



LAW OFFICES OF  
**MORRIS LAING**  
Evans Brock & Kennedy, Chtd.

Sender's email: jschlatter@morrislaing.com  
Direct Phone: (316) 383-6423  
Direct Fax: (316) 383-6523

Robert I. Guenther  
A.J. Schwartz  
William B. Sorensen Jr.  
Jeffery L. Carmichael  
Robert W. Coykendall  
Robert K. Anderson  
Karl R. Swartz  
Roger L. Theis  
Richard F. Hayse  
Thomas R. Docking  
Diane H. Sorensen  
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Roger N. Walter  
James D. Young  
Kelly S. Herzik

Kimberly K. Bonifas  
Richard A. Kear  
Cameron V. Michaud  
Ryan M. Peck  
Shannon M. Braun  
Will B. Wohlford  
Justin F. Carter<sup>◇</sup>  
Danielle J. Carter<sup>◇</sup>  
Megan L. Hoffman  
Sabrina K. Standifer  
Jonathan A. Schlatter  
Khari E. Taustin\*  
Sarah G. Briley  
Grant A. Brazill

Of Counsel  
John W. Johnson  
C. Michael Lennen  
Thomas E. Wright  
Trevor C. Wohlford

\*Resident & Licensed in FL  
◇ Licensed only in IL & MI

November 9, 2018

Kansas Corporation Commission,  
Conservation Division  
266 N Main Street, Suite 220  
Wichita, KS 67202-1513

**Re: Request for Hearing – Docket No. 19-CONS-3150-CPEN**  
**Kansas Crude Investments LLC, License No. 35203**  
**In re: Compliance with K.A.R. 82-3-107 and -130 at the Riedel #4**

To whom it may concern:

On behalf of Kansas Crude Investments LLC (“Operator”), we respectfully request a hearing in the above-captioned docket. Operator contends that the penalty order was issued in error or under circumstances that are inequitable, and respectfully requests that the Penalty Order be rescinded and the fines voided.

### *Background*

On March 1, 2018, Operator obtained permission to wash down the Riedel #4 well, API No. 15-051-02844-0001 (“Subject Well”). See Exhibit A, p.1. The Subject Well is located in the Southeast Quarter of the Northwest Quarter of the Southwest Quarter (SE/4 NW/4 SW/4) of Section 31-T13S-R19W, Ellis County, Kansas, approximately 2,210’ from the South line and 990’ from the West line of said section. Musgrove Petroleum Corp. originally drilled the Subject Well in 1957. The Subject Well appears to have continuously produced oil, either from the Arbuckle or Lansing-Kansas City formations, or both, from 1957 until May 20, 2016, when it was plugged and abandoned by then operator Enterprise, Inc. See Exhibit A, p.5.

Operator acquired the oil and gas lease on the West Half of the Southwest Quarter (W/2 SW/4) of Section 31-T13S-R19W in October of 2017. Soon thereafter Operator proceeded to rework the Riedel #7 and Riedel #2 oil wells and bring them back into production, along with the Riedel #1 SWD well. The success of those operations prompted Operator to seek permission to

wash down the Subject Well and test it for commercial quantities of oil from the Arbuckle formation.

The well plugging record filed in 2016 indicated cement plugs were set in the Subject Well at 3,518', 1,968', and at surface. *See Exhibit A, p.5.* As stated above, Operator obtained Commission approval to wash down the Subject Well on March 1, 2018, and on or about May 23, 2018, Operator notified District 4 that he intended to spud the Subject Well. Several days thereafter Operator commenced operations to wash down the Subject Well.

Operator soon discovered that there were not three individual cement plugs set in the Subject Well. Rather, there was essentially a continuous column of cement from 30' to 3,700' feet set inside the Subject Well. Operator drilled on the Subject Well for weeks before drilling through the bottom of the cement column. Then, after clearing a brief 120' void, Operator drilled into iron. Operator believes this iron to be a retrievable bridge plug set decades ago above the top of the Arbuckle formation. Operator subsequently spent weeks milling on the iron part, trying to fish it out of the hole, and attempting to wash it over. Unfortunately, Operator's drilling rig broke down just as Operator believed it was about to finally clear the iron impediment from the Subject Well. The rig is currently in the shop getting repaired, and Operator has been advised that it will be a couple weeks before the rig is repaired. Once repaired, Operator intends to rig back up over the Subject Well and finish clearing out the iron impediment and drilling the Subject Well to total depth. Operator believes it could reach total depth soon after recommencing wash down operations, with the Subject Well tested and completed for production (or drilled and abandoned) within a month or two.

