

JUN 20 2012 **BEFORE THE STATE CORPORATION COMMISSION**
LEGAL SECTION **OF THE STATE OF KANSAS**

Before Commissioners: Mark Sievers, Chairman
 Ward Loyd, Commissioner
 Thomas E. Wright, Commissioner

In the Matter of the Application of Wilton) Docket No. 12-CONS-266-CWLE
Petroleum, Inc. for a well location exception for)
its Roemer Trust #2 well, to be located in the)
Northeast Quarter of the Northeast Quarter of the) CONSERVATION DIVISION
Northeast Quarter of Section 13, Township 16)
South, Range 30 West, Lane County, Kansas.)
_____) License No. 7775

AMENDED APPLICATION
FOR WELL LOCATION EXCEPTION AND ALLOWABLE

COMES NOW Wilton Petroleum, Inc. ("Wilton Petroleum" or "Applicant"), by and through its legal counsel, Jonathan A. Schlatter of Morris, Laing, Evans, Brock & Kennedy, Chtd., and files with the State Corporation Commission of the State of Kansas ("Commission") its Amended Application for Well Location Exception for its proposed Roemer Trust #2 oil well to be drilled and completed in the Roemer Field in Lane County, Kansas ("Amended Application") in the above-captioned matter. In support of its Amended Application, Wilton Petroleum states and alleges to the Commission as follows:

1. Wilton Petroleum is an Oregon corporation that is duly licensed, authorized, and active and in good standing with the Kansas Secretary of State's office to do business in Kansas.
2. Wilton Petroleum is currently licensed and in good standing with the Commission to operate oil and gas wells in Kansas under Conservation Division oil and gas operator's license number 7775.
3. Commission regulation K.A.R. 82-3-108 provides the general setback requirement for oil and gas wells in Kansas. It provides that, absent special spacing rules on a

county or field-wide basis or the Commission granting a well-location exception, an oil and gas well shall not be drilled nearer than 330 feet from any lease or unit boundary line.

4. Wilton Petroleum is the owner and operator of the Roemer Trust oil and gas lease, which covers the Northeast Quarter (NE/4) of Section 13, Township 16 South, Range 30 West, Lane County, Kansas (“the subject acreage”).

5. Wilton Petroleum’s Application for Well Location Exception and Allowable was previously approved by the Commission on June 11, 2012, authorizing Wilton Petroleum to drill and complete the Roemer Trust #2 (“the subject well”) as an oil well producing from the Roemer Field in the Mississippian System in the Northeast Quarter of the Northeast Quarter of the Northeast Quarter (NE/4 NE/4 NE/4) of Section 13, Township 16 South, Range 30 West, Lane County, at a location that is approximately 435’ south from the North section line and approximately 100’ west of the East section line.

6. Due to concerns regarding the location of the subject well previously approved by the Commission, including concerns regarding topographical obstructions that could affect or impact drilling operations, Wilton Petroleum now desires to drill and complete the subject well at a location that is approximately 442’ south from the North section line and approximately 22’ west of the East section line.

7. The Applicant’s geophysical and geological consultants have evaluated the Mississippian System across Wilton Petroleum’s Roemer Trust leasehold interests and determined that the location of the subject well proposed in this Amended Application is an equally optimal location as the location that was previously approved by the Commission and allows for the recovery of hydrocarbon reserves in substantial parity with the location previously approved.

8. The only lease nearer to the proposed Roemer Trust #2 well than the statewide setback requirement established by K.A.R. 82-3-108 is Wilton Petroleum's D&E Roemer Farms Lease, located on the Northwest Quarter (NW/4) of Section 18, Township 16 South, Range 29 West, Lane County, Kansas. Wilton Petroleum's mineral owners under the D&E Roemer Farms Lease, Randy D. Roemer and Elaine Roemer, who also are partial undivided mineral owners under the Roemer Trust Lease, have expressed their written consent and permission for the Applicant to drill the subject well at the proposed location. Enclosed hereto as Exhibit A is a copy of the letter signed by Randy D. Roemer and Elaine Roemer, owners of the minerals underlying the Northwest Quarter of Section 18, Township 16 South, Range 29 West, Lane County, Kansas.

