

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

In the Matter of the failure of Benjamin M. Giles)	Docket No: 20-CONS-3082-CPEN
("Operator") to comply with K.A.R. 82-3-120.)	
)	CONSERVATION DIVISION
)	
_____)	License No: 5446

JOINT REPLY TO STAFF'S RESPONSE

MWM Oil Co., Inc., RAG Oil Co., LLC, Community National Bank & Trust, and the Unsecured Creditors' Committee (collectively, "Petitioners"), jointly with Charlene A. Giles, as Executor of the Estate of Benjamin M. Giles (the "Estate"), file this Reply to Staff's Responses to Petitions for Intervention, Requests for Hearings, Emergency Motions to Lift Shut-In Order, and Request to Renew License. In support of its Joint Reply, Petitioners and the Estate state and allege as follows:

I. The Petitions to Intervene Should be Granted

Petitioners unquestionably satisfy the statutory and regulatory requirements for intervention in this docket, and the Commission should grant their petitions to intervene. Staff does not dispute that Petitioner's timely submitted their petitions.¹ The only dispute is whether the petitions "state facts demonstrating the petitioners' legal rights may be substantially affected by the proceeding."² It cannot be denied that petitioners' legal rights have already been

¹ K.A.R. 82-1-225(a)(1).

² K.A.R. 82-1-225(a)(2).

substantially affected by this proceeding, and that such rights will continue to be irreparably harmed if the shut-in order continues.

Staff's parsing of Petitioners' "legal interest in the expiration or continuation of the Operator's license"³ as being severable from Petitioners' property and contract rights (i.e., legal rights) in the wells and leases is nonsensical, and is divorced from reality. The ability to operate a well is fundamental to an oil and gas lease, and one cannot exist without the other. An oil and gas lease is an asset that expires absent continuous production from its wells. An oil and gas lease only yields revenues if the wells drilled upon it are permitted to produce and sell oil and gas. These are the basics. The leases and wells are the assets of MWM and RAG, and the collateral and source of repayment of the Creditors. By ordering the wells shut-in, the value of the leases has been artificially depressed and revenues from the sale of oil completely severed. Further depressing the value of the wells and leases are Staff's unsubstantiated, vague and dubious allegations of "environmental issues." These actions and allegations not only directly harm Petitioners, but also harm the other stakeholders in the leases, and operate to threaten the State well plugging fund.

Moreover, if the people with direct property and contract interests in the wells and leases at issue have no "legal right" to intervene, then who does? To adopt Staff's position in this regard would be to effectively erase the right to intervene from Kansas statutes and Commission regulations. That cannot be the law in Kansas.

In its Response, Staff has failed to articulate any practical reason why Petitioners should not be permitted to participate in these proceedings. For these reasons and the reasons previously briefed in great detail, it cannot be argued that Petitioners legal rights are unaffected by this proceeding. As such, Petitioners should be granted intervention.

³ Staff's Resp. to Pets to Intervene, ¶ 8, pp. 3-4.

II. The Shut-In Order Should be Lifted

The motions to lift shut-in order filed by Petitioners and the Estate go into great detail in describing the enormous amount of waste caused by the shut-in order, how the shut-in order violates correlative rights and does nothing to protect freshwater. In response, Staff offers nothing more than cynical conjecture as to whether the leases will sell at auction, misguided views as to the financial condition and motivations of Petitioners and the Estate, and unsubstantiated, vague and dubious allegations of “environmental issues.” Worse, after directing the Estate and Petitioners not to seek to renew Operator’s license for five months, Staff now—for the first time in its responsive brief—seeks to throw the book at Petitioners and the Estate for not doing exactly what Staff directed them not to do. This about-face is patently unfair and outrageously punitive, and Staff’s failure to address this fact in its Response is a glaring omission. Most importantly, however, Staff presents nothing that resembles a compelling argument as to what purpose the shut-in serves, or, more specifically, how the shut-in order does anything other than run directly contrary to the Commission’s mission to prevent waste, and protect correlative rights and freshwater.

a. Staff should be estopped from reversing its position regarding the Estate’s renewal of the Operator’s license.

For five months, Staff told Petitioners and the Estate not to attempt to renew Operator’s license. Now, for the first time in its Response, Staff suggests that the Estate should have sought to renew Operator’s license. This 180-degree shift in position is unconscionable, and the Commission should not sanction Staff’s improper behavior.

Indeed, Staff does not deny that it was Petitioners who first broached the issue of the impending expiration of Operator’s license back in June, more than a month before Operator’s license was set to expire. At all times leading up to, and after, the expiration of Operator’s license,

it was Staff's direction that the Estate not seek to renew the license.⁴ By changing its position at the eleventh hour, Staff has placed the Estate, Petitioners, and the other stakeholders and creditors of the leases in an extremely damaging and vulnerable position on the eve of selling the Leases at auction. On Monday, Staff suggested for the first time that the Estate apply for renewal of Operator's license, a path Staff knew the Estate was willing to take in June, more than a month before Operator's license expired. Staff should not be permitted to punish Petitioners and the Estate for following Staff's instructions. To allow Staff to take the position in its Responses, in stark contrast to all previous communication with Petitioners and the Estate, is unfair and the Commission should estop Staff from doing so.