Operator has not submitted a well completion report for the Subject Well because there is nothing to report. Operator has not reached the objective total depth, and all the casing that is cemented inside the Subject Well is the same casing that was in the well when it was originally drilled in 1957. Operator did not submit a completion report because it did not want to misrepresent to the Commission that the Subject Well was completed, when it was not.

Operator contacted Commission staff by phone one day after receiving the Notice of Violation attached as Exhibit A to the Penalty Order. Operator advised staff of the difficulties it had encountered in washing down the Subject Well. In response, Commission staff told Operator that the file had been noted, and that Operator may disregard the Notice of Violation and that no further enforcement action related to the Subject Well would be taken at that time. Relying on that representation, Operator continued drilling on the Subject Well without submitting a well completion report. A couple weeks later the drilling rig broke down, and on October 25, 2018, Operator contacted Commission staff, this time by email, to obtain permission to remove the rig from the Subject Well so it could be repaired. *See Exhibit B.* In response to that request, Operator learned that the Commission had entered the penalty order in this docket that same day.

#### *Request for Rescission of the Penalty Order or Hearing*

The Penalty Order finds that Operator violated K.A.R. 82-3-107 and -130. -107 requires that an operator submit certain specified data with the well completion report within 120 days after commencing recompletion operations in the well. None of the data described in -107 is available

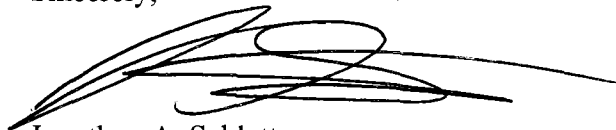
to submit to the Commission because the Subject Well is not completed, and because the drilling operation is a wash down not a newly drilled well (e.g., there will be no formation cuttings or cores to send to KGS). -130 requires a well completion report be submitted within 120 days after spudding the Subject Well regardless of the manner in which the well is completed or recompleted, including a well which is dry and abandoned, which report shall include the type, amount, and method of cementing used on all casing strings in the wellbore. Again, as noted above, there is nothing to report because Subject Well has not been completed (or drilled dry) and no new casing strings have been cemented into the wellbore.

Operator contends penalizing it for violating Commission regulations would be in error or inequitable. After receiving the Notice of Violation, Operator contacted staff and apprised it of the reason for the delay in completing the well. Staff advised Operator that it could disregard the Notice of Violation and that staff would not continue enforcement proceedings related to the Subject Well. It would be inequitable to now penalize Operator for relying on staff's representations, or for staff's oversight in continuing enforcement proceedings against Operator after it said it would not.

Additionally, none of the data and information that Operator is required to report under -107 and -130 are available to be reported. There is no consequence of the Commission not having this report at this time, because the report would be blank. Operator is in an impossible position of being required to either furnish information that does not exist or reporting inaccurate information to the Commission under oath. The regulations should not be interpreted in that manner against Operator under these unusual circumstances. On these grounds, imposition of the Penalty Order and fines would be unreasonable, arbitrary and capricious towards Operator.

For these reasons, Operator respectfully requests that the penalty order in this docket be rescinded, or that this matter be set for hearing. To the extent a formal request for additional time to submit the well completion report for the Subject Well is necessary, Operator respectfully submits that request. *See* K.A.R. 82-3-107(d)(2), -130(b).

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan A. Schlatter', with a long horizontal line extending to the right.

Jonathan A. Schlatter

For the Firm

*Attorneys for Kansas Crude Investments LLC*

JAS/cah

Encl.

cc: Lauren Wright, KCC Litigation Counsel

## For KCC Use:

Effective Date: 03/06/2018

District # 4

SGA? ☐ Yes ☒ NoKANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form C-1

March 2010

Form must be Typed

Form must be Signed

All blanks must be Filled

## NOTICE OF INTENT TO DRILL

Must be approved by KCC five (5) days prior to commencing well

Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act, MUST be submitted with this form.

