

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Application of IGWT, Inc.)
for an Exception to K.A.R. 82-3-401(d) for its)
Edmiston #6 Well Located in the NW/4 of)
Section 33, Township 25 South, Range 4 East,)
Butler County, Kansas.)
Docket No. 25-CONS-3251 -CEXC
CONSERVATION DIVISION

APPLICATION FOR EXCEPTION

IGWT, Inc. ("IGWT") by and through its attorney, Keith A. Brock, hereby petitions the Kansas Corporation Commission ("Commission") to grant an exception pursuant to K.A.R. 82-3-100(b) to the prohibition set forth in K.A.R. 82-3-401(d) against disposal of produced water into a producing zone at the Edmiston #6. In support hereof, IGWT, states:

1. IGWT is a corporation authorized to do business in the State of Kansas. Applicant's address is P.O. Box 550, Rosehill, KS 67133.
2. IGWT has been issued by the Kansas Corporation Commission Operator's License No. 3167.
3. IGWT is the operator of the Edmiston #6, API# 15-015-40425-0001 (the "Edmiston #6"), which is located in the NW/4 of Section 33, Township 25 South, Range 4 East, Butler County, Kansas.
4. The Edmiston #6 is completed into both the Arbuckle formation and also the Mississippi formation. The Mississippi formation is also a "producing zone" as that term is used in K.A.R. 82-3-401(d). IGWT has filed the Application for Injection Well Form U-1 attached hereto as **Exhibit A** (the "Injection Application") and has given proper notice of such application. Commission Staff has indicated that they cannot administratively approve the Injection Application due to K.A.R. 82-3-401(d). However, no protests have been filed to the Injection Application and Commission Staff has indicated that they would not have an objection to the Injection Application if the Commission

were to grant an exception to K.A.R. 82-3-401(d) pursuant to K.A.R. 82-3-100(b), which is the relief requested in this docket.

5. K.A.R. 82-3-401(d) mandates that if an application is for disposal into a producing zone . . . the disposal zone shall be below the oil-water contact or 50 feet below the base of the producing zone. . . ."

6. The Edmiston #6 was originally drilled as a producing well and completed in the Mississippi formation. Said well was thereafter converted to a disposal well and completed into the Arbuckle formation via permit # D-32651. Subsequently, said well was converted again to an injection well for enhanced oil recovery ("EOR") purposes into the Mississippi formation and is currently permitted as an EOR injection well into the Mississippi formation via Permit # E-34,305. IGWT now wishes to simultaneously inject into the Mississippi formation and also dispose of excess water into the Arbuckle formation in the Edmiston #6. IGWT operates certain producing wells on the Edmiston Lease and IGWT believes that initiating the simultaneous injection into the Mississippi formation will increase the ultimate recovery of oil from the Edmiston Lease and underground waste will be avoided. The simultaneous injection and disposal into the Edmiston #6 will also prevent waste by allowing the needed injection and disposal operations to be completed with a single well rather than being required to drill multiple wells.

7. The requested maximum injection pressure for the Edmiston #6 is only 250 psig, therefore the requested dual injection/disposal operations at the Edmiston #6 well will not adversely affect production from the Mississippi formation and is instead expected to increase such production. The Edmiston #6 is currently permitted as an EOR well injecting into the Mississippi formation and is being operated in that capacity, thus this history provides assurance that the Mississippi formation which is a the producing zone at issue in this docket will not be harmed by the proposed operations. In addition, the disposal of all excess produced water into the Arbuckle formation will prevent large

quantities of produced water from being stored above ground and will therefore prevent pollution.

8. For the reasons set forth above, this application will prevent waste, protect correlative rights and prevent pollution.