It should be noted that, although Staff urges the Estate to apply for renewal of Operator's license, the Estate is currently blocked from accessing the KOLAR system online, and thus has no way to submit its application. Staff has not cooperated in efforts to renew the license. Staff should not be permitted to insist the Estate attempt to renew the license, while simultaneously obstructing its ability to do so. In lieu of the KOLAR application process, the Estate attaches its application

⁴ The following is a timeline of some of the communications between Petitioners and Staff on the subject:

- June of 2019 - Petitioners' counsel and legal staff held a phone conference with Staff regarding the likelihood bankruptcy would be filed, and explained the need to discuss what to do with Operator's license.
- July 1, 2019 - Petitioners' counsel sent an email to Staff explaining Petitioners' impending bankruptcy and seeking advice on how to approach Operator's impending license expiration, including the consequences to the Estate and the State plugging fund.
- July 22, 2019 - Petitioners' counsel and representatives of the Estate met with Staff, regarding the impending license expiration and bankruptcy filing, and sought clarification and advice on how to proceed. At this time, Staff directed Petitioners to not seek to renew Operator's license.
- August 17, 2019 – In response to the NOV in the captioned docket, Petitioners' counsel sent an email to Staff reiterating and confirming the directive not to seek renewal of Operator's license as discussed at the July 22 meeting.
- August 28, 2019 - Petitioners' counsel informed Staff that Petitioners' planned to auction off their interests in Operator's leases at a December 5th auction.
- August 29, 2019 - Petitioners' counsel confirmed with Staff that the wells were being operating in accordance with Staff's directives.
- September 25, 2019 - Petitioners' counsel sent an email to Staff advising that the bankruptcy court authorized Petitioners' to engage a third-party to consult in the operation of Operators' wells in an effort to bring them into compliance and prepare them for auction.

and well inventory report to this Reply as Exhibit A, and requests the Commission grant the Estate's Request to Renew License as soon as possible. The Estate stands ready to tender the requisite financial assurance, and has obtained an order from the Probate Court allowing it to do so.⁵

b. Staff allegations of “environmental issues” remain completely unsubstantiated and vague, and Staff refuses to respond to any inquiry as to what these “issues” are.

Staff continues to reference unsubstantiated environmental issues without providing any detail as to what these issues are, or where they exist. In its Response, Staff does not dispute that the Petitioners and the Estate have brought numerous wells into compliance and cured many so-called environmental issues on the leases. Instead of recognizing this truth, Staff recklessly blathers that there are “environmental issues that require immediate attention,”⁶ and that many of the wells and leases have “existing environmental problems,” and some wells present “high environmental risk.”⁷ Petitioners and the Estate are unaware of any actual environmental issues on the leases, and Staff has not identified any. There is no denying, however, that these unsubstantiated allegations will negatively affect the value of the leases, and increase the likelihood that a few of the leases may not sale at auction.

Staff has also repeatedly refused to respond to inquiries as to what these alleged environmental issues are. For example, in Docket No. 20-CONS-3039-CPEN (In the matter of the Paulsen 8B SWD well), the prehearing officer twice instructed Staff to work with the Estate and Petitioners to address alleged “environmental issues” on the lease. Staff refused to engage in any dialogue on the subject, and ignored the requests of Petitioners to discuss the same. In that docket,

⁵ See the Estate's Notice of Order to Renew Operator's License filed in this docket.

⁶ Staff's Response to Petitions for Intervention, Requests for Hearings, and Emergency Motions to Life Shut-In Order, ¶ 12.

⁷ Staff's Response to the Estate's Request for Hearing, Motion to Lift Shut-In Order, and Request to Renew License, ¶ 10.

just like this one, Staff chose to lob unsubstantiated and vague allegations of “environmental issues” in a Response brief—allegations that are strikingly similar to the unsubstantiated and vague allegations hurled in this docket. The Paulsen 8B allegations were made in spite of the fact that Staff openly admitted during the first prehearing conference in that docket that Petitioners had cured the only substantive environmental issue on the lease.

Staff also points to Docket No. 19-CONS-3399-CPEN as evidence of an open penalty order, but the violations in that docket have all been cured. The Glenn Lygrisse #1 has been TA’d,⁸ and the Edson #4 was pumping oil before the shut-in order was entered. With respect to Docket No. 20-CONS-3052-CPEN, Staff is well aware of the bizarre circumstances surrounding that docket, and it is disingenuous to attempt to conflate that docket with the ongoing operations on Operator’s leases. Finally, Staff’s speculation regarding the financial condition of Petitioners and the Estate is incorrect and utterly belied by the actions of Petitioners and the Estate. The financial condition of the Petitioners improved drastically through the increased production on the leases. As noted in Petitioners’ original motions, oil production on the leases had increased from 4-6 BOPD to 25-30 BOPD. The increased production created a great deal of revenue that was in turn used to bring more wells into production and into compliance with Commission regulations. The production restored on many of the leases made them marketable for sale at auction, contrary to Staff’s cynical “opinion.”⁹ The shut-in order has decimated the progress made on the leases to no logical end.

None of these facts are denied by Staff in their Response. Unbelievably, Staff suggests that Petitioners have no interest in curing environmental concerns associated with Operator’s expired

⁸ See Exhibit B.

⁹ Staff’s Response to Petitions for Intervention, Requests for Hearings, and Emergency Motions to Life Shut-In Order, ¶ 12.

license and instead are “solely focused on getting as many assets to the sale,”¹⁰ even though getting as many assets to the sale *necessarily entails curing any known environmental concerns*. This position not only is illogical, but also it ignores all communication from Petitioners to Staff articulating efforts and asking for clarification and guidance, and the actual and undeniable progress made on the leases.

c. Placing Operator’s wells on the State plugging list is a bad idea, and creates more waste.