Expected Spud Date: 04/01/2018  
month day year

OPERATOR: License# **35203**  
 Name: Kansas Crude Investments LLC  
 Address 1: 1593 220TH AVE  
 Address 2:  
 City: HAYS State: KS Zip: 67601 +  
 Contact Person: Trevor Calvin  
 Phone: 785-656-0551

CONTRACTOR: License#  
 Name: Advise on ACO-1 -- Must be licensed by KCC

Well Drilled For: Well Class: Type Equipment:

☒ Oil ☐ Enh Rec ☒ Infield ☒ Mud Rotary  
☐ Gas ☐ Storage ☐ Pool Ext. ☐ Air Rotary  
☐ Disposal ☐ Wildcat ☐ Cable  
☐ Seismic : # of Holes ☐ Other  
☐ Other:

☒ If OWWO: old well information as follows:

Operator: Musgrove Petroleum Corp  
 Well Name: Riedel  
 Original Completion Date: 05/05/1957 Original Total Depth: 4010

Directional, Deviated or Horizontal wellbore? ☐ Yes ☒ No

If Yes, true vertical depth:

Bottom Hole Location:

KCC DKT #:

OWWO

Spot Description:

S2 NE NW SW Sec. 31 Twp. 13 S. R. 19 ☐ E ☒ W  
 (a/a/a/a) 2210 feet from ☐ N / ☒ S Line of Section  
 990 feet from ☐ E / ☒ W Line of Section

Is SECTION: ☒ Regular ☐ Irregular?

(Note: Locate well on the Section Plat on reverse side)

County: Ellis

Lease Name: Riedel Well #: 4

Field Name: Irvin

Is this a Prorated / Spaced Field? ☐ Yes ☒ No

Target Formation(s): Arbuckle

Nearest Lease or unit boundary line (in footage): 600

Ground Surface Elevation: 2230 Estimated feet MSL

Water well within one-quarter mile: ☒ Yes ☐ NoPublic water supply well within one mile: ☐ Yes ☒ No

Depth to bottom of fresh water: 180

Depth to bottom of usable water: 750

Surface Pipe by Alternate: ☐ I ☒ II

Length of Surface Pipe Planned to be set: 250

Length of Conductor Pipe (if any):

Projected Total Depth: 4010

Formation at Total Depth: Arbuckle

Water Source for Drilling Operations:

☐ Well ☐ Farm Pond ☒ Other: HauledDWR Permit #: (Note: Apply for Permit with DWR ☐)Will Cores be taken? ☐ Yes ☒ No

If Yes, proposed zone:

## AFFIDAVIT

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55 et. seq.

It is agreed that the following minimum requirements will be met:

1. Notify the appropriate district office **prior** to spudding of well;
2. A copy of the approved notice of intent to drill **shall be** posted on each drilling rig;
3. The minimum amount of surface pipe as specified below **shall be set** by circulating cement to the top; in all cases surface pipe **shall be set** through all unconsolidated materials plus a minimum of 20 feet into the underlying formation.
4. If the well is dry hole, an agreement between the operator and the district office on plug length and placement is necessary **prior to plugging**;
5. The appropriate district office will be notified before well is either plugged or production casing is cemented in;
6. If an ALTERNATE II COMPLETION, production pipe shall be cemented from below any usable water to surface within **120 DAYS** of spud date. Or pursuant to Appendix "B" - Eastern Kansas surface casing order #133,891-C, which applies to the KCC District 3 area, alternate II cementing must be completed within 30 days of the spud date or the well shall be plugged. **In all cases, NOTIFY district office** prior to any cementing.

## Submitted Electronically

## For KCC Use ONLY

API # 15 - 15-051-02844-00-01

Conductor pipe required 0 feet

Minimum surface pipe required 250 feet per ALT. ☐ I ☒ II

Approved by: Rick Hestermann 03/01/2018

This authorization expires: 03/01/2019

(This authorization void if drilling not started within 12 months of approval date.)