9. A list of all operators or lessees and unleased mineral owners within one-half mile of the Edmiston #6, whose names and addresses IGWT has been able to determine after reasonable search and inquiry is attached as **Exhibit B**. Notice of this Application is being provided to all persons identified on **Exhibit B** and will be published in the Wichita Eagle and the Butler County Times-Gazette, the official newspaper for Butler County, Kansas. Each publisher's affidavit will be submitted to the Commission upon receipt from the publisher. Notice of this Application will, therefore, be compliant with K.A.R. 82-3-135a.

WHEREFORE, IGWT respectfully requests the Commission docket this Application and, if no written protest is received within the applicable protest period that this Application be administratively granted and an order issued pursuant to K.A.R. 82-3-100(b) granting an exception to the prohibition set forth in K.A.R. 82-3-401(d) against disposal of produced water into a producing zone; and that the Injection Application then be administratively granted as well. In the event a timely and proper protest is filed with the Commission, IGWT requests the Commission set this Application for hearing and, upon such hearing, grant the request for exception and afford such other and further relief as the Commission deems necessary and proper.



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
Attorneys for Applicant

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 Applicant and is duly authorized to make this affidavit; that he has read the foregoing Application for Exception, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 4th day of February, 2025.



Notary Public

Appointment/Commission Expires:

**KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION
APPLICATION FOR INJECTION WELL**

Form U-1
August 2020
Form must be Typed
Form must be Signed
All blanks must be Filled

Disposal

Enhanced Recovery: Repressuring
 Waterflood
 Tertiary

Date: 2/9/2024

Operator License Number: 3167

Operator: IGWT, INC

Address: PO BOX 550, ROSEHILL, KS 67133

Contact Person: KENTON HUPP

Phone: 316-2655800

Email: kenton2@klhoilandgasconsulting.com

Permit Number: E34305 E34451

API Number: 15-015-40425-0001

Well Location

Sec. 33 Twp. 25 S. R. 4 E W

1650 feet from S / N Line of Section

1600 feet from E / W Line of Section

GPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: NAD27 NAD83 WGS84

Lease Description: S2 NW & SW OF 33-25S-4E

Lease Name: EDMISTON Well Number: 6

Field Name: WHITewater EAST

County: BUTLER

Deepest Usable Water

Formation: _____

Depth to Bottom of Formation: _____

Check One: Old Well Being Converted Newly Drilled Well Well to be Drilled

Surface Elevation: 1319 feet Well Total Depth: 3041 feet Plug Back Depth: TBD feet

Datum of top of injection formation: 2510 feet (reference mean sea level)

Injection Formation Description:

Name	top / bottom	perf / open hole	depth
ARBUCKLE	2780 / 2540	OPEN HOLE	at 2838 to 3044 feet
MISSISSIPPI	2 50 / 2630	PERF	at 2 50 to 2550 feet

List of Wells/Facilities Supplying Produced Saltwater or Other Fluids Approved by the Conservation Division:
(attach additional sheets if necessary)

	Lease Operator	Lease/Facility Name	Lease/Facility Description	Well ID & Spot Location
1.	IGWT, INC	EDMISTON	SW NW & SW/4	33-25S-4E
2.	IGWT, INC	BEN PEFFLY	SW	28-25S-4E
3.	IGWT, INC	VARNER FARMS	N2 NW	33-25S-4E

	Producing Formation	Strata Depth	Total Dissolved Solids (if available)
1.	MISSISSIPPI	2510 to 2550 feet	_____ mg/l
2.	MISSISSIPPI	2522 to 2572 feet	_____ mg/l
3.	MISSISSIPPI	2556 to 2626 feet	_____ mg/l

Maximum Requested Liquid Injection Rate: 2000 bbls / day; or

Maximum Requested Gas Injection Rate: _____ scf / day. Type of Gas: _____

Maximum Requested Injection Pressure: 250 psig

Well Completion

Type: Tubing & Packer Packerless Tubingless

	Conductor	Surface	Intermediate	Production	Tubing
Size		10"	7"	4.5"	2.3/8"
Setting Depth		164	2514'	2838'	TBD
Amount of Cement		169SX	75SX	325SX	
Top of Cement		0			
Bottom of Cement		164		2838'	

If Alternate If cementing, complete the following:

Perforations / D.V. Tool at _____ feet, cemented to _____ feet with _____ sx.