Staff does not deny that the shut-in order has already caused waste. Wells that were producing oil are now sitting idle, leaving oil in the ground. Revenues that were being used to improve leases for sale at auction have been choked-off by the shut-in order. Reckless and unsubstantiated allegations of “environmental issues” are likely to further depress the value of the leases, making them less likely to sell at auction. Simply put, the shut-in order serves no stated beneficial purpose, nor does it prevent waste, or protect correlative rights and freshwater.

Amazingly, Staff suggests that the best course of action is to immediately place wells that would be otherwise sold at auction on the State plugging list. That is obviously a bad idea. The scheduled auction is less one month away. There is no reason not to follow through with the auction and transfer as many wells as possible to responsible operators. Lifting the shut-in order would facilitate the sale of the wells at auction because consistent production could be demonstrated, making the leases more marketable. As it stands, the biggest obstacle to selling the leases at auction is the shut-in order and Staff’s unsubstantiated and vague allegations of “environmental issues.”

¹⁰ Staff’s Response to Petitions for Intervention, Requests for Hearings, and Emergency Motions to Life Shut-In Order, ¶ 13.

The Commission is charged with efficiently and prudently administering the State's well plugging funds. Staff's proposal does the opposite and looks more like irrational vengeance than a party minding its duties. There is no reason to follow this course of action. The Commission should seek to preserve the State's plugging fund and prevent waste. The clearest path to doing that is to lift the shut-in order, giving the wells the best chance to be sold at auction to a responsible operator.

d. Staff does not respond to the Estate's argument that the Shut-In Order was illegally issued.

Staff failed to address the Estate's legal argument that the Commission did not have statutory authority to shut in the wells without proper notice and a hearing. As stated in the Estate's Motion, K.S.A. 55-162 provides the Commission must follow one of two statutory procedures, both requiring notice and a hearing, before it may resort to shutting in wells.¹¹ Even without considering the multitude of issues within Staff's arguments, the Commission should lift the shut-in order until these statutory directives are followed.

WHEREFORE, for the reasons set forth above, Petitioners and the Estate respectfully request the Commission grant Petitioners' Petitions for Intervention and Motions to Lift Shut-In Order, and grant the Estate's Request for Hearing, and for such further and other relief as it deems just and proper.

¹¹ The Estate's Request for Hearing, Motion to Lift Shut-In Order, and Request to Renew License, at 2-3.

Respectfully submitted by,

SWANSON BERNARD, LLC

MORRIS, LAING, EVANS, BROCK
& KENNEDY, CHARTERED

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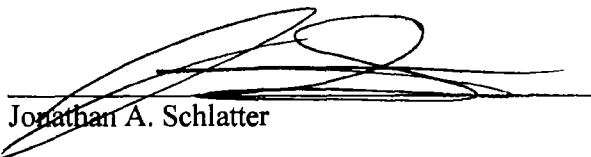
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VERIFICATION

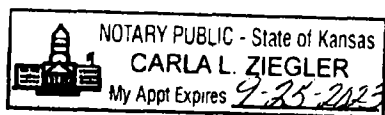
STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

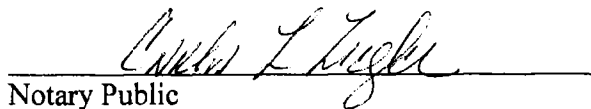
Jonathan A. Schlatter, being of lawful age and being first duly sworn upon his oath, deposes and says:

That he is the attorney for MWM Oil Co., Inc. and RAG Oil Co., LLC; he has read the above and foregoing Reply and is familiar with its contents, and that the statements made therein are true and correct to the best of his knowledge and belief.


Jonathan A. Schlatter

SIGNED AND SWORN to before me this 6th day of November, 2019.




Notary Public


My Appointment expires:
9-25-2023

VERIFICATION

STATE OF MISSOURI)
) ss:
COUNTY OF JACKSON)

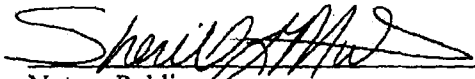
Daniel V. Hiatt, Jr., being of lawful age and being first duly sworn upon his oath, deposes and says:

That he is the attorney for the Estate of Benjamin M. Giles; he has read the above and foregoing Reply and is familiar with its contents, and that the statements made therein are true and correct to the best of his knowledge and belief.



Daniel V. Hiatt, Jr.

SIGNED AND SWORN to before me this 6th day of November, 2019.



Notary Public

My Appointment expires:



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 6th day of November, 2019, I caused the original of this **Joint Reply to Staff's Response** to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and caused a true and correct copy of the same be electronically served to the following parties:

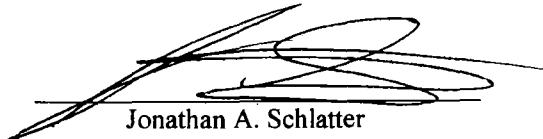
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Jonathan A. Schlatter

FOR KCC USE ONLY	
LICENSE NO:	
EXPIR DATE:	

**KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION
KCC LICENSE APPLICATION**

Form OPL-1
June 2018
Form must be Typed
Form must be Signed
All blanks must be Filled

Notice: Read instructions before completing this information.

