

Jennifer Nelson Clark (7947)  
333 South State Street  
PO Box 45360  
Salt Lake City, Utah 84145-0360  
(801) 324-5392  
(801) 324-5935 (fax)  
[Jennifer.Clark@dominionenergy.com](mailto:Jennifer.Clark@dominionenergy.com)

*Attorney for Enbridge Gas*

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE APPLICATION OF ENBRIDGE GAS FOR APPROVAL OF THE PICEANCE DEVELOPMENT AS A WEXPRO II PROPERTY	Docket No. 25-057-03 <b>VERIFIED REDACTED APPLICATION</b>
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Questar Gas Company dba Enbridge Gas Utah (“Enbridge Gas” or “Company”) submits this Verified Redacted Application (“Application”) to the Utah Public Service Commission (“Utah Commission”) for an order approving inclusion of recently acquired properties within the Piceance Development (“Piceance Development” or “Development”) as a Wexpro II property pursuant to the Wexpro II Agreement. This Application is supported by the attached Enbridge Gas Exhibits A through P, the pre-filed Direct Testimony of Kelly B Mendenhall (Enbridge Gas Confidential Exhibit 2.0) and the pre-filed Direct Testimony of Brady Rasmussen (Enbridge Gas Confidential Exhibit 3.0), all of which are incorporated by this reference.

The Piceance Development is outside the existing Wexpro I Development Drilling Area. Simultaneously with this filing, Enbridge Gas is applying for an order approving the Piceance Development from the Wyoming Public Service Commission (“Wyoming

Commission”). Under the terms of the Wexpro II Agreement, which was approved by the Utah Commission on March 28, 2013, and the Wyoming Commission on April 11, 2013, Enbridge Gas is required to apply for approval to include properties within a Wexpro I Development Drilling Area acquired by Wexpro as Wexpro II properties. Though none of the Piceance Development is in the Wexpro I Development Drilling Area, Enbridge Gas voluntarily offers the entire Piceance Development for approval to be included as a Wexpro II property. Enbridge Gas provides the following in support of this Application:

### **BACKGROUND**

1. On September 12, 2012, Wexpro Company, Enbridge Gas, the Utah Division of Public Utilities (“Division”), and the Wyoming Office of Consumer Advocate (“OCA”) entered into the Wexpro II Agreement, subject to the approval of both the Utah Commission and the Wyoming Commission. On March 28, 2013, the Utah Commission issued a Report and Order in Docket No. 12-057-13 approving the Wexpro II Agreement. On April 11, 2013, the Wyoming Commission held a public hearing and public deliberations upon the matter in Docket No. 30010-123-GA-12 and rendered a bench order approving the Wexpro II Agreement. On October 16, 2013, the Wyoming Commission issued a formal Memorandum Opinion, Findings and Order Approving the Wexpro II Agreement in Docket No. 30010-123-GA-12.

2. On November 5, 2013, Enbridge Gas filed an application seeking approval of the Trail Unit Acquisition as a Wexpro II property before the Utah and Wyoming Commissions. The Trail Unit Acquisition was an acquisition within a Wexpro I Development Drilling Area and, under the terms of the Wexpro II Agreement, Enbridge Gas was required to bring the property before both the Utah and Wyoming Commissions for approval.

3. On December 23, 2013, the Company, the Division, the Utah Office of Consumer Services (“OCS”), and the OCA, entered into a Settlement Stipulation for the Trail Unit Acquisition. The Utah Commission issued a report and order approving the Trail Unit Settlement Stipulation on January 17, 2014, and the Wyoming Commission issued an order approving the Trail Unit Settlement Stipulation on January 27, 2014.

4. The Trail Unit Settlement Stipulation provides that Wexpro generally designs its annual drilling program to provide cost-of-service production that is, on average, at or below the current 5-year Rockies-adjusted NYMEX price (“5-Year Forward Curve”). The Trail Unit Settlement Stipulation also provides that the Company and Wexpro will manage combined cost-of-service production from Wexpro I and Wexpro II properties to Enbridge Gas at or below 65%.

5. On August 31, 2015, Enbridge Gas filed an application seeking approval of the Canyon Creek Acquisition Area as a Wexpro II property before the Utah and Wyoming Commissions. The Canyon Creek Acquisition Area was an acquisition within a Wexpro I Development Drilling Area and, under the terms of the Wexpro II Agreement, Questar Gas was required to bring the property before both the Utah and Wyoming Commissions for approval.

