

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

In the matter of the failure of ANR Pipeline      )  
Company (Operator) to comply with K.A.R. 82-   )  
3-701 and K.A.R. 82-3-702 at two cathodic      )  
protection boreholes in Meade County, Kansas.   )  
\_\_\_\_\_  
Docket No.: 25-CONS-3329-CPEN  
CONSERVATION DIVISION  
License No.: 32953

**PETITION FOR RECONSIDERATION OF PENALTY ORDER AND  
REQUEST FOR STAY OF LICENSE SUSPENSION**

COMES NOW, ANR Pipeline Company (“ANR”), by and through counsel, and pursuant to K.S.A. 55-164(b), 77-528, and 77-529, submits this Petition for Reconsideration of Penalty Order and Request for Stay of License Suspension in the above-captioned matter. ANR states and alleges to the Commission as follows:

1. ANR is a Delaware corporation with a business address of 700 Louisiana Street, Houston, Texas. ANR was issued oil and gas operator’s License No. 32953 by the Commission.

2. On April 1, 2025, the Commission issued a Penalty Order to ANR for alleged violations of K.A.R. 82-3-701 and K.A.R. 82-3-702 related to two cathodic protection boreholes in Meade County, Kansas (“Subject Boreholes”).

3. The Penalty Order stated that ANR could request a hearing on the issues set forth in the Order within thirty days of service and that the Penalty Order would become final if no hearing were timely requested. The Penalty Order further stated that ANR could petition for reconsideration of the final Penalty Order in accordance with the time limits established in K.S.A. 77-529(a)(1), which requires that a request for reconsideration be submitted within fifteen days of service of a Final Order.

4. According to the Penalty Order, the Commission’s Docket Room served a copy of the Penalty Order on Robert Southers of ANR via U.S. First Class Mail on April 1, 2025. However,

ANR never received that mailing. *See* Declaration of Karen Franks, attached hereto as Exhibit 1. When the Commission did not receive a response to the Penalty Order, on May 30, 2025, it issued a Notice of License Suspension suspending License No. 32953. ANR received the Notice of License Suspension on June 9, 2025, after the deadlines stated in the Penalty Order had passed.

5. It is ANR's position that because ANR did not receive the Penalty Order through no fault of its own, no "service" of the Penalty Order was effectuated, and the time limits for requesting a hearing on the Penalty Order and for petitioning for reconsideration, both of which are triggered by "service" of the Order, did not begin to run. *See* K.S.A. 55-164(b), 77-529.

6. Further, under K.S.A. 77-512, a license may not be suspended unless the licensee is first given notice and an opportunity for a hearing. ANR was not provided notice or the opportunity to request a hearing prior to the Commission's issuance of the Notice of License Suspension. Moreover, K.S.A. 55-162 and 55-164 do not provide the Commission with statutory authority to suspend a license based solely on a licensee's failure to respond to a penalty order. Such suspension, without notice or hearing, constitutes a violation of due process.

7. For these reasons, ANR requests that the Commission grant, out of time, ANR's petition for reconsideration of the Penalty Order. ANR further requests that the Notice of License Suspension be stayed, and that License No. 32953 be returned to active status, pending the Commission's reconsideration of the Penalty Order.

8. ANR offers the following bases for reconsideration of the Penalty Order.

9. As an initial matter, the Subject Boreholes are not associated with natural gas production, gathering, or storage but rather were installed for the purpose of cathodic protection on an interstate natural gas pipeline. The federal Pipeline Safety Act preempts "state safety standards for interstate pipeline facilities or interstate pipeline transportation." 49 U.S.C. §

60104(c). K.A.R. 82-3-701 and 82-3-702, as applied to ANR's interstate pipeline, are "safety" regulations because they regulate activities related to the prevention of pipeline corrosion.

10. Additionally, the Penalty Order contains misstatements and incomplete statements of fact. For example, in the Penalty Order, the Commission alleges that ANR did not submit Cathodic Protection Borehole Notices of Intent to the Commission until February 8, 2025, after the Subject Boreholes had already been drilled. Order ¶ 6. In fact, Intent Forms for the Subject Boreholes were first submitted to the Commission on October 1, 2024 (for Groundbed ANR Trunk MP74.80 #1) and October 4, 2024 (for Groundbed ANR Trunk MP83.30 #1), prior to commencement of drilling. *See* Exhibit 2.

11. The Penalty Order also alleges that the length of cathodic surface casings at the Subject Boreholes were insufficient. Order ¶ 8. With respect to the Borehole for Groundbed ANR Trunk MP74.80, the cathodic surface casing was installed to a depth of 40 feet, in accordance with comments received from Ms. CeLena Peterson, Geologist with the Commission's Conservation Department, on October 16, 2024. *See* Exhibit 3 (Peterson correspondence) and Exhibit 4 (Cathodic Protection Borehole Intent Form, resubmitted to the Commission on October 17, 2024).

12. ANR requests that the Commission review and reconsider the factual and legal bases on which the Penalty Order was issued and, to prevent injustice and ensure due process protections are satisfied, reinstate License No. 32953 while it conducts this review.

### **CONCLUSION**

For the foregoing reasons, ANR respectfully requests that the Commission reconsider the Penalty Order issued to ANR on April 1, 2025 and stay the May 30, 2025 License Suspension Notice pending the requested reconsideration.

