

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

In the matter of the Application of)	19
Jo-Allyn Oil Co. Inc. for an exception to the)	Docket No. 18 -CONS- <u>3147</u> -CEXC
10-year time limitation of K.A.R. 82-3-111 for)	
its Shurtless 2-15 well located in the NE/4 of)	CONSERVATION DIVISION
Section 15, Township 34 South, Range 22 West,)	
Clark County, Kansas.)	License No.: 33514
_____)	

APPLICATION

COMES NOW Jo-Allyn Oil Co. Inc. ("Applicant") in support of its Application in the captioned matter and states as follows:

1. Applicant is an Oklahoma corporation, authorized to do business in the State of Kansas. Applicant's address is P.O. Box 442, Route 2, Box 245, Laverne, Oklahoma 73848.
2. Applicant has been issued by the Kansas Corporation Commission Operator's License 33514, which expires on December 30, 2018.
3. Applicant is the owner and operator of the Shurtless 2-15 well, API 1502521447000 ("the subject well"), which is located in the NE/4 of NE/4 of SW/4 of NE/4 of Section 15, Township 34 South, Range 22 West, Clark County, Kansas. The subject well is located on an active oil and gas lease or unit comprising the following lands: The NE/4 of Section 15, Township 34 South, Range 22 West, Clark County, Kansas, containing 160 acres, more or less ("leased premises").]
4. Pursuant to K.A.R. 82-3-111, Applicant obtained temporary abandonment status, for the subject well on August 25, 2008. The subject well has maintained such status from August 25, 2008 to the present date.

5. On or about September 18, 2018 the Kansas Corporation Commission notified Applicant temporary abandonment status for the subject well would be denied from and after October 18, 2018, because subject well had been temporarily abandoned for more than ten (10) years.

6. K.A.R. 82-3-111 imposes a 10-year limitation on the amount of time during which wells may be temporarily abandoned, but an exception to the 10-year limitation may be obtained pursuant to said regulation through an Application filed with the Commission pursuant to K.A.R. 82-3-100. Applicant seeks such an exception.

7. On September 7, 2018, the subject well passed a Commission Staff-witnessed mechanical integrity test of the casing between the surface and a point within fifty (50) feet above the uppermost perforation in the well.

8. Applicant wishes to continue TA status for the subject well, because Applicant intends to use the well to re-enter the well bore by removing the plug over the Production Zone.

9. Applicant submits the following information regarding the well in support of the Application.

- A. Total of 2 wells on this Lease.
- B. Estimation of plugging the 2 wells on the Lease would be \$45,000.00.
- C. The producing well on this lease is currently producing 4 bbls per day.
- D. Remaining reserves on lease is unknown.
- E. Both well bores on lease set close to each other and we do not want to slow or stop the production on the producing well. We have not re-entered and removed the plug over the production zone due to that reason. We plan on doing so at the time the producing well bore slows production, quits producing. or casing goes bad etc.

10. Applicant has included a plat map (Exhibit A hereto) showing the locations of all producing, injection, temporarily abandoned, abandoned, and plugged wells located on the same leased premises as the subject well.

11. Based on the foregoing, Applicant requests the Commission grant an exception to the

10-year limitation, specifically to allow the subject well to remain eligible for temporary abandonment status for three (3) years following the expiration of the 10-year limitation. Applicant understands that the exception would be valid for three (3) years, but Applicant would still need to apply annually to the Conservation Division District Office for approval of an application for temporary abandonment status.

12. Listed in the attached Exhibit "B" are the names and addresses of the following persons:

- A. Each operator of each oil and gas lease covering lands within one-half (1/2) mile radius of the subject well; and
- B. Each person who owns any mineral interest of record in and under any lands located within one-half (1/2) mile radius of subject well (provided that such mineral interest is not covered by any oil and gas lease).

13. Notice of this Application will be published pursuant to K.A.R. 82-3-135a. In addition, notice of the hearing to be held in this matter will be provided as prescribed by K.A.R. 82-3-135.

WHEREFORE, Applicant prays that this matter be granted administratively without a hearing, or in the alternative be set for hearing, and upon hearing that the Commission grant Applicant's request, for an exception to the K.A.R. 82-3-111 ten (10) year limitation, to allow the subject well to remain temporarily abandoned for three (3) years, subject to annual approval by the Conservation Division District Office of an application for temporary abandonment status.

Respectfully submitted,

TRIPLETT WOOLF GARRETSON, LLC

By: 

Timothy E. McKee, #7135
2959 N. Rock Rd., Suite 300
Wichita, KS 67226
Telephone: (316) 630-8100
Facsimile: (316) 630-8101
E-mail: temckee@twgfirm.com

VERIFICATION

STATE OF OKLAHOMA)
) ss:
COUNTY OF HARPER)

I, Kristen Carman, of lawful age, being first duly sworn upon her oath states that she is the Corporate Secretary for Jo-Allyn Oil Co., Inc. and states that she declares that the statements made in the Application are true and correct to the best of her knowledge and belief.



KRISTEN CARMAN

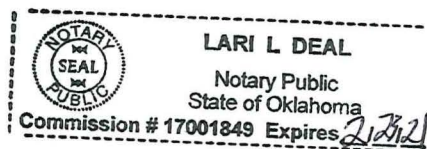
SUBSCRIBED AND SWORN to before me this 9 day of October, 2018.



