



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

Phone: 316-337-6200  
Fax: 346-337-6211  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

**NOTICE OF PENALTY ASSESSMENT**  
20-CONS-3130-CPEN

November 5, 2019

Calvin R. Hullum Jr.  
Bengalia Land and Cattle Company  
PO Box 521008  
Tulsa, OK 74152-1008

This is a notice of a penalty assessment for violation(s) of Kansas Oil and Gas Conservation Statutes, Rules, and Regulations. For a full description of the penalty and process please refer to the Penalty Order that is attached to this notice.

**IF YOU ACCEPT THE PENALTY:**

You have been assessed a \$600 penalty. You have 30 days from the service date of this Penalty Order to pay the fine amount. Check or money order must be made payable to the Kansas Corporation Commission and mailed to the Conservation Division of the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The payment must include a reference to the docket number of this proceeding. Payment by credit card may be made by calling the Conservation Division at 316-337-6200.

**IF YOU CONTEST THE PENALTY:**

You have the right to request a hearing. A written request for hearing must be made within 30 days after service of the Penalty Order setting forth the specific grounds upon which relief is sought. Respondent must submit the request to the Commission, at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The Commission shall conduct a hearing in accordance with the provisions of the Kansas administrative procedure act within 30 days after receipt of such request. K.S.A. 55-164; K.S.A. 77-542; K.A.R. 82-1-215.

**IF YOU FAIL TO ACT:**

Failure to pay the fine amount, or in the alternative, provide a written request for a hearing, within thirty (30) days of service of the Penalty Order, will result in the attached Penalty Order becoming a Final Order and may result in additional sanctions, including additional monetary penalties, the suspension of your oil and gas operating license, and the shutting-in of all operations until compliance is obtained. K.S.A. 55-164; K.S.A. 77-537.

Respectfully,

Michael Glamann  
Litigation Counsel  
316-337-6200

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

Before Commissioners:           Dwight D. Keen, Chair  
  Shari Feist Albrecht  
  Susan K. Duffy

In the matter of the failure of Bengalia Land and Cattle Company (“Operator”) to comply with K.A.R. 82-3-111 at the K and G #1-27, Mott Trust #1-26, De Chant #2, Maxine #1-30, Nichols #2-32 and Wedel Trust 33 #3-33 in Finney County and Gray County, Kansas.	)	Docket No.: 20-CONS-3130-CPEN
	)	CONSERVATION DIVISION
	)	License No.: 33989
	)	

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**PENALTY ORDER**

The above captioned matter comes before the State Corporation Commission of the State of Kansas (Commission). Having examined the files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

**I. JURISDICTION**

1. The Commission has the exclusive jurisdiction and authority to regulate oil and gas activities in Kansas.<sup>1</sup> The Commission has jurisdiction to regulate the “construction, operation, and abandonment of any well and the protection of the usable water of this state from any actual or potential pollution from any well.”<sup>2</sup> Every operator conducting oil and gas activity in Kansas must be licensed by the Commission.<sup>3</sup>

2. The Commission has the authority to issue a Penalty Order for violation of any provision of K.S.A. 55-101 *et seq.*, rule, regulation, or order of the Commission.<sup>4</sup> The Commission shall take appropriate action which may include, but not be limited to, imposing a

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<sup>1</sup> K.S.A. 74-623.

<sup>2</sup> K.S.A. 55-152.

<sup>3</sup> K.S.A. 55-155.