9. The production of oil and/or gas from the Roemer Field through the subject well will not cause uncompensated cognizable drainage between Wilton Petroleum's Roemer Trust Lease and offsetting leaseholds, and therefore will not violate correlative rights.

10. The drilling and completion of the subject well at the proposed location is necessary to prevent waste and adequately and efficiently drain the Roemer Field as it underlies the Northeast Quarter of Section 13, Township 16 South, Range 30 West, Lane County, Kansas. Production from the subject well will allow for the recovery of significant additional hydrocarbon reserves from Wilton Petroleum's Roemer Trust leasehold that otherwise would not be recovered by the existing well on the Roemer Trust Lease.

11. A map of the subject acreage for showing all wellbores within a 1/2-mile radius of the subject well is attached to the Application as Exhibit B.

12. The names and addresses of all unleased offset mineral owners and offset operators whose property boundaries or lease lines are located at a distance less than the

statewide minimum setback requirement from the proposed well location are set forth in the attached Exhibit C.

13. The Applicant is also causing the Notice of Amended Application, a copy of which is filed herewith, to be published as required by this Commission in the *Wichita Eagle* and the *Dighton Herald* newspapers.

NOW THEREFORE, Applicant prays that the Commission assign a date for hearing this Amended Application, and should any interested party protest this Amended Application, upon such hearing grant Applicant's request for a well location exception for the subject well, attribute to the subject well ten (10) acres from the Northeast Quarter of the Northeast Quarter of the Northeast Quarter of Section 13, Township 16 South, Range 30 West, Lane County, Kansas, and grant a full production allowable to the subject well; should no interested party protest this Amended Application, Applicant prays that the Commission grant Applicant's request for a well location exception, attribution of said acreage, and a full production allowable for the subject well administratively, without the expense and inconvenience of a hearing on the uncontested matter.

Respectfully submitted,



Jonathan A. Schlatter, #24848

300 N. Mead, Suite 200

Wichita, KS 67202-2745

Telephone: 316-262-2671

Facsimile: 316-262-6226

Attorneys for Wilton Petroleum, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of June, 2012, true and correct copies of the above and foregoing "Amended Application for Well Location Exception and Allowable" with Attached Exhibits "A-C" and the Notice of Amended Application were served by depositing copies of the same in the United States Mail, first class postage prepaid, and properly addressed to each party set forth on Exhibit "C", and that the original and seven (7) copies were hand-delivered to the Kansas Corporation Commission.



Jonathan A. Schlatter, #24848

 **Wilton Petroleum Inc.**


P.O. Box 391 • Canton, KS 67428 • 620-628-4466


June 11, 2012

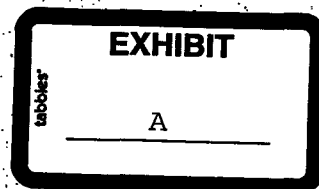
Bernie Rundstrom
Vice President Operations
Wilton Petroleum, Inc.
PO Box 391
Canton, KS 67428

This letter is to inform Wilton Petroleum, Inc. that we Randy D. Roemer and Elaine Roemer are owners of the Northwest Quarter of Section 18, Township 16-S, Range 29-W, Lane County, Kansas. Furthermore we grant Wilton Petroleum, Inc. our permission to drill an oil-gas well approximately 22 feet from our west boundary line. The wells approximate location is 442 feet from the north line and 22 feet from the east line of Northeast Quarter of Section 13, Township 16-S, Range 30W, Lane County, Kansas.