Name: The Estate of Benjamin M. Giles Attention: _____
Address 1: 821 High Street Phone: (_____) _____
Address 2: _____ City/State/Zip: Towanda, KS 67144

ALL REQUIRED FORMS RELATING TO THE CONSERVATION DIVISION MUST SHOW SAME ENTITY AS ON THIS APPLICATION.

Item 1 TYPE OF LICENSE APPLICABLE: ☒ Operator ☐ Stratigraphic/Seismic ☐ Well Plugging ☐ Drilling Contractor ☐ Gas Storage
(Check All That Apply) ☐ Drilling, Workover, Service Units ☐ Case Puller ☐ Personal Use ☐ Gas Gatherer

Item 2 BUSINESS ENTITY: ☒ Individual ☐ General Partnership ☐ Limited Liability Partnership ☐ Kansas Corporation
☐ Limited Liability Company ☐ Foreign Corporation

Federal Employer Identification No. N/A or Social Security No. _____
CORPORATIONS OR LIMITED PARTNERSHIPS are required to be authorized to engage in business in Kansas by the Office of the Secretary of State. Please enclose a Certificate of Good Standing from the Secretary of State's Office (785) 296-4564.

Item 3 REGISTERED RESIDENT AGENT (For Corporations, Limited Liability Companies, or Limited Partnerships Only)
Name: N/A Phone: (_____) _____
Address: _____
City/State/Zip: _____ Email: _____

Item 4 NAME OF PARTNER(S) OR OFFICERS (Must list all. Include Name, Title, Address and Phone)

N/A

Item 5 EMERGENCY CONTACT PERSON (Must be other than Licensee) (Alternate Address and Phone)
Name: Charlene Giles Phone: (_____) _____
Address: 821 High Street
City/State/Zip: Towanda, KS 67144 Email: _____

Item 6 Dependent on type of entity, have you as an individual, partner or officer had a KCC Conservation Division License revoked, suspended or not renewed by the Commission? ☒ Yes ☐ No If yes, enclose a brief statement including name and date of revocation, suspension or non-renewal.

Item 7 Do you currently have any outstanding monetary penalties or compliance owed to the Commission or are you currently paying a monthly installment plan? ☐ Yes ☒ No

Item 8 ATTACH a copy of equipment assessment rendition sheets and paid personal property tax receipts ONLY on the drilling or movable well servicing equipment being licensed.

Item 9 EQUIPMENT TAG NUMBERS, YEAR, MAKE, MODEL AND TYPE OF EQUIPMENT AS LISTED ON PROPERTY TAX RENDITION

Tag No.	Make	Model	Type	Status
5900	Franks	658	DD w/65' Pole Pulling Unit	Active
5901	Franks	44	DD w/65' Pole Pulling Unit	Active

Item 10 Remittance enclosed: \$100.00 for license(s) + \$25.00 per equipment tag = \$ 150.00 Financial Responsibility provided by:
Remittance enclosed: \$25.00 for personal use license = \$ _____
a) Cash \$ _____
b) Bond _____
c) Letter of Credit _____

Item 11 I do hereby certify that, to the best of my knowledge, the foregoing facts and information are true and correct.
Signature of authorized individual, Officer or Agent: _____ Title: _____

Item 12 Subscribed and sworn to before me this _____ day of _____ 20_____

(Notary Public) My commission expires: _____

Item 13 Well Inventory Required: (Check One) ☒ Attached ☐ No wells

Mail to: KCC - Conservation Division, Licensing Department, 266 N Main St, Ste 220, Wichita, KS 67202-1513

EXHIBIT A

**Attachment to
KCC License Renewal Application**

Name: Estate of Benjamin M. Giles

Item 6. License suspended under Docket No. 20-CONS-3082-CPEN.

Item 11-12: District Court of Butler County, Kansas. Case No. 2019-PR-000031 captioned In the Matter of the Estate of Benjamin M. Giles. Order for Authority to Renew Operators License. See PDF.

Item 13: Operator Well Inventory: See PDF.

ELECTRONICALLY FILED
2019 Oct 29 AM 9:37
CLERK OF THE BUTLER COUNTY DISTRICT COURT
CASE NUMBER: 2019-PR-000031



Court: Butler County District Court
Case Number: 2019-PR-000031
Case Title: In the Matter of the Estate of Benjamin M Giles
Type: Order for Authority to Renew Operators License

SO ORDERED.

Mike Ward

/s/ Honorable Mike Ward, District Court Judge

IN THE DISTRICT COURT OF BUTLER COUNTY, KANSAS
PROBATE SECTION

In the Matter of the Estate of)	Consolidated Case Nos. 2019-PR-000031
)	2019-PR-000040
BENJAMIN M. GILES, Deceased)	

ORDER FOR AUTHORITY TO RENEW OPERATORS LICENSE

On this date, comes on for hearing the Petition for Authority to Renew Operators License filed by Charlene A. Giles, Executor of the Estate of Benjamin M. Giles, deceased.

There are no appearances.

After examining the files, hearing the evidence, statements and arguments of counsel, and being duly advised in the premises, the Court finds:

1. The decedent at the time of death was one of the shareholders of MWM Oil Co., Inc., a Kansas corporation, and one of the members of Rag Oil Co., LLC, a Kansas limited liability company (collectively known as "the Businesses"). As a result of the decedent's death, the Estate is now the shareholder and member of the Businesses, respectively.

