

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of R.T. Enterprises of) Docket No.14-CONS- 550 -CWLE
Kansas, Inc. for Multiple Well Location Exceptions for)
Wells Upon the Pearson and Finnerty Leases Located)
in Section 11, Township 15 South, Range 20 East in) License No. 33715
Douglas County Kansas.) Conservation Division

APPLICATION

R.T. Enterprises of Kansas, Inc., ("R.T."), by and through its counsel, Keith A. Brock, Anderson & Byrd, LLP, hereby moves the Kansas Corporation Commission ("Commission") for multiple well location exceptions for wells upon the Pearson and Finnerty Leases located in Section 11, Township 15 South, Range 20 East in Douglas County, Kansas. In support of this Application, R.T. states as follows:

1. R.T. is a corporation duly authorized to do business within the State of Kansas, with its correct mailing address being P.O. Box 339, Louisburg, Kansas 66053.

2. R.T. is the operator of the following oil and gas leases:

Finnerty Lease

Lessor: William P. Finnerty and Mary K. Finnerty, both single

Lessee: James A. Moon

Date: April 2, 1918

Recorded: Book 101, Page 435

Covering: S/2 SE/4 Sec. 11-T15S-R20E, Douglas County, Kansas

Pearson Lease

Lessor: Hiram T. Howard and Bertha P. Howard, husband and wife

Lessee: James A. Moon

Date: April 2, 1918

Recorded: Book 101, Page 496

Covering: N/2 SE/4 Sec. 11-T15S-R20E, Douglas County, Kansas

(collectively the "Leases").

3. R.T. has drilled several oil wells upon the Leases, all of which were drilled to total depths of less than 2,000 feet; said wells are located less than 660 feet from the nearest oil well (the "Existing Wells"). R.T. also intends to drill additional oil wells upon the Leases all of which will be drilled to total depths of less than 2,000 feet and be located less than 660 feet from the nearest oil well. (the "Planned Wells"). The locations of both the Existing Wells and the Planned Wells is set forth in detail on the spreadsheets attached hereto as Exhibit A.

4. R.T. requests an order approving the location of the Existing Wells and also an order approving the location of the Planned Wells. Due to the nature and characteristics of the producing formation beneath the Leases and also the viscosity of the oil found therein, it is necessary for the oil wells drilled on the Leases to be located approximately 330 feet apart in order to efficiently produce the oil reserves therefrom without committing undue waste. To the extent that an exception to the well location restrictions in K.A.R. 82-3-108 or K.A.R. 82-3-207 is necessary in order for both the Existing Wells and the Planned Wells to be in compliance with all applicable rules and regulations, R.T. requests an exception to said well location restrictions.

5. It is R.T.'s position that K.A.R. 82-3-207 and K.A.R. 82-3-108 specifically permit R.T. to drill the Existing Wells in the locations which they have been drilled, and the Planned Wells in the locations set forth on Exhibit A. However, this Application is being filed in order to obtain clarification from the Commission regarding the interpretation of K.A.R. 82-3-207 and K.A.R. 82-3-108 and also to seek an exception to said well location restrictions if the Commission determines that an exception is necessary in order for both the Existing Wells and the Planned Wells to comply with all applicable rules and regulations.

6. The granting of this Application will prevent waste and will not violate correlative

rights.

7. The well locations for both the Existing Wells and the Planned Wells are depicted on the maps accompanying this Application and marked as Exhibit B. On said maps, the Existing Wells are shown as black circles; the red triangles represent injection wells which have already been drilled; the black flags represent the Planned Wells; and the red flags represent the planned location for injection wells.

8. None of the Existing Wells or the Planned Wells are located closer than 165 feet from the lease boundary lines as required by K.A.R. 82-3-108.

9. There are no offset operators whose lease line is located less than the required distance from the proposed well locations.

10. There are no unleased offset mineral owners whose property boundary is located less than the minimum distance required by K.A.R. 82-3-108(b) from the proposed well locations.

11. R.T. does not operate any lease that will be situated less than the minimum distance required by K.A.R. 82-3-108(b) from the proposed well locations.

12. Each of the Existing Wells and the Planned Wells will have 2.5 acres attributable to said well.

13. R.T. requests and allowable of 25 bbls of oil per day from each of the Existing Wells and each of the Planned Wells, pursuant to K.A.R. 82-3-207.

