



2015.05.11 15:38:13
Kansas Corporation Commission
/S/ Amy L. Gilbert

May 7, 2015

Ms. Shari Feist Albrecht, Chair
Mr. Jay Scott Emler, Commissioner
Mr. Pat Apple, Commissioner
Conservation Division
Kansas Corporation Commission
266 North Main Street
Suite 220
Wichita, Kansas 67202-1513

RECEIVED
KANSAS CORPORATION COMMISSION

MAY 11 2015

LEGAL SECTION

Re: Request for Abatement, or
Abatement Hearing
Penalty Order 15-CONS-833-CPEN
Ohnmacht #4 Workover
API 15-051-03239-00-01
Ne Ne Section 16 – 15S – 18W
Ellis County, Kansas

Dear Commissioners:

Please consider this letter as my respectful request for a hearing or perhaps even the direct abatement of the \$500 penalty recently assessed against Belport for failure to file Form ACO-1 re our recent workover of the Ohnmacht #4 well.

As the enclosed chain of emails confirms, I endeavored to complete Form ACO-1 via KOLAR in early April. Evidently, I was trying to enter too much information into KOLAR, which prompted KOLAR to require additional information that was not germane to our workover.

With the assistance of Kansas Corporation Commission ("KCC") staff member Naomi B. James, I finally have been able to complete the form to KOLAR's satisfaction. Ironically, this was accomplished by providing KOLAR with less information about the well than I had to provide.

If I had not tried repeatedly to file the ACO-1 before the filing deadline, I would not protest the \$500 fine recently levied for failure to file. However, since I finally have been able to complete the form (with Naomi's help) in a format acceptable to KOLAR, and since this filing has been accepted by the Kansas Corporation Commission, I respectfully request an abatement of the \$500 penalty or, failing that, a hearing to present my request for such an abatement.

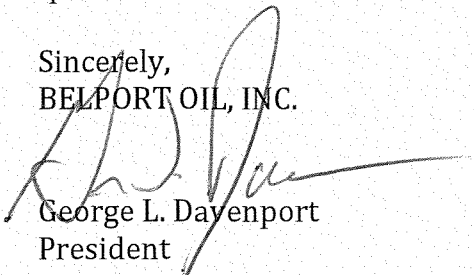
Enclosed please find copies of the emails that I exchanged with KCC staff during April as part of my effort to complete the form to KOLAR's acceptance, along with a copy of the final, now approved ACO-1.

As required by the penalty order, I am submitting this letter and seven copies for your review.

Please feel free to contact me with any questions that you may have. If you wish to reach me on my mobile phone, my mobile number is (918) 637-5476.

Thank you for your consideration of my request.

Sincerely,
BELPORT OIL, INC.



George L. Dayenport
President

Emails to/frm KCC Staff re KOLAR Problems

April 16, 2015

From: "Naomi B. James" <n.james@kcc.ks.gov>
Subject: **workover**
Date: April 16, 2015 2:06:51 PM CDT
To: "gldavenport@belport.net" <gldavenport@belport.net>
✉ 1 Attachment, 6.0 KB

In reference to your email this morning to Amy, she referred you to me. The only information you need to include is what you are doing to the well right now for the work over. If you included old casing (surface), delete it. If you get stuck or KOLAR won't let you submit for some reason, please give me a call at 316-337-6230.

Naomi James

Good Morning,

I have completed form ACO-1 to describe our workover of the Ohnmacht #4. The Ohnmacht #4 was plugged in 1983 and our workover included drilling out all plugs (with fresh water). We rented a portable steel mud pit and did not have to haul off any of our circulating water ...
the Arbuckle drank it.

I have tried to submit the ACO-1 via KOLAR but KOLAR will not accept it since it defaults to requiring casing weight and Circulating Media disposal information.

How should I proceed? May I simply print the form and then mail it?

Thanks,

George Davenport
President
Belport Oil, Inc.

918 637-5476

Naomi James, *Environmental Scientist II*
Conservation Division - Production Department
Kansas Corporation Commission
266 N. Main St. Ste 220 Wichita KS 67202-1513
Phone (316) 337-6230 | Fax (316) 337-6211



Emails to/frm KCC Staff re KOLAR Problems

May 6, 2015

From: "Naomi B. James" <n.james@kcc.ks.gov>
Subject: **RE: Belport unable to submit ACO-1 re Old Well Workover**
Date: May 6, 2015 8:10:09 AM CDT
To: George Davenport <gldavenport@belport.net>

George,

If you do not have the original surface casing you do not need to include it. On a workover, the only information that is needed is what was done to the well during the workover. If you re perfed and no additional casing was added, all you need to put is the perms. If you added tubing, a liner, port collar, or dv tool, only put that info.

By doing this, that will eliminate needing casing weight. Also, for the pit, you should be able to leave it blank or put zeros in.

