

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the Application of Victory)	Docket No.: 26-CONS-3135-CEXC
Minerals LLC for an exception to the 10-)	
year time limitation of K.A.R. 82-3-111 for)	CONSERVATION DIVISION
its Snyder 4 well located in the NE/4 Sec.)	
30 Township 33 South Range 8 East of)	License No.: 34470
<u>Cowley County, Kansas.</u>)	

APPLICATION

COMES NOW VICTORY MINERALS LLC ("Applicant") in support of its Application in the captioned matter and states as follows:

1. Applicant is a Limited Liability Company authorized to do business in the State of Kansas. Applicant's address is PO Box 414830, Kansas City, MO 64141.
2. Applicant has been issued by the Kansas Corporation Commission Operator's License Number 34470 which expires on 10/30/2026.
3. Applicant is the owner and operator of the Snyder 4 well, API Number 15-035-24588-00-00 ("Subject Well"), which is located in Lot 4 of Section 30, Township 33 South, Range 8 East, Cowley County, Kansas. The Subject Well is located on an active oil and gas lease or unit comprising the following lands:

Lot 4, Section 30, Township 33 South, Range 8 East, of the 6th P.M., Cowley County, Kansas, containing 30 acres, more or less.
4. Pursuant to K.A.R. 82-3-111, the well was shut in, and obtained temporary abandonment status, for the Subject Well on September 23, 2015. The Subject Well has maintained such status from September 23, 2015, to the present date.
5. On or about October 20, 2025, the Kansas Corporation Commission notified Applicant temporary abandonment status for the Subject Well would be denied from and after November 19, 2025, because the Subject Well had been temporarily abandoned for more than ten (10) years.

6. K.A.R. 82-3-111 imposes a 10-year limitation on the amount of 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. On or about October 16, 2025, the Subject Well passed a Commission Staff-witnessed mechanical integrity test of the casing between the surface and a point within (50) fifty feet above the uppermost perforation or open hole in the well.

8. Applicant wishes to continue TA status for the Subject Well, because Applicant intends to use the well for the following purpose: productive recompletion in a shallower horizon.

9. Applicant submits the following information regarding the well in support of the Application.

- a. The Subject Well is the only well on this lease, which is a cased hole drilled in 2014 by Drake Exploration, License Number 33556 and transferred to Victory Minerals LLC, License Number 34470 on 03/31/2022. The Subject well is to be re-logged to be recompleted in the same gas-helium zone(s) that have proved productive in the region
- b. Other wells in the Township have cost between \$10,000 – \$15,000 to plug.
- c. This lease has no other production.
- d. Estimates of gas helium reserves are 112.5 MMCF for this 30-acre location, based on the historic US Department of Interior 1921 Report of Gas Helium in the vicinity of the Subject Well.
- e. Operator needs to run a new gamma-ray neutron, collar locator log, from 1,400' to surface, perforate 3 - 4 holes, 100 – 150' below the lowest potential productive gas-helium zone,

circulate fresh drilling mud to surface, circulate fresh cement to surface, and let cure.

Perforate potential gas-helium zones, test flow-rates, analyze gas, and consider stimulation.

10. Applicant has included a plat map showing the locations of all producing injection, temporarily abandoned, abandoned, and plugged wells located on the same lease premises as the Subject Well.

11. 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 approval of an application for temporary abandonment status.

12. Listed are the names and addresses of the following persons:

- a. There are no offset operators of oil and gas leases covering lands within one-half (1/2) mile radius of the Subject Well, except for Applicant; 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 the Subject Well are:

Jarvis Ranch LLC, PO Box 573, Cedar Vale, KS 67024, and

Ed J. Snyder Trust, PO Box 571, Cedar Vale, KS 6724

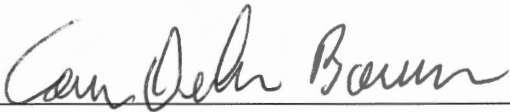
13. Notice of this Application will be published pursuant to K.A.R. 82-3-135a. In addition, notice of the hearing to be held in this matter will be provided as prescribed by K.A.R. 82-3-135.

WHEREFORE, Applicant prays that this matter be granted administratively without a hearing, or in the alternative be set for a 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,

Victory Minerals LLC
PO Box 414830
Kansas City, MO 64141
(816) 223 – 3712

By 
Carmon Decker Bonanno
Victory Minerals LLC

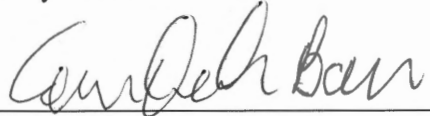
VERIFICATION

STATE OF KANSAS)
)ss.
COUNTY OF JOHNSON)

Carmon Decker Bonanno, of lawful age, being duly sworn upon his oath deposes and states:

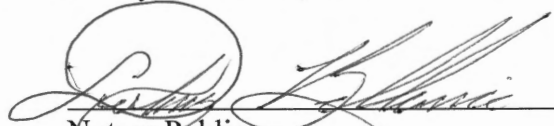
That he has the authority on behalf of Victory Minerals LLC to file this application, that he has read the above and foregoing application and is familiar with the contents thereof; and, that the statements made therein are true and correct to the best of his knowledge and belief.