Tubing: Type COATED 2 3/8 Grade J55

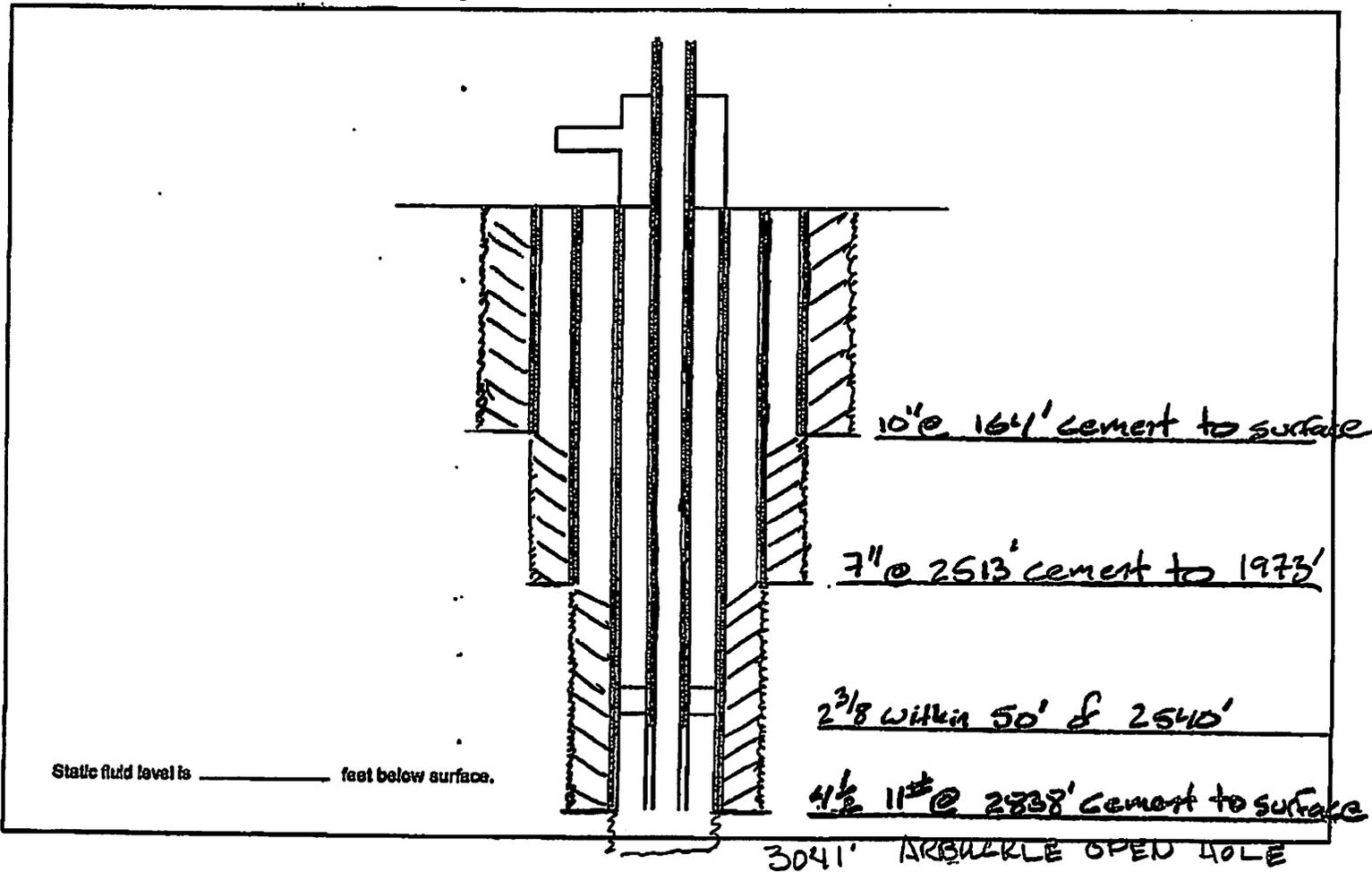
Packer: Type DL SHEAR TENSION COATED PACKER Depth TBD

