

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

In the Matter of the Petition of Somerset )  
Energy, Inc., to Open a Docket Pursuant to ) 25-CONS-3195-CMSC  
K.S.A. 55-605(a) ) Docket No. 25-CONS-\_\_\_\_-MIS

**PETITION OPENING DOCKET PURSUANT TO K.S.A. 55-605(a)**

Somerset Energy, Inc., ("Somerset") by and through its attorney, Keith A. Brock, hereby petitions the Kansas Corporation Commission ("Commission") to open a docket pursuant to K.S.A. 55-605(a). In support hereof, Somerset, states:

LEGAL BASIS FOR THIS PETITION

1. K.S.A. 55-605(a) provides in pertinent part, "[a]ny person, . . . . may institute proceedings before the Commission upon any question relating to the enforcement of this act or for the . . . . Enforcement of, any rule, regulation or order thereunder, and jurisdiction is hereby conferred upon the Commission to hear and determine the same."

2. K.S.A. 55-601 is a statutory prohibition against "waste" and Kansas Appellate Courts have recognized that the primary duty of the Commission is to prevent "waste."

3. K.S.A. 55-602 states, "[t]he term 'waste' as used herein, in addition to its ordinary meaning, shall include economic waste, **underground waste**, surface waste, **waste of reservoir energy**, and the production of crude oil or petroleum in excess of transportation or marketing facilities or reasonable market demands." (Emphasis added).

FACTUAL BASIS FOR THIS PETITION

4. Somerset is the current operator of the Nevius and Barkis Leases located Section 17,

Township 16 South, Range 24 East, Miami County, Kansas.

5. A water flood is being conducted upon the Nevius and Barkis Leases under Permit #: E31866 which has been authorized since March 14, 2024, and at the rates and pressures currently authorized since January 9, 2015.

6. No new wells have been drilled in this area since 2015 and no new injection authorization or modifications have been sought since such time. Essentially this water flood has been operated since at least 2015 with no issues or events.

7. KCC Staff recently conducted an inspection of Somerset's leases and located an abandoned well that has been designated as the Nevius #OW-6 well. Somerset has never operated the Nevius #OW-6 well, nor has such well broken out or caused any pollution.

8. KCC Staff nevertheless demanded that Somerset add the Nevius #OW-6 well to its well inventory and accept legal responsibility for it.

9. Since K.S.A. 55-179 clearly indicates that Somerset is not responsible for the Nevius #OW-6, Somerset refused to add said well to its well inventory or to accept legal responsibility for said well.

10. KCC Staff then sent the letter attached hereto as **Exhibit A** to Lance Town, Somerset Energy, Inc. which is dated October 2, 2024. This letter is in essence a unilateral attempt by KCC Staff to revoke injection authority under Permit # E31866, unless Somerset accepts legal responsibility for the Nevius #OW-6 and brings it into compliance with Commission regulations.

11. Since the Nevius #OW-6 has not broken out, and Somerset is clearly not a legally responsible party for said well pursuant to any of the six categories listed in K.S.A. 55-179(b)(1)-(6). Somerest refused to add the Nevius #OW-6 to its well inventory or to accept legal responsibility or

said well. Somerset through its attorney sent the letter attached hereto as **Exhibit B** to KCC Staff. This letter in essence explains that Somerset is not legally responsible for the Nevius #OW-6, that no factual basis has been established for revoking Somerset's injection permit, and KCC staff does not have authority to unilaterally revoke Somerset's injection permit without affording due process through a formal hearing before the Commission.

12. On December 2, 2024, KCC Staff sent the letter attached hereto as **Exhibit C** to the attorney for Somerset, which was received by Somerset's attorney on the afternoon of December 6, 2024. This letter essentially concedes that KCC Staff does not have authority to unilaterally revoke Somerset's injection permit without affording due process, so instead KCC Staff is temporarily reducing the injection rate and pressure of eight of Somerset's injection wells **to 0 barrels per day and 0 psi**. Such letter further states that unless Somerset ceases injecting into said wells within 10 days from the date of the letter, i.e. December 12, 2024, KCC Staff will recommend a Shut-In Order for the wells together with a \$10,000 penalty.

13. As indicated in more detail in the Motion for Preliminary Order filed in this Docket, shutting in the injection wells identified in KCC Staff's letter may cause the water bank created by Somerset's water flood to dissipate and cause permanent underground waste to occur. Thus, KCC Staff is directing Somerset to take actions which would directly violate K.S.A. 55-601 by causing permanent underground waste to occur in an attempt to force Somerset to accept legal responsibility for a well that is it is clearly not responsible for pursuant to K.S.A. 55-179.