Spud date: Agent:

## Remember to:

- File Certification of Compliance with the Kansas Surface Owner Notification Act (KSONA-1) with Intent to Drill;
- File Drill Pit Application (form CDP-1) with Intent to Drill;
- File Completion Form ACO-1 within 120 days of spud date;
- File acreage attribution plat according to field proration orders;
- Notify appropriate district office 48 hours prior to workover or re-entry;
- Submit plugging report (CP-4) after plugging is completed (within 60 days);
- Obtain written approval before disposing or injecting salt water.
- If well will not be drilled or permit has expired (See: authorized expiration date) please check the box below and return to the address below.

☐ Well will not be drilled or Permit Expired Date: \_\_\_\_\_  
 Signature of Operator or Agent: \_\_\_\_\_

31  
13  
19  
☐ E ☒ W

Side Two

For KCC Use ONLY

API # 15 - 15-051-02844-00-01

**IN ALL CASES PLOT THE INTENDED WELL ON THE PLAT BELOW**

In all cases, please fully complete this side of the form. Include items 1 through 5 at the bottom of this page.

Operator: Kansas Crude Investments LLC  
 Lease: Riedel  
 Well Number: 4  
 Field: Irvin

Number of Acres attributable to well: \_\_\_\_\_  
 QTR/QTR/QTR/QTR of acreage: S2 - NE - NW - SW

Location of Well: County: Ellis  
 2210 feet from ☐ N / ☒ S Line of Section  
 990 feet from ☐ E / ☒ W Line of Section  
 Sec. 31 Twp. 13 S. R. 19 ☐ E ☒ W

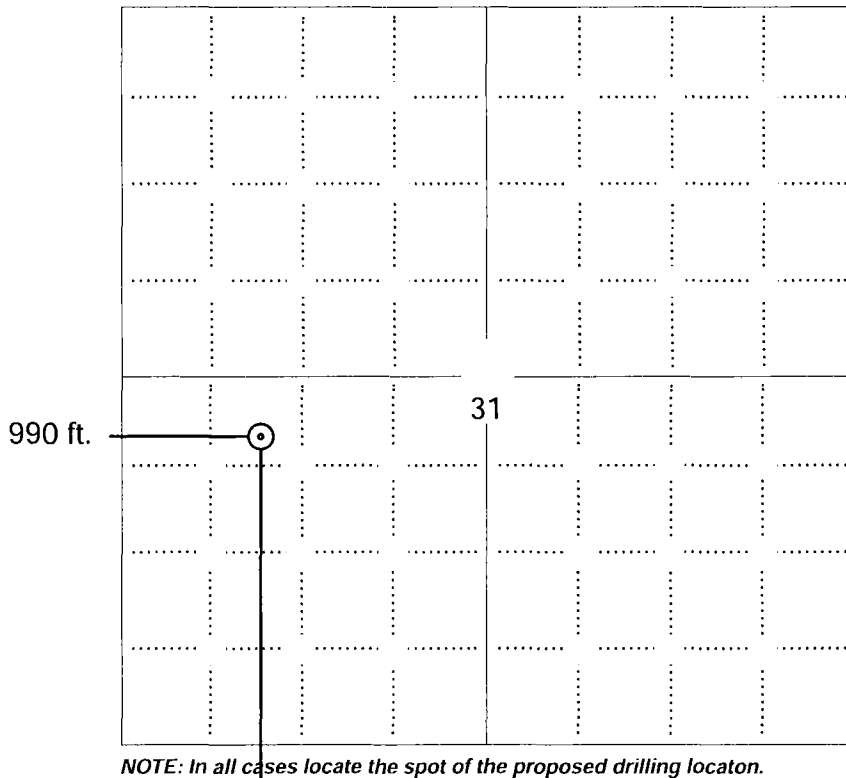
Is Section: ☒ Regular or ☐ Irregular

If Section is Irregular, locate well from nearest corner boundary.

