

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

Before Commissioners:      Shari Feist Albrecht, Chair  
                                 Jay Scott Emler  
                                 Dwight D. Keen

In the Matter the Application of IGWT,      )	Docket No: 18-CONS-3383-CWLE
Inc., for the assignment of and a location      )	
exemption for the Varner Farms #1 located      )	CONSERVATION DIVISION
990' FNL and 1500' FWL of Section 33,      )	
Township 25 South, Range 4 East, Butler      )	License No: 3167
County, Kansas.      )	

**PREFILED TESTIMONY OF KENTON L. HUPP II**  
**ON BEHALF OF IGWT, INC.**

- 1    Q:    Would you please state your name, position, employer, and office address?
- 2    A:    My name is Kenton L. Hupp, II. I am employed by IGWT, Inc., as a petroleum geologist
- 3            and also as Chief Operations Officer, performing various functions with the company
- 4            involving drilling locations and preparations for wells. My business office address is 218
- 5            W. Young, Rose Hill, Kansas, mailing address of PO Box 550, Rose Hill, Kansas 67133-
- 6            0550.
- 7    Q:    Would you please relate your educational background?
- 8    A:    I received a Bachelor of Arts in General Marketing from Wichita State University in 1999
- 9            and a Bachelor of Science degree in geology in 2014 from Wichita State University.
- 10   Q:    Are you familiar with the surface topography in the area encompassed by this application:
- 11   A:    Yes, I have personally inspected and photographed the area.
- 12   Q:    What has been your involvement in this Application?

1 A: IGWT, Inc., has an oil and gas lease covering the intended drill site in the NE/4 NW/4 of  
2 Section 33, Township 25 South, Range 4 East. When the lease was obtained, the landowner  
3 informed us that the area in which we were planning to drill was a draw and drainage area.  
4 I inspected the area personally and it was clear that our original drill site would be located  
5 within a drainage area that extended a considerable distance to the East as well, and that  
6 any drainage would flow right through the planned location, with possible detrimental  
7 impact on a future producing well site, which we were concerned might also have a bad  
8 effect on some ponds on the adjacent property to the South.

9 Q: Did you reach a conclusion from this inspection?

10 A: Yes.

11 Q: Can you explain your conclusion?

12 A: Yes. It was our conclusion that it would be best to move the drill site out of the drainage  
13 area, either East or West, and that moving the drill site West would be preferable.

14 Q: Why West?

15 A: Because of the East-West width of the drainage area, to be clear of it we would have to  
16 move a considerable distance East, and our geologic information indicated that the farther  
17 we might move East, the greater the chance that we would find the Mississippian Chert to  
18 have thinned to the point that we would not be able to achieve a successful completion.

19 Q: Do you sponsor any Exhibits of the area?

20 A: Yes, Exhibit A to my testimony.

21 Q: Was that Exhibit prepared by you or under your supervision?

22 A: Yes. My Exhibit is a photographs of the area, taken by me.

23 Q: Can you explain your Exhibit?

1     A:     Yes. My Exhibit A shows a stake at IGWT's original proposed location in the foreground,  
2             and a stake for the proposed new location to the West. It clearly shows that the terrain of  
3             the revised proposed location is substantially higher than the original location, thus  
4             avoiding the low-lying drainage area.

5     Q:     Does this conclude your testimony?

6     A:     Yes.





HUPP II EXHIBIT

A