Annulus Corrosion Inhibitor: Type TREATED FLUID TBD Concentration _____

List Logs Enclosed: _____

Well Sketch

(To sketch installation, darken the appropriate lines, indicate cement, and show depths.)



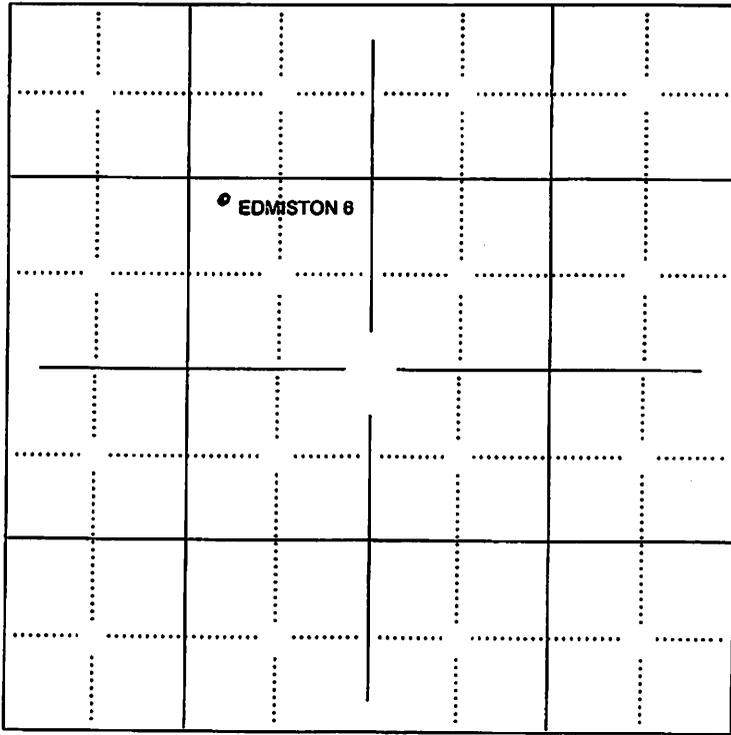
Offset Operators, Unlease Mineral Owners & Landowners Acreage

	NAME	LEASEHOLD DESCRIPTION
1	Michael & Martha Treweeke	SE/4 SEC 33-25S-4E
2	William & Bridgett Thomas	SW/4 SW/4 SEC 33-25S-4E
3	Relph & Kathleen Relph	E/2 E/2 SW/4 SEC 33-25S-4E
4	Relph & Kathleen Relph	W/2 E/2 SW/4 SEC 33-25S-4E
5	Dennis & Kathy Fisher	NW/4 SW/4 SEC 33-25S-4E
6	Max & Sherri Griffin	NE/C SE/4 A TR SEC 32-25S-4E (21 ACRES)
7	Flying J Farm LLC	E/2 NE/4 SEC 32-25S-4E
8	Calvin & Carla Varner	E/2 SE/4 SEC 29-25S-4E
9	Patrick Wilson	SW/4 LESS A TR SEC 28-25S-4E
10	Paul & Sabrina Tillotson	SE/C SW/4 A TR SEC 28-25S-4E (4.7 ACRES)
11	Marvin & Kara Nice	SW/4 A TR SEC 28-25S-4E (4.60 ACRES)
12	Varner Farms, Inc.	SE/4 SEC 28-25S-4E
13	Ray & Mary Varner	NW/C NE/4 SEC 33-25S-4E (4.7 ACRES)
14	Varner Farms, Inc.	N/2 NE LESS A TR; NE NW SEC 33-25S-4E
15	Joseph & Valerie Hepburn	NW/C NE/4 SEC 33-25S-4E (64.10 ACRES)
16	John O. Cleveland	PT NW/4 NW/4 SEC 33-25S-4E (17.3 ACRES)
17	Eric & Jennifer Strecker	PT SW/C NW/4 NW/4 SEC 33-25S-4E (17.8 ACRES)
18	Shane & Christy Anderson	PT NW/4 SEC 33-25S-4E (2.7 ACRES)
19	Lloyd & Jacqueline Thomas	PT NW/4 SEC 33-25S-4E (2.4 ACRES)
20	Charles Mark Sumner	S/2 NW/4 SEC 33-25S-4E
20	John A Sumner	S/2 NW/4 SEC 33-25S-4E
20	Roger E. Sumner	S/2 NW/4 SEC 33-25S-4E
20	Carolyn Nissim	S/2 NW/4 SEC 33-25S-4E
20	Robert H. Brown Family Trust	S/2 NW/4 SEC 33-25S-4E
OFFSET	Brickley Enterprises	NW/4 NW/4 SEC 33-25S-4E
OP	IGWT, Inc.	