14. KCC Staff's practice of forcing operators to accept wells which they are not legally responsible for under K.S.A. 55-179 by threatening to revoke injection permits and impose enormous fines has become a widespread practice throughout the industry. This practice is unlawful and

completely disregards and actually frustrates the Commission's statutory directives. Thus, Somerset will also introduce evidence in this Docket which will show that the actions being taken by KCC Staff with regard to the Nevius #OW-6 well are representative of a wide spread practice by KCC Staff against a multitude of operators across eastern Kansas to force operators to accept legal responsibility for wells which the Kansas Legislature has mandated they are not responsible for.

15. Ironically, the Commission was the sponsor of the 2021 amendment to K.S.A. 55-179. However, KCC Staff has ignored the provisions of such statute by attempting to impose legal responsibility upon operators at Staff's own discretion and without regard to the statutory criteria set forth in K.S.A. 55-179 as amended. The KCC Staff's actions taken against Somerset with respect to the Nevius #OW-6 well is consistent with KCC Staff's actions taken against other similarly situated operators with respect to wells they are not legally responsible for under K.S.A. 55-179 and evidence will be introduced in this Docket to demonstrate the existence of this widespread practice as well.

16. As it relates to the Nevius #OW-6 well and the actions taken against Somerset, KCC Staff has taken actions which actually cause waste, ignore statutory procedures and deny due process in an attempt to unlawfully compel Somerset to accept legal responsibility for an orphaned well which Somerset is not responsible for under K.S.A. 55-179.

17. In light of the above referenced facts, Somerset believes the action being required of it and other operators by KCC Staff constitutes waste.

18. Since the Commission is charged with a statutory duty to prevent waste, and to administer K.S.A. 55-179 as it is written, this docket is being initiated so that all available evidence can be presented to the Commission through a formal hearing.

WHEREFORE, Somerset respectfully requests the Commission open a docket pursuant to

K.S.A. 55-605(a).



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Keith A. Brock, #24130  
ANDERSON & BYRD, LLP  
216 S. Hickory ~ P.O. Box 17  
Ottawa, Kansas 66067  
(785) 242-1234, telephone  
(785) 242-1279, facsimile  
[kbrock@andersonbyrd.com](mailto:kbrock@andersonbyrd.com)  
Attorneys for Somerset Energy, Inc.

STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Somerset Energy, Inc. and is duly authorized to make this affidavit; that he has read the foregoing Petition Opening Docket Pursuant to K.S.A. 55-605(a), knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



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Keith A. Brock

SUBSCRIBED AND SWORN to before me this 11<sup>th</sup> day of December, 2024.



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Notary Public

Appointment/Commission Expires:



## EXHIBIT A

Conservation Division  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513

Phone: 316-337-6200  
Fax: 316-337-6211  
<http://kcc.ks.gov/>

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

### ACTION NEEDED

October 2, 2024

Lance Town  
Somerset Energy, Inc.  
4453 Shawnee Road  
Wellsville, KS 66092

#### RE: Abandoned Wells Near Injection Wells

Dear Operator:

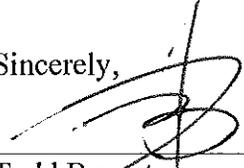
Commission Staff recently conducted inspections of your leases. In the course of those inspections, Staff obtained evidence that one or more unplugged, abandoned wells exist within the quarter-mile area of review of injection wells listed on your license. These wells are referenced on the attached list.

Under K.A.R. 82-3-403(a), one of the permitting factors considered in authorizing injection is the construction of all oil and gas wells within a quarter-mile of the proposed injection well, including all abandoned, plugged, producing, and other injection wells. The abandoned wells within a quarter-mile of your injection wells pose an environmental risk if they remain unaddressed. Additionally, under K.A.R. 82-3-408, injection permits may be revoked by the Commission for just cause.

Until the abandoned wells within the quarter-mile area of review of your injection wells have been properly addressed, no injection at the wells on the attached list is permitted. **Please shut-in and cease injection operations at each of the injection wells on the attached list within 15 days from the date of this letter.** Failure to cease injection operations until the abandoned wells found within the quarter-mile area of review of your injection wells are brought into compliance may result in a significant monetary penalty or Staff filing a show cause motion requiring you to appear before the Commission to provide reasons why your injection permits should not be revoked.

