

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the matter of the Application of Apollo Energies, Inc. for an exception to the 10-year time limitation of K.A.R. 82-3-111 for its Early A-1 well located in the SE/2 of the NW/4 of Section 4, Township 33 South, Range 11 West, Barber County, Kansas.)	Docket No. 20-CONS-3132-CEXC
)	
)	CONSERVATION DIVISION
)	
)	License No. 30481
)	
)	

NOTICE OF OBJECTION TO APPLICATION

COMES NOW Bank of America, N.A., Trustee (“Protestant”), which owns a mineral interest in the NW/4 of Section 4, T33S, R11W, Barber County, Kansas. Protestant objects to this Application for the following reasons:

1. Applicant, Apollo Energies, Inc., improperly alleges that the subject well is located on “an active oil and gas lease or unit comprising the following lands: West Half of the Northeast Quarter and the East Half of the Northwest Quarter of Section 4, T33W, R11W, Barber County, Kansas.” The lease covering this acreage has not produced since May 4, 2018, or perhaps even earlier.
2. Applicant’s lease on this acreage has expired for lack of production.
3. Applicant has no right to have any further access to the surface other than to plug the Early A-1 well.
4. Applicant has already received a temporarily abandoned status on the Early A-1 well for more than ten (10) years.

5. Applicant has failed to develop any exploration or other uses for the subject well during the last ten (10) years and should not be granted any additional temporary abandonment status for three (3) additional years as requested in the Application.

WHEREFORE, Protestant requests that this application be denied.

Submitted by:

WITHERS, GOUGH, PIKE & PFAFF, LLC
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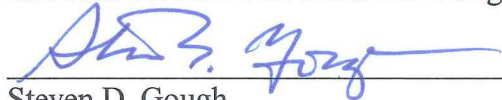
By: /s/ Steven D. Gough
Steven D. Gough, #09016
Attorneys for Bank of America, N.A.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Steven D. Gough, being of lawful age and being first duly sworn upon his oath, deposes and says:

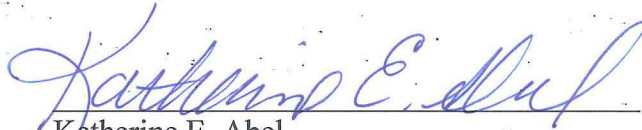
That he is the attorney for Bank of America, N.A., Trustee ("Protestant"); he has read the above and forgoing **Notice of Objection to Application** and is familiar with the contents thereof and that the statements made therein are true and correct to the best of his knowledge and belief.



Steven D. Gough

SUBSCRIBED AND SWORN to before me this 14th day of November 2019





Katherine E. Abel
Notary Public

My Appointment Expires:

June 30, 2022

CERTIFICATE OF SERVICE

The undersigned hereby certifies that November 14, 2019, a copy of the foregoing was served by electronic mail to:

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Production Manager
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Facsimile: 620-672-1224

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/s/ Steven D. Gough
Steven D. Gough