6. On October 26, 2015, the Company, the Division, the OCS, and the OCA, entered into a Settlement Stipulation for the Canyon Creek Acquisition. The Utah Commission issued a report and order approving the Canyon Creek Settlement Stipulation on November 17, 2015, and the Wyoming Commission issued an order approving the Canyon Creek Settlement Stipulation on February 24, 2016.

7. The Canyon Creek Settlement Stipulation provides clarification of and enhancements to the previous Wexpro II agreements and stipulations. First, it clarifies the

calculation of the 5-Year Forward Curve established in the Trail Unit Settlement Stipulation. Second, it provides that all post-2015 development drilling and capital investment would earn the commission-allowed rate of return. It also provides that Dry Hole and non-commercial well costs will be charged and shared on a 50/50 basis between Enbridge Gas customers and Wexpro. It further provides for sharing of cost savings from post-2015 volumes when the annual overall cost of service per dekatherm is less than the market price per dekatherm. It also provides that Wexpro will manage its production from Wexpro I and Wexpro II wells to 55% of the IRP demand beginning in the 2020 IRP year (referred to herein as the “Wexpro Production Cap”). Finally, it provides that Enbridge Gas will maintain on its website a current copy of all relevant documents governing the cost-of-service arrangement between Wexpro and Enbridge Gas.

8. In 2017, the Utah Commission and the Wyoming Commission approved the inclusion of the Vermillion Acquisition as a Wexpro II property in Docket No. 17-057-01 and Docket No. 30010-162-GA-17, respectively.

9. On February 3, 2022, the Company, the Division, the OCS, and the OCA, filed Applications in Utah and Wyoming seeking the Utah and Wyoming Commission’s approval of a Settlement Stipulation that would modify the Wexpro Production Cap in order to allow Wexpro to take advantage of potentially lower production costs. *See* Utah in Docket No. 22-057-04 and Wyoming in Docket No. 30010-203-GA-22 (the “Production Cap Docket”).

10. The Settlement Stipulation in the Production Cap Docket (the “Production Cap Settlement Stipulation”) modified the terms of the Canyon Creek Settlement Stipulation by allowing Wexpro to produce more than the 55% of the Company’s IRP demand. The Production Cap Settlement Stipulation provides that Wexpro may be permitted to manage combined cost-of-service production from Wexpro I and II properties to exceed the 55%

threshold if: (a) Wexpro shows that the planned production will be provided at a cost lower than the five-year forecast curve together with shut-in costs; (b) the planned production does not exceed (i) 65% of Enbridge Gas’s annual forecasted demand identified in its Integrated Resource Plan (“IRP”); or (ii) 65% of the minimum threshold as defined in the Trail Settlement Stipulation ; (c) the Company identifies the date by which Wexpro I and Wexpro II production levels will again be reduced to a level at or below 55% of Enbridge Gas’s annual IRP forecast; and (d) the Commission finds the plan to be in the public interest. The Utah Commission approved the Production Cap Settlement Stipulation on April 13, 2022, and the Wyoming Commission approved the Production Cap Settlement Stipulation on August 8, 2022.

11. Also in 2022, the Utah Commission and the Wyoming Commission approved the inclusion of the Alkali Gulch Acquisition as a Wexpro II property in Docket No. 22-057-05 and Docket No. 30010-204-GA-22, respectively.

12. In 2023, the Utah Commission and the Wyoming Commission approved the inclusion of the Horseshoe Bend Development as a Wexpro II property in Docket No. 24-057-03 and 30010-222-GA-24, respectively.

13. The Wexpro Agreement, the Wexpro II Agreement, and the settlement stipulations described in this Application are referred to collectively as the “Wexpro Agreements.”

## PICEANCE DEVELOPMENT

14. On December 23, 2024, Wexpro Development Company entered into a Joint Development Agreement with the owner of a working interest located in Garfield and Mesa Counties, Colorado (the “Joint Development Agreement” or “Agreement”). A copy of the Agreement is attached hereto as Enbridge Gas Confidential Exhibit K. The Agreement provided that [REDACTED]

[REDACTED] The properties at issue in the Agreement are outside of the Development Drilling Areas defined in the Wexpro Agreements.