Should you have any questions regarding this matter, please feel free to contact me. Thank you for your cooperation in this matter.

Sincerely,

  
\_\_\_\_\_  
Todd Bryant  
Underground Injection Control

Cc: Troy Russell, Duane Sims, District #3

## List of Injection Wells and Unplugged Wells Within Their Area of Review

Well Name	API #	Docket #	Field Report #8707
Barkis #AI-40	15-121-31020	E-31,866	
Barkis #CW-2	15-121-29608	E-31,866	
Barkis #BW-2	15-121-27397	E-31,866	
Barkis #AW-2	15-121-27398	E-31,866	
Barkis #AW-4	15-121-26389	E-31,866	
Nevius #3-AW	15-121-26388	E-31,866	
Nevius #AI-12	15-121-31011	E-31,866	
Nevius #AI-14	15-121-31005	E-31,866	
Issues			
Nevius #OW-6	15-121-02901		

LAW OFFICES OF  
*ANDERSON & BYRD*  
A Limited Liability Partnership

EXHIBIT B

JOHN L. RICHESON  
JAMES G. FLAHERTY  
R. SCOTT RYBURN  
KEITH A. BROCK  
THOMAS H. SACHSE  
DANIEL J. KEATING

216 S. HICKORY, P. O. BOX 17  
OTTAWA, KANSAS 66067  
(785) 242-1234, *Telephone*  
(785) 242-1279, *Facsimile*  
[www.andersonbyrd.com](http://www.andersonbyrd.com)

ROBERT A. ANDERSON  
(1920-1994)

RICHARD C. BYRD  
(1920-2008)

October 22, 2024

*Sent by Electronic Mail*

Todd Bryant

via: [t.bryant@kcc.ks.gov](mailto:t.bryant@kcc.ks.gov)

Re: Abandoned Wells Near Injection Wells

Dear Todd:

I am in receipt of your letter dated October 2, 2024 addressed to Lance Town, Somerset Energy, Inc., concerning the Nevius #OW-6 Well.

The above referenced well has not broken out, there is no evidence at all that it is causing pollution, nor is there any evidence that such well poses a risk to fresh and usable water. This abandoned well has existed on the subject lease for decades without any issue or event. You have not demonstrated that such well is even open into the same formation as the existing injection wells, that this well is in communication with the existing injection wells, or any other facts whatsoever that would constitute just cause to revoke my client's injection permit. Moreover, you do not have authority to unilaterally revoke an injection permit as threatened in your letter without affording due process through a formal hearing before the Commission. For these reasons, I am writing to let you know that my client will not voluntarily cease injection at the wells referenced in your letter, nor will it accept responsibility for the Nevius #OW-6 Well. Please direct all further correspondence concerning this matter to my attention.

While my client values its relationship with the Commission, your conduct is not lawful. It is clear to me that you are trying to shift legal responsibility for an abandoned well to my client who is not responsible for said well under K.S.A. 55-179 by attempting to hold its injection permit hostage.

Sincerely,



Keith A. Brock  
[Kbrock@andersonbyrd.com](mailto:Kbrock@andersonbyrd.com)

KAB:rr

cc: Troy Russell, Duane Simms, Kelsey Marsh, Tristan Kimbrell

Conservation Division  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513



EXHIBIT C

Phone: 316-337-6200  
Fax: 316-337-6211  
<http://kcc.ks.gov/>

Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Annie Kuether, Commissioner

Laura Kelly, Governor

December 2, 2024

Keith Brock  
Anderson & Byrd  
PO Box 17  
Ottawa, Kansas 66067-0017  
*Attorneys for Somerset Energy, Inc.*

**Re: Abandoned Wells Near Injection Wells**

Mr. Brock:

This letter is in response to your letter dated October 22, 2024, addressed to Mr. Todd Bryant concerning the injection wells near the abandoned Nevius #OW-6 well. Staff is temporarily reducing the injection rate and pressure of the eight injection wells that are within a quarter mile of the Nevius #OW-6 well. The list of those wells was included in Mr. Bryant's initial letter but have been attached to this letter for your reference. Staff's legal authority to take this action is contained in the injection permits. I have attached a copy of the permits to this letter for your reference. The injection permits issued for each of the wells on the attached list state, "Authorized rates and pressures are subject to temporary or permanent modification during or as the result of any investigation conducted by Commission Staff". **The new injection rate and pressure for these wells is 0 barrels per day and 0 psi.**

The operator shall have 10 days from the date of this letter (December 12, 2024) to reduce the rate and pressure of the affected injection wells in accordance with this letter. If Commission Staff discovers any of the eight injection wells operating at a greater rate and/or pressure after that date, then Staff will recommend a Shut-In Order for the wells, including a \$10,000 penalty.