<sup>4</sup> K.S.A. 55-162; K.S.A. 55-164.

monetary penalty “not to exceed \$10,000, which shall constitute an actual and substantial economic deterrent to the violation for which the penalty is assessed.”<sup>5</sup> “In the case of a continuing violation, every day such violation continues shall be deemed a separate violation.”<sup>6</sup>

3. Within 90 days after operations cease on any well drilled for the purpose of exploration, discovery, service, or production of oil, gas, or other minerals, the operator of that well shall: (1) plug the well, (2) return the well to service, or (3) file an application with the Conservation Division requesting temporary abandonment (“TA”) authority, on a form prescribed by the Conservation Division.<sup>7</sup> No well shall be temporarily abandoned unless first approved by the Conservation Division.<sup>8</sup> A well shall not be eligible for TA status if the well has been shut in for 10 years or more without an application for an exception pursuant to K.A.R. 82-3-100 and approval by the Commission.<sup>9</sup> The failure to file a notice of temporary abandonment shall be punishable by a \$100 penalty,<sup>10</sup> and the failure to obtain approval of temporary abandonment status shall subject the operator to additional administrative action.<sup>11</sup>

4. K.A.R. 82-3-111(e) provides an exemption for certain wells that are (1) fully equipped for production of oil or gas or for injection; (2) capable of immediately resuming production of oil or gas or of injection; (3) subject to a valid continuing oil and gas lease; when (4) the cessation period for the well is less than 365 days; and (5) the well is otherwise in full compliance with all of the Commission’s regulations.

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<sup>5</sup> K.S.A. 55-164.

<sup>6</sup> *Id.*

<sup>7</sup> *See* K.A.R. 82-3-111(a).

<sup>8</sup> K.A.R. 82-3-111(b).

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> K.S.A. 55-164; K.A.R. 82-3-111(b).

## II. FINDINGS OF FACT

5. Operator conducts oil and gas activities in Kansas under active license number 33989.

6. Operator is responsible for the care and control of the following wells (“the subject wells”).

- a. K and G #1-27, API #15-055-21988-00-00, Section 27, Township 26 South, Range 31 West, Finney County, Kansas;
- b. Mott Trust #1-26, API #15-055-21994-00-00, Section 26, Township 26 South, Range 31 West, Finney County, Kansas;
- c. De Chant #2, API #15-069-20298-00-00, Section 6, Township 25 South, Range 30 West, Gray County, Kansas;
- d. Maxine #1-30, API #15-069-20316-00-00, Section 32, Township 27 South, Range 30 West, Gray County, Kansas;
- e. Nichols #2-32, API #15-069-20325-00-00, Section 32, Township 27 South, Range 30 West, Gray County, Kansas; and
- f. Wedel Trust 33 #3-33, API #15-069-20480-00-00, Section 33, Township 26 South, Range 30 West, Gray County, Kansas.

7. On August 6, 2019, Commission records indicated that the K and G #1-27 had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111 and that the well was not exempt pursuant to K.A.R. 82-3-111(e). The well had also not been approved for temporary abandonment status. Thus, District Staff sent a letter to Operator, requiring

Operator to bring the subject well into compliance with K.A.R. 82-3-111 by September 3, 2019.<sup>12</sup>

8. On August 20, 2019, Commission records indicated that the Mott Trust #1-26, De Chant #2, Maxine #1-30, Nichols #2-32, and Wedel Trust 33 #3-33 had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111 and that the wells were not exempt pursuant to K.A.R. 82-3-111(e). Operator had applied for temporary abandonment status but the Mott Trust #1-26 was denied because it has reached the 10-year time limit of K.A.R. 82-3-111. The De Chant #2, Maxine #1-30, Nichols #2-32, and Wedel Trust 33 #3-33 were denied temporary abandonment status because Operator lacks a valid oil and gas lease. Thus, District Staff sent a letter to Operator, requiring Operator to bring the subject wells into compliance with K.A.R. 82-3-111 by September 17, 2019.

9. On October 9 and 11, 2019, District Staff inspected the subject wells, because the deadline in the letters had passed and the violations had not been resolved, verifying that the wells continued to be inactive and unplugged.<sup>13</sup>

### **III. CONCLUSIONS OF LAW**

10. The Commission concludes that it has jurisdiction over Operator and this matter under K.S.A. 55-152 and K.S.A. 74-623.