Sincerely yours,


Randy D. Roemer
Date: 6-15-12


Elaine Roemer
Date: 6-15-12



Wilton Petroleum, Inc

ROEMER TRUST LEASE

N/2 + SW/4

Section 13

Township 16-5 Range 30 W County Lane State KS

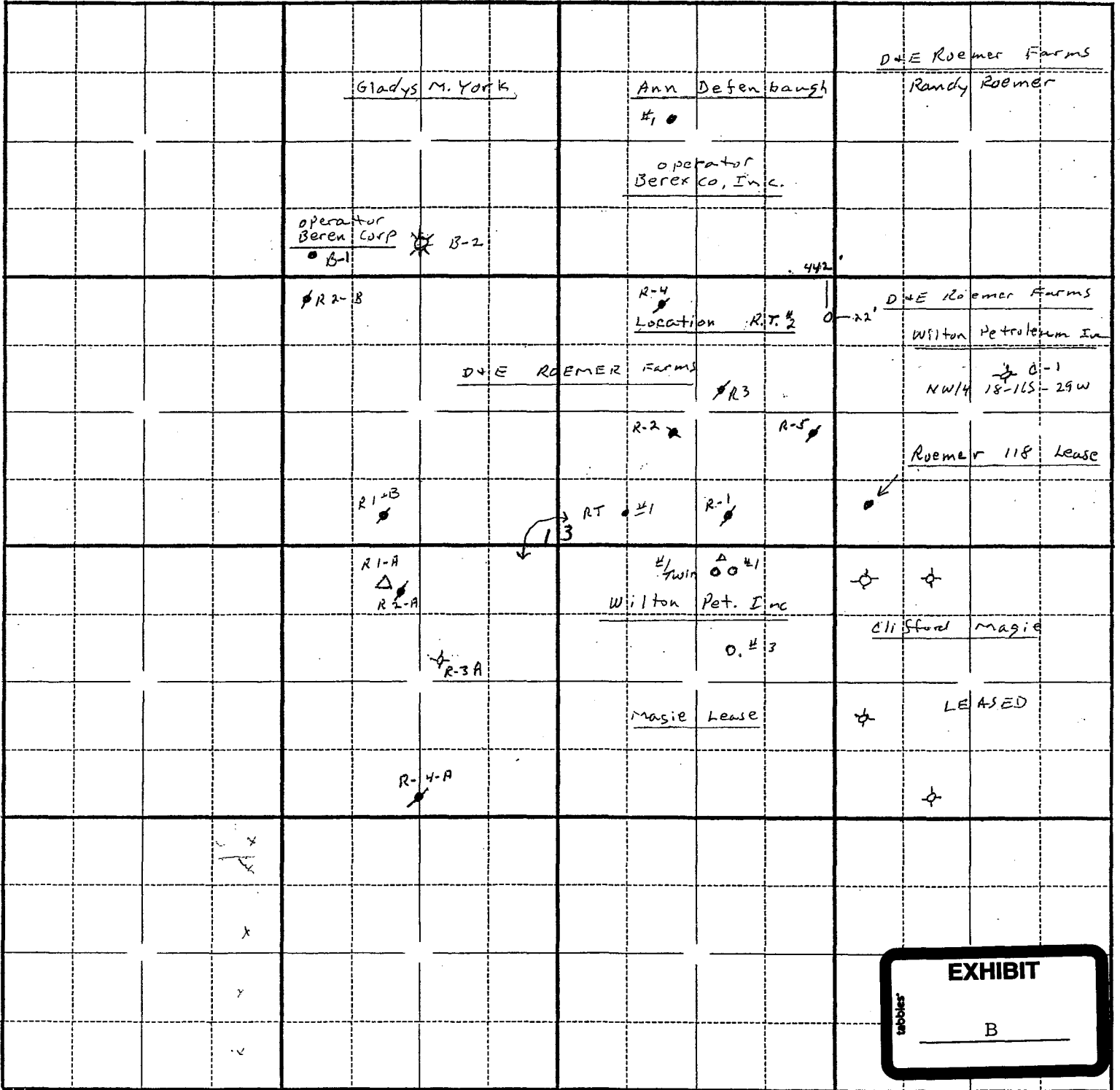


EXHIBIT "C"

Wilton Petroleum, Inc.
PO Box 391
Canton, KS 67428

Berexco, LLC
2020 N. Bramblewood
Wichita, KS 67206

Beren Corp.
2020 N. Bramblewood
Wichita, KS 67206

Randy and Elaine Roemer
262 N. Dodge Rd.
Healy, KS 67850