14. In the interest of economy the notices of intention to drill for the Existing Wells and the Planned Wells are not attached hereto due to their voluminous nature, but will be provided to the Commission upon request.

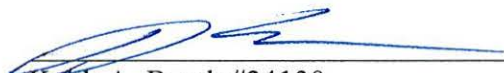
15. The accompanying documents required by K.A.R. 82-3-108(e) are enclosed herewith.

16. Notice of this Application for well location exceptions will be published once in both the *Wichita Eagle* newspaper and *The Lawrence Journal World* a newspaper in Douglas County, Kansas.

17. It would cause substantial and actual underground waste if R.T. is prohibited from producing from the Existing Wells during the pendency of this Application. Therefore, R.T. hereby moves the Commission for a preliminary order allowing R.T. to operate the Leases and to produce from the Existing Wells while this Application is pending before the Commission. R.T. will file a more formal motion requesting this preliminary order in the immediate future, which will be supported by accompanying expert testimony.

WHEREFORE, R.T. prays for an order,

- a. Finding that K.A.R. 82-3-207 and K.A.R. 82-3-108 specifically permit R.T. to drill the Existing Wells in the location which they have been drilled, and to drill the Planned Wells in the locations currently contemplated and that no exception to said well location restrictions is necessary;
- b. Or, if the Commission finds that K.A.R. 82-3-207 and K.A.R. 82-3-108 do not permit the Existing Wells to be drilled in the location which they have been drilled or permit the Planned Wells to be drilled in the location currently contemplated, that the Commission grant an exception to said well location restrictions; and
- c. granting R.T.'s request for a preliminary order allowing R.T. to continue to operate the Leases and produce from the Existing Wells while this application is pending.



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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF FRANKLIN)

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for the Applicant named above, and is duly authorized to make this affidavit; that he has read the foregoing Application, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 12th day of February, 2014.





Notary Public

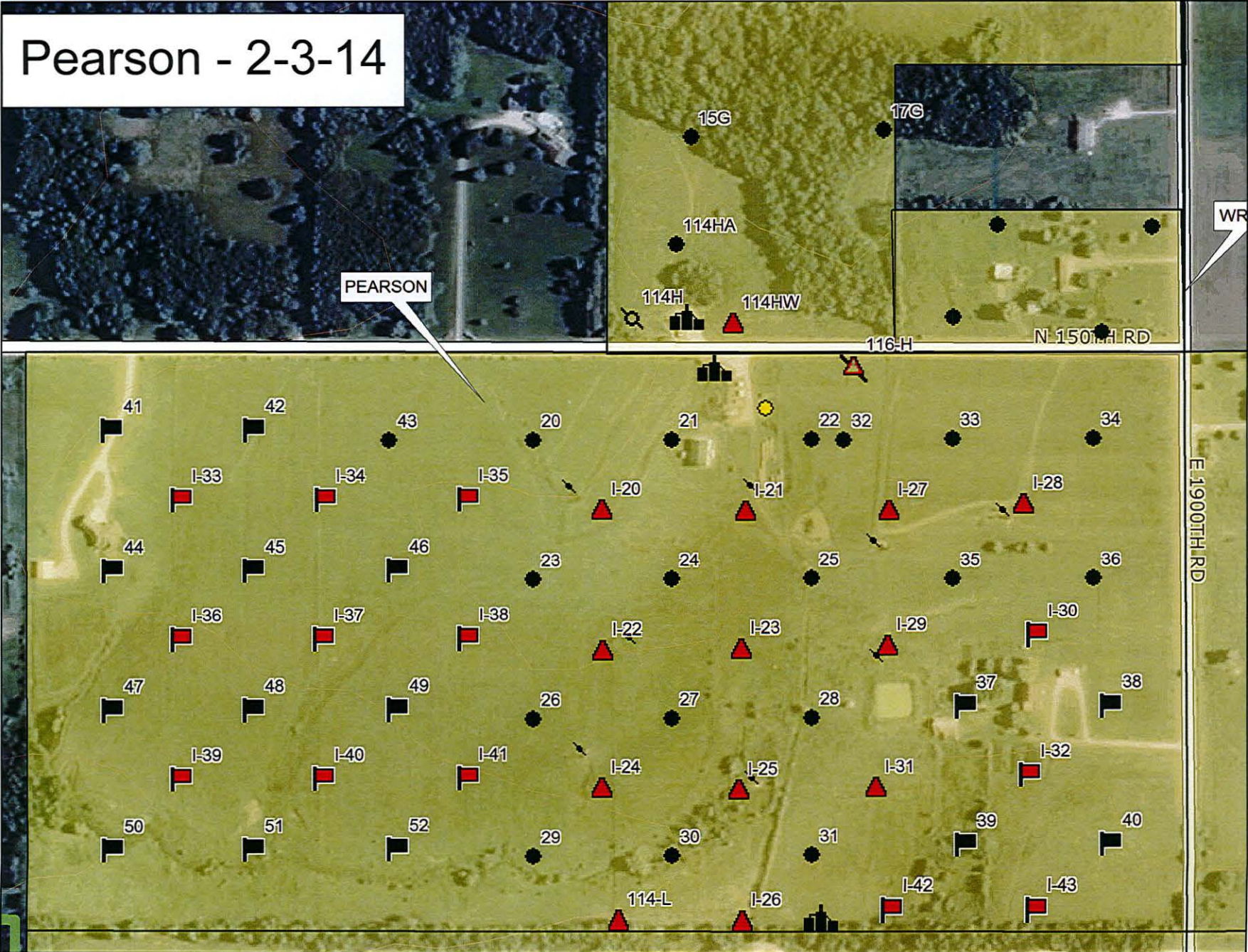
Appointment/Commission Expires:

EXHIBIT A

Pearson Drilling - N/2 SE/4 of 11-15S-20E					
Existing Wells					
Well	Lat	Lon	FSL	FEL	NB
20	38.75968	95.15404	2440	1480	200
21	38.75968	95.15292	2440	1160	200
22	38.75968	95.15180	2440	840	200
23	38.75881	95.15404	2120	1480	520
24	38.75881	95.15292	2120	1160	520
25	38.75881	95.15180	2120	840	520
26	38.75793	95.15404	1800	1480	480
27	38.75793	95.15292	1800	1160	480
28	38.75793	95.15180	1800	840	480
29	38.75707	95.15404	1485	1480	165
30	38.75707	95.15292	1485	1160	165
31	38.75707	95.15180	1485	840	165
32	38.75968	95.15175	2440	820	200
33	38.75968	95.15067	2440	520	200
34	38.75968	95.14954	2440	200	200
35	38.75880	95.15067	2120	520	520
36	38.75880	95.14954	2120	200	200
Planned Wells					
Well	Lat	Lon	FSL	FEL	NB
37	38.75792	95.15067	1800	520	480
38	38.75792	95.14954	1800	200	200
39	38.75706	95.15067	1485	520	165
40	38.75706	95.14954	1485	200	165
41	38.75968	95.15742	2440	2440	200
42	38.75968	95.15629	2440	2120	200
44	38.75880	95.15742	2120	2440	200
45	38.75880	95.15629	2120	2120	520
46	38.75880	95.15517	2120	1800	520
47	38.75793	95.15742	1800	2440	200
48	38.75793	95.15629	1800	2120	480
49	38.75793	95.15517	1800	1800	480
50	38.75706	95.15742	1485	2440	165
51	38.75706	95.15629	1485	2120	165
52	38.75706	95.15517	1485	1800	165