2. The Businesses are located and operated in the State of Kansas and are in good standing with the Kansas Secretary of State and are under the jurisdiction of the State Corporation Commission of the State of Kansas.

3. At the time of his death, the decedent had a valid oil and gas operators license issued by the Commission under License No. 5446 (the "Operators License").

4. The Businesses filed for bankruptcy under Chapter 11 of the bankruptcy code on July 26, 2019, and in conjunction with said bankruptcy proceedings, the working interests and overriding

royalty interested in certain wells owned by the Businesses (the "Subject Wells") are scheduled to be sold at auction on December 5, 2019.

5. The Subject Wells and the potential sale proceeds which may be received at auction on December 5, 2019, represent assets which could potentially inure to the benefit of the Estate. In the event there is a surplus in the bankruptcy proceedings, a portion of such surplus would be distributable to the Estate as an owner of the Businesses and potentially be available to claimants of the Estate.

6. The Executor should be authorized to renew the Operators License, on an interim basis, and to pay from Estate funds in an amount not to exceed \$5,000 for payment of the renewal fees due the Commission.

IT IS THEREFORE BY THE COURT CONSIDERED, ORDERED, ADJUDGED AND DECREED:

(A) The above findings are hereby made a part of the order and decree of this Court.

(B) The Executor is authorized and directed to renew the Operators License on an interim basis.

(C) The Executor is authorized to pay from Estate funds in an amount not to exceed \$5,000 for payment of the renewal fees due the Commission.

(D) The Executor is granted the authority to take such further action as she deems appropriate to continue to operate the Subject Wells until they are sold at auction on December 5, 2019.

Judge

Submitted by:

/s/ Daniel V. Hiatt, Jr.

Daniel V. Hiatt, Jr. KS Bar #22992

James A. Durbin KS Bar #14379

Swanson Bernard, LLC

4600 Madison Avenue, Suite 600

Kansas City, MO 64112

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(816) 561-4498 - facsimile

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jdurbin@swansonbernard.com

Attorneys for Petitioner

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISIONOPERATOR WELL INVENTORY
(FORM OWI-1)Form OWI-1
June 2008

Lease Name*	Well No.*	API No.**	Year Drilled*	Year Assumed Responsibility*	Depth*	County*	Section-Township-Range*	Spot Location* (Q/Q/Q/Q)	Footage from Section Line* (i.e. FSL = Feet from South Line)	Type of Well* (Oil/Gas/Water/ CB/WSW)	Well Status* (Producing/ Inactive)	KDOR Lease Code(s)	Latitude	Longitude	Datum
ABLAH	1-11	15-015-21575-0000	1980		2389	Butler	11 -26 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NW -NW -SW	2338 <input checked="" type="checkbox"/> FSL 404 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	117026			
ABLAH	1A SWD	15-015-30089-0001	2012		2650	Butler	11 -26 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NW -NW -SW	2310 <input checked="" type="checkbox"/> FSL 330 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	AI				
BUSENITZ	1	15-015-20014-0000	1967		2751	Butler	26 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NE -SW -SW	992 <input checked="" type="checkbox"/> FSL 983 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101863			
BUTTWICK SWD	1	15-173-00262-0001	1957		3842	Sedgwick	12 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NE -NW -NW	4950 <input checked="" type="checkbox"/> FSL 4290 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	AI				
CLEARWATER	1	15-015-20093-0001			2790	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SW -SW -SE	364 <input checked="" type="checkbox"/> FSL 2387 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	EOR	IN		37.4934	-97.062	NAD83
CLEARWATER	2	15-015-20125-0000	1968		2723	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NE -NW -SE	2310 <input checked="" type="checkbox"/> FSL 1650 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101862	37.4954	-97.061	NAD83
CLEARWATER	5	15-015-20620-0000	1974		2712	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W N2 -N2 -N2 -S2	2345 <input checked="" type="checkbox"/> FSL 2640 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101862	37.4954	-97.0623	NAD83
CLEARWATER	6	15-015-20714-0000	1975		2745	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SE -NE -SW	1637 <input checked="" type="checkbox"/> FSL 2320 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101862	37.4947	-97.0627	NAD83
CLEARWATER	7	15-015-20749-0000	1975		2723	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NW -NE -SW	2331 <input checked="" type="checkbox"/> FSL 1816 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101862	37.4954	-97.0633	NAD83
CLEARWATER	8	15-015-20750-0000	1975		2707	Butler	33 -25 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SW -NE -SE	1691 <input checked="" type="checkbox"/> FSL 988 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101862	37.4948	-97.0602	NAD83
DEMOSS	1	15-173-20805-0000	1988		3146	Sedgwick	12 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NW -SE -NW	3652 <input checked="" type="checkbox"/> FSL 3408 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	113506	37.4822	-97.0953	NAD83
EDSON	3	15-173-01905-0000	1957		2862	Sedgwick	1 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SW -SW -SE	361 <input checked="" type="checkbox"/> FSL 2349 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	106774	37.4842	-97.0941	NAD83
EDSON	4	15-173-01906-0000	1957		2860	Sedgwick	1 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SW -NW -SE	1650 <input checked="" type="checkbox"/> FSL 2310 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	106774	37.4855	-97.0941	NAD83
ERDWIEN	1A	15-173-21021-0000	2013		3380	Sedgwick	11 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W W2 -SE -SW -SW	330 <input checked="" type="checkbox"/> FSL 890 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR				
FLYING J GEER	20WVO	15-015-01490-0001	2013		2543	Butler	32 -25 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -E2 -E2 -NE	1376 <input checked="" type="checkbox"/> FSL 311 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	P&A				
GILES	1	15-015-21467-0000	1980		2913	Butler	18 -26 S -3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SW -NE -NW	1070 <input checked="" type="checkbox"/> FSL 1320 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	118426			
GLEN LYGRISSE	1	15-173-20738-0000	1985		2905	Sedgwick	12 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NE -NW -SE	2310 <input checked="" type="checkbox"/> FSL 1650 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	124397	37.4809	-97.0933	NAD83
H. ERDWIEN	2	15-173-00787-0003			3969	Sedgwick	11 -26 S -2	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -NE -SW -SW	973 <input checked="" type="checkbox"/> FSL 4335 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	AI				
HILDRETH	2	15-015-19224-0000			2428	Butler	3 -26 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SE -SE -SE	332 <input checked="" type="checkbox"/> FSL 327 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101732			
HILDRETH	3-A	15-015-21219-0000	1981		2467	Butler	3 -26 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SE -NE -SE	1658 <input checked="" type="checkbox"/> FSL 325 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101732			
HILDRETH	6-A	15-015-22116-0000	1982		2500	Butler	3 -26 S -4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W -SE -SE -NW -SE	1293 <input checked="" type="checkbox"/> FSL 1474 <input checked="" type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101732			