Additionally, Staff intends to file a motion requesting a presiding officer be assigned and a prehearing conference set in anticipation of a formal hearing where the operator will be required to appear before the Commission to show why its injection authority for the injection wells at issue should not be revoked.

Sincerely,

Legal Department Staff

cc: Todd Bryant, UIC Supervisor  
Troy Russell, Duane Sims, District #3  
Somerset Energy, Inc.

**List of Injection Wells and Unplugged Wells Within Their Area of Review**

<b>Well Name</b>	<b>API #</b>	<b>Docket #</b>	<b>Field Report #8707</b>
Barkis #AI-40	15-121-31020	E-31,866	
Barkis #CW-2	15-121-29608	E-31,866	
Barkis #BW-2	15-121-27397	E-31,866	
Barkis #AW-2	15-121-27398	E-31,866	
Barkis #AW-4	15-121-26389	E-31,866	
Nevius #3-AW	15-121-26388	E-31,866	
Nevius #AI-12	15-121-31011	E-31,866	
Nevius #AI-14	15-121-31005	E-31,866	
Issues			
Nevius #OW-6	15-121-02901		



**THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS  
CONSERVATION DIVISION**

**AMENDMENT TO ADD TWO INJECTION WELLS TO AN ENHANCED RECOVERY PROJECT  
AND TO MODIFY THE MAXIMUM AUTHORIZED INJECTION PRESSURE**

Oper. License #: 34028	Permit #: E31866
Operator: Triple T Oil, LLC	Pilot Well Name & No.: Barkis #CW-2
Address: PO Box 716	Location: 3405'FSL 2970'FEL
City: Louisburg	Sec. 17 Twp 16 Rge 24 (x)(E) ()(W)
State: Kansas	County: Miami
Zip Code: 66053	Field Name: Big Lake

Project Acreage: N/2 - Sec. 17; SW/4 & N/2 SE/4 – Sec. 16; NW/4 Sec. 21; all of Sec. 20; N/2 & SW/4 – Sec. 29, all in T16S-R24E

After reviewing the operator's application dated January 9, 2015 to amend the Enhanced Recovery Injection Permit dated March 14, 2014, the Conservation Division grants an amendment to the permit to add two additional wells to the Enhanced Recovery project and to increase the maximum authorized injection pressure to 500 psig under permit #E-31866. Each additionally permitted well is subject to the specifications and requirements of this permit including any attachments or any attached amendments.

Amendment to add the Barkis #AW-2 well, located 2970'FSL and 2650'FEL, Section 17 Township 16S, Range 24E.

- The injection formation is known as the Squirrel.
- The depth of the permitted injection interval is from 656' to 665', (x)(PF), ()(OH)
- The maximum authorized injection rate is 200 barrels of fluid per day.
- The maximum authorized injection pressure is 500 PSIG.
- Authorized rates and pressures are subject to temporary or permanent modification during or as the result of any investigation conducted by Commission Staff.
- Attachment (x)YES, ()NO.

Complete casing information is as follows:

	<u>SIZE</u>	<u>SEAT DEPTH</u>	<u>INTERVAL CEMENTED</u>	<u>SACKS CEMENT USED</u>
Surface	6-1/4"	20'	20' to 0'	3
Production	2-7/8"	698'	698' to 0'	98
Tubing	None			

In addition to the specific permit conditions and requirements set out above or on the attachment hereto, this permit is subject to all of the provisions of K.A.R. 83-3-400 et seq. Injection authority cannot be transferred without approval of the Conservation Division.