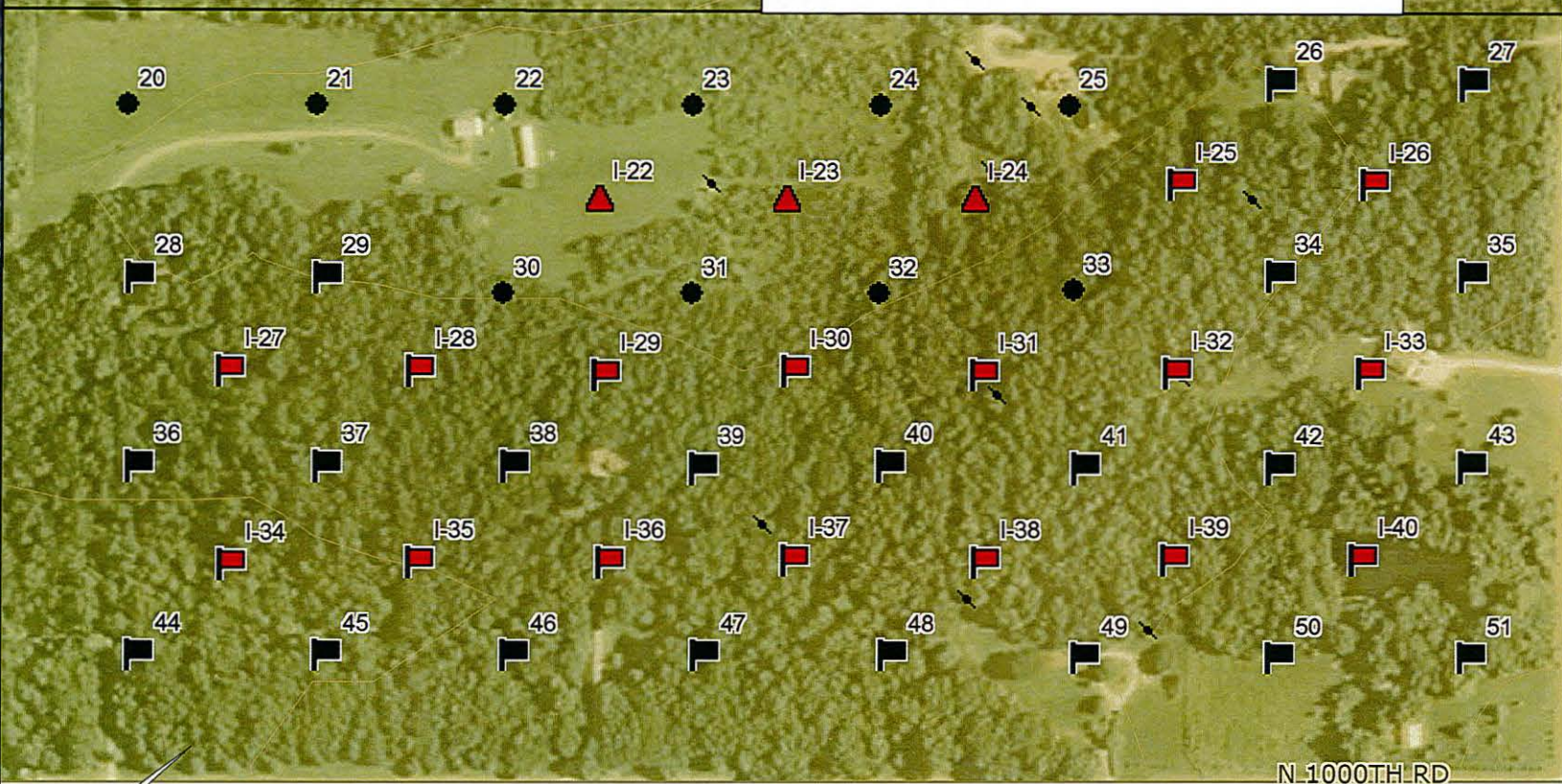
Finnerty Drilling - S/2 SE/4 of 11-15S-20E					
Existing Wells					
Well	Lat	Lon	FSL	FEL	NB
20	38.75617	95.15736	1155	2440	165
21	38.75617	95.15623	1155	2120	165
22	38.75617	95.15511	1155	1800	165
23	38.75617	95.15399	1155	1480	165
24	38.75617	95.15287	1155	1160	165
25	38.75617	95.15175	1155	840	165
30	38.75530	95.15511	835	1800	485
31	38.75530	95.15399	835	1480	485
32	38.75530	95.15287	835	1160	485
33	38.75530	95.15175	835	840	485
Planned Wells					
Well	Lat	Lon	FSL	FEL	NB
26	38.75617	95.15063	1155	520	165
27	38.75617	95.14951	1155	200	165
28	38.75530	95.15736	835	2440	200
29	38.75530	95.15623	835	2120	485
34	38.75530	95.15063	835	520	485
35	38.75530	95.14951	835	200	200
36	38.75442	95.15736	515	2440	200
37	38.75442	95.15623	515	2120	515
38	38.75442	95.15511	515	1800	515
39	38.75442	95.15399	515	1480	515
40	38.75442	95.15287	515	1160	515
41	38.75442	95.15175	515	840	515
42	38.75442	95.15063	515	520	515
43	38.75442	95.14951	515	200	200
44	38.75355	95.15736	200	2440	200
45	38.75355	95.15623	200	2120	200
46	38.75355	95.15511	200	1800	200
47	38.75355	95.15399	200	1480	200
48	38.75355	95.15287	200	1160	200
49	38.75355	95.15175	200	840	200
50	38.75355	95.15063	200	520	200
51	38.75355	95.14951	200	200	200

