

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

IN THE MATTER OF THE APPLICATION)	
OF BLUERIDGE PETROLEUM CORP.)	DOCKET NO. 19-CONS-3394-CEXC
FOR AN EXTENSION TO THE PIT CLOSURE)	
TIME REQUIREMENT OF K.A.R. 82-3-602 FOR)	LICENSE NO. 31930
OLSON #1-9 WELL LOCATED)	
IN THE SE/4 SECTION 9-14S-8E)	CONSERVATION DIVISION
MORRIS COUNTY, KANSAS)	

MOTION FOR EXTENSION OF TIME

COMES NOW Blueridge Petroleum Corp. ("Operator") and moves the Commission for an Order extending the period allowed to close the drilling pits on the "Olson #1-9," which is the subject matter of this proceeding and states and alleges as follows:

1. The pits were ordered to be closed by September 9, 2019, according to the Order entered herein on July 25, 2019.
2. On September 18, 2017, the KCC approved a Notice of Intent to Drill, for the drilling of Olson #1-9.
3. Pursuant to K.A.R. 82-3-601a, Operator constructed temporary reserve and working pits in October of 2017 in order to contain the drilling fluids associated with the drilling of Olson #1-9 wellbore.
4. Applicant drilled the Olson #1-9, with the spud date being October 2, 2017, and was plugged as a dry hole on October 8, 2017.
5. Operator had an initial period of 365 days within which to close the drilling pits. Operator requested an extension of time from the Director on October 12, 2018 and an extension of time to close the pit was granted until January 12, 2019.

6. On January 24, 2019, the operator contacted the Commission, requesting additional extension to the pit closure deadline. On January 29, 2019, the Commission notified the Operator that the request for extension had been approved, with the new deadline for closing of the pit established as April 2, 2019. On April 15, 2019, the Commission notified the Operator that an extension of time to close the subject pits was unavailable and that any exception to K.A.R. 82-3-602 must be applied with formal Application with notice published under K.S.A. 82-3-100. An Application for an exception to K.A.R. 82-3-602 was filed on May 24, 2019 and it was approved for a period of 45 days from July 25, 2019, ending on September 9, 2019.

7. The pits were checked a number of times, but they remain too wet to close. Morris County had unusually wet weather in 2018 and early 2019 and due to the wet conditions, causing the pits to remain wet.

8. Operator requests this Motion be approved for the following reasons:

A. It is the accepted and preferred best practice by industry and landowners alike not to close any pits until they have thoroughly dried out. Closing pits early leads to future soil issues including collapse and erosion. The Olson #1-9 drilling pits are still not dry as of the filing of this application.

B. The precipitation and moisture level in the Morris County, Kansas area has been unusually high throughout much of 2018 and early 2019. In the month of May, 2019, alone, precipitation in the county totaled 15 inches.

C. Granting an extension to the pit closure deadline for an additional period of 180 days from September 9, 2019, would allow the Operator to wait and close the pits after the pits have dried sufficiently.

9. The landowner and farm tenant have not made a request to close the pits and they are aware of the wet conditions in their field and the pits themselves. They also wish to delay closing until sufficient drying has occurred.

10. Based on the foregoing, Operator requests that the Commission grant an exception to the 365 day deadline and subsequent 90-day extensions permitted by the Director in order to allow the subject pits to remain open and properly dry before being filled. Operator requests this extension be for a period of 180 days from September 9, 2019.

11. There are no oil and gas operators of record within a one-half mile radius of subject Lands other than Applicant, Blueridge Petroleum Corp.

12. The mineral owners covering lands within a one-half mile radius of the subject land are as follows:

Hazel Zimmerman
Everett Zimmerman Trust
1128 D. Avenue
Alta Vista, Kansas 66834

Keith & Donna Olson
278 S. 1000 Road
Alta Vista, Kansas 66834

Tamra L. & Charles M. Lillich
223 S. 1000 Road
Alta Vista, Kansas 66834

Don & Alice Johnston
Dowell Heirs Farm, LLC

3701 Quail Creek Court
Lawrence, Kansas 66047


13. The surface owner of the land containing the Olson #1-9 and pits is:

Keith & Donna Olson
278 S. 1000 Road
Alta Vista, Kansas 66834

14. Notice of this application and any required hearing has been published pursuant to K.A.R. 82-3-135a and K.A.R. 82-3-135 on September 13, 2019 in the Council Grove Daily Republican newspaper. Proof of the publication is attached to this Application, shown as Exhibit A.