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Company/Individual Name: Giles, Benjamin M.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISIONForm OWI-1
June 2009OPERATOR WELL INVENTORY
(FORM OWI-1)

Lease Name*	Well No.*	API No.**	Year Drilled*	Year Assumed Responsibility*	Depth*	County*	Section-Township-Range*	Spot Location* (OQQQ)	Footage from Section Line* (Ls. FSL - Feet from South Line)	Type of Well* (Oil/Gas/Water/CBM/SW)	Well Status* (PROD/Active/Inactive)	KDOR Lease Code(s)	Latitude	Longitude	Datum
HILDRETH	7	15-015-23788-0000	2008		2500	Butler	3 -26 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W SW -SW -SE -SE	290 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1133 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101732			
HILDRETH A	A-5	15-015-21893-0001			2650	Butler	3 -26 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SE -NW -SE	1718 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1684 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	IN	101732	37.4854	-96.5837	NAD83
HINNENKAMP	1	15-015-23150-0000	1989		3292	Butler	7 -26 s-3	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -SE -NE	2318 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 969 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	129830	37.4816	-97.082	NAD83
HINNENKAMP	2	15-015-23296-0000	1992		2950	Butler	7 -26 s-3	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -SW -NE	1655 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 2321 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	129830	37.4822	-97.0837	NAD83
HLADIK	1	15-173-20833-0001	2006		3277	Sedgwick	12 -26 s-2	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -NE -NW	4316 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 3393 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	AI		37.80793	-97.16504	NAD83
IK LYGRISSE	2B	15-173-03589-0001	2004		3310	Sedgwick	12 -26 s-2	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -SW -NE	1715 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 2310 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	136538	37.4821	-97.0941	NAD83
JONES	2	15-015-01503-0000	1963		2582	Butler	33 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -N2 -NW -NW	1041 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 304 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101937			
JONES	4	15-015-22171-0000	1982		2400	Butler	33 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -NW	325 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 691 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101937			
LYGRISSE	1	15-173-03521-0000	1959		2883	Sedgwick	12 -26 s-2	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -SW -NE	2336 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 2329 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	106775	37.4815	-97.0941	NAD83
LYGRISSE	B-2	15-173-20077-0000	1971		2871	Sedgwick	12 -26 s-2	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -SE -NE	3590 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 974 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	106775	37.4821	-97.0924	NAD83
M & L LAND STOLLER	1A	15-173-21023-0000	2013		3366	Sedgwick	11 -26 s-2	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -N2 -SW -SE -SW	430 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1650 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	145005			
MCCULLOCH	10X	15-015-01501-0002			3000	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -SW -NW	3142 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 5016 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	AI	131261			
MCCULLOCH	11	15-015-23320-0000	1993		2653	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -SW -NW	3300 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 4620 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	131261			
MCCULLOCH	12 SWD	15-015-40467-0001	2015		3052	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -NE -NW	990 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1650 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	IN				
MCCULLOCH	2A	15-015-24061-0000	2015		2641	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -SW -SE -NW	2260 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1600 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	131261			
MCCULLOCH	5	15-015-01496-0000	1950		2631	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NE -SW -NW	3630 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 4291 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	131261	37.5007	-97.0114	NAD83
MCCULLOCH	7	15-015-01498-0000	1950		2602	Butler	32 -25 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -SW -NW	3630 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 4952 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	131261	37.5007	-97.0122	NAD83
MELVILLE	1AOWO	15-015-20510-0001	2009		2420	Butler	10 -26 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -NW -NE	989 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 2310 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101666			
MELVILLE	5OWO	15-015-30332-0002	2012		2478	Butler	10 -26 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -NW -NE -NE	276 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 1065 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101666			
MELVILLE	B-1	15-015-24091-0000	2017		2470	Butler	10 -26 s-4	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SE -SE -NE	2310 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 330 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR				
NEWCOMER	1	15-173-20033-0000	1968		3425	Sedgwick	35 -25 s-1	<input checked="" type="checkbox"/> E <input type="checkbox"/> W -SW -NW -NW	4198 <input type="checkbox"/> FNL <input checked="" type="checkbox"/> FSL 5139 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	106779	37.5012	-97.1752	NAD83