Respectfully submitted,

By: /s/ Kathryn A. Larkins

James F. Thompson, KS Bar #15804  
Kathryn A. Larkins, KS Bar #18533  
**SHOOK, HARDY & BACON L.L.P.**  
2555 Grand Blvd.  
Kansas City, Missouri 64108  
Telephone: 816.474.6550  
Fax: 816.421.5547  
jftompson@shb.com  
klarkins@shb.com

*Attorneys for ANR Pipeline Company*

### **CERTIFICATE OF SERVICE**

I, Kathryn A. Larkins, hereby certify that on this 30th day of June, 2025, I caused the original of the foregoing Petition for Reconsideration and Request for Stay to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and served to the following by means of electronic service:

Todd Bryant, Geologist Specialist  
Kansas Corporation Commission  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513  
[Todd.Bryant@ks.gov](mailto:Todd.Bryant@ks.gov)

CeLena Peterson, Production Department  
Kansas Corporation Commission  
266 N. Main St., Ste. 220  
Wichita, KS 67202-1513  
[celena.peterson@ks.gov](mailto:celena.peterson@ks.gov)

Tristan Kimbrell, Litigation Counsel  
Kansas Corporation Commission  
Central Office  
266 N. Main St., Ste 220  
Wichita, KS 67202-1513  
[Tristan.Kimbrell@ks.gov](mailto:Tristan.Kimbrell@ks.gov)

/s/ Kathryn A. Larkins  
Attorney For ANR Pipeline Company



# **EXHIBIT 1**

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

Before Commissioners:                      Andrew J. French, Chairperson  
   Dwight D. Keen  
   Annie Kuether

In the matter of the failure of ANR Pipeline	)	Docket No.: 25-CONS-3329-CPEN
Company (Operator) to comply with K.A.R. 82-	)	
3-701 and K.A.R. 82-3-702 at two cathodic	)	CONSERVATION DIVISION
protection boreholes in Meade County, Kansas.	)	
		License No.: 32953

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**AFFIDAVIT OF KAREN FRANKS**

I, Karen Franks, being of lawful age and duly sworn upon my oath, do hereby state as follows:

1.        I hold the position of Director, U.S. Natural Gas Land Services, for ANR Pipeline Company ("ANR"), a wholly-owned subsidiary of TC Energy Corporation ("TC Energy").

2.        I have personal knowledge of the facts set forth in this affidavit through direct involvement and through consultations with other employees with knowledge, including my direct reports.

3.        I have reviewed the Penalty Order issued by the Commission to ANR in Docket No. 25-CONS-3329-CPEN ("Penalty Order"). The Penalty Order states that, on April 1, 2025, the Commission's Docket Room served a copy of the Penalty Order via United States First Class Mail on my direct report, Robert Southers, at ANR's corporate office located at 700 Louisiana Street, Houston, Texas. However, based on reasonable investigation and inquiry, Mr. Southers did not receive that mailing. Based on reasonable investigation and inquiry, no other employee or representative of ANR received the mailing.

4.        I have also reviewed the Commission's Notice of License Suspension, dated May 30, 2025. The Notice of License Suspension was also addressed to Robert Southers at ANR's

corporate office at 700 Louisiana Street in Houston, Texas. Mr. Southers, however, is assigned to an office in Duluth, Minnesota. Allison Rogers, an administrative Associate assigned to the Houston office, received the mailed Notice on Monday, June 9, 2025. She scanned that Notice to the addressee, Mr. Southers, that same day. Mr. Southers received a copy of the Notice of License Suspension through scanned message on June 9, 2025.

5. I was not aware of the existence of the Penalty Order until I received communications from Mr. Southers regarding the Notice of License Suspension, which references the Penalty Order and docket number. Based on reasonable investigation and inquiry, no other employee or representative of ANR had knowledge of the existence of the Penalty Order before June 9, 2025.

Further Affiant Sayeth Naught.

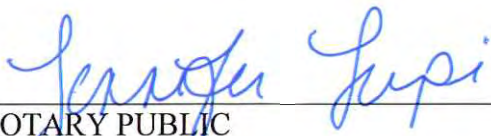
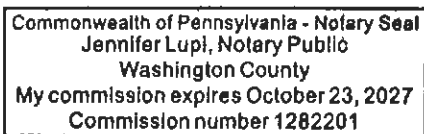


Karen Franks

COMMONWEALTH OF PENNSYLVANIA)

COUNTY OF Washington) ss.

Subscribed and sworn to before me, a Notary Public, this 27<sup>th</sup> day of June, 2025.

  
NOTARY PUBLIC

My Commission Expires:

# **EXHIBIT 2**



For KCC Use ONLY

API # 15 \_\_\_\_\_

**DRAFT****IN ALL CASES, PLEASE FULLY COMPLETE THIS SIDE OF THE FORM.**

In all cases, please fully complete this side of the form. Include items 1 through 3 at the bottom of this page.

Operator: ANR Pipeline Company  
 Facility Name: Grounded ANR Trunk 100 MP74.00  
 Borehole Number: 1

Location of Well: County: Meade  
1020 feet from ☒ N / ☐ S Line of Section  
1001 feet from ☒ E / ☐ W Line of Section  
 Sec. 5 Twp. 34 S. R. 25 ☐ E ☒ W