WHEREFORE, Operator prays that this Motion be granted administratively without a hearing or in the alternative be set for hearing, and upon hearing that the Commission grant Operator's request, for a 180 day extension of time to the pit closure requirement set forth in K.A. R. 82-3-602.

Respectfully submitted,

By: 
Timothy R. Keenan, Attorney for
Jonathan Allen, President
Blueridge Petroleum Corp.
P.O. Box 30545
Edmond, OK 73003
(580) 242-3732

VERIFICATION

STATE OF KANSAS, COUNTY OF BARTON, ss.

Timothy R. Keenan, attorney for Blueridge Petroleum Corporation and being first duly sworn, upon oath deposes and states:

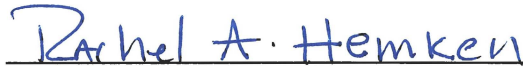
That he is the attorney for Blueridge Petroleum Corporation the operator in the above-titled action, and has read the foregoing and knows the contents thereof, and that the statements therein contained are true and correct.



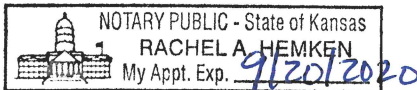
Timothy R. Keenan, Attorney for
Blueridge Petroleum Corp.

SUBSCRIBED AND SWORN to before me on this 17th day of October, 2019.

My commission expires:



Notary Public



STATE OF KANSAS

BARTON
COUNTY

Proof of Publication

SS.

MARY HOISINGTON

of lawful age, duly sworn upon oath states that SHE

is the PUBLISHER

of **THE GREAT BEND TRIBUNE**

THAT said newspaper has been published at least weekly fifty (50) times a year and has been so published for at least five years prior to the first publication of the attached notice:

THAT said paper was entered as second class mail matter at the post office of its publication:

THAT said paper has a general paid circulation on a daily, or weekly, or monthly, or yearly basis in

BARTON County, Kansas, and is

NOT a trade, religious or fraternal publication and has been PRINTED and published in BARTON County, Kansas.

That the attached notice was published in a regular issue of said newspaper

for 1 consecutive weeks, the first publication being on the 10th day
of April 2019 and the last publication on the 10th day
of April 2019

Publication Fee \$ _____

Affidavit, Notary's Fees \$ _____

Additional Copies _____ at _____ \$ _____

Total Publication Fee \$ 34.24

(Sign) Mary Hoisington

Witness my hand this 10th day of April 2019

SUBSCRIBED and Sworn to before me this 10th

day of April 2019

(Notary Public)



State of Kansas -Notary Public

Loretta Russell

My commission expires 9-8-22

(First published in the Great Bend Tribune on April 10, 2019) IT

BEFORE THE CORPORATION
COMMISSION OF THE
STATE OF KANSAS NOTICE
OF FILING APPLICATION

RE: L.D. Drilling, Inc.

Application to authorize an extension of time to close the drilling pits on the Arensman #2 well, located in the NE 1/4 NE 1/4, NW 1/4 of Section Twenty-eight (28), Township Sixteen (16) South, Range Eleven (11) West, Barton County, Kansas.

TO: All Oil & Gas Producers, unleased Mineral Interest Owners, Landowners, and all persons whomsoever concerned.

You, and each of you, are hereby notified that L. D. Drilling, Inc. has filed an application to authorize a 210 day extension of time, ending on August 12, 2019 or L. D. Drilling, Inc. to close the drilling pits on the Arensman #2 well, located in the NE 1/4 NE 1/4, NW 1/4 of Section Twenty-eight (28), Township Sixteen (16) South, Range Eleven (11) West, Barton County, Kansas.

Any persons who object to or protest this application shall be required to file their objections or protest with the Conservation Division of the State Corporation Commission of the State of Kansas within thirty (30) days from the date of this publication. These protests shall be filed pursuant to Commission regulations and must state specific reasons why granting the application may cause waste, violate correlative rights or pollute the natural resources of the State of Kansas.

All persons interested or concerned shall take notice of the foregoing and shall govern themselves accordingly.
L.D. Drilling, Inc.
7 SW 26th Ave.
Great Bend, Kansas 67530
(620) 793-3051

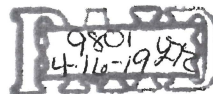


EXHIBIT "A"