Date Amended: 03/04/2015

Director, Underground Injection Control  
Conservation Division

Attachment to Permit #E-31866

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis #BW-2 Loc: 2970'FSL 2970'FEL, Sec. 17 Twp 16 Rge 24 (x)(E) ()(W)

	<u>SIZE</u>	<u>SEAT DEPTH</u>	<u>INTERVAL CEMENTED</u>	<u>SACKS CEMENT USED</u>
Surface	6-1/4"	20'	20' to 0'	3
Production	2-7/8"	685'	685' to 0'	100
Tubing	None			

Injection interval is from 655' to 663', (x)(PF), ()(OH)

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**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS  
CONSERVATION DIVISION**

**INJECTION PERMIT FOR ENHANCED RECOVERY**

Oper. License #: 34028	Permit #: E-31,866
Operator: Triple T Oil, LLC	Pilot Well Name & No.: Barkis #CW-2
Address: P.O. Box 716	Location: 3405' FSL 2970' FEL
City: Louisburg	Sec. 17 TWP 16 RGE 24 (x) (E) ( ) (W)
State: KS	County: Miami
Zip Code: 66053	Field Name: Big Lake

COPY

Project Acreage: N/2 - Sec. 17; SW/4 & N/2 SE/4 – Sec. 16; NW/4 Sec. 21; all of Sec. 20; N/2 & SW/4 – Sec. 29, all in T16S-R24E

After reviewing the records and files in this matter, Triple T Oil, LLC has purchased the following wells approved for injection under permit E-24,978. The effective date of the transfer was 09/01/2014 with a Commission approved transfer date of 11/06/2014. The Conservation Division grants a permit for the injection of produced saltwater or other fluids approved by the Conservation Division. Each additional permitted well is subject to the specifications and requirements of this permit including any attachments or any attached amendments.

- The injection formation is known as the Squirrel.
- The depth of the permitted injection interval is from 656' to 665', (x)(PF), ( )(OH)
- The maximum authorized injection rate is 200 barrels of fluid per day.
- The maximum authorized injection pressure is 500 PSIG.
- Authorized rates and pressures are subject to temporary or permanent modification during or as the result of any investigation conducted by Commission Staff.
- Attachment (x) YES, ( ) NO.

Injection authority is transferred to E-31,866 for the following wells:

Well Name	Well Number	Spot Location	Section	Township	Range
Barkis	AW4	3640' FSL 2660' FEL	17	- 16S	- 24E
Kuhn	I-W	525' FSL 3165' FEL	16	- 16S	- 24E
Nevius	AW-3	3310' FSL 2620' FEL	17	- 16S	- 24E

Well(s), Leases(s) and Facilities supplying fluid for injection:

Lease Operator	Lease Name	Lease Description
Triple T Oil, LLC	Barkis, Kuhn, Nevius, Phillips	N/2-Sec. 17; SW/4 & N/2 SE/4 of Sec. 16; NW/4 of Sec. 21, all in 16-24E

In addition to the specific permit conditions and requirements set out above or on the attachment hereto, this permit is subject to all of the provisions of K.A.R. 83-3-400 et seq. Injection authority cannot be transferred without approval of the Conservation Division.

Date of Approval: 03/26/2015

\_\_\_\_\_  
Director, Underground Injection Control  
Conservation Division

COPY

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis #AW4 Loc: 3640' FSL 2660'FEL, Sec. 17 Twp 16 Rge 24 (x)(E) ( ) (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Surface	6-1/4"	21'	0' to 21'	4
Production	2-7/8"	705'	0' to 694'	73

Packer type and setting depth: N/A

Injection interval is from 672' to 682', (x)(PF), ( ) (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Kuhn #1-W Loc: 525'FSL 3165'FEL, Sec. 16 Twp 16 Rge 24 (x)(E) ( ) (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Surface	6-1/4"	20'	0' to 20'	3
Production	2-7/8"	476'	0' to 476'	65

Packer type and setting depth: N/A

Injection interval is from 431' to 450', (X)(PF), ( ) (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Nevius #AW-3 Loc: 3310'FSL 2620'FEL, Sec. 17 Twp 16 Rge 24 (x)(E) ( ) (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Surface	6-1/4"	20'	0' to 20'	2
Production	2-7/8"	694'	0' to 694'	74

Packer type and setting depth: N/A

Injection interval is from 669' to 677', (X)(PF), ( ) (OH)

Injection interval is from 431' to 450', (X)(PF), ( ) (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis #CW-2 Loc: 3405'FSL 2970'FEL, Sec. 17 Twp 16 Rge 24 (x)(E) ( ) (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Surface	6-1/4"	20'	0' to 20'	3
Production	2-7/8"	698'	0' to 698'	98

Packer type and setting depth: N/A

Injection interval is from 656' to 665', (X)(PF), ( ) (OH)



THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS  
CONSERVATION DIVISION

CORRECTION TO A PERMIT AMENDMENT DATED: OCTOBER 15<sup>TH</sup>, 2015

Oper. License #: 34350

Permit #: E-31,866

Operator: Altavista Energy, Inc.

