

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)

AMENDED 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, files its Amended Petition to Intervene seeking permission from the Commission to intervene and participate in this docket. This Amended Petition amends, supercedes and replaces in its entirety the Petition to Intervene filed by the Petitioner in this matter on March 8, 2018. Petitioner alleges and states the following in support of its Amended 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 fifteen-sixteenths (15/16) interest in and to all oil, gas and other minerals in and under the South Half of the Southwest Quarter (S/2 SW/4) of Section 29, Township 14 South, Range 32 West, Logan County, Kansas (the “Subject Lands”).

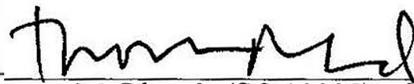
2. The Applicant in this docket, Trans Pacific Oil Corporation (“Applicant”) proposes to drill its J. William Unit No. 3-29 well (the “Subject Well”) on the Subject Lands at a location described as 80 feet from the South line and 550 feet from the West line (80 ft. FSL & 550 ft. FWL) of said Section 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 and prevent waste, without violating the correlative rights of offsetting mineral owners. 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)
Law Offices of Thomas M. Rhoads LC
200 E. 1st Street, Suite 301
Wichita, Kansas 67202-2114
Telephone: (316) 260-4440
Facsimile: (316) 260-4419
Email: tmrhoads@sbcglobal.net

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 Amended 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

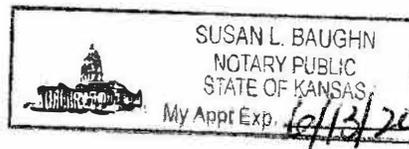
SUBSCRIBED AND SWORN TO before me, the undersigned authority, this 9th day of
March, 2018.

My commission expires:

June 13, 2020



Notary Public



CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 9th day of March, he caused the above and foregoing Amended 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
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027
Email: s.feather@kcc.ks.gov

Prehearing Officer

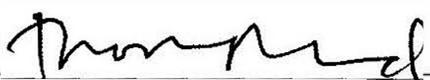
David E. Bengston
Stinson Leonard Street LLP
1625 N. Waterfront Parkway,
Suite 300
Wichita, Kansas 67206
Email: david.bengston@stinson.com

Attorney for Applicant,
Trans Pacific Oil Corporation, Inc.

Jonathan R. Myers, Litigation Counsel
Kansas Corporation Commission
Conservation Division
266 N. Main Street, Suite 220
Wichita, Kansas 67202-1513
Email: j.myers@kcc.ks.gov

Chasen R. Katz
Thompson, Arthur, Davidson & Katz
P. O. Box 111
Russell, Kansas 67665
Email: tad@eaglecom.net

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