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Company/Individual Name: Giles, Benjamin M.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISIONForm OWI-1
June 2009OPERATOR WELL INVENTORY
(FORM OWI-1)

Lease Name*	Well No.*	API No.**	Year Drilled*	Year Assumed Responsibility*	Depth*	County*	Section-Township-Range*	Spot Location* (GGRG)	Footage from Section Line* (i.e. FSL = Feet from South Line)	Type of Well* (Oil/Gas/Water/CS/WSW)	Well Status* (Producing/Inactive)	KDOR Lease Code(s)	Latitude	Longitude	Datum
NEWCOMER	1B	15-173-00089-0001	2004		3715	Sedgwick	35 - 25 S - 1	<input checked="" type="checkbox"/> E <input type="checkbox"/> W - SW - SW - NW	2920 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 5128 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	IN	106779			
NEWCOMER	A	15-173-20082-0001	2005		3428	Sedgwick	35 - 25 S - 1	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NW - NW - NW	330 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 330 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	106779	37.5018	-97.1752	NAD83
PAULSEN	1	15-015-01020-0002	1976		2430	Butler	2 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W NE - NE - NW - SW	2473 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 4145 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	113594	37.4901	-96.5803	NAD83
PAULSEN	2	15-015-40043-0000	1966		2447	Butler	2 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W SW - SE - SW - SW	308 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 4316 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	113594	37.484	-96.5805	NAD83
PAULSEN	3	15-015-40044-0000	1966		2433	Butler	2 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W SE - NW - SW - SW	865 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 4672 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	113594	37.4846	-96.5809	NAD83
PAULSEN	8B	15-015-21486-0001			2650	Butler	2 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - SW - SW - SW	403 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 4946 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	SWD	IN	113594	37.484	-96.5812	NAD83
RALSTON	1	15-015-40140-0000	1950		2412	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NE - NW - SE	2086 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1574 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101755			
RALSTON	10	15-015-23667-0000	2005		2485	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - SE - NE - SE	1430 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 550 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101755			
RALSTON	11	15-015-24092-0000	2017		2470	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W SW - SW - NE - SE	1394 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1060 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR				
RALSTON	2	15-015-01016-0001	2008		2417	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W SE - NW - SE	1637 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1481 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101755	37.4801	-96.4834	NAD83
RALSTON	4	15-015-40142-0000	1952		2413	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NE - SW - SE	1190 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1771 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101755			
RALSTON	6	15-015-40144-0000	1957		2377	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NW - SE - SE	845 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1140 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101755			
RALSTON	9	15-015-22572-0000	1984		2465	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W E2 - NE - SE	1998 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 330 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101755			
RALSTON OWWO	11	15-015-40321-0001	2012		2404	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W NE - NW - NE - SE	2415 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 690 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	PR	101755			
RALSTON OWWO	5	15-015-40045-0001	2009		2605	Butler	10 - 26 S - 4	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - SW - SE - SE	290 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1130 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101755			
RAMSEY	2	15-015-20239-0000	1969		2735	Butler	4 - 26 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - SW - NE - NE	4393 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1243 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101943	37.4922	-97.0612	NAD83
RAMSEY	3	15-015-20276-0000	1969		2729	Butler	4 - 26 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NW - SE - NE	3745 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 1189 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	101943	37.4915	-97.0612	NAD83
RAY	A-1	15-015-20784-0000	1976		2711	Butler	34 - 25 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NW - NW - SW	2505 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 163 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	103116			
RAY	B-7	15-015-21144-0002			2734	Butler	34 - 25 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NE - SW - NW	3696 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 4601 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN				
RAY A	2	15-015-20867-0000	1976		2714	Butler	34 - 25 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - NE - NW - SW	2358 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 923 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	103116			
RAY A	3	15-015-21608-0000	1981		2723	Butler	34 - 25 S - 3	<input type="checkbox"/> E <input checked="" type="checkbox"/> W - S2 - NW - SW	1750 <input type="checkbox"/> FSL <input checked="" type="checkbox"/> FSL 721 <input type="checkbox"/> FEL <input checked="" type="checkbox"/> FWL	OIL	IN	103116			

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OIL & GAS CONSERVATION DIVISIONOPERATOR WELL INVENTORY
(FORM OWI-1)Form OWI-1
June 2009

