.
2. The City is a surface owner of land included in the Application, which is planned to become a community park. By virtue of its interest in this land as a public resource, the City would be affected and aggrieved by the granting of the Application.
3. The City has received and is processing a petition for annexation by the St. Vrain Valley School District for land within the Application, which is planned to become the sites of two schools.
4. The City joins in the Protest and Intervention of Boulder County to the Application, for the reasons stated therein, and the City requests relief and reserves rights as stated therein.
5. Furthermore, any surface operations contemplated in connection with the Application should be located as far as possible from the planned school sites and park described above, which are located in the NW1/4 of Section 14, Township 2 North, Range 69 West.

6. The City joins Boulder County and does not request additional time to present at the hearing.

Dated this 27th day of November, 2017.

Respectfully submitted,

CITY OF LONGMONT

By:  _____

Daniel E. Kramer, #43752

Assistant City Attorney

408 Third Ave.

Longmont, CO 80501

dan.kramer@longmontcolorado.gov

ATTORNEY FOR CITY OF LONGMONT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of **PROTEST AND INTERVENTION BY THE CITY OF LONGMONT** has been mailed or served electronically this 27th day of November, 2017 to the following entities that require notice of such filing and an original and two copies have been sent or filed with the COGCC:

James P. Rouse
Hearing Officer
Oil and Gas Conservation Commission
1120 Lincoln Street, Ste. 801
Denver, CO 80203
James.Rouse@state.co.us

Jillian Fulcher
Jobediah J. Rittenhouse
Beatty & Wozniak, P.C.
216 16th Street, Suite 1100
Denver, CO 80202
jfulcher@bwenergylaw.com
jrittenhouse@bwenergylaw.com



Lucienne Petrocco, Legal Secretary