15. The Wexpro II Agreement governs the requirements for Wexpro and Enbridge Gas when Wexpro acquires a property like the Piceance Development outside the Development Drilling Area (as defined in the Wexpro II Agreement). Section IV-1 of the Wexpro II Agreement provides that “Wexpro will acquire oil and gas properties or undeveloped leases at its own risk.” Section IV-1(a) further provides that Enbridge Gas “shall apply to the Utah and Wyoming Commissions for approval to include under this Agreement any oil and gas property that Wexpro acquires within the Wexpro I development drilling areas.” In addition, Section IV-1(b) provides that Enbridge Gas “may apply for Commission approval to include these (properties outside the development drilling areas) properties under this agreement.”

16. Wexpro has entered the Joint Development Agreement at its own risk. If the Piceance Development is approved as a Wexpro II property, then the drilling costs associated with the Piceance Development incurred thus far will be passed on to customers.

## SUPPORTING INFORMATION

17. Section IV-2 of the Wexpro II Agreement provides that when Enbridge Gas files an application with the Utah and Wyoming Commissions requesting approval to include proposed properties under the Wexpro II Agreement, they must include certain information. This Application contains the specified information in the attached Enbridge Gas Exhibits A through P, which are incorporated by this reference. Each exhibit is described below.

### **Enbridge Gas Exhibit A: Purchase price and gas pricing assumptions**

Enbridge Gas Exhibit A provides the gas and oil pricing assumptions used in the Piceance Development. A Rockies basis adjustment was applied to derive the spot market price where the properties are located.

### **Enbridge Gas Confidential Exhibit B: Locations of current and future wells**

The locations of current and future wells are depicted on a schematic attached to this Application as Enbridge Gas Confidential Exhibit B.

### **Enbridge Gas Exhibit C: Historical production and remaining reserves of current wells**

Since the Development does not include current production, Enbridge Gas Exhibit C shows that there is no historical production or remaining reserves of current wells within the Piceance Development property.

**Enbridge Gas Confidential Exhibit D: Forecasted production/reserves for future wells**

Enbridge Gas Confidential Exhibit D contains a spreadsheet listing the future wells that are planned to be drilled in the Piceance Development, and their estimated production/reserves for the life of the wells.

**Enbridge Gas Confidential Exhibit E: Forecasted decline curves for current and future wells**

Enbridge Gas Confidential Exhibit E shows the anticipated type curve for the future development wells in the Piceance Development.

**Enbridge Gas Confidential Exhibit F: Estimated drilling (capital) cost per well**

Enbridge Gas Confidential Exhibit F provides a detailed estimate of the capital cost to drill a future well in the Piceance Development.

**Enbridge Gas Confidential Exhibit G: Estimated operating expenses for future wells**

Enbridge Gas Confidential Exhibit G is a summary of the estimated operating expenses for future wells within the Piceance Development. The information shown is based on historical data and Wexpro's experience operating and maintaining wells near the Piceance Development area.

**Enbridge Gas Confidential Exhibit H: Gross working interest and net revenue interest for future wells**

Enbridge Gas Confidential Exhibit H shows the working interest and net revenue interest for the current wells and the future wells for each of the properties.



**Enbridge Gas Exhibit I: Estimated production tax per Dth for future wells**

Enbridge Gas Exhibit I is a summary of the estimated production tax per Dth for future Piceance Development wells. Production taxes vary based on the market price of natural gas. Therefore, included in this summary table are natural gas prices ranging from \$2.00 to \$6.00 per Dth.

**Enbridge Gas Confidential Exhibit J: Estimated gathering/processing costs per Dth and future wells**

Enbridge Gas Confidential Exhibit J is a summary of the estimated gathering/processing costs per Dth for future Piceance Development wells.

**Enbridge Gas Confidential Exhibit K: Description of any land lease, title, and legal issues related to real property**

Enbridge Gas Confidential Exhibit K contains a confidential copy of the Joint Development Agreement by and between [REDACTED] and Wexpro Development Company.