11. The Commission concludes Operator committed six violations of K.A.R. 82-3-111 because the subject wells have been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.<sup>14</sup>

#### **THEREFORE, THE COMMISSION ORDERS:**

A. Operator shall pay a \$600 penalty.

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<sup>12</sup> Exhibit A.

<sup>13</sup> Exhibit B.

<sup>14</sup> K.S.A. 55-164; K.A.R. 82-3-111(b).

B. Operator shall plug the subject wells, or return the wells to service, or obtain TA status for the wells if eligible. Obtaining TA status shall include application for, and Commission approval of, an exception to the 10-year limit on TA status if applicable.

C. If no party requests a hearing, and Operator is not in compliance with this Order within 30 days from the date of service of this Order, then Operator's license shall be suspended without further notice. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding license suspension. The Commission may impose further sanctions, including additional monetary penalties and any other remedies available to the Commission by law, without further notice.

D. Checks and money orders shall be payable to the Kansas Corporation Commission. Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The payment must include a reference to the docket number of this proceeding. Credit card payments may be made by calling the Conservation Division at 316-337-6200.

E. Any party may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, setting forth the specific grounds upon which relief is sought, to the Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. Hearings will be scheduled only upon written request. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing.

F. A corporation shall appear before the Commission by a Kansas licensed attorney.<sup>15</sup>

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<sup>15</sup> K.S.A. 77-515(c); K.A.R. 82-1-228(d)(2).

G. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further orders as it may deem necessary.

**BY THE COMMISSION IT IS SO ORDERED.**

Keen, Chair; Albrecht, Commissioner; Duffy, Commissioner

Dated: 11/05/2019



\_\_\_\_\_  
Lynn M. Retz  
Executive Director

Mailed Date: 11/05/2019

JMG



Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

BENGALIA LAND AND CATTLE COMPANY  
PO BOX 521008  
TULSA OK,74152

August 06, 2019  
KCC Lic. 33989

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-055-21988-00-00  
K AND G 1-27  
27-26S-31W, NWNWSW  
FINNEY County, Kansas

Operator:

On August 06, 2019, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by SEPTEMBER 03, 2019  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
MICHAEL MAIER  
KCC District # 1



Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

August 20, 2019

CALVIN HULLUM JR  
Bengalia Land and Cattle Company  
PO BOX 521008  
TULSA, OK 74152-1008

Re: Temporary Abandonment  
API 15-055-21994-00-00  
MOTT TRUST 1-26  
NE/4 Sec.26-26S-31W  
Finney County, Kansas

Dear CALVIN HULLUM JR:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reason(s):

**Shut-in Over 10 years**

Pursuant to K.A.R. 82-3-111, the well must be plugged or returned to service by September 17, 2019.

If you wish to instead file an application for an exception to the 10-year limitation of K.A.R. 82-3-111, demonstrating why it is necessary to TA the well for more than 10 years, then you must file the application for an exception by September 17, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Michael Maier  
KCC DISTRICT 1

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

August 20, 2019

DAVID HULLUM  
Bengalia Land and Cattle Company  
PO BOX 521008  
TULSA, OK 74152-1008

Re: Temporary Abandonment  
API 15-069-20298-00-00  
DE CHANT 2  
NE/4 Sec.06-25S-30W  
Gray County, Kansas

Dear DAVID HULLUM:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**Lack of Lease**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by September 17, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Michael Maier  
KCC DISTRICT 1

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

August 20, 2019

CALVIN R HULLUM JR  
Bengalia Land and Cattle Company  
PO BOX 521008  
TULSA, OK 74152-1008

Re: Temporary Abandonment  
API 15-069-20316-00-00  
MAXINE 1-30  
NE/4 Sec.30-27S-30W  
Gray County, Kansas

Dear CALVIN R HULLUM JR:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**Lack of Lease**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by September 17, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Michael Maier  
KCC DISTRICT 1

