

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

In the matter of the Application of Oil Producers, ) Docket No. 20-CONS-<sup>3080</sup>-CEXC  
Inc. of Kansas for an exception to the 10-year )  
time limitation of K.A.R. 82-3-11 for its ) CONSERVATION DIVISION  
Keller #1B SWD well located in the SW/4 of )  
Section 24, Township 33 South, Range 32 West, ) License No.: 8061  
Seward County, Kansas.)

**APPLICATION**

COMES NOW Oil Producers Inc., of Kansas (“Applicant”) in support of its Application in the captioned matter and states as follow:

1. Applicant is a Corporation, authorized to do business in the State of Kansas at 1710 Waterfront Parkway, Wichita, KS 67206.
2. Applicant has been issued by the Kansas Corporation Commission Operator’s License 8061, which expires January 30, 2020.
3. Applicant is the owner and operator of the Keller #1B SWD well, API # 15-175-10010-00-01 (“subject well”), which is located in the Southeast Quarter of the Northeast Quarter of the Northeast Quarter of the Southwest Quarter (SE NE NE SW) of Section 24, Township 33 South, Range 32 West, Seward County, Kansas. The subject well is located on an active oil and gas lease or unit comprising the following lands:  
  
All of Section 13, Township 31 South, Range 32 West, Seward County, Kansas.
4. Pursuant to K.A.R. 82-3-111, the well was shut in, or Applicant obtained temporary abandonment status, for the subject well on January 1, 2009. The subject well has maintained such status from January 1, 2009 the present date.
5. On or about April 2, 2019, the Kansas Corporation Commission notified Applicant temporary abandonment status for the subject well would be denied from and after April 20, 2019, because subject well has been temporarily abandoned for more than ten (10) years.
6. K.A.R. 82-3-11 imposes a 10-year limitation on the amount of the 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. The subject well demonstrated mechanical integrity as evidenced by passage of Commission Staff-witnessed mechanical integrity test on September 14, 2018.

8. Operator is keeping the subject well for future use as a salt water disposal well. Operator feels that having to plug the subject well would create an unnecessary economic hardship based on current depressed oil prices and the number of wells the operator has been required to plug in recent months.

Apart from the economic waste of plugging subject well, there is absolutely no basis to believe that this well poses any environmental risk since the Commission Staff witnessed consecutive successful MITs over the past 10 year, including the last successful MIT.

Estimated cost to plug this well would be \$20,000.00. The cost to replace the well is estimated to be \$200,000.

9. Applicant has included a plat map showing the locations of all producing, injection, temporarily abandoned, abandoned, and plugged wells located on the same leased premises as the subject well.
10. 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 the approval of an application for temporary abandonment status.
11. Listed in the attached Exhibit "A 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).
12. Notice of this Application will be published pursuant to K.A.R. 82-3-135a. In addition, notice of the hearing to 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,

Oil Producers Inc. of Kansas  
1710 Waterfront Parkway  
Wichita, KS 67206  
Phone: (316)681-0231  
Fax: (316) 682-3136



Melody C. Fletcher, Chief Operating Officer

**EXHIBIT "A"**

**NW/4 Sec. 24-33S-32W Less R/W Unleased mineral owner**

Rice Davies Trust  
19510 Road 13  
Liberal, KS 67901

**NE/4 Sec. 24-33S-32W Less R/W Unleased mineral owner**

James R. Floyd  
P.O. Box 1549  
Liberal, KS 67905

**N/2 SW/4 Sec. 24-33S-32W Operator**

KPL NGL Pipeline LP  
100 W 5<sup>th</sup> St.  
Tulsa, OK 74103

**S/2 W/2 SW/4 Sec. 24-33S-32W Operator**

Panhandle Eastern Pipeline  
1900 Dalrock Road  
Rowlett, TX 75088

**E/2 SW/4 & SE/4 Sec. 24-33S-32W Unleased mineral owner**

Michael & Shirley Childers  
P.O. Box 992  
Cripple Creek, CO 80813

Keller #1B SWD Sec. 24-33S-32W Seward Co., KS

