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Kansas Corporation Commission
/s/ Lynn M. Retz

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KANSAS CORPORATION COMMISSION

APR 06 2018

CONSERVATION DIVISION
WICHITA, KS

Benjamin M. Giles
346 South Lulu
Wichita, Kansas 67211
(316) 265-1992

April 5, 2018

To Whom It May Concern:

I wish to protest Urban Oil & Gas Group, LLC's intent to convert their Lygrisse 82X well to a disposal well in Sedgwick County, Kansas.

In their application, they state that their 4 ½ liner will be set at 3,370' and their 2 3/8 lined tubing packer will be set at 3,350.

I have the Erdwien Lease and well directly across the intersection to the Northeast (SW of Sec. 11-26S-2E). Enclosed please find the deepening record of the H. Erdwien #1 drilled in 1929 and deepened in 1949. As you can see from the deepening report, this well was deepened to the bottom of the Simpson at 3,297'. A copy of the plugging report is also attached showing that oil was produced from 3,269' to 3,297'. The bottom of the Simpson in the Erdwien well is only 73 Ft. above the bottom of Urban's 82X well's 4 ½ casing liner and only 53 Ft. above where they are setting their packer.

We are planning on either washing the Erdwien well down or twinning the well at some point. We do not feel that 73 Ft. of 4 ½ pipe below the bottom of the Simpson formation at 3,297' is adequate to prevent the Simpson formation from being contaminated especially when the packer will be set only 53' Ft. below the bottom of the Simpson formation. This in turn will prevent us from possibly producing the Simpson formation to the Northeast.

We feel that Urban should be required to deepen the well and set and cement the 4 ½ liner and packer to the granite wash formation at approximately 4,000.

Very truly yours,


Benjamin M. Giles