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

August 20, 2019

CALVIN R. HULLUM JR  
Bengalia Land and Cattle Company  
PO BOX 521008  
TULSA, OK 74152-1008

Re: Temporary Abandonment  
API 15-069-20325-00-00  
NICHOLS 2-32  
NW/4 Sec.32-27S-30W  
Gray County, Kansas

Dear CALVIN R. HULLUM JR:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**Lack of Lease**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by September 17, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Michael Maier  
KCC DISTRICT 1

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-682-7933  
<http://kcc.ks.gov/>

Dwight D. Keen, Chair  
Shari Feist Albrecht, Commissioner  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

August 20, 2019

CALVIN R HULLUM JR  
Bengalia Land and Cattle Company  
PO BOX 521008  
TULSA, OK 74152-1008

Re: Temporary Abandonment  
API 15-069-20480-00-00  
WEDEL TRUST 33 3-33  
SE/4 Sec.33-26S-30W  
Gray County, Kansas

Dear CALVIN R HULLUM JR:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**Lack of Lease**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by September 17, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Michael Maier  
KCC DISTRICT 1

KCC OIL/GAS REGULATORY OFFICES

Date: 10/11/19

District: 01

Case #: \_\_\_\_\_

New Situation

Lease Inspection

Response to Request

Complaint

Follow-Up

Field Report

Operator License No: 33989

API Well Number: 15-055-21988-00-00

Op Name: Bengalia Land and Cattle Co.

Spot: NW NW SW Sec 27 Twp 26 S Rng 31  E /  W

Address 1: PO Box 521008

2342 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

4943 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.75757 Long: 100.70566 Date: 10/11/19

State: Okla Zip Code: 74152 -

Lease Name: K&G Well #: 1-27

Operator Phone #: 918 587 8022

County: Finney

Reason for Investigation:

Check status of gas well

Problem:

No response to NOV letter dated 8-6-19 for failure to TA. Deadline was 9-3-19. Last KGS gas production 6/14

Persons Contacted:

None

Findings:

Pumping unit w/ elec motor. Power shut off. Meter run 40' east. No active chart. Battery dead. Don't see a water tank.

Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ 2 pics

Verification Sources:

Photos Taken: Yes 2

<input checked="" type="checkbox"/> RBDMS	<input checked="" type="checkbox"/> KGS	<input checked="" type="checkbox"/> TA Program
<input type="checkbox"/> T-I Database	<input type="checkbox"/> District Files	<input type="checkbox"/> Courthouse
<input type="checkbox"/> Other: _____		