Is Section: ☒ Regular or ☐ Irregular

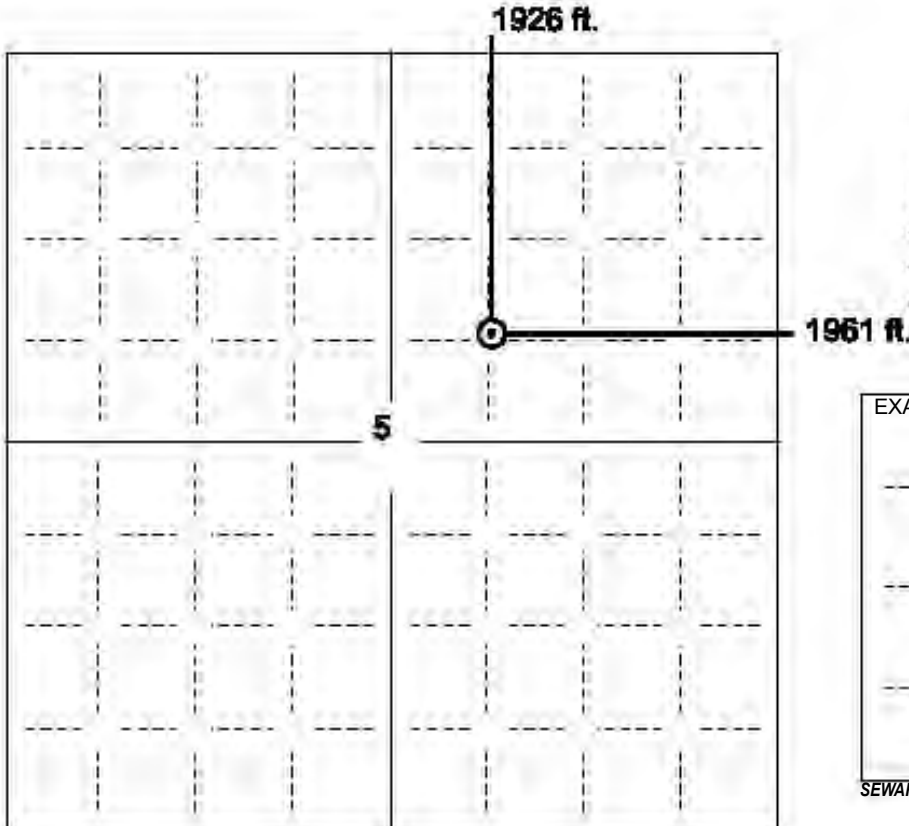
If Section is Irregular, locate well from nearest corner boundary.

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

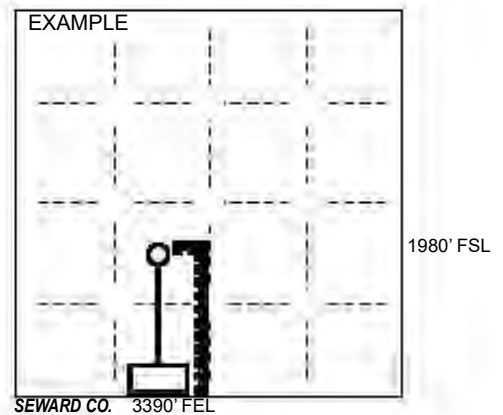
**PLAT**

Show location of the Cathodic Borehole. 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:**

1. 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.;
2. The distance of the proposed drilling location from the section's south / north and east / west; line.
3. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

## APPLICATION FOR SURFACE PIT

*Submit in Duplicate*

Operator Name: <b>ANR Pipeline Company</b>		License Number: <b>32953</b>	
Operator Address: <b>700 LOUISIANA ST SUITE 1300</b>		<b>HOUSTON TX 77002</b>	
Contact Person: <b>Allison Keller</b>		Phone Number: <b>832-320-5255</b>	
Lease Name & Well No.: <b>Grounded ANR Trunk 100 MPT4.00 1</b>		Pit Location (QQQQ): <b>SW - NE - SW - NE</b> Sec. <b>5</b> Twp. <b>34</b> R. <b>28</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>1928</b> Feet from <input checked="" type="checkbox"/> North / <input type="checkbox"/> South Line of Section <b>1961</b> Feet from <input checked="" type="checkbox"/> East / <input type="checkbox"/> West Line of Section <b>Meadow</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit <small>(If WP Supply API No. or Year Drilled)</small>	Pit is: <input type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: _____ (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Chloride concentration: _____ mg/l <small>(For Emergency Pits and Settling Pits only)</small>	
Is the bottom below ground level? <input type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used? <b>Not Applicable</b>	
Pit dimensions (all but working pits): _____ Length (feet) _____ Width (feet) <input checked="" type="checkbox"/> N/A: Steel Pits Depth from ground level to deepest point: _____ (feet) <input type="checkbox"/> No Pit			
If the pit is lined give a brief description of the liner material, thickness and installation procedure.  <b>Not Applicable</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring.  <b>Not Applicable</b>	
Distance to nearest water well within one-mile of pit: _____ feet    Depth of water well _____ feet		Depth to shallowest fresh water _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input 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: _____ Number of working pits to be utilized: _____ Abandonment procedure: _____ Drill pits must be closed within 365 days of spud date _____	
I hereby certify that the above statements are true and correct to the best of my knowledge and belief.			
_____ Date		_____ Signature of Applicant or Agent	

KCC OFFICE USE ONLY			
Date Received: _____		Permit Number: _____	
Permit Date: _____		Lease Inspection: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
<input type="checkbox"/> Liner <input type="checkbox"/> Steel Pit <input type="checkbox"/> RFAC <input type="checkbox"/> RFAS			



**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form KSONA-1  
July 2021  
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 Install); T-1 (Request for Change of Operator Transfer of Injection or Surface Pls 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 Install) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Allison Keller  
Phone: ( 304 ) 357-2347 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: allison\_keller@anrenergy.com

Well Location:  
SW NE SW NE Sec. 5 Twp. 34 S. R. 28 ☐ East ☒ West  
County: Meade  
Lease Name: Grounded ANR Trunk 100 MP74.90 Well #: 1

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

Surface Owner Information:  
Name: Michael Lawrence Amerin  
Address 1: 23463 V Road  
Address 2: \_\_\_\_\_  
City: Plains State: KS Zip: 67069 + \_\_\_\_\_

*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 Install), you must supply the surface owners and the KCC with a plat showing the predicted locations of house 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 (see Chapter 55 of the Kansas Statutes Annotated), 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 hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_





For KCC Use:

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

District # 1

SGA? ☐ Yes ☒ No

**KANSAS CORPORATION COMMISSION**  
**OIL & GAS CONSERVATION DIVISION**

Form CB-1  
Oct 2014

Form must be Typed  
Form must be Signed  
All blanks must be Filled

**CATHODIC PROTECTION BOREHOLE INTENT**

Must be approved by the KCC sixty (60) 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: 10/7/2024  
month day year

OPERATOR: License# 82963  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Allison Keller  
Phone: 832-320-5255

CONTRACTOR: License# 990  
Name: Associated Drilling, Inc. #890  
Type Drilling Equipment: ☒ Mud Rotary ☐ Cable  
☐ Air Rotary ☐ Other

**Construction Features**

Length of Cathodic Surface (Non-Metallic) Casing  
Planned to be set: 20 feet  
Length of Conductor pipe (if any): 0 feet  
Surface casing borehole size: 12 inches  
Cathodic surface casing size: 10 inches  
Cathodic surface casing centralizers set at depths of: 6 ; 20 ;  
\_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ;  
Cathodic surface casing will terminate at:  
☐ Above surface ☐ Surface Vault ☒ Below Surface Vault  
Pitless casing adaptor will be used: ☐ Yes ☒ No Depth \_\_\_\_\_ feet  
Anode installation depths are: 345 ; 335 ; 325 ; 315 ; 305 ;  
295 ; 285 ; 275 ; 265 ; 255 ; 245 ; 235 ; 225 ;

**AFFIDAVIT**

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55-101 et. seq.