Section corner used: ☐ NE ☐ NW ☐ SE ☐ SW

**PLAT**

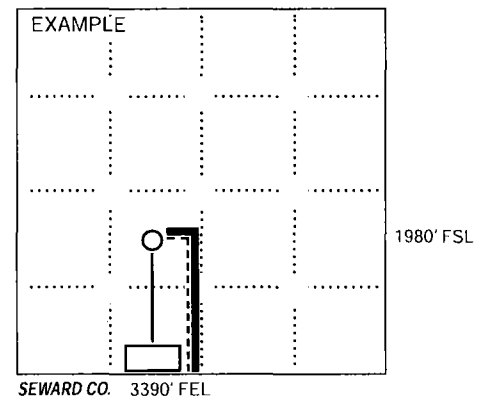
Show location of the well. Show footage to the nearest lease or unit boundary line. Show the predicted locations of lease roads, tank batteries, pipelines and electrical lines, as required by the Kansas Surface Owner Notice Act (House Bill 2032). You may attach a separate plat if desired.



NOTE: In all cases locate the spot of the proposed drilling location.

**LEGEND**

- ☐ Well Location
- ☐ Tank Battery Location
- ☐ Pipeline Location
- ☐ Electric Line Location
- ☐ Lease Road Location



2210 ft.

In plotting the proposed location of the well, you must show:

- The manner in which you are using the depicted plat by identifying section lines, i.e. 1 section, 1 section with 8 surrounding sections, 4 sections, etc.
- The distance of the proposed drilling location from the south / north and east / west outside section lines.
- The distance to the nearest lease or unit boundary line (in footage).
- If proposed location is located within a prorated or spaced field a certificate of acreage attribution plat must be attached: (CO-7 for oil wells; CG-8 for gas wells).
- The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION  
**APPLICATION FOR SURFACE PIT**

Form CDP-1  
May 2010  
Form must be Typed

Submit in Duplicate

Operator Name: <b>Kansas Crude Investments LLC</b>		License Number: <b>35203</b>	
Operator Address: <b>1593 220TH AVE</b>		<b>HAYS KS 67601</b>	
Contact Person: <b>Trevor Calvin</b>		Phone Number: <b>785-656-0551</b>	
Lease Name & Well No.: <b>Riedel 4</b>		Pit Location (QQQQ): <b>S2 - NE - NW - SW</b> Sec. <b>31</b> Twp. <b>13</b> R. <b>19</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>2210</b> Feet from <input type="checkbox"/> North / <input checked="" type="checkbox"/> South Line of Section <b>990</b> Feet from <input type="checkbox"/> East / <input checked="" type="checkbox"/> West Line of Section <b>Ellis</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input checked="" type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit (If WP Supply API No. or Year Drilled)	Pit is: <input checked="" type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: <b>171</b> (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Chloride concentration: _____ mg/l (For Emergency Pits and Settling Pits only)	
Is the bottom below ground level? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used?	
Pit dimensions (all but working pits): <b>12</b> Length (feet) <b>10</b> Width (feet) <input type="checkbox"/> N/A: Steel Pits Depth from ground level to deepest point: <b>8</b> (feet) <input type="checkbox"/> No Pit			
If the pit is lined give a brief description of the liner material, thickness and installation procedure. <b>Unroll 6mil liner and place dirt around edges</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring. <b>monitor fluid daily</b>	
Distance to nearest water well within one-mile of pit: <b>993</b> feet Depth of water well <b>40</b> feet		Depth to shallowest fresh water <b>15</b> feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input checked="" type="checkbox"/> KDWR	
<b>Emergency, Settling and Burn Pits ONLY:</b> Producing Formation: _____ Number of producing wells on lease: _____ Barrels of fluid produced daily: _____ Does the slope from the tank battery allow all spilled fluids to flow into the pit? <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Drilling, Workover and Haul-Off Pits ONLY:</b> Type of material utilized in drilling/workover: <b>water</b> Number of working pits to be utilized: <b>2</b> Abandonment procedure: <b>haul fluid to disposal/let dry and back fill</b> Drill pits must be closed within 365 days of spud date.	
Submitted Electronically			

KCC OFFICE USE ONLY

Date Received: **02/28/2018** Permit Number: **15-051-02844-00-01** Permit Date: **03/01/2018** Lease Inspection: ☒ Yes ☐ No  
☒ Liner ☐ Steel Pit ☒ RFAC ☐ RFAS

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form KSONA-1  
January 2014  
**Form Must Be Typed**  
**Form must be Signed**  
**All blanks must be Filled**