If it still giving you problems please let me know.

Naomi.

From: George Davenport [<mailto:gldavenport@belport.net>]

Sent: Wednesday, May 06, 2015 7:41 AM

To: Naomi B. James

Subject: Belport unable to submit ACO-1 re Old Well Workover

```
function notifyScript() { if(window.top == window){ var evt = document.createEvent("Event");
evt.initEvent("notify", false, false); if (document.getElementById("addthis-extension-script") == null) {
var d=document.createElement("div"); d.setAttribute("style", "display:none"); d.setAttribute("id",
"addthis-extension-script"); if (window._ate) d.textContent=_ate.pub(); else if(window.addthis_config
&& addthis_config.pubid) d.textContent= addthis_config.pubid; else if(window.addthis_config &&
addthis_config.username) d.textContent= addthis_config.username; else if(window.addthis_pub)
d.textContent= addthis_pub; else d.textContent=""; document.body.appendChild(d); }
document.documentElement.dispatchEvent(evt); }}notifyScript()
```

Hi Naomi,

Here is what KOLAR tells me re the ACO-1 that I have been trying to complete. As you and I discussed yesterday by phone, I tried to submit the ACO-1 a number of times during the first half of April.

For many reasons, I would like to complete my submission as soon as possible, but will need your help to do so.

May I call you this afternoon to work through the KOLAR blocks?

Thanks,
George Davenport
Belport Oil, Inc.

918 637-5476

- Home
- KCC Forms []

- C1+CDP1

Intent to Drill

- CB1+CDP1

Cathodic Protection Borehole Intent

- ACO1

Completion Report

- ACO4

Application for Commingling of Production or Fluids

- ACO5

Application for Dual Completion

- ACO18

Application for Venting or Flaring

- CDP1

Pit Application

- CDP4

Pit Closure

- CDP5

Waste Transfer

- CP1

Well Plugging Application

- CP4

Well Plugging Record

- CP111

Temporary Abandonment Application

- Licensing []

- Well Inventory
- License Renewal
- Certificate of License

- Settings []

- User
- Group

- Tools []

- Well - Lease Research
- Spot Research

- Help []

- KCC Forms
- User and Group Information
- Contact Us

Form Details

Back to Well Completion
Ohnmacht 4 (1249705)

```
function confirmDelete(delUrl) { if (confirm("Are you sure you want to delete")) { document.location = delUrl; } }
```

Actions

View PDF

Delete

Edit

Cannot Submit You have not entered all the required fields.

Download Fracking Disclosure Template

```
function displayAttachmentPDF(binary_url) { var newwindow = window.open(binary_url,'mywindow'); }  
function confirmDelete() { if (confirm("Are you sure you want to delete")) { return true; } else { return false; } }
```

Attachments

[Add Attachment]

Remarks

Remarks to KCC

[Add Remark]

Remarks

George We re-entered a plugged well, and I do not have information regarding the weight of the Davenport surface and production casing run by the original operator. Also, we drilled out the cement 04/15/015 plugs using fresh water as our circulating media. We also used a portable steel pit. All 11:35 am circulating fluid was absorbed by the Arbuckle so none was hauled off.

Problems Preventing Submission

Form Field	Error Message
Casing	Weight is required for each row.
Fluid Mngmt - County	Fluid Mngmt - County is required.
Fluid Mngmt - Lease Name	Fluid Mngmt - Lease Name is required.
Fluid Mngmt - Operator License	Fluid Mngmt - Operator License is required.
Fluid Mngmt - Operator Name	Fluid Mngmt - Operator Name is required.
Fluid Mngmt - Township	Fluid Mngmt - Township is required.
Fluid Mngmt - Quarter	Fluid Mngmt - Quarter is required.
Fluid Mngmt - Range	Fluid Mngmt - Range is required.
Fluid Mngmt - Range Direction	Fluid Mngmt - Range Direction is required.
Fluid Mngmt - Section	Fluid Mngmt - Section is required.
Fluid Mngmt - Permit	Fluid Mngmt - Permit is required.

For any filing made by the operator or on behalf of the operator, the operator on whose behalf the filing was made is responsible for compliance with all Commission rules and regulations relating to the filing and any permit issued by the Commission.

“KOLAR WORKED !!”

Emails to/frm KCC Staff re KOLAR Problems

May 6 & 7, 2015

From: "Naomi B. James" <n.james@kcc.ks.gov>
Subject: RE: Belport unable to submit ACO-1 re Old Well Workover
Date: May 7, 2015 8:14:42 AM CDT
To: George Davenport <gldavenport@belport.net>

Haha! No problem. Kolar likes to be difficult! I think IT did it on purpose myself ;)
Naomi

From: George Davenport [<mailto:gldavenport@belport.net>]
Sent: Wednesday, May 06, 2015 6:18 PM
To: Naomi B. James
Subject: Re: Belport unable to submit ACO-1 re Old Well Workover

Hi Naomi,

With the help of your instruction, I finally have been able to get KOLAR to accept my ACO-1 submission. Thank you for guiding me through the process. When I first tackled the form in early April, I was reluctant to skip fields for which I knew the answers. For example, my well files indicate the well's casing configuration, etc, so I was trying to add that kind of information in order to submit a complete report.