**Enbridge Gas Confidential Exhibit L: Forecasted long-term cost-of-service analysis**

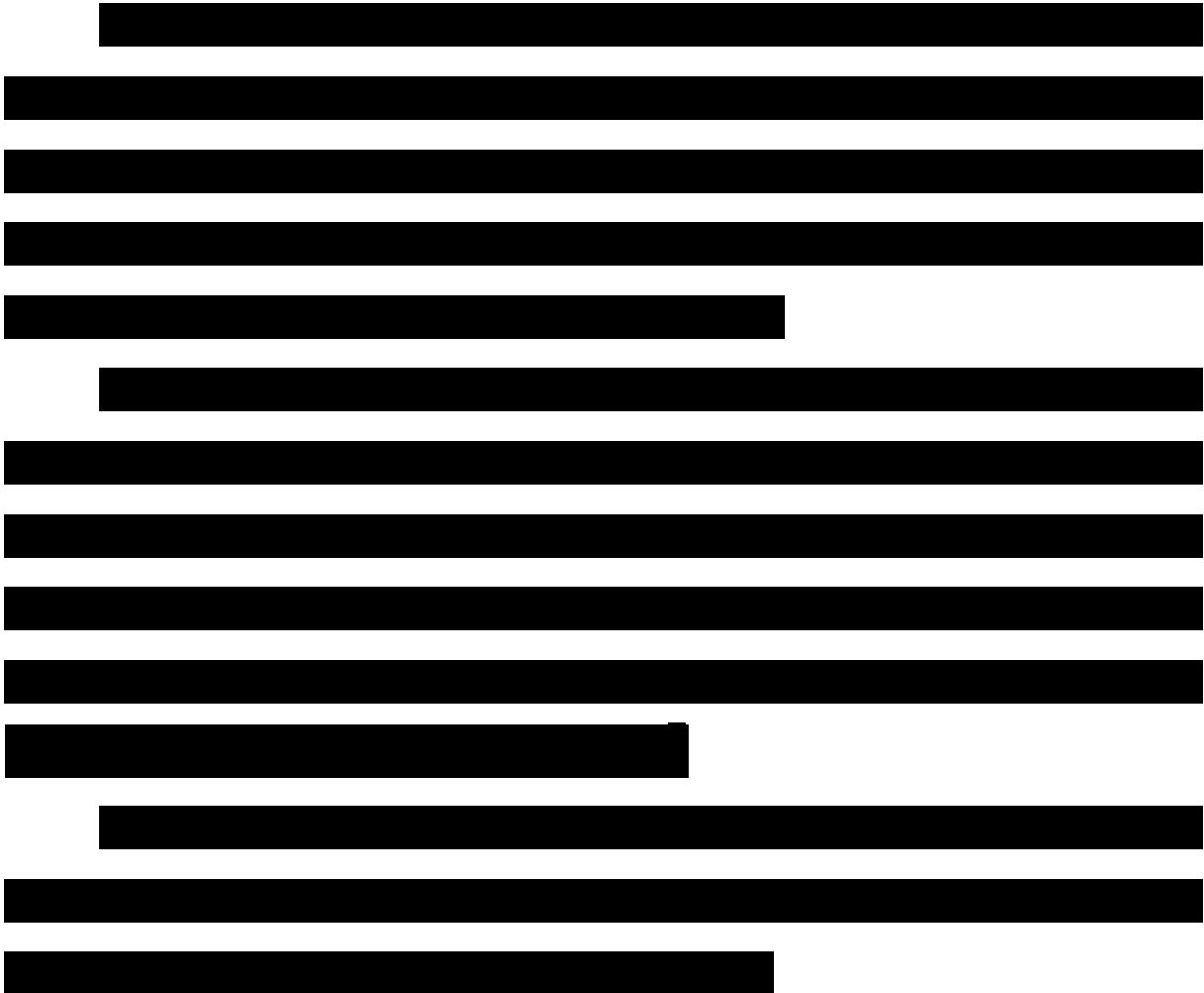
Enbridge Gas Confidential Exhibit L shows the estimated cost-of-service analysis over a 30-year period for the Piceance Development. For illustrative purposes, cost-of-service is shown on a cumulative and annual basis.

Pages 1 through 4 on the exhibit show the cumulative cost of service; pages 5 through 8 show the annual cost of service. For comparison purposes, the estimated production over the 25-year period has also been included in each graph.

**Enbridge Gas Confidential Exhibit M: Impact on Enbridge Gas' gas supply**

Enbridge Gas Confidential Exhibit M is a bar chart showing the estimated production levels for Wexpro I and Wexpro II production, and the incremental Piceance Development production for the next five (5) years.

**Enbridge Gas Confidential Exhibit N: Geologic data**



[Redacted text block]

[Redacted text block]

[Redacted text block]

**Enbridge Gas Confidential Exhibit O: Future development plan for the proposed properties**

Enbridge Gas Confidential Exhibit O is a summary of future wells planned to be drilled from 2024 through 2029 within the Piceance Development.