Victory Minerals LLC



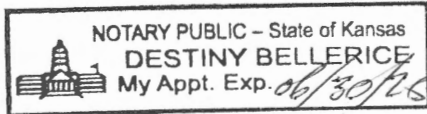
Carmon Decker Bonanno

SUBSCRIBED AND SWORN to before me this 24TH day of October, 2025.



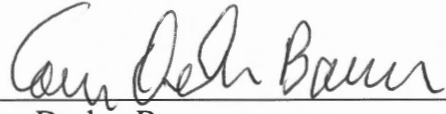
Notary Public

My Appointment Expires: *06/30/26*



CERTIFICATE OF SERVICE

I hereby certify on this 24TH day of October, 2025, true and correct copies of the above and foregoing Application and the Notice of Application were served by depositing copies of the same in the United States Mail, postage prepaid, and properly addressed to the landowner/s set forth in paragraph 12 of said Application, filed by Applicant, and the original to the Kansas Corporation Commission.

A handwritten signature in cursive script, reading "Carmon Decker Bonanno", written over a horizontal line.

Carmon Decker Bonanno
Victory Minerals LLC

For KCC Use ONLY

API # 15 - _____

IN ALL CASES PLOT THE INTENDED WELL ON THE PLAT BELOW

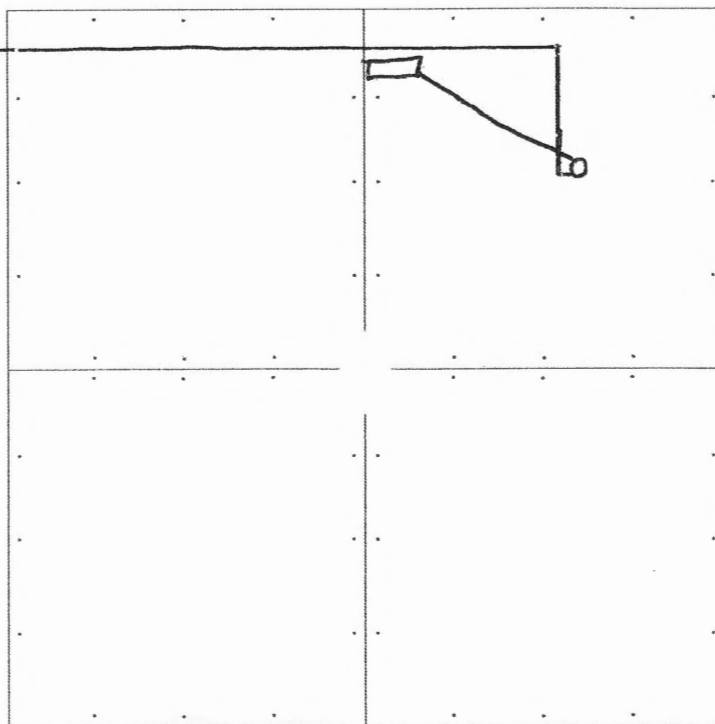
In all cases, please fully complete this side of the form. Include items 1 through 5 at the bottom of this page.

Operator: Drake Exploration LLC.Lease: SnyderWell Number: 4Field: Otter CreekNumber of Acres attributable to well: 10QTR/QTR/QTR/QTR of acreage: SE corner - Lot 4 - _____ - _____Location of Well: County: Cowley990 feet from ☒ N / ☐ S Line of Section6,930 feet from ☒ E / ☐ W Line of SectionSec. 30 Twp. 33 S. R. 8 ☒ E ☐ WIs Section: ☐ Regular or ☒ Irregular

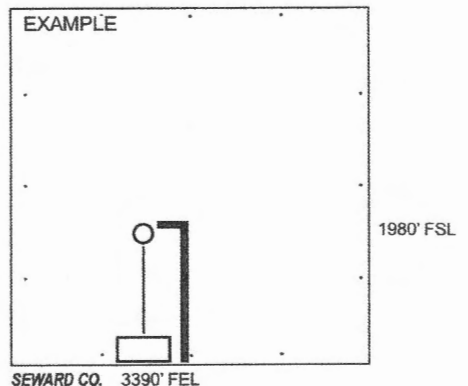
If Section is Irregular, locate well from nearest corner boundary.

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.

**LEGEND**

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

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