

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

In the matter of the Application of Thresher        ) Docket No. 25-CONS-3375-CEXC  
Energy, Inc. for an exception to the 10-year time )  
limitation of K.A.R. 82-3-111 for its Girod #1    ) CONSERVATION DIVISION  
well located in the NW/4 NW/4 NW/4 of         )  
Section 17, Township 32 South, Range 7 East     ) License No. 35820  
Cowley County, Kansas.                             )

**FIRST AMENDED APPLICATION**

Thresher Energy, Inc. ("Applicant") submits this First Amended Application in replacement of the Application previously submitted in the captioned docket in order to supplement the factual basis and support for the following-described requested relief. Applicant requests an exception to the 10-year temporary abandonment time limitation set forth in K.A.R. 82-3-111(b) for its Girod #1 well pursuant to K.A.R. 82-3-100(b). In support of its Application, as amended and replaced by this First Amended Application, Applicant states as follows:

1. Applicant is a Delaware corporation authorized and in good standing with the Kansas Secretary of State's office to do business in Kansas. Applicant's mailing address is 2 Northpoint Drive, Suite 800, Houston, Texas, 77060.
2. The Commission has issued Applicant oil and gas operator's License No. 35820, which license is in full force and effect through March 30, 2026.
3. Applicant is the owner and operator of the Girod #1 well, API No. 15-035-24553-0000 ("Subject Well") located in the NW/4 NW/4 NW/4 of Section 17-T32S-R7E, Cowley County, Kansas.
4. The Subject Well was shut-in on or about May 20, 2015. Applicant, or its predecessors in interest, have maintained TA status for the Subject Well since that time.

5. On February 7, 2025, Commission staff granted Applicant's Temporary Abandonment Application for the Subject Well. In the letter attached thereto, Commission staff advised Applicant that TA status for the Subject Well would expire May 20, 2025. The May 20, 2025 expiration date in said letter is 10 years from the original shut-in date of the Subject Well. On May 14, 2025, Applicant timely submitted the Application filed in this docket seeking an exception to the 10-year time limit on temporary abandonment status for the Subject Well. This First Amended Application is filed in replacement of the original Application to provide additional information requested by Commission staff to support the exception requested herein.

6. K.A.R. 82-3-111 imposes a 10-year limitation on the amount of time during which a well may be temporarily abandoned. K.A.R. 82-3-111(b) provides that an exception to this 10-year limitation may be obtained, provided an application seeking such an exception is filed pursuant to K.A.R. 82-3-100(b). The Application, as amended and replaced by this First Amended Application, seeks such an exception for the Subject Well.

7. On May 13, 2025, the Subject Well passed a Commission staff-witnessed mechanical integrity test of the casing between the surface and a point within 50' above the uppermost perforation in the well.

8. Applicant wishes to continue the temporary abandonment status for the Subject Well so that it may be recompleted as a producer of oil, and if such recompletion efforts are not successful, to convert the Subject Well into a disposal well.

9. Applicant has evaluated the information and data obtained during the drilling and completion of the Subject Well, and believes that potentially 35,000 BO may be recovered therefrom, which belief is based in part on local decline curve analysis. During the original completion of the Subject Well several pay zones were tested and treated for completion before

the Subject Well was ultimately completed in the Lansing formation. The Mississippi formation was completed with a frac, and Applicant believes the Subject Well can be recompleted in the Mississippi for production of oil reserves. The estimated cost to recomplete the Subject Well in the Mississippi formation, and to equip the well for production is \$50,000. Accordingly, the value of potential oil reserves that could be recovered from recompletion operations far exceeds the cost of plugging the Subject Well. As such, granting this Application will prevent waste and protect correlative rights. In the event recompletion operations are not successful, the Subject Well will be evaluated for conversion into a disposal well.

10. As demonstrated by the MIT recently conducted, the Subject Well has satisfactory mechanical integrity and does not present a threat to fresh water. The estimated cost to plug and abandon the Subject Well is approximately \$18,000. The estimated oil reserves that can be recovered through recompletion operations exceeds the cost to plug and abandon the Subject Well many times over.

11. Attached as Exhibit A is a plat map showing the location of all producing, injection, temporarily abandoned, abandoned, and plugged wells located on the Lease.

12. For the foregoing reasons, Applicant requests that the Commission grant an exception to the 10-year time limitation for temporary abandonment status set forth in K.A.R. 82-3-111, specifically to allow the Subject Well to remain eligible for temporary abandonment status for three years following the expiration of the 10-year limitation. While the Subject Well remains shut-in during such three-year period, Applicant will continue to annually submit temporary abandonment applications.

13. A list of each operator and owner of unleased minerals, other than Applicant, within 1/2-mile of the Subject Well ("Offsets") is attached as Exhibit B. A copy of the Application and

the Notice of Application was mailed to each Offset in connection with the original filing. Notice of Application has been published in the *Wichita Eagle* and the *Cowley Courier Traveler*, the official newspaper for Cowley County, Kansas. As a result, notice complies with the requirements of K.A.R. 82-3-135a, and is lawful and proper in all respects.

14. The protest period expired for the Application expired June 6, 2025. One protest was docketed, however, the protester failed to appear at the prehearing conference, and is in default by order of the Presiding Officer. Accordingly, that protest can be shown as withdrawn and this matter is ripe for adjudication.

WHEREFORE Applicant requests that the Commission administratively grant the Application, as amended and replaced by this First Amended Application, and issue an order granting an exception to the 10-year time limitation prescribed by K.A.R. 82-3-111, and allow the Subject Well to remain temporarily abandoned for three additional years, subject to annual approval by the applicable Conservation Division District Office, and to provide for such other and further as it deems necessary and proper.