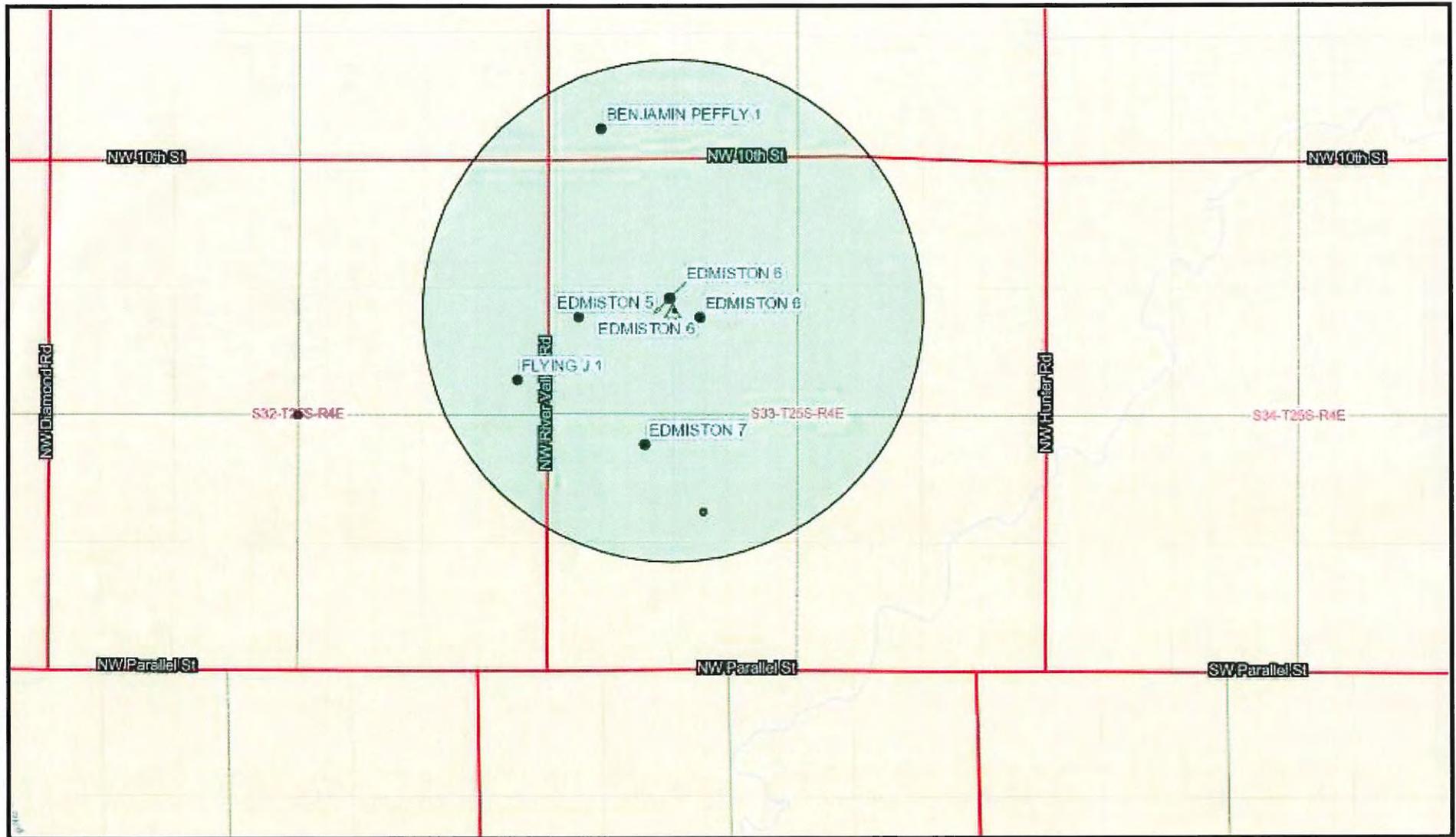
Plat and Certificate of Injection Well Location and Surrounding Acreages