Notary Public

My Appointment Expires:

2-23-21



CERTIFICATE OF SERVICE

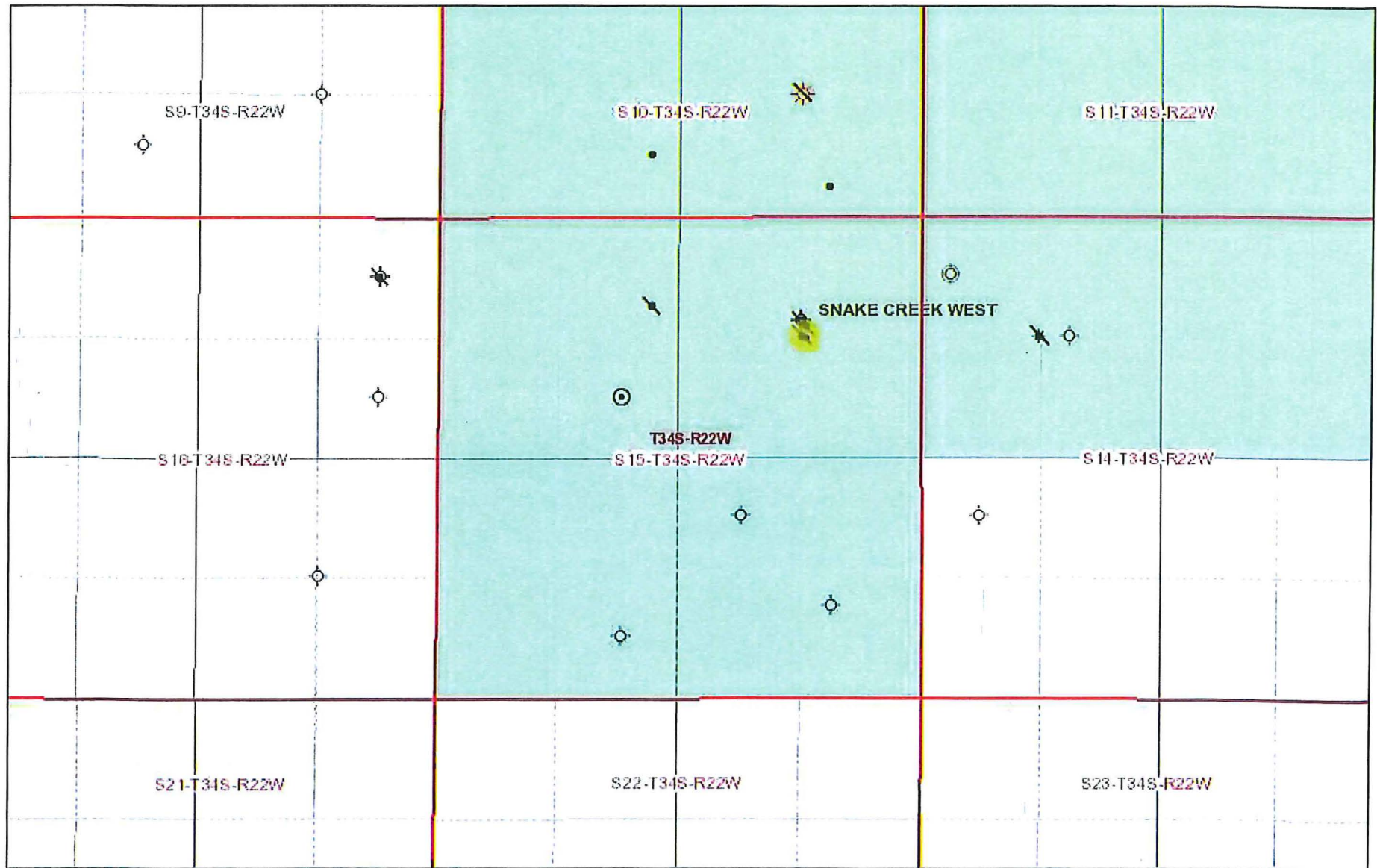
I hereby certify on this 16th day of October, 2018, true and correct copies of the above and foregoing Application and the Notice of Application were served by depositing copies of the same in the United States Mail, postage prepaid, and properly addressed to the landowners set forth in paragraph 12 of said Application and each party set forth in Exhibit B attached to said Application filed by Applicant, and the original Application was filed with the Kansas Corporation Commission via electronic filing.



Timothy E. McKee, #7135

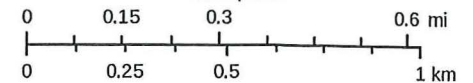
shurtlett 2-15

EXHIBIT A



October 4, 18

1:18,056



Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri

Kansas Geological Survey
<http://maps.kgs.ku.edu/olgas>

UNLEASED MINERAL OWNERS

Oliver P. Shupe Amended & Restated Rev. Trust
Oliver P. Shupe, Trustee
9231 Ensley Lane
Leawood, KS 66206

Bentley Randall, III
202 636 E. County Road 335
Woodward, OK 73801

Susan L. Prophet
11 Charter Ridge
Sandy Hook, CT 06482

Gregory C. Randall
Post Office Box 484
Buffalo, OK 73834

Theron Mac Randall
Post Office Box 1332
Burns Flat, OK 73624

Meuli Ranch, LLC
Max R. Meuli, Agent
3046 US Highway 183
Ashland, KS 67831

RJA FRANKS, LLC
c/o Jane E. Record, Manager
Route 3, Box 121
Laverne, OK 73848

Jo Nell Noe
20300 Gamble Drive
Brooksville, FL 34601

Peggy D. Thomas
517 Kensington Lake Circle
Brandon, FL 33511

Marka A. Brooks
12 Coolidge Court
Palm Coast, FL 32137

Philip H. Arnold and Susan Burlingham Arnold
3310 Lola St.
Wichita, KS 67205

Jane S. Rankin
P.O. Box 3
Ashland, KS 67831

EXHIBIT B