

MAY 17 2012

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

LEGAL SECTION

Before Commissioners: Mark Sievers, Chairman
Ward Loyd, Commissioner
Thomas E. Wright, Commissioner

In the Matter of the Application of Wilton)	Docket No. 12-CONS-266-CWLE
Petroleum, Inc. for a well location exception for)	
its Roemer Trust #2 well, to be located in the)	
Northeast Quarter of the Northeast Quarter of the)	CONSERVATION DIVISION
Northeast Quarter of Section 13, Township 16)	
South, Range 30 West, Lane County, Kansas.)	
<hr/>		License No. 7775

APPLICATION FOR WELL LOCATION EXCEPTION AND ALLOWABLE

COMES NOW Wilton Petroleum, Inc. ("Wilton Petroleum" or "Applicant"), by and through its legal counsel, Michael Lennen and Jonathan A. Schlatter of Morris, Laing, Evans, Brock & Kennedy, Chtd., and files with the State Corporation Commission of the State of Kansas ("Commission") its Application for Well Location Exception for its proposed Roemer Trust #2 oil well to be drilled and completed in the Roemer Field in Lane County, Kansas ("Application"). In support of its Application, Wilton Petroleum alleges and states:

1. Wilton Petroleum is an Oregon corporation that is duly licensed, authorized, and active and in good standing with the Kansas Secretary of State's office to do business in Kansas.
2. Wilton Petroleum is currently licensed and in good standing with the Commission to operate oil and gas wells in Kansas under Conservation Division oil and gas operator's license number 7775.
3. Commission regulation K.A.R. 82-3-108 provides the general setback requirement for oil and gas wells in Kansas. It provides that, absent special spacing rules on a county or field-wide basis or the Commission granting a well-location exception, an oil and gas well shall not be drilled nearer than 330 feet from any lease or unit boundary line.

4. Wilton Petroleum is the owner and operator of the Roemer Trust oil and gas lease, which covers the Northeast Quarter (NE/4) of Section 13, Township 16 South, Range 30 West, Lane County, Kansas (“the subject acreage”). Wilton Petroleum desires to drill and complete the Roemer Trust #2 (“the subject well”) as an oil well producing from the Roemer Field in the Mississippian System in the Northeast Quarter of the Northeast Quarter of the Northeast Quarter (NE/4 NE/4 NE/4) of Section 13, Township 16 South, Range 30 West, Lane County, at a location that is approximately 435’ south from the North section line and approximately 100’ west of the East section line.

5. The Applicant’s geo-physical and geological consultants have evaluated the Mississippian System across Wilton Petroleum’s Roemer Trust leasehold and determined that the proposed location of the subject well is the most optimal location to allow the best recovery of hydrocarbon reserves.

6. The only lease nearer to the proposed Roemer Trust #2 well than the statewide setback requirement established by K.A.R. 82-3-108 is Wilton Petroleum’s D&E Roemer Farms Lease, located on the Northwest Quarter (NW/4) of Section 18, Township 16 South, Range 29 West, Lane County, Kansas. Wilton Petroleum’s mineral owners under the D&E Roemer Farms Lease, Randy D. Roemer and Elaine Roemer, who also are partial undivided mineral owners under the Roemer Trust Lease, have expressed their written consent and permission for the Applicant to drill the subject well at the proposed location. Enclosed hereto as Exhibit A is a copy of the letter signed by Randy D. Roemer and Elaine Roemer, owners of the minerals underlying the Northwest Quarter of Section 18, Township 16 South, Range 29 West, Lane County, Kansas.

7. The Production of oil and/or gas from the Roemer Field through the subject well will not cause uncompensated cognizable drainage between Wilton Petroleum's Roemer Trust Lease and offsetting leaseholds, and therefore will not violate correlative rights.

8. The drilling and completion of the subject well at the proposed location is necessary to prevent waste and adequately and efficiently drain the Roemer Field as it underlies the Northeast Quarter of Section 13, Township 16 South, Range 30 West, Lane County, Kansas. Production from the subject well will allow for the recovery of significant additional hydrocarbon reserves from Wilton Petroleum's Roemer Trust leasehold that otherwise would not be recovered by the existing well on the Roemer Trust Lease.

9. A map of the subject acreage showing all wellbores within a 1/2-mile radius of the subject well is attached to the Application as Exhibit B.


10. The names and addresses of royalty owners in the Northwest Quarter of Section Section 18, Township 16 South, Range 29 West, Lane County, Kansas, and the names and addresses of all unleased, offset mineral owners and offset operators within one-half mile of the acreage attributed to the subject wells are set forth in the attached Exhibit C.

11. The Applicant is also causing the Notice of Application, a copy of which is filed herewith, to be published as required by this Commission in the *Wichita Eagle* and the *Dighton Herald* newspapers.

NOW THEREFORE Applicant prays that the Commission assign a date for hearing this Application, and should any interested party protest this Application, upon such hearing grant Applicant's request for a well location exception for the subject well, attribute to the subject well ten acres from the Northeast Quarter of the Northeast Quarter of the Northeast Quarter of Section 13, Township 16 South, Range 30 West, Lane County, Kansas, and grant a full production

allowable to the subject well; should no interested party protest this Application, Applicant prays that the Commission grant Applicant's request for a well location exception, attribution of said acreage, and a full production allowable for the subject well administratively, without the expense and inconvenience of a hearing on the uncontested matter.

Respectfully submitted,



Jonathan A. Schlatter, #24848
300 N. Mead, Suite 200
Wichita, KS 67202-2745
Telephone: 316-262-2671
Facsimile: 316-262-6226
Attorneys for Wilton Petroleum, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of May, 2012, true and correct copies of the above and foregoing "Application for Well Location Exception" with Attached Exhibits "A-C" and the Notice of Application were served by depositing copies of the same in the United States Mail, first class postage prepaid, and properly addressed to each party set forth on Exhibits "C", and that the original and seven (7) copies were hand delivered to the Kansas Corporation Commission.



Jonathan A. Schlatter, #24848

 **Wilton Petroleum Inc.**

P.O. Box 391 • Canton, KS 67428 • 620-628-4466

March 29, 2012

Bernie Rundstrom
Vice President Operations
Wilton Petroleum, Inc.
PO Box 391
Canton, KS 67428

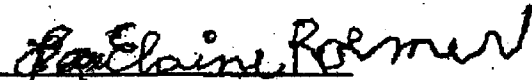
This letter is to inform Wilton Petroleum, Inc. that we Randy D. Roemer and Elaine Roemer are owners of the Northwest Quarter of Section 18, Township 16-S, Range 29-W, Lane County, Kansas. Furthermore we grant Wilton Petroleum, Inc. our permission to drill an oil-gas well approximately 100 feet from our west boundary line. The wells approximate location is 435 feet from the north line and 100 feet from the east line of Northeast Quarter of Section 13, Township 16-S, Range 30W, Lane County, Kansas.

Sincerely yours,



Randy D. Roemer

Date: 3-4-2012



Elaine Roemer

Date: 3-4-2012

EXHIBIT

A

tabbles

EXHIBIT "C"

Wilton Petroleum, Inc.
PO Box 391
Canton, KS 67428

Berexco, LLC
2020 N. Bramblewood
Wichita, KS 67206

Beren Corp.
2020 N. Bramblewood
Wichita, KS 67206

Randy and Elaine Roemer
262 N. Dodge Rd.
Healy, KS 67850

Skunkhollow, LC
Clifford D. Magie, Manager
P.O. Box 106
Healy, KS 67850

J. Fred Hambright, Inc.
125 N. Market, Suite 1415
Wichita, KS 67202