Operator: IGWT, INC Location of Well: W2 NNW SE NW
 Lease: EDMISTON 1650 feet from S / N Line of Section
 Well Number: 6 1600 feet from E / W Line of Section
 County: BUTLER Sec. 33 Twp. 25 S. R. 4 East West

Plat
 Show the following information: applicant injection well, all producing wells, inactive wells, plugged wells, and other wells within a one-half mile radius, all lease boundaries, lease operators, unleased mineral rights owners, well numbers, and producing wells producing formation tops.



- applicant well
- D & A well
- plugged producer
- producing well
- other injection well
- water supply well
- plugged injection well
- temporary abandoned well



Oil and Gas Wells

- | | | | | |
|---------------------------------------|--|--------------------------------|----------------------------------|--|
| ● Coal Bed Methane | ⊗ Enhanced Oil Recovery, Plugged Abandoned | ⊗ Injection, Plugged Abandoned | ⊗ Oil and Gas, Plugged Abandoned | ⊗ Other, Plugged Abandoned |
| ● Coal Bed Methane, Plugged Abandoned | ⊗ Gas | ○ Intert | ● Oil | ⊗ Salt Water Disposal |
| ◇ Dry and Abandoned | ⊗ Gas, Plugged Abandoned | ○ Location | ⊗ Oil, Plugged Abandoned | ⊗ Salt Water Disposal, Plugged Abandoned |
| ⊗ Enhanced Oil Recovery | ⊗ Injection | ● Oil and Gas | ⊗ Other | |

2/8/2024

<https://maps.kgs.ku.edu/oilgas>

Affidavit of Notice Served

Re: Application for: SALTWATER DISPOSAL
Well Name: EDMISTON 6 Legal Location: W2 NW SE NW 33-25S-4E

Note: A copy of this affidavit must be served as a part of the application.

Name:

Address: (Attach additional sheets if necessary)

See attached sheet

I certify that the statements and information contained in this application are true and correct to the best of my knowledge, and that a true and correct copy of this application was delivered or mailed to all required persons, and that such persons are identified on Page 5 of this application.

Kevin Kupp

Applicant or Duly Authorized Agent

Subscribed and sworn before me on: February 12, 2024

Patricia R. Haden

Notary Public

My Commission Expires: 4-5-2027

Protests may be filed by any party having a valid interest in the application. Petitions for protests shall be in writing and shall clearly identify the name and address of the protester and the title of the application. The petition shall include a clear and concise statement of the direct and substantial interest of the protester in the proceeding, including specific allegations as to the manner in which the grant of the application will cause waste, violate correlative rights, or pollute the water resources of the state of Kansas. Protesters shall serve the protest upon the applicant by mail or personal service at the same time or before the protester files the protest with the Conservation Division. Protests must be filed within 30 days of the publication notice of the application.