Pilot Well Name & No.: Barkis CW-2

Address: P.O. Box 128

Location: 3405'FSL 2970'FEL

City: Wellsville

Sec. 17 Twp 16S Rge 24 (x)(E)()(W)

State: Kansas

County: Miami

Zip Code: 66092

Field Name: Paola-Rantoul

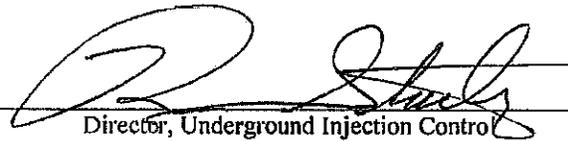
Project Acreage: N/2 Sec. 17, SW/4 & N/2 SE/4 Sec. 16, NW/4 Sec. 21, All Sec. 20, N/2 & SW/4 Sec. 29-16S-24E

On October 15<sup>th</sup>, 2015, the Commission issued an amended permit in the above-referenced matter. In that permit, the operator's application date was listed as August 24<sup>th</sup>, 2015 when instead it should have been July 29<sup>th</sup> and August 24<sup>th</sup> 2015.

The Commission's October 15<sup>th</sup>, 2015 permit is amended to make the above corrections, in all other respects the permit remains in full force and effect.

In addition to the specific permit conditions and requirements set out above or on the attachment hereto, this permit is subject to all of the provisions of K.A.R. 83-3-400 et seq. Injection authority cannot be transferred without approval of the Conservation Division.

Date Corrected: October 20, 2015

  
\_\_\_\_\_  
Director, Underground Injection Control  
Conservation Division



Attachment to Permit E-31,866

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Stahl AI-11 Loc: 2310'FSL 4620'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	3
Intermediate	"	'	' to '	
Production	2.875"	655'	0' to 655'	90
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 606' to 618',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Stahl AI-12 Loc: 2310'FSL 4290'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	20'	0' to 20'	8
Intermediate	"	'	' to '	
Production	2.875"	720'	0' to 720'	92
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 624' to 634',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Stahl AI-13 Loc: 1980'FSL 5000'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	700'	0' to 700'	88
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 622' to 632',  (PF),  (OH)

Attachment to Permit E-31,866

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis T-1 Loc: 4750'FSL 4750'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	20'	0' to 20'	4
Intermediate	"	'	' to '	
Production	2.875"	738'	0' to 738'	104
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 675' to 685',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis T-2 Loc: 4090'FSL 4750'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	20'	0' to 20'	4
Intermediate	"	'	' to '	
Production	2.875"	732'	0' to 732'	112
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 662' to 672',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis AI-11 Loc: 4455'FSL 5115'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	755'	0' to 755'	105
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 663' to 672',  (PF),  (OH)

Attachment to Permit E-31,866

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis A1-12 Loc: 3821'FSL 5135'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	723'	0' to 723'	96
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 639' to 649',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis A1-13 Loc: 3465'FSL 4785'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	714'	0' to 714'	82
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 642' to 652',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Barkis A1-40 Loc: 3710'FSL 2990'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	764'	0' to 764'	97
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 684' to 694',  (PF),  (OH)

Attachment to Permit E-31,866

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Nevius AI-12 Loc: 3300'FSL 2310'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	5
Intermediate	"	'	' to '	
Production	2.875"	744'	0' to 744'	94
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 652' to 660',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Nevius AL-14 Loc: 3630'FSL 2310'FEL, Sec. 17 Twp 16S Rge 24  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	7"	23'	0' to 23'	4
Intermediate	"	'	' to '	
Production	2.875"	720'	0' to 720'	95
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from 640' to 649',  (PF),  (OH)

Complete casing information for the well added by this amendment is as follows:

Well Name and No.: Loc: 'FSL 'FEL, Sec. Twp Rge  (E)  (W)

	SIZE	SEAT DEPTH	INTERVAL CEMENTED	SACKS CEMENT USED
Conductor	"	'	' to '	
Surface	"	'	' to '	
Intermediate	"	'	' to '	
Production	"	'	' to '	
Tubing	"	'	' to '	

Additional Cementing: ' to '  
 Packer type and setting depth: set @ '  
 Injection interval is from ' to ',  (PF),  (OH)