

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION OF)	DOCKET NO. 18-CONS-3240-CWLE
TRANS PACIFIC OIL CORPORATION FOR A)	
WELL LOCATION EXCEPTION FOR THE)	CONSERVATION DIVISION
J. WILLIAM UNIT NO. 3-29 WELL IN SECTION)	
29, TOWNSHIP 14 SOUTH, RANGE 32 WEST,)	LICENSE NO. 9408
LOGAN COUNTY, KANSAS)	

PETITION TO INTERVENE

COMES NOW, Garrett and Company Resources, LLC (“Petitioner”), and pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, requests permission from the Commission to intervene and participate in this docket. Petitioner alleges and states the following in support of its Petition:

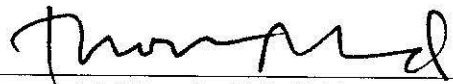
1. Petitioner is a limited liability company organized and existing under the laws of the State of Oklahoma, maintaining principal business offices at 9701 N. Broadway Extension, Oklahoma City, Oklahoma 73114. Petitioner owns an undivided one-half (1/2) interest in and to all oil, gas and other minerals in and under the West Half of the West Half (W/2 W/2) of Section 32, Township 14 South, Range 32 West, Logan County, Kansas (the “Subject Lands”).

2. Petitioner’s land and mineral rights directly offset the J. William Unit No. 3-29 well (the “Subject Well”) proposed to be drilled by Trans Pacific Oil Corporation (“Applicant”) in this docket in the South Half of the Southwest Quarter (S/2 SW/4) of Section 29, Township 14 South, Range 32 West, Logan County, Kansas at a location 80 feet from the South line and 550 feet from the West line (80 ft. FSL & 550 ft. FWL) of said Section 29. Petitioner has leased its interest in and to the Subject Lands to Applicant, and authorized the formation of a 40 acre oil production unit for the Subject Well that includes Petitioner’s interest in 20 acres of the Subject Lands.

3. Petitioner's legal rights, duties, privileges, immunities or other legal interests may be substantially affected by this proceeding. Specifically, Applicant's ability to drill the Subject Well at its proposed location and to produce the same at its proposed allowable will directly benefit development and production of Petitioner's oil, gas and other minerals, prevent waste, and protect the Petitioner's correlative rights. The intervention sought is in the interests of justice and will not impair the orderly and prompt conduct of these proceedings. Petitioner will abide by the Procedural Schedule determined at the Prehearing Conference in this matter on March 2, 2018 and set forth in the Prehearing Officer Order Setting Status Conference, Discovery and Protective Orders issued March 6, 2018.

WHEREFORE, Petitioner requests that the Commission issue its order authorizing Petitioner's intervention in these proceedings; requiring that Petitioner be served with all pleadings, discovery, testimony and orders herein; allowing Petitioner's participation in this docket; and granting to Petitioner such other and further relief as the Commission deems just and proper.

Respectfully submitted,




Thomas M. Rhoads (SC 10005)
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Attorney for Petitioner,
Garrett and Company Resources, LLC

VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SEDGWICK)

Thomas M. Rhoads, of lawful age and being first duly sworn upon his oath, deposes and states: That he is the Attorney for the Petitioner in the above-captioned proceeding; that he has read the above and foregoing Petition to Intervene, knows and understands the contents thereof, and states that the statements and allegations therein contained are true and correct according to his knowledge, information, and belief.

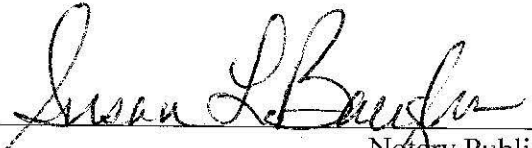


Thomas M. Rhoads

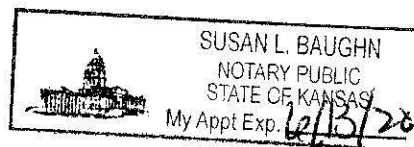
SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 8th day of
March, 2018.

My commission expires:

June 13, 2020



Notary Public



CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 8th day of March, he caused the above and foregoing Petition to Intervene to be filed with the State Corporation Commission of the State of Kansas and served electronically upon the following persons at the email addresses shown:

Samuel Feather, Deputy General Counsel
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Attorney for Protestants,
Ilene Rose, Trustee of the Rose Family
Trust UTI 6/29/06 and
Ilene Rose, Trustee of the Rose Survivor's
Trust UTI 6/29/06



Thomas M. Rhoads