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

1. Notify the appropriate District office prior to spudding and again before plugging the well. An agreement between the operator and the District Office on plugs and placement is necessary prior to plugging. In all cases, notify District Office prior to any grouting.
2. Notify appropriate District Office 48 hours prior to workover or re-entry.
3. A copy of the approved notice of intent to drill shall be posted on each drilling rig.
4. The minimum amount of cathodic surface casing as specified below shall be set by grouting to the top when the cathodic surface casing is set.
5. File all required forms: a. File Drill Pit Application (form CDP-1) with Intent to Drill (form CB-1). b. File Certification of Compliance with Kansas Surface Owner Notification Act (form KSONA-1) with Cathodic Protection Borehole Intent (CB-1) c. File Completion Form (ACO-1) within 0 days from spud date. d. Submit plugging report (CP-4) within 0 days after final plugging is completed.

I hereby certify that the statements made herein are true and to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_

**For KCC Use ONLY**

API # 15 - \_\_\_\_\_  
Conductor pipe required \_\_\_\_\_ feet  
Minimum Cathodic Surface Casing Required: \_\_\_\_\_ feet  
Approved by: \_\_\_\_\_  
This authorization expires: \_\_\_\_\_  
(This authorization void if drilling not started within 12 months of approval date.)  
Spud date: \_\_\_\_\_ Agent: \_\_\_\_\_

Spot Description: 37.163673, -100.255504  
NW NE NE NE Sec. 14 Twp. 30 S. R. 27 ☐ E ☒ W  
(Q/Q/Q/Q) 47 feet from ☒ N / ☐ S Line of Section  
460 feet from ☒ E / ☐ W Line of Section

Is SECTION: ☒ Regular ☐ Irregular?  
(Check directions from nearest outside corner boundaries)

County: Moore  
Facility Name: Groundbed ANR Trunk 100 MP09.30  
Borehole Number: 1  
Ground Surface Elevation: 2455 Estimated MSL  
Cathodic Borehole Total Depth: 360 feet  
Depth to Bedrock: \_\_\_\_\_ feet

**Water Information**

Aquifer Penetration: ☒ None ☐ Single ☐ Multiple  
Depth to bottom of fresh water: \_\_\_\_\_  
Depth to bottom of usable water: \_\_\_\_\_  
Water well within one-quarter mile: ☐ Yes ☒ No  
Public water supply well within one mile: ☐ Yes ☒ No  
Water Source for Drilling Operations:  
☐ Well ☐ Farm Pond ☐ Stream ☒ Other

Water Well Location: \_\_\_\_\_  
DWR Permit # \_\_\_\_\_  
Standard Dimension Ratio (SDR) is = 28

(Cathodic surface csg. O.D. in inches / MWT in inches = SDR)

Annular space between borehole and casing will be grouted with:  
☐ Concrete ☐ Neat Cement ☐ Bentonite Cement ☒ Bentonite Clay  
Anode vent pipe will be set at: 2 feet above surface  
Anode conductor (backfill) material TYPE: Lonsco SC-3 Coke Breeze  
Depth of BASE of Backfill installation material: 150  
Depth of TOP of Backfill installation material: 220  
Borehole will be Pre-Plugged? ☒ Yes ☐ No

If this permit has expired or will not be drilled, check a box below, sign, date and return to the address below.

☐ Permit Expired ☐ Well Not Drilled

Date \_\_\_\_\_ Signature of Operator or Agent \_\_\_\_\_

Mail to: **KCC - Conservation Division, 286 N Main St, 4th Fl, Wichita, KS 67202-1813**

16 33 27 ☐ E ☒ W



For KCC Use ONLY

API # 15 \_\_\_\_\_

Side Two  
**DRAFT**

**IN ALL CASES, PLEASE FULLY COMPLETE THIS SIDE OF THE FORM.**

In all cases, please fully complete this side of the form. Include items 1 through 3 at the bottom of this page.

Operator: ANR Pipeline Company  
Facility Name: Grounded ANR Trunk 100 MP83.30  
Borehole Number: 1

Location of Well: County: Meade  
47 feet from ☒ N / ☐ S Line of Section  
450 feet from ☒ E / ☐ W Line of Section  
Sec. 15 Twp. 30 S. R. 27 ☐ E ☒ W

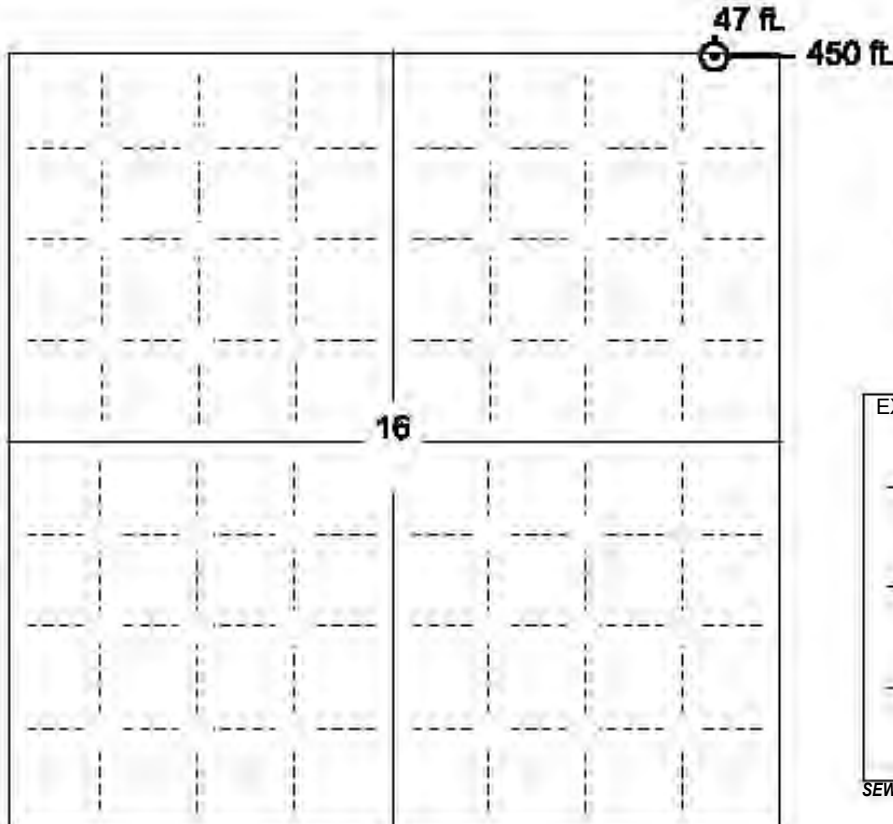
Is Section: ☒ Regular or ☐ Irregular

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






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

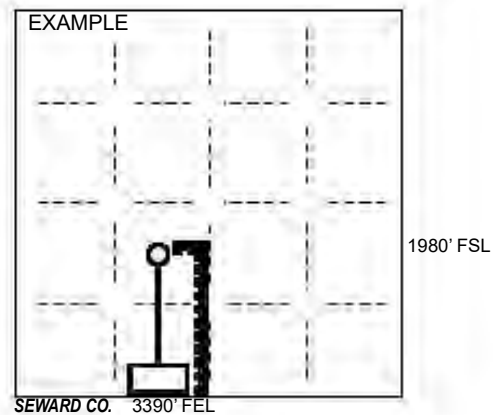
**PLAT**

Show location of the Cathodic Borehole. 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:**

1. 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.;
2. The distance of the proposed drilling location from the section's south / north and east / west; line.
3. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

## APPLICATION FOR SURFACE PIT

*Submit in Duplicate*

Operator Name: <b>ANR Pipeline Company</b>		License Number: <b>32953</b>	
Operator Address: <b>700 LOUISIANA ST SUITE 1300</b>		<b>HOUSTON TX 77002</b>	
Contact Person: <b>Allison Keller</b>		Phone Number: <b>832-320-5255</b>	
Lease Name & Well No.: <b>Grounded ANR Trunk 100 MP21.50 1</b>		Pit Location (QQQQ): <b>NW - NE - NE - NE</b> Sec. <b>16</b> Twp. <b>33</b> R. <b>27</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>47</b> Feet from <input checked="" type="checkbox"/> North / <input type="checkbox"/> South Line of Section <b>450</b> Feet from <input checked="" type="checkbox"/> East / <input type="checkbox"/> West Line of Section <b>Meadow</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit <small>(If WP Supply API No. or Year Drilled)</small>	Pit is: <input type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: _____ (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		Chloride concentration: _____ mg/l <small>(For Emergency Pits and Settling Pits only)</small>	
Is the bottom below ground level? <input type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used? <b>Not Applicable</b>	
Pit dimensions (all but working pits): _____ Length (feet) _____ Width (feet) <input checked="" type="checkbox"/> N/A: Steel Pits Depth from ground level to deepest point: _____ (feet) <input type="checkbox"/> No Pit			
If the pit is lined give a brief description of the liner material, thickness and installation procedure.  <b>Not Applicable</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring.  <b>Not Applicable</b>	
Distance to nearest water well within one-mile of pit: _____ feet    Depth of water well _____ feet		Depth to shallowest fresh water _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input 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: _____ Number of working pits to be utilized: _____ Abandonment procedure: _____ Drill pits must be closed within 365 days of spud date _____	
I hereby certify that the above statements are true and correct to the best of my knowledge and belief.			
_____ Date		_____ Signature of Applicant or Agent	

### KCC OFFICE USE ONLY

☐ Liner    ☐ Steel Pit    ☐ RFAC    ☐ RFAS

Date Received: \_\_\_\_\_ Permit Number: \_\_\_\_\_ Permit Date: \_\_\_\_\_ Lease Inspection: ☐ Yes ☒ No

**DRAFT**  
KANSAS CORPORATION COMMISSION  
OF OIL & GAS CONSERVATION DIVISION

Form KSONA-1  
July 2021  
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 Install); T-1 (Request for Change of Operator Transfer of Injection or Surface Pls 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 Install) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Allison Keller  
Phone: ( 304 ) 357-2347 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: allison\_keller@anrenergy.com

Well Location:  
NW\_NE\_NE\_NE Sec. 16 Twp. 33 S. R. 27 ☐ East ☒ West  
County: Meade  
Lease Name: Grounded ANR Trunk 100 MPB330 Well #: 1

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

Surface Owner Information:  
Name: Darwin D Ediger Trust  
Address 1: 23215 U Road  
Address 2: \_\_\_\_\_  
City: Meade State: KS Zip: 67864 + \_\_\_\_\_

*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 Install), you must supply the surface owners and the KCC with a plat showing the predicted locations of house 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:

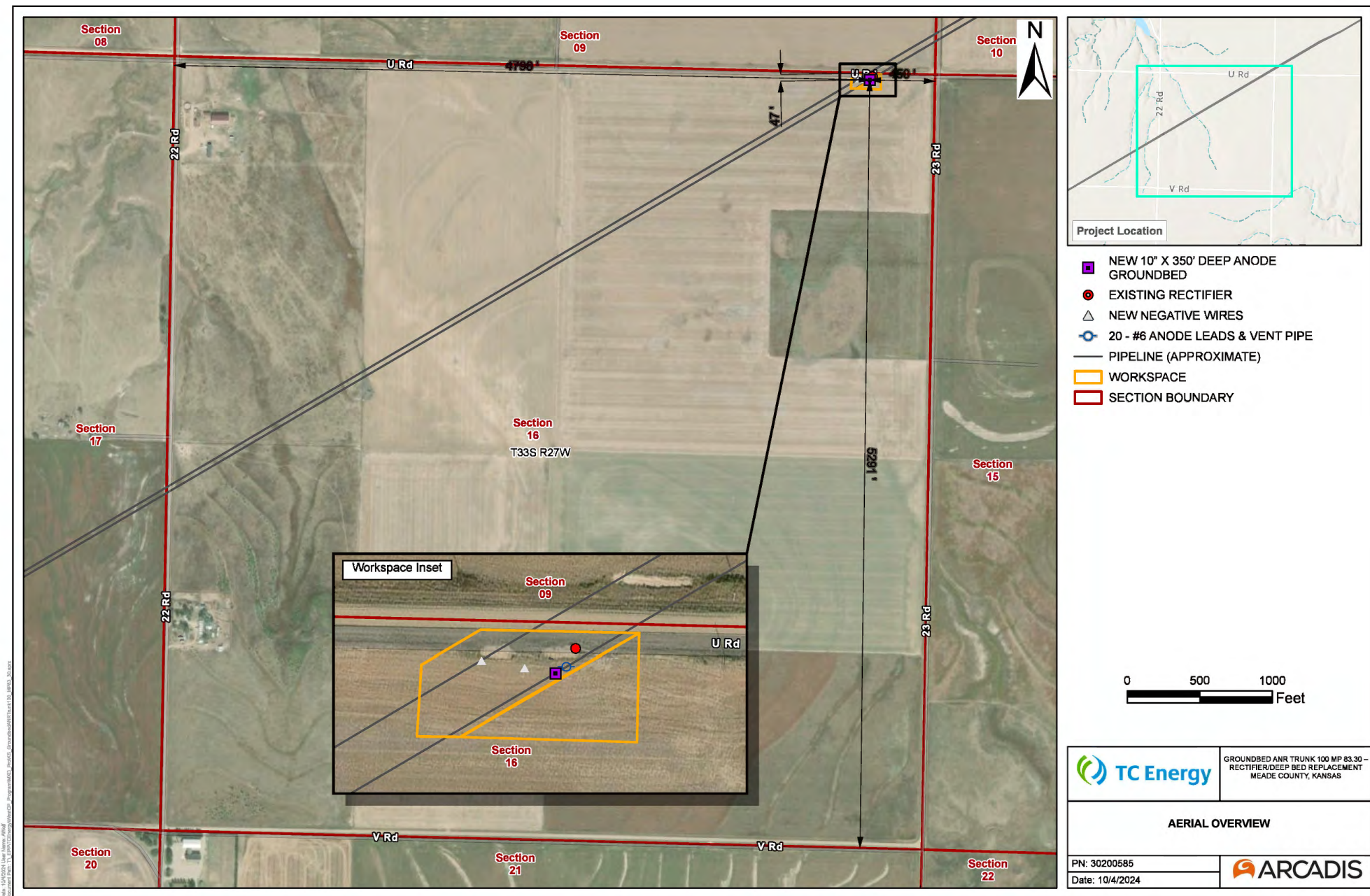
- ☒ I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that 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 hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_





# **EXHIBIT 3**

**Remarks**

CeLena Peterson 10/16/2024 09:05 am	Depth to Bottom of Fresh Water was changed from "" to "550"
CeLena Peterson 10/16/2024 09:05 am	Depth To Bedrock was changed from "" to "35"
CeLena Peterson 10/16/2024 09:05 am	Depth to Bottom of Usable Water was changed from "" to "550"
CeLena Peterson 10/16/2024 09:05 am	DWR Permit Number was changed from "" to "apply if needed"
CeLena Peterson 10/16/2024 09:05 am	Aquifer Penetration was changed from "None" to "Multiple"
CeLena Peterson 10/16/2024 09:23 am	1. Minimum surface casing in this area is 40 ft.
CeLena Peterson 10/16/2024 09:24 am	2. Minimum for anode vent pipe is 3 ft.
CeLena Peterson 10/16/2024 09:30 am	3. Cathodic borehole casing size must be 6 inches greater than the surface casing size.
CeLena Peterson 10/16/2024 09:33 am	4. Footage on attached map and footage entered on the intent should match
CeLena Peterson 10/16/2024 09:34 am	Please make necessary changes and resubmit.



---

**From:** kgs\_exadata\_prd\_sa@ku.edu  
**Sent:** Wednesday, October 16, 2024 9:41 AM  
**To:** Nielsen, Abby  
**Subject:** +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

You don't often get email from kgs\_exadata\_prd\_sa@ku.edu. [Learn why this is important](#)

**Arcadis Warning:** Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

The KCC has returned the **Cathodic Protection Borehole Intent (CB1CDP1)** for the well named "Groundbed ANR Trunk 100 MP74.80 1". Corrections are needed or additional information is required.

Be sure to make the necessary changes and resubmit the CB1CDP1 within 35 days. Specific information from the KCC about what needs to be done is available on KOLAR.

After 35 days, if the CB1CDP1 has not been resubmitted to the KCC, the form will be deleted from KOLAR and you will not be able to retrieve it, but you have the option to file a new CB1CDP1.

**NOTE: If you are requesting confidentiality on an ACO-1, then you must resubmit the ACO-1 before the original 120 day confidentiality period expires in order for confidentiality to be granted.**

This is [KOLAR](#) email request #107169586802 [10/16/2024 09:39:30] [document #1796820].

# **EXHIBIT 4**

For KCC Use:

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

District # 1

SGA? ☒ Yes ☐ No

**KANSAS CORPORATION COMMISSION**  
**OIL & GAS CONSERVATION DIVISION**

Form CB-1  
Oct 2014

Form must be Typed  
Form must be Signed  
All blanks must be Filled

**CATHODIC PROTECTION BOREHOLE INTENT**

Must be approved by the KCC sixty (60) 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: 10/16/2024  
month day year

OPERATOR: License# 82963  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Allison Keller  
Phone: 832-320-5255

CONTRACTOR: License# 990  
Name: Associated Drilling, Inc. #890  
Type Drilling Equipment: ☒ Mud Rotary ☐ Cable  
☐ Air Rotary ☐ Other

**Construction Features**

Length of Cathodic Surface (Non-Metallic) Casing  
Planned to be set: 40 feet  
Length of Conductor pipe (if any): 0 feet  
Surface casing borehole size: 12 inches  
Cathodic surface casing size: 18 inches  
Cathodic surface casing centralizers set at depths of: 6 ; 20 ;  
\_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ; \_\_\_\_ ;  
Cathodic surface casing will terminate at:  
☐ Above surface ☐ Surface Vault ☒ Below Surface Vault  
Pitless casing adaptor will be used: ☐ Yes ☒ No Depth \_\_\_\_\_ feet  
Anode installation depths are: 345 ; 335 ; 325 ; 315 ; 305 ;  
295 ; 285 ; 275 ; 265 ; 255 ; 245 ; 235 ; 225 ;

**AFFIDAVIT**

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55-101 et. seq.

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

- Notify the appropriate District office prior to spudding and again before plugging the well. An agreement between the operator and the District Office on plugs and placement is necessary prior to plugging. In all cases, notify District Office prior to any grouting.
- Notify appropriate District Office 48 hours prior to workover or re-entry.
- A copy of the approved notice of intent to drill shall be posted on each drilling rig.
- The minimum amount of cathodic surface casing as specified below shall be set by grouting to the top when the cathodic surface casing is set.
- File all required forms: a. File Drill Pit Application (form CDP-1) with Intent to Drill (form CB-1). b. File Certification of Compliance with Kansas Surface Owner Notification Act (form KSONA-1) with Cathodic Protection Borehole Intent (CB-1) c. File Completion Form (ACO-1) within 0 days from spud date. d. Submit plugging report (CP-4) within 0 days after final plugging is completed.

I hereby certify that the statements made herein are true and to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_

**For KCC Use ONLY**

API # 15 - \_\_\_\_\_  
Conductor pipe required 0 feet  
Minimum Cathodic Surface Casing Required: 40 feet  
Approved by: \_\_\_\_\_  
This authorization expires:  
(This authorization void if drilling not started within 12 months of approval date.)  
Spud date: \_\_\_\_\_ Agent: \_\_\_\_\_

Spot Description: 37.120354, -100.387120  
SW NE SW NE Sec. 5 Twp. 34 S. R. 24 ☐ E ☒ W  
(Q/Q/Q/Q) 1930 feet from ☒ N / ☐ S Line of Section  
1950 feet from ☒ E / ☐ W Line of Section  
Is SECTION: ☒ Regular ☐ Irregular?  
(Check directions from nearest outside corner boundaries)  
County: Monroe  
Facility Name: Groundbed ANR Trunk 100 MP74.50  
Borehole Number: 1  
Ground Surface Elevation: 2227 Estimated MSL  
Cathodic Borehole Total Depth: 360 feet  
Depth to Bedrock: 36 feet  
**Water Information**  
Aquifer Penetration: ☐ None ☐ Single ☒ Multiple  
Depth to bottom of fresh water: 560  
Depth to bottom of usable water: 560  
Water well within one-quarter mile: ☐ Yes ☒ No  
Public water supply well within one mile: ☐ Yes ☒ No  
Water Source for Drilling Operations:  
☐ Well ☐ Farm Pond ☐ Stream ☒ Other  
Water Well Location: \_\_\_\_\_  
DWR Permit # apply if needed  
Standard Dimension Ratio (SDR) is = 28  
(Cathodic surface csg. O.D. in inches / MWT in inches = SDR)  
Annular space between borehole and casing will be grouted with:  
☐ Concrete ☐ Neat Cement ☐ Bentonite Cement ☒ Bentonite Clay  
Anode vent pipe will be set at: 0 feet above surface  
Anode conductor (backfill) material TYPE: Lonsco SC-3 Coke Breeze  
Depth of BASE of Backfill installation material: 150  
Depth of TOP of Backfill installation material: 220  
Borehole will be Pre-Plugged? ☒ Yes ☐ No

If this permit has expired or will not be drilled, check a box below, sign, date and return to the address below.

☐ Permit Expired ☐ Well Not Drilled

Date

Signature of Operator or Agent

For KCC Use ONLY

API # 15 \_\_\_\_\_

Side Two  
**DRAFT**

**IN ALL CASES, PLEASE FULLY COMPLETE THIS SIDE OF THE FORM.**

In all cases, please fully complete this side of the form. Include items 1 through 3 at the bottom of this page.

Operator: ANR Pipeline Company  
Facility Name: Grounded ANR Trunk 100 MP74.00  
Borehole Number: 1

Location of Well: County: Meade  
1030 feet from ☒ N / ☐ S Line of Section  
1056 feet from ☒ E / ☐ W Line of Section  
Sec. 5 Twp. 34 S. R. 25 ☐ E ☒ W

Is Section: ☒ Regular or ☐ Irregular

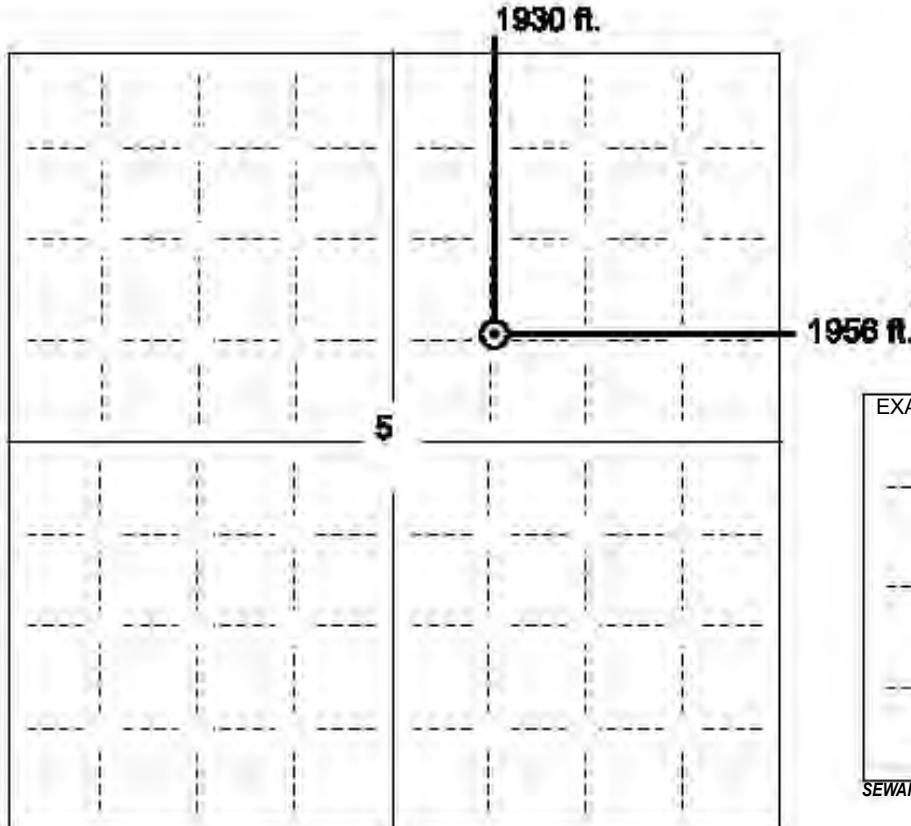
If Section is Irregular, locate well from nearest corner boundary.

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

**PLAT**

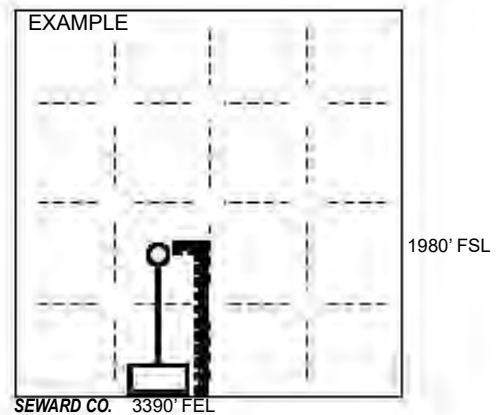
Show location of the Cathodic Borehole. Show footage to the nearest lease or unit boundary line. Show the predicted locations of lease roads, tank batteries, pipelines and electrical lines, as required by the Kansas Surface Owner Notice Act (House Bill 2032).

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:**

1. 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.;
2. The distance of the proposed drilling location from the section's south / north and east / west; line.
3. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

## APPLICATION FOR SURFACE PIT

*Submit in Duplicate*

Operator Name: <b>ANR Pipeline Company</b>		License Number: <b>32953</b>	
Operator Address: <b>700 LOUISIANA ST SUITE 1300</b>		<b>HOUSTON TX 77002</b>	
Contact Person: <b>Allison Keller</b>		Phone Number: <b>832-320-5255</b>	
Lease Name & Well No.: <b>Grounded ANR Trunk 100 MPT4.00 1</b>		Pit Location (QQQQ): <b>SW - NE - SW - NE</b> Sec. <b>5</b> Twp. <b>34</b> R. <b>28</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>1930</b> Feet from <input checked="" type="checkbox"/> North / <input type="checkbox"/> South Line of Section <b>1956</b> Feet from <input checked="" type="checkbox"/> East / <input type="checkbox"/> West Line of Section <b>Meadow</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit <small>(If WP Supply API No. or Year Drilled)</small>	Pit is: <input type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: _____ (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Chloride concentration: _____ mg/l <small>(For Emergency Pits and Settling Pits only)</small>	
Is the bottom below ground level? <input type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used? <b>Not Applicable</b>	
Pit dimensions (all but working pits): _____ Length (feet) _____ Width (feet) <input checked="" type="checkbox"/> N/A: Steel Pits Depth from ground level to deepest point: _____ (feet) <input type="checkbox"/> No Pit			
If the pit is lined give a brief description of the liner material, thickness and installation procedure.  <b>Not Applicable</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring.  <b>Not Applicable</b>	
Distance to nearest water well within one-mile of pit: _____ feet    Depth of water well _____ feet		Depth to shallowest fresh water _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input 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: _____ Number of working pits to be utilized: _____ Abandonment procedure: _____ Drill pits must be closed within 365 days of spud date _____	
I hereby certify that the above statements are true and correct to the best of my knowledge and belief.  <div style="display: flex; justify-content: space-between;"> <span>_____ Date</span> <span>_____ Signature of Applicant or Agent</span> </div>			

### KCC OFFICE USE ONLY

Date Received: \_\_\_\_\_ Permit Number: \_\_\_\_\_ Permit Date: \_\_\_\_\_

Lease Inspection: ☐ Yes    ☒ No



**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form KSONA-1  
July 2021  
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 Install); T-1 (Request for Change of Operator Transfer of Injection or Surface Pls 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 Install) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Allison Keller  
Phone: ( 304 ) 357-2347 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: allison\_keller@anrenergy.com

Well Location:  
SW NE SW NE Sec. 5 Twp. 34 S. R. 28 ☐ East ☒ West  
County: Maize  
Lease Name: Grounded ANR Trunk 100 MP74.90