Respectfully submitted,

MORRIS LAING LAW FIRM

By: 

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*Attorneys for Thresher Energy, Inc.*

**VERIFICATION**

STATE OF KANSAS            )  
  ) ss:  
COUNTY OF SEDGWICK    )

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

That he is the attorney for Thresher Energy, Inc.; he has read the above and forgoing First Amended Application and is familiar with the 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 22<sup>nd</sup> day of July, 2025.

  
Notary Public

My Appointment expires: 11/05/2028

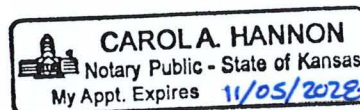
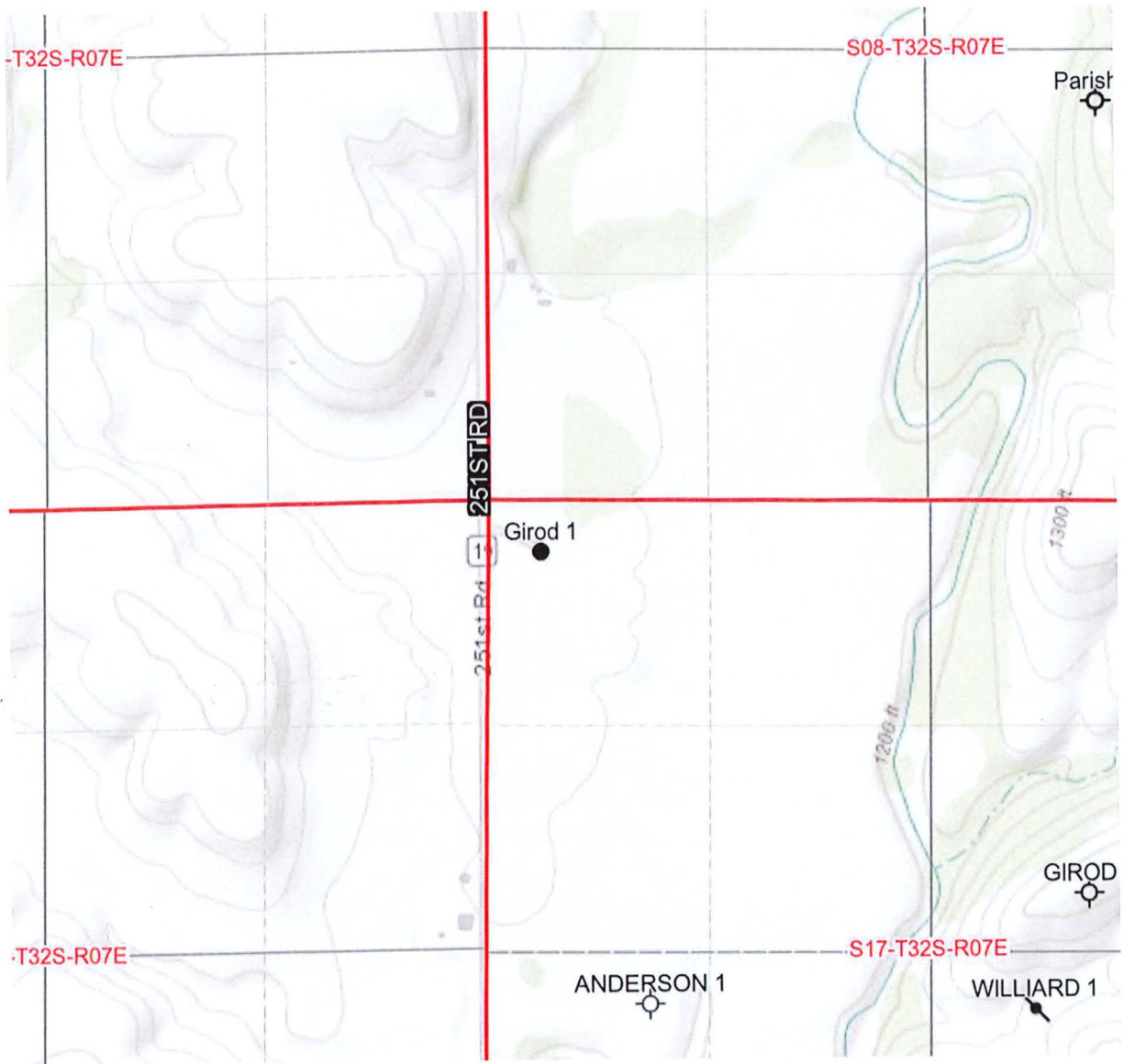


EXHIBIT A

Plat



## **EXHIBIT B**

### Offsets

Marilyn Trimmell, Marilyn Baxter (Girod)  
Justin and Lisa Trimmell  
P. O. Box 788  
Andover, KS 67202

Max D. Lawrence Revocable Living Trust  
15315 251<sup>st</sup> Road  
Cambridge, KS 67023

Parish Farms, LLC  
Attn: William Scott  
27 Drummore Dr.  
Bella Vista, AR 72715

James V. & Misti A. Wallingford Revocable Trust  
14827 251<sup>st</sup> Rd.  
Cambridge, KS 67203

Bruce Daniel Storm, Jr.  
& Susan K. Storm  
P. O. Box 824  
Elk City, OK 73648

Sue Karol Storm Roach &  
Greg Roach  
1746 S. Yorktown Ave.  
Tulsa, OK 74104

**CERTIFICATE OF SERVICE**

I certify that on this 22<sup>nd</sup> day of July, 2025, I caused the original of the foregoing First Amended Application and its Exhibits A and B to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and true and correct copies of the same to be mailed by United States Postal Service, first class mail, postage prepaid, to the persons identified below.

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Jonathan A. Schlatter