EXHIBIT B



Finnerty - 2-3-14

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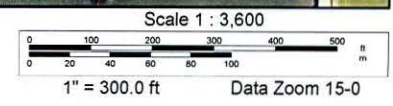


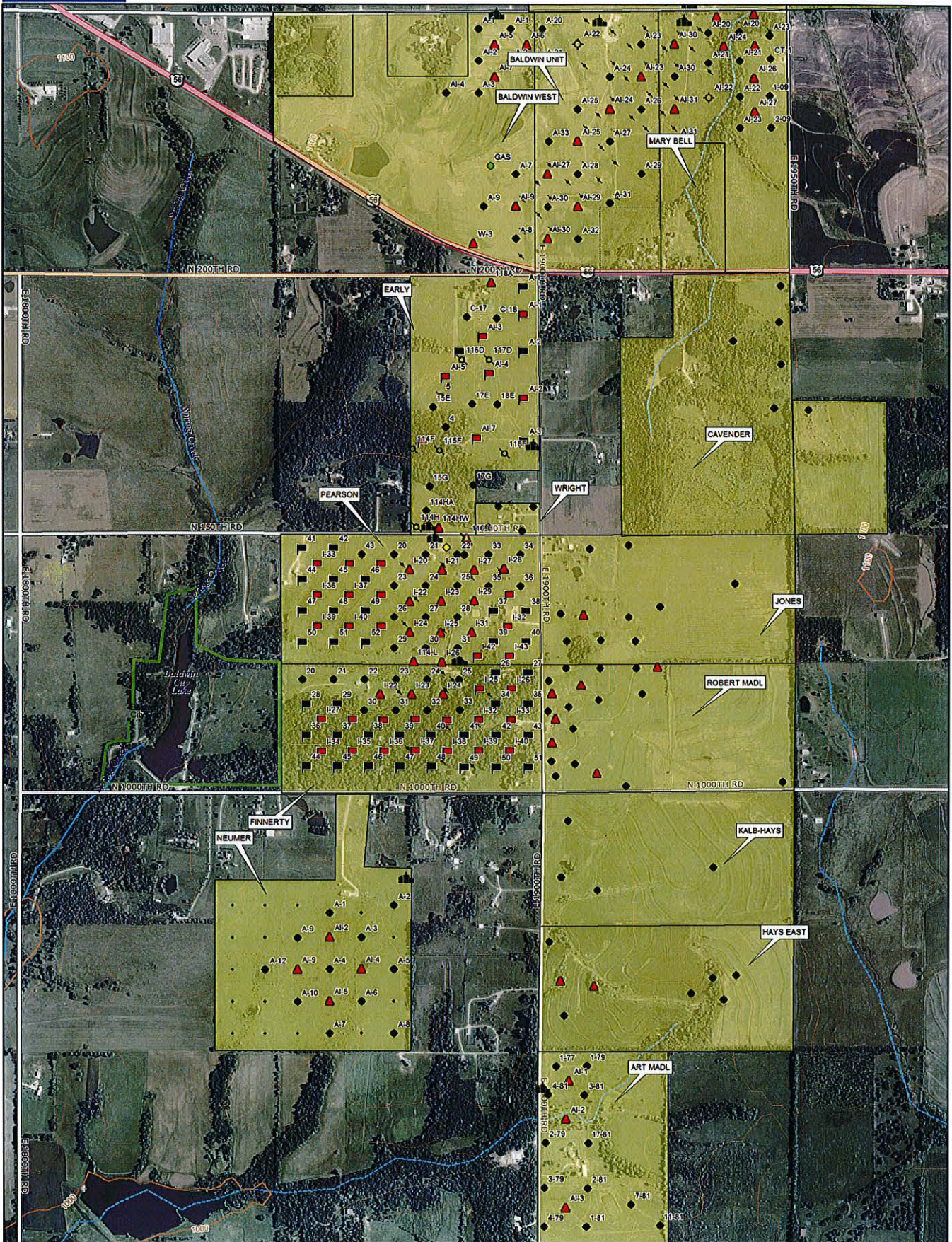
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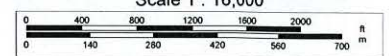
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Scale 1 : 16,000



1" = 1,333.3 ft Data Zoom 14-0