I was stuck until you instructed me to enter zeros into fields that relate to well data not altered by our workover. Thank you for helping me to escape from KOLAR Purgatory !!

Sincerely,
Belport OIL, Inc.

George L. Davenport
President

On May 6, 2015, at 8:10 AM, Naomi B. James wrote:

George,

If you do not have the original surface casing you do not need to include it. On a workover, the only information that is needed is what was done to the well during the workover. If you re perfed and no additional casing was added, all you need to put is the perms. If you added tubing, a liner, port collar, or dv tool, only put that info.

“KOLAR FINALLY WORKED !!”

Ohnmacht #4 ACO-1 Accepted by KCC

May 7, 2015

From: chasm@kgs.ku.edu
Subject: **+KOLAR: Well Completion for "Ohnmacht 4" Approved**
Date: May 7, 1915 7:41:57 AM CST
To: gldavenport@belport.net
Reply-To: chasm@kgs.ku.edu

The **Well Completion** (ACO1) for the well named "Ohnmacht 4" was approved by the KCC. Please log on to KOLAR to review the form.

If you marked "Vented" for Disposition of Gas, then you must submit an ACO-18 to the KCC within 60 days.

If you marked "Dually Completed" for Method of Completion, then you must submit an ACO-5 to the KCC within 60 days.

If you marked "Commingled" for Method of Completion, then you must submit an ACO-4 to the KCC within 60 days.

This is KOLAR email request #100145321884, document #1249705.

Confidentiality Requested:

☐ Yes ☒ No

KANSAS CORPORATION COMMISSION 1249705
OIL & GAS CONSERVATION DIVISION

Form ACO-1

August 2013

Form must be Typed

Form must be Signed

All blanks must be Filled

WELL COMPLETION FORM
WELL HISTORY - DESCRIPTION OF WELL & LEASE

OPERATOR: License # 33809

Name: Belpoint Oil, Inc.

Address 1: 1443 S NORFOLK AVE

Address 2:

City: TULSA State: OK Zip: 74120 + 5610

Contact Person: George Davenport

Phone: (918) 584-8989

CONTRACTOR: License # 34410

Name: American Pulling Service

Wellsite Geologist: Carl Zimmerman

Purchaser: NCRA

Designate Type of Completion:

- ☐ New Well ☐ Re-Entry ☒ Workover
- ☒ Oil ☐ WSW ☐ SWD ☐ SIOW
- ☐ Gas ☐ D&A ☐ ENHR ☐ SIGW
- ☐ OG ☐ GSW ☐ Temp. Abd.
- ☐ CM (Coal Bed Methane)
- ☐ Cathodic ☐ Other (Core, Expl., etc.):

If Workover/Re-entry: Old Well Info as follows:

Operator: Tomlinson Oil Company

Well Name: Ohnmacht #4

Original Comp. Date: 12/28/1962 Original Total Depth: 3610

- ☐ Deepening ☐ Re-perf. ☐ Conv. to ENHR ☐ Conv. to SWD
- ☐ Plug Back ☐ Conv. to GSW ☒ Conv. to Producer

- ☐ Commingled Permit #:
- ☐ Dual Completion Permit #:
- ☐ SWD Permit #:
- ☐ ENHR Permit #:
- ☐ GSW Permit #:

11/18/2014 12/4/2014 12/30/2014
Spud Date or Date Reached TD Completion Date or
Recompletion Date Recompletion Date

API No. 15 - 15-051-03239-00-01

Spot Description:

NE NE SE Sec. 16 Twp. 15 S. R. 18 ☐ East ☒ West

2310 Feet from ☐ North / ☒ South Line of Section

330 Feet from ☒ East / ☐ West Line of Section

Footages Calculated from Nearest Outside Section Corner:

☐ NE ☐ NW ☒ SE ☐ SW

GPS Location: Lat: , Long:
 (e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Ellis

Lease Name: Ohnmacht Well #: 4

Field Name: Schoenchen

Producing Formation: Arbuckle

Elevation: Ground: 2041 Kelly Bushing: 2045

Total Vertical Depth: 3628 Plug Back Total Depth:

Amount of Surface Pipe Set and Cemented at: 0 Feet

Multiple Stage Cementing Collar Used? ☒ Yes ☐ No

If yes, show depth set: 0 Feet

If Alternate II completion, cement circulated from:

feet depth to: w/ sx cmt.