**Enbridge Gas Confidential Exhibit P: Other data as requested or as may be appropriate to an evaluation of the property**

Enbridge Gas Confidential Exhibit P includes the Confidential economic model for the Piceance Development. Wexpro used this model in the cost-of-service analysis of the Piceance Development, and it will be provided to each Commission, the OCS, the Division, and the OCA electronically.

Enbridge Gas has also filed the sworn direct testimony of Kelly B Mendenhall (Enbridge Gas Confidential Exhibit 2.0) and Brady B. Rasmussen (Enbridge Gas Confidential Exhibit 3.0) in support of this Application. As set forth in Mr. Mendenhall's testimony, approval of the Piceance Development as a Wexpro II property would provide an opportunity for Enbridge Gas's customers to receive cost-of-service gas that is estimated to provide lower-cost gas for many years. Additionally, as set forth in Mr. Rasmussen's testimony, Wexpro will continue to manage its current production and future drilling programs at or below the 5-Year Forward Curve and to manage combined cost-of-service production from Wexpro I and Wexpro II properties to Enbridge Gas at or below the thresholds established in the Canyon Creek Settlement Stipulation. In the event that the production is more than 55%, the Company will follow the procedures outlined in the Production Cap Settlement Stipulation. Mr. Mendenhall's and Mr. Rasmussen's testimonies, their attachments, and Enbridge Gas Exhibits A through P are incorporated herein by this reference.

**PRAYER FOR RELIEF**

Based upon the foregoing, and supporting testimony, Enbridge Gas respectfully requests that the Utah Commission approve the Piceance Development as a Wexpro II property.

DATED this 24<sup>th</sup> day of January, 2025.

Respectfully submitted,

Enbridge Gas



Jenniffer Nelson Clark (7947)


Enbridge Gas

Attorney for Enbridge Gas

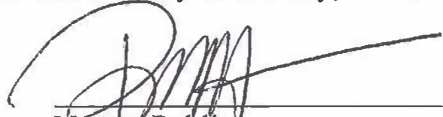
**VERIFICATION**

State of Utah            )  
                                  ) ss.  
County of Salt Lake    )

Brady Rasmussen, being first duly sworn upon oath, deposes and states: he is the Vice President and General Manager of Wexpro Company; he has direct personal knowledge of the matters addressed herein; he has read the foregoing Application; and the statements made in the Application are true and correct to the best of his knowledge, information and belief. The documents attached thereto are true and correct copies of the documents they purport to be.

  
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Brady B. Rasmussen  
Vice President and General Manager

Subscribed and sworn to before me this 24<sup>th</sup> day of January, 2025.

  
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Notary Public



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Verified Redacted Application was served upon the following persons by email on January 24, 2025:

Patricia E. Schmid  
Patrick Grecu  
Assistant Attorneys General  
160 East 300 South  
P.O. Box 140857  
Salt Lake City, UT 84114-0857  
[pschmid@agutah.gov](mailto:pschmid@agutah.gov)  
[pgrecu@agutah.gov](mailto:pgrecu@agutah.gov)

Robert J. Moore  
Assistant Attorney General  
160 East 300 South, 5<sup>th</sup> Floor  
P.O. Box 140857  
Salt Lake City, Utah 84114-0857  
[rmoore@agutah.gov](mailto:rmoore@agutah.gov)

Chris Parker  
Director  
Brenda Salter  
Division of Public Utilities  
160 East 300 South  
P.O. Box 146751  
Salt Lake City, UT 84114-6751  
[chrisparker@utah.gov](mailto:chrisparker@utah.gov)  
[bsalter@utah.gov](mailto:bsalter@utah.gov)

Michele Beck  
Director  
Office of Consumer Services  
160 East 300 South  
P.O. Box 146782  
Salt Lake City, UT 84114-6782  
[mbeck@utah.gov](mailto:mbeck@utah.gov)

Anthony Ornelas  
Administrator  
Wyoming Office of Consumer  
Advocate  
2515 Warren Avenue, Suite 304  
Cheyenne, WY 82002  
[Anthony.Ornelas@wyo.gov](mailto:Anthony.Ornelas@wyo.gov)

Michelle Madsen  
Legal Counsel  
Wyoming Office of Consumer Advocate  
2515 Warren Avenue, Suite 304  
Cheyenne, WY 82002  
[Michelle.Madsen@wyo.gov](mailto:Michelle.Madsen@wyo.gov)



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