By: Ken Jehlik  
ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

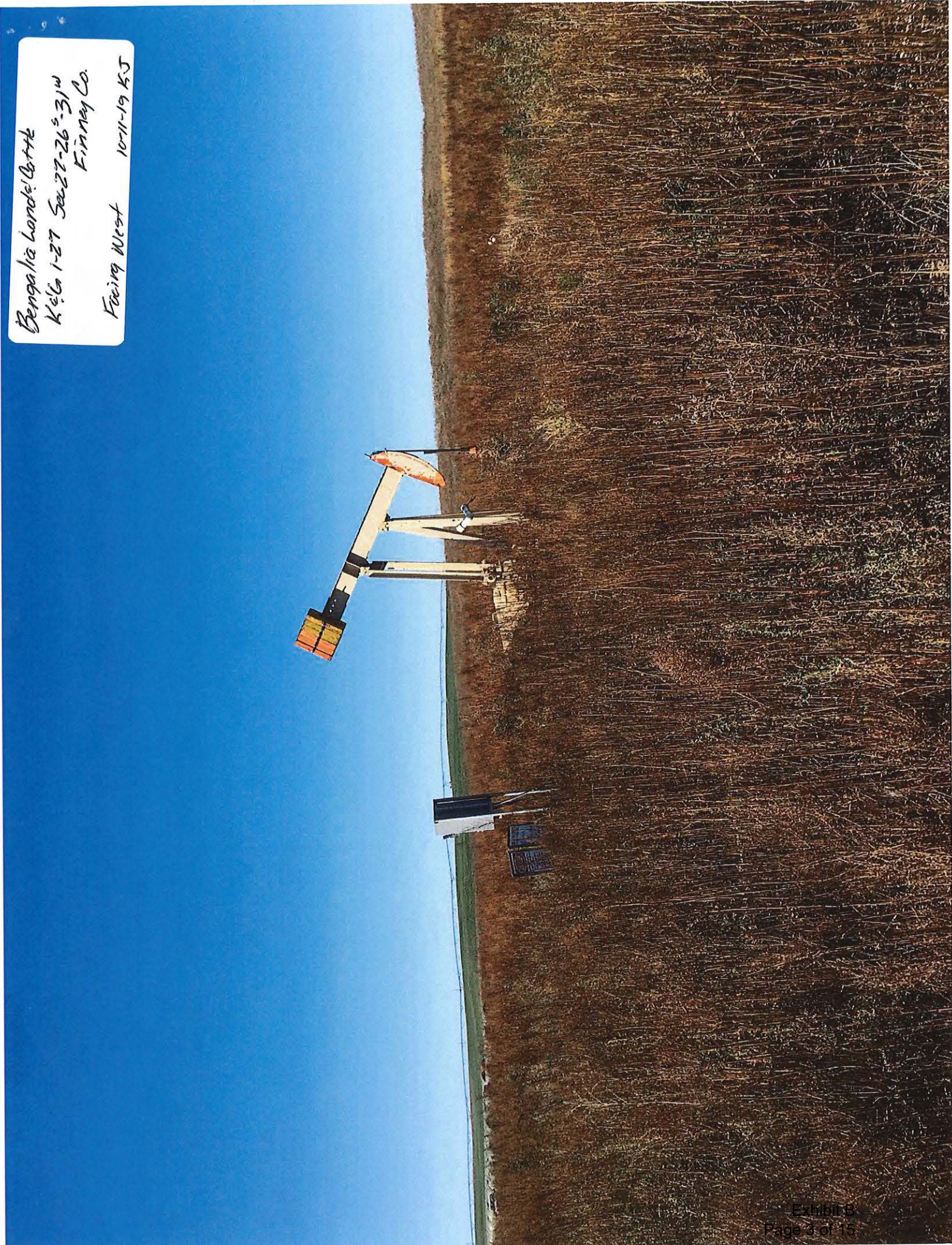
Form: 02/22/2008

Bengalia Laird & Co  
K 61-27 Sec 27-26-31W  
Finnery Co  
Inactive meter run  
chart  
10-11-19 KJ

DALE ANN ENTERPRISES  
1001 165-3RD SW  
MUSKOGEE, AL 36455



Bengalia Land Co LLC  
K&G 1-27 Sec 27-26<sup>s</sup>-31<sup>w</sup>  
Finney Co.  
Facing West 10-11-19 KJ





KCC OIL/GAS REGULATORY OFFICES

Date: 10/09/19

District: 01

Case #: \_\_\_\_\_

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 33989

API Well Number: 15-055-21994-00-00

Op Name: Bengalia Land and Cattle Co

Spot: SW SW NE Sec 26 Twp 26 S Rng 31  E /  W

Address 1: PO Box 521008

3000 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

2263 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.75925 Long: 100.67824 Date: 10/9/19

State: Okla Zip Code: 74152 -

Lease Name: Mott Trust Well #: 1-26

Operator Phone #: 918 587 8022

County: Finney

Reason for Investigation:

Check gas well status

Problem:

No response to denied TA NOV letter for the well being shut in over 10 years dated 8-20-19. Well was shut in 2-1-09

Persons Contacted:

None

Findings:

Pumping unit w/ elec motor. Power shut off. Meter run 35' south. No chart on recorder. Two 210 bbl covered FG water tank 1400' SW

Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ pics

Verification Sources:

Photos Taken: Yes 2

- RBDMS
- T-I Database
- Other: \_\_\_\_\_
- KGS
- District Files
- TA Program
- Courthouse

By: Ken Jehlik

PIRT 2  
ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

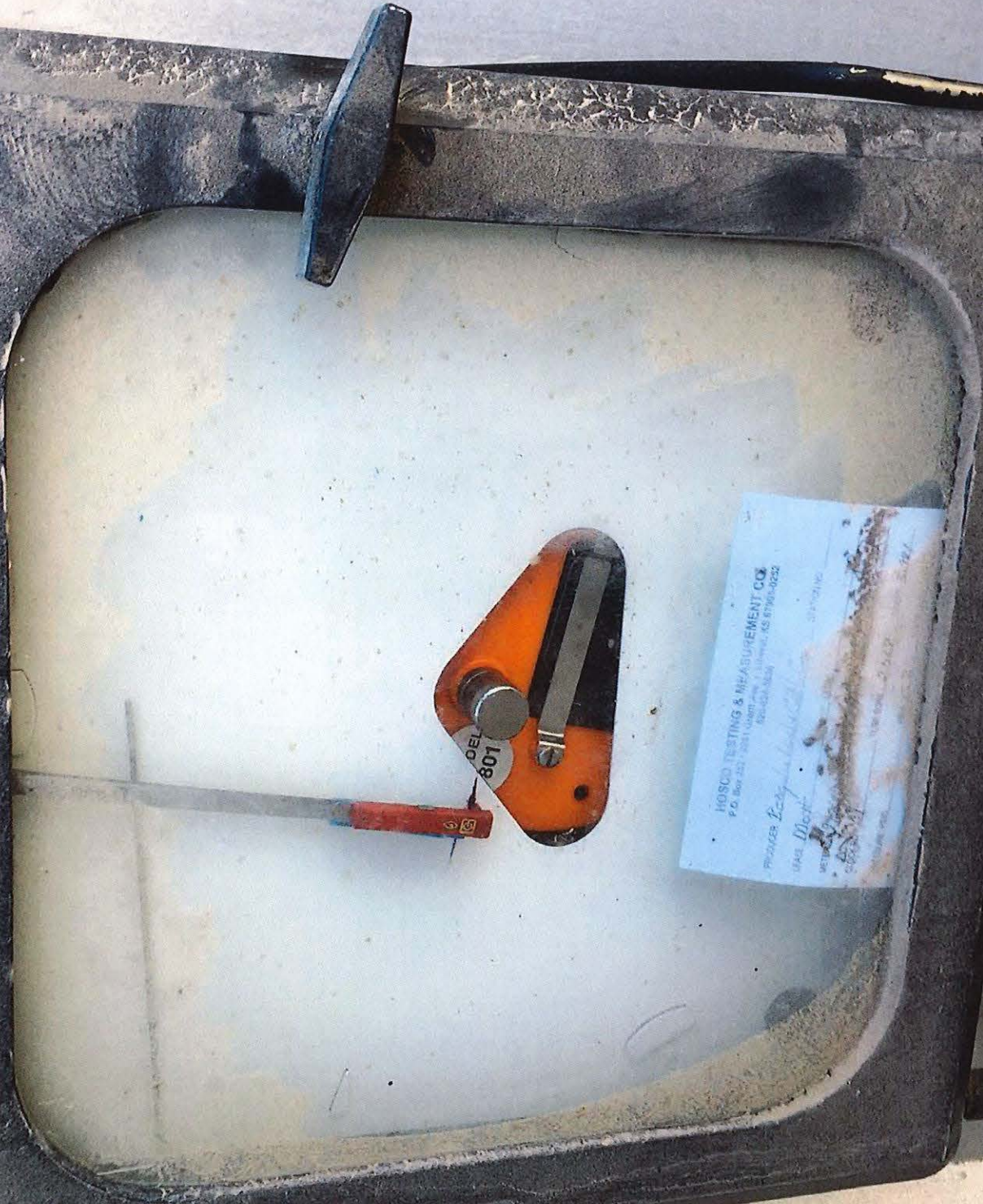
JA

Form: 02/22/2008

Bergeria Land & Co. Hk 10-9-1915  
Mott Trust 1-26  
NE Sec 26-26-31 Finney Co  
Facing west.