Drilling Fluid Management Plan

(Data must be collected from the Reserve Pit)

Chloride content: ppm Fluid volume: bbls

Dewatering method used:

Location of fluid disposal if hauled offsite:

Operator Name:

Lease Name: License #:

Quarter Sec. Twp. S. R. ☐ East ☐ West

County: Permit #:

AFFIDAVIT

I am the affiant and I hereby certify that all requirements of the statutes, rules and regulations promulgated to regulate the oil and gas industry have been fully complied with and the statements herein are complete and correct to the best of my knowledge.

Submitted Electronically

KCC Office Use ONLY

☐ Confidentiality Requested

Date:

☐ Confidential Release Date:

☐ Wireline Log Received

☐ Geologist Report Received

☐ UIC Distribution

ALT ☐ I ☒ II ☐ III Approved by: NAOMI JAMES Date: 05/07/2015



1249705

Operator Name: Belpart Oil, Inc. Lease Name: Ohnmacht Well #: 4
 Sec. 16 Twp. 15 S. R. 18 ☐ East ☒ West County: Ellis

INSTRUCTIONS: Show important tops of formations penetrated. Detail all cores. Report all final copies of drill stems tests giving interval tested, time tool open and closed, flowing and shut-in pressures, whether shut-in pressure reached static level, hydrostatic pressures, bottom hole temperature, fluid recovery, and flow rates if gas to surface test, along with final chart(s). Attach extra sheet if more space is needed.

Final Radioactivity Log, Final Logs run to obtain Geophysical Data and Final Electric Logs must be emailed to kcc-well-logs@kcc.ks.gov. Digital electronic log files must be submitted in LAS version 2.0 or newer AND an image file (TIFF or PDF).

Drill Stem Tests Taken (Attach Additional Sheets)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Log	Formation (Top), Depth and Datum	<input type="checkbox"/> Sample
Samples Sent to Geological Survey	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Name Arbuckle	Top 3606	Datum -1561
Cores Taken	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
Electric Log Run	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
List All E. Logs Run:				
GR Neutron Log				
Cement Bond Log				

CASING RECORD <input type="checkbox"/> New <input type="checkbox"/> Used							
Report all strings set-conductor, surface, intermediate, production, etc.							
Purpose of String	Size Hole Drilled	Size Casing Set (In O.D.)	Weight Lbs. / Ft.	Setting Depth	Type of Cement	# Sacks Used	Type and Percent Additives

ADDITIONAL CEMENTING / SQUEEZE RECORD				
Purpose:	Depth Top Bottom	Type of Cement	# Sacks Used	Type and Percent Additives
<input type="checkbox"/> Perforate				
<input checked="" type="checkbox"/> Protect Casing	1836-1900	Common	200	3% CC
<input type="checkbox"/> Plug Back TD				
<input type="checkbox"/> Plug Off Zone	2412-2442	Common	200	3% CC8.625

Did you perform a hydraulic fracturing treatment on this well? ☐ Yes ☒ No (If No, skip questions 2 and 3)
 Does the volume of the total base fluid of the hydraulic fracturing treatment exceed 350,000 gallons? ☐ Yes ☐ No (If No, skip question 3)
 Was the hydraulic fracturing treatment information submitted to the chemical disclosure registry? ☐ Yes ☐ No (If No, fill out Page Three of the ACO-1)

Shots Per Foot	PERFORATION RECORD - Bridge Plugs Set/Type Specify Footage of Each Interval Perforated	Acid, Fracture, Shot, Cement Squeeze Record (Amount and Kind of Material Used)	Depth
TUBING RECORD: Size: <u>2.875</u> Set At: <u>3580</u> Packer At:		Liner Run: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
Date of First, Resumed Production, SWD or ENHR. <u>2/17/2015</u>		Producing Method: <input type="checkbox"/> Flowing <input checked="" type="checkbox"/> Pumping <input type="checkbox"/> Gas Lift <input type="checkbox"/> Other (Explain) _____	
Estimated Production Per 24 Hours	Oil Bbls. <u>9</u>	Gas Mcf <u>280</u>	Water Bbls. Gas-Oil Ratio Gravity <u>31</u>

DISPOSITION OF GAS: <input type="checkbox"/> Vented <input type="checkbox"/> Sold <input type="checkbox"/> Used on Lease (If vented, Submit ACO-18.)		METHOD OF COMPLETION: <input checked="" type="checkbox"/> Open Hole <input type="checkbox"/> Perf. <input type="checkbox"/> Dually Comp. <input type="checkbox"/> Commingled (Submit ACO-5) (Submit ACO-4) <input type="checkbox"/> Other (Specify) _____		PRODUCTION INTERVAL: <u>OH Arbuckle</u> <u>3605 - 3628</u>	
--	--	--	--	--	--