Offset Operators, Unlease Mineral Owners & Landowners Acreage

	NAME	ADDRESS	CITY	ZIP
1	Michael & Martha Treweeke	8114 NW Parallel St	Towanda, KS	67144-9132
2	William & Bridgett Thomas	P.O. Box 376	Towanda, KS	67144-0376
3	Relph & Kathleen Relph	8550 NW Parallel St	Towanda, KS	67144-9409
4	Relph & Kathleen Relph	8550 NW Parallel St	Towanda, KS	67144-9409
5	Dennis & Kathy Fisher	428 NW River Valley Rd	Towanda, KS	67144-9360
6	Max & Sherri Griffin	427 NW River Valley Rd	Towanda, KS	67144
7	Flying J Farm LLC	1268 Kay Rd	Concordia, KS	67901-7175
8	Calvin & Carla Varner	9080 NW 10th	Towanda, KS	67144
9	Patrick Wilson	8814 NW 10th	Towanda, KS	67144
10	Paul & Sabrina Tillotson	8600 NW 10th St	Towanda, KS	67144
11	Marvin & Kara Nice	8524 NW 10th	Towanda, KS	67144
12	Varner Farms, Inc.	9769 SW Parallel St	Towanda, KS	67144
13	Ray & Mary Varner	8405 NW 10th	Towanda, KS	67144
14	Varner Farms, Inc.	9769 SW Parallel St	Towanda, KS	67144
15	Joseph & Valerie Hepburn	P.O. Box 451	Towanda, KS	67144-0451
16	John O. Cleveland	435 SW Hunter Rd	Towanda, KS	67144-9130
17	Eric & Jennifer Strecker	836 NW River Valley Rd	Towanda, KS	67144
18	Shane & Christy Anderson	P.O. Box 429	Towanda, KS	67144
19	Lloyd & Jacqueline Thomas	8909 NW 10th	Towanda, KS	67144
20	Charles Mark Sumner	203 Lark Hill Lane	Ballwin, Mo	63021-5047
20	John A Sumner	203 Lark Hill Lane	Ballwin, Mo	63021-5047
20	Roger E. Sumner	203 Lark Hill Lane	Ballwin, Mo	63021-5047
20	Carolyn Nissim	203 Lark Hill Lane	Ballwin, Mo	63021-5047
20	Robert H. Brown Family Trust	203 Lark Hill Lane	Ballwin, Mo	63021-5047
OFFSET	Brickley Enterprises	PO Box 1118	El Dorado, KS	67042
OP	IGWT, Inc.	P.O. Box 550	Rose Hill, KS	67133

NEWSPAPER NOTICE

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

RE: IGWT, Inc. - Application for a permit to authorize the injection of saltwater into the Edmiston #6 located in Butler County, Kansas.

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

You, and each of you, are hereby notified that IGWT, Inc. is filing an application to commence the repressuring of saltwater for enhanced recovery into the Mississippi formation and the Arbuckle formation at the Edmiston #6, located in the W2 NW SE NW of Section 33-25S-4E, Butler County, Kansas, with a maximum operating pressure of 250 psig and a maximum injection rate of 2000 bbl. per day.

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

All persons interested or concerned shall take notice of the foregoing and shall govern themselves accordingly.

IGWT, Inc.
P.O. BOX 550
ROSE HILL, KS 67133
316-265-5800

Offset Operators, Unlease Mineral Owners & Landowners Acreage

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6	Max & Sherri Griffin	427 NW River Valley Rd	Towanda, KS	67144
7	Flying J Farm LLC	1268 Kay Rd	Concordia, KS	67901-7175
8	Calvin & Carla Varner	9080 NW 10th	Towanda, KS	67144
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