**CERTIFICATION OF COMPLIANCE WITH THE  
KANSAS SURFACE OWNER NOTIFICATION ACT**

*This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.*

Select the corresponding form being filed: ☒ C-1 (Intent) ☐ CB-1 (Cathodic Protection Borehole Intent) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 35203  
Name: Kansas Crude Investments LLC  
Address 1: 1593 220TH AVE  
Address 2: \_\_\_\_\_  
City: HAYS State: KS Zip: 67601 + \_\_\_\_\_  
Contact Person: Trevor Calvin  
Phone: ( 785 ) 656-0551 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: \_\_\_\_\_

Well Location:  
S2 NE NW SW Sec. 31 Twp. 13 S. R. 19 ☐ East ☒ West  
County: Ellis  
Lease Name: Riedel Well #: 4

*If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:*

**Surface Owner Information:**

Name: Marian Veley  
Address 1: 1639 Bullevarad St  
Address 2: \_\_\_\_\_  
City: Philomath State: Oregon Zip: 97370 + \_\_\_\_\_

*When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.*

*If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.*

**Select one of the following:**

- ☒ I certify that, pursuant to the Kansas Surface Owner Notice Act (House Bill 2032), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.
- ☐ I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

*If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.*

I Submitted Electronically



**Notice:** Fill out COMPLETELY  
and return to Conservation Division at  
the address below within  
60 days from plugging date.

KANSAS CORPORATION COMMISSION 1314010  
OIL & GAS CONSERVATION DIVISION  
**WELL PLUGGING RECORD**  
K.A.R. 82-3-117

Form CP-4  
March 2009  
Type or Print on this Form  
Form must be Signed  
All blanks must be Filled

OPERATOR: License #: 31240  
Name: Enterprise Inc  
Address 1: 2708 BARCLAY DR  
Address 2: \_\_\_\_\_  
City: HAYS State: KS Zip: 67601 + 2125  
Contact Person: Steve Weilert  
Phone: (785) 650-1952  
Type of Well: (Check one) ☒ Oil Well ☐ Gas Well ☐ OG ☐ D&A ☐ Cathodic  
☐ Water Supply Well ☐ Other: \_\_\_\_\_ ☐ SWD Permit #: \_\_\_\_\_  
☐ ENHR Permit #: \_\_\_\_\_ ☐ Gas Storage Permit #: \_\_\_\_\_  
Is ACO-1 filed? ☒ Yes ☐ No If not, is well log attached? ☐ Yes ☐ No  
Producing Formation(s): List All (If needed attach another sheet)  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Depth to Top: \_\_\_\_\_ Bottom: \_\_\_\_\_ T.D. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Depth to Top: \_\_\_\_\_ Bottom: \_\_\_\_\_ T.D. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ Depth to Top: \_\_\_\_\_ Bottom: \_\_\_\_\_ T.D. \_\_\_\_\_

API No. 15 - 15-051-02844-00-00  
Spot Description: \_\_\_\_\_  
S2 NE NW SW Sec. 31 Twp. 13 S. R. 19 ☐ East ☒ West  
2210 Feet from ☐ North / ☒ South Line of Section  
4290 Feet from ☒ East / ☐ West Line of Section  
Footages Calculated from Nearest Outside Section Corner:  
☐ NE ☐ NW ☒ SE ☐ SW  
County: Ellis  
Lease Name: RIEDEL Well #: 4  
Date Well Completed: \_\_\_\_\_  
The plugging proposal was approved on: \_\_\_\_\_ (Date)  
by: \_\_\_\_\_ (KCC District Agent's Name)  
Plugging Commenced: 5/19/2016  
Plugging Completed: 5/20/2016

Show depth and thickness of all water, oil and gas formations.

Oil, Gas or Water Records		Casing Record (Surface, Conductor & Production)			
Formation	Content	Casing	Size	Setting Depth	Pulled Out
		Surface	8.87	250	
		Production	5.5	3924	

Describe in detail the manner in which the well is plugged, indicating where the mud fluid was placed and the method or methods used in introducing it into the hole. If cement or other plugs were used, state the character of same depth placed from (bottom), to (top) for each plug set.