Bungalia Level's Cattle 10-9-19 KJ  
Mont Trust-26  
NE Sec 2626-31 Finney Co  
No chart on meter run recorder



HOSCO TESTING & MEASUREMENT CO.  
P.O. Box 221, 2011 Union Ave., Lincoln, NE 68501-0221  
Lincoln, NE  
PRICES Vary with Market  
MAIL Dept  
WEIGHTS & MEASUREMENTS  
CLASSIFIED  
10/11/19

KCC OIL/GAS REGULATORY OFFICES

Date: 10/09/19

District: 01

Case #: \_\_\_\_\_

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 33989

API Well Number: 15-069-20298-00-00

Op Name: Bengalia Land and Cattle Co

Spot: NW SE NE Sec 6 Twp 25 S Rng 30  E /  W

Address 1: PO Box 521008

3309 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

958 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.91010 Long: 100.65005 Date: 10/9/19

State: Okla Zip Code: 74152 -

Lease Name: Dechant Well #: 2

Operator Phone #: 918 587 8022

County: Gray

Reason for Investigation:

Check gas well status

Problem:

No response to denied TA NOV "lack of lease" letter dated 8-20-19.

Persons Contacted:

Earl Ochenpaugh--pumper

Findings:

Pumping unit w/ elec motor. Power off.  
200 bbl FG water tank 1400' NE  
No meter run assigned to the well was ever installed. Gas went to a master meter along with several other wells.

Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ pic

Verification Sources:

Photos Taken: yes 1

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> RBDMS | <input checked="" type="checkbox"/> KGS | <input checked="" type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database     | <input type="checkbox"/> District Files | <input type="checkbox"/> Courthouse            |
| <input type="checkbox"/> Other: _____     |   |  |

By: Ken Jehlik

PIRT 2  
EGRS

JK

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/22/2008



Ensignia Land Co. (A) 10-9-19 15.5  
Declin 2 NE Sec 6 25-30' Gray C  
Facing north  
There is no eyes meter run for this  
905 well.

KCC OIL/GAS REGULATORY OFFICES

Date: 10/11/19

District: 01

Case #: \_\_\_\_\_

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 33989

API Well Number: 15-069-20316-00-00

Op Name: Bengalia Land and Cattle Co

Spot: NW NW NE Sec 30 Twp 27 S Rng 30  E /  W

Address 1: PO Box 521008

4966 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

2298 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.67743 Long: 100.64215 Date: 10/11/19

State: Okla Zip Code: 74152 -

Lease Name: Maxine Well #: 1-30

Operator Phone #: 918 587 8022

County: Gray

Reason for Investigation:

Check oil well status

Problem:

No response to denied NOV letter for "lack of lease" dated 8-20-19. Deadline was 9-17-19.

Persons Contacted:

None

Findings:

Well head with tbg & rods in the hole. Not connected to any sales line. No pumping unit, stock tanks or water tank.

Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ pics

Verification Sources:

Photos Taken: Yes 1

- RBDMS
- T-I Database
- Other: \_\_\_\_\_
- KGS
- District Files
- TA Program
- Courthouse

By: Ken Jehlik  
ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

SA

Form: 02/22/2008

Bengalia Land & Cattle Co  
Maxine 1-30 Sec 30-27S-30W  
Gray Co  
Facing South 10-11-19 KJ



KCC OIL/GAS REGULATORY OFFICES

Date: 10/11/19

District: 01

Case #: \_\_\_\_\_

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 33989

API Well Number: 15-069-20325-00-00

Op Name: Bengalia Land and Cattle Co

Spot: NW NW NW Sec 32 Twp 27 S Rng 30  E /  W

Address 1: PO Box 521008

4983 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

4814 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.66295 Long: 100.63265 Date: 10/11/19

State: Okla Zip Code: 74152 -

Lease Name: Nichols Well #: 2-32

Operator Phone #: 918 587 8022

County: Gray

Reason for Investigation:

Check status of oil well

Problem:

No response to denied NOV TA letter for "lack of lease" dated 8-20-19. Deadline was 9-17-19.

Persons Contacted:

None

Findings:

Well head w/ 2 3/8 tbg. No rods, pumping unit or tank battery.  
Not connected to any sales line.  
Wrong lease sign at well.

Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ picture.

Verification Sources:

Photos Taken: Yes 1

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> RBDMS | <input checked="" type="checkbox"/> KGS | <input checked="" type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database     | <input type="checkbox"/> District Files | <input type="checkbox"/> Courthouse            |
| <input type="checkbox"/> Other: _____     |   |  |

By: Ken Jehlik  
FCRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

*JK*

Form: 02/22/2008



Bengo via Landa's Office  
Nichols 2-32  
Sec 32-27-300 Gray Co  
Facing South 10/11-19 KJ



# KCC OIL/GAS REGULATORY OFFICES

Date: 10/11/19

District: 01

Case #: \_\_\_\_\_

- New Situation
- Response to Request
- Follow-Up

- Lease Inspection
- Complaint
- Field Report

Operator License No: 33989

API Well Number: 15-069-20480-00-00

Op Name: Bengalia Land and Cattle Co.

Spot: SE SE SE Sec 33 Twp 26 S Rng 30  E /  W

Address 1: PO Box 521008

465 Feet from  N /  S Line of Section

Address 2: \_\_\_\_\_

320 Feet from  E /  W Line of Section

City: Tulsa

GPS: Lat: 37.73787 Long: 100.59871 Date: 10/11/19

State: Okla Zip Code: 74152

Lease Name: Wedel Trust Well #: 3-33

Operator Phone #: 918 587 8022

County: Gray

### Reason for Investigation:

Check well status

### Problem:

No response to NOV letter for denied TA due to "lack of lease" dated 8-20-19. Deadline was 9-17-19

### Persons Contacted:

None

### Findings:

Pumping unit w/ gas engine. Down.  
Tank Battery:  
Two 200 bbl steel stock tanks  
One FG gun bbl  
One 200 bbl covered FG water tank.

### Action/Recommendations:

Follow Up Required  Yes  No

Date: \_\_\_\_\_

Send to legal w/ pics

### Verification Sources:

Photos Taken: Yes 2

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> RBDMS | <input checked="" type="checkbox"/> KGS | <input checked="" type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database     | <input type="checkbox"/> District Files | <input type="checkbox"/> Courthouse            |
| <input type="checkbox"/> Other: _____     |   |  |

By: Ken Jehlik  
ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

*JA*

Form: 02/22/2008

Bengalia Land & Cattle  
Wedel Trust 3-33  
Sec 33 #265-300 Gray Co  
Facing east 10-11-19 KJ



Bengalia Land & Cattle  
Wedel Trust 3-33  
Sec 33 - 26<sup>s</sup> - 30<sup>w</sup> Gray Co  
Facing west 10-11-1910



**CERTIFICATE OF SERVICE**

20-CONS-3130-CPEN

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of first class mail and electronic service on 11/05/2019.

MICHAEL GLAMANN, LITIGATION COUNSEL  
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CALVIN R. HULLUM JR  
BENGALIA LAND AND CATTLE COMPANY  
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/S/ DeeAnn Shupe  
\_\_\_\_\_  
DeeAnn Shupe