Lease Name*	Well No.*	API No.**	Year Drilled*	Year Assumed Responsibility*	Depth*	County*	Section-Township-Range*	Spot Location* (N/Q/Q/Q)	Footage from Section Line* (S.E. FSL = Feet from South Line)	Type of Well* (O/P/MSW/L/ CB/MSW)	Well Status* (PROD/Active/ Inactive)	KDOR Lease Code(s)	Latitude	Longitude	Datum
RAY B	1	15-015-20800-0001			2707	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SW - SW - NW 3073 <input checked="" type="checkbox"/> FSL 5033 <input checked="" type="checkbox"/> FEL	EOR	IN		37.5001	-97.0547	NAD83
RAY B	2	15-015-20803-0000	1976		2692	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SE - SW - NW 2294 <input checked="" type="checkbox"/> FSL 948 <input checked="" type="checkbox"/> FEL	OIL	IN	103116			
RAY B	4	15-015-20881-0000	1976		2752	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- NW - NE - SW 2334 <input checked="" type="checkbox"/> FSL 1566 <input checked="" type="checkbox"/> FEL	OIL	IN	103116			
RAY B	6	15-015-20995-0000	1978		2712	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- NW - SE - NW 1530 <input checked="" type="checkbox"/> FSL 1581 <input checked="" type="checkbox"/> FEL	OIL	IN	103116			
RAY C	1	15-015-20944-0000	1977		2725	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SW - NE - NW 985 <input checked="" type="checkbox"/> FSL 1653 <input checked="" type="checkbox"/> FEL	OIL	IN	103116			
RAY C	2	15-015-21013-0000	1978		2727	Butler	34 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- NE - NE - NW 330 <input checked="" type="checkbox"/> FSL 2310 <input checked="" type="checkbox"/> FEL	OIL	IN	103116			
REED	1	15-015-20132-0000	1968		2755	Butler	32 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SE - SE - NE 2317 <input checked="" type="checkbox"/> FSL 330 <input checked="" type="checkbox"/> FEL	OIL	PR	101944	37.5	-97.066	NAD83
SCHAUF	1	15-015-20134-0001			2777	Butler	35 - 25 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SE - SW - NW 2970 <input checked="" type="checkbox"/> FSL 4290 <input checked="" type="checkbox"/> FEL	EOR	AI	114436			
TILGNER	1	15-015-21497-0000	1980		3430	Butler	7 - 26 S - 3	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- SW - NE - NE 4465 <input checked="" type="checkbox"/> FSL 800 <input checked="" type="checkbox"/> FEL	SWD	IN		37.483	-97.0818	NAD83
WRIGHT	10WWO	15-015-01211-0002	2017		2627	Butler	32 - 25 S - 4	<input checked="" type="checkbox"/> E <input checked="" type="checkbox"/> W	- NE - NE - SW 2310 <input checked="" type="checkbox"/> FSL 2310 <input checked="" type="checkbox"/> FEL	OIL	IN				
							- S -	<input type="checkbox"/> E <input type="checkbox"/> W	<input type="checkbox"/> FSL <input type="checkbox"/> FEL						
							- S -	<input type="checkbox"/> E <input type="checkbox"/> W	<input type="checkbox"/> FSL <input type="checkbox"/> FEL						
							- S -	<input type="checkbox"/> E <input type="checkbox"/> W	<input type="checkbox"/> FSL <input type="checkbox"/> FEL						
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Conservation Division
District Office No. 2
3450 N. Rock Road
Building 600, Suite 601
Wichita, KS 67226



Phone: 316-337-7400
Fax: 316-630-4005
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Susan K. Duffy, Commissioner

Laura Kelly, Governor

September 06, 2019

Charlene Giles
Giles, Benjamin M.
821 HIGH ST
TOWANDA, KS 67144-9047

Re: Temporary Abandonment
API 15-173-20738-00-00
GLEN LYGRISSE 1
SE/4 Sec.12-26S-02E
Sedgwick County, Kansas

Dear Charlene Giles:

"Your temporary abandonment (TA) application for the well listed above has been approved. In accordance with K.A.R. 82-3-111 the TA status of this well will expire 09/06/2020.

- * If you return this well to service or plug it, please notify the District Office.
- * If you sell this well you are required to file a Transfer of Operator form, T-1.
- * If the well will remain temporarily abandoned, you must submit a new TA application, CP-111, before 09/06/2020.

You may contact me at the number above if you have questions.

Very truly yours,

Dan Fox"

EXHIBIT B

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

KOLAR Document ID: 1471042

Form CP-111

July 2017

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 5446
Name: Giles, Benjamin M.
Address 1: 821 HIGH ST
Address 2: _____
City: TOWANDA State: KS Zip: 67144 + 9047
Contact Person: Charlene Giles
Phone: (316) 541-2253
Contact Person Email: charlene121965@att.net
Field Contact Person: Dusty Green
Field Contact Person Phone: (316) 655-7542

API No. 15- 15-173-20738-00-00
Spot Description: _____
NE NW SE Sec. 12 Twp. 26 S. R. 2 ☒ E ☐ W
2310 feet from ☐ N / ☒ S Line of Section
1650 feet from ☒ E / ☐ W Line of Section
GPS Location: Lat: _____, Long: _____
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
County: Sedgwick Elevation: _____ ☐ GL ☐ KB
Lease Name: GLEN LYGRISSE Well #: 1
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
Spud Date: 09/11/1985 Date Shut-In: 05/12/2015

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	N/A	12.25	8.625	N/A	N/A	N/A
Setting Depth		210	2904			
Amount of Cement		150	100			
Top of Cement		N/A	N/A			
Bottom of Cement		N/A	N/A			

Casing Fluid Level from Surface: 2850 How Determined? fluid gun Date: 09/04/2019

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk In Hole at _____ (depth) ☐ Tools In Hole at _____ (depth) Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____

Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2910 Plug Back Depth: _____ Plug Back Method: _____

Geological Data:


Formation Name _____ Formation Top _____ Formation Base _____ Completion Information
1. _____ At: _____ to _____ Feet Perforation Interval 2860 to 2872 Feet or Open Hole Interval _____ to _____ Feet
2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

I HEREBY CERTIFY THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
Review Completed by: <u>Dan Fox</u> Comments: <u>TA application approved for 1 year.</u>					
TA Approved: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> Denied Date: <u>09/08/2019</u>					

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 800, Suite 801, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250