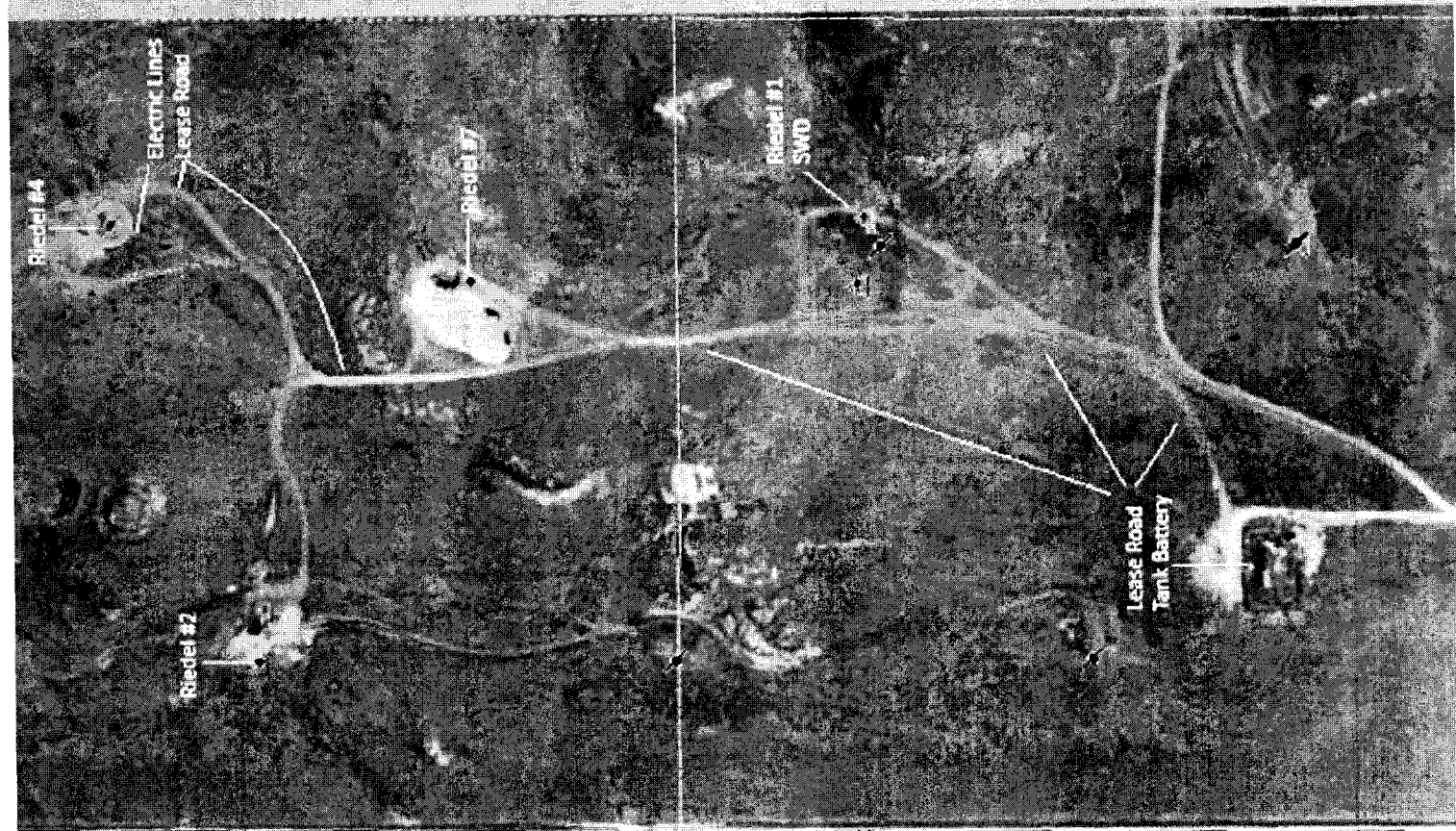
Cement set at 3518, 1968 and surface

Plugging Contractor License #: 32028 Name: Chito's Well Service, LLC  
Address 1: PO BOX 66 Address 2: \_\_\_\_\_  
City: PLAINVILLE State: KS Zip: 67663 + \_\_\_\_\_  
Phone: (785) 434-2079  
Name of Party Responsible for Plugging Fees: Steve Weilert  
State of Kansas County, Ellis, ss.  
Steve Weilert ☐ Employee of Operator or ☒ Operator on above-described well,  
(Print Name)

being first duly sworn on oath, says: That I have knowledge of the facts statements, and matters herein contained, and the log of the above-described well is as filed, and the same are true and correct, so help me God.

Submitted Electronically





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



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

Shari Feist Albrecht, Chair  
Jay Scott Emler, Commissioner  
Pat Apple, Commissioner

Governor Jeff Colyer, M.D.

March 01, 2018

Trevor Calvin  
Kansas Crude Investments LLC  
1593 220TH AVE  
HAYS, KS 67601

Re: Drilling Pit Application  
Riedel 4  
SW/4 Sec.31-13S-19W  
Ellis County, Kansas

Dear Trevor Calvin:

District staff has inspected the location and has determined that an unsealed condition will present a pollution threat to water resources.

District staff has recommended that the reserve pit be lined. If a plastic liner is to be used it must have a minimum thickness of 10 mil. Integrity of the liner must be maintained at all times.

**If production casing is set all completion fluids shall be removed from the working pits daily. NO completion fluids or non-exempt wastes shall be placed in the reserve pit.**

The fluids are to be removed from the reserve pit within 72 hours of completion of drilling operations. The fluids should be taken to an authorized disposal well. Please call the District Office at (785) 261-6250 when the fluids have been removed. Please file form CDP-5 (August 2008), Exploration and Production Waste Transfer, through KOLAR within 30 days of fluid removal.

**A copy of this letter should be posted in the doghouse along with the approved Intent to Drill.** If you have any questions or concerns please feel free to contact the District Office at (785) 261-6250.

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**From:** Trevor Calvin <kansascrudeinvestments@outlook.com>  
**Sent:** Monday, October 29, 2018 8:14 PM  
**To:** Jonathan Schlatter  
**Subject:** Fwd: Riedel #4 Request

Sent from my iPhone

Begin forwarded message:

**From:** Rene Stucky <r.stucky@kcc.ks.gov>  
**Date:** October 29, 2018 at 4:35:37 PM CDT  
**To:** Trevor Calvin <kansascrudeinvestments@outlook.com>  
**Subject:** RE: Riedel #4 Request

Trevor,

I am sorry but the Commission has already issued the penalty. It is docket 19-CONS-3150-CPEN. You would need to dispute it and request a hearing through legal. I have no control on it now. Unfortunately probably cheaper to just pat the \$100 (I believe that is what it is). However, to give yourself some time I would recommend you dispute it, then when you complete the well file the ACO-1 and you can drop the dispute if you do not want to go to hearing.

Rene

**Rene Stucky**  
*UIC Director/Production Supervisor*  
Kansas Corporation Commission  
266 N Main St., Ste.220  
Wichita, KS 67202-1513  
316-337-6223

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**From:** Trevor Calvin <kansascrudeinvestments@outlook.com>  
**Sent:** Friday, October 26, 2018 7:27 AM  
**To:** Rene Stucky <r.stucky@kcc.ks.gov>  
**Subject:** Riedel #4 Request

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

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Mr. Stucky,  
Kansas Crude Investments, LLC filed an intent to drill on or around March 1, 2018 on the Riedel #4 Well in Ellis County, Kansas. API # 15-051-02844-0001. The expected spud date was April 1, 2018. Prior to spudding the, the District #4 office was notified. We drilled cement 30'-3700'. After falling through cement we hit a 120' void and ran into iron. We have milled, fished, and

are in the process of washing over whatever may be down the hole. In the last couple weeks, our rig has shown signs of a bearing going out on our Frank's Box.

I am writing you to request permission to rig down and take the rig to the shop to be fixed. In addition, extend all permits for the necessary duration of time to get to the bottom of the hole. I would assume it will take 2 weeks to 3 weeks tops to get the rig fixed and back on location. If there is anything else I need to do please let me know.

Thank you in advance.

Kansas Crude Investments, LLC  
Trevor Calvin  
1593 220th Avenue  
Hays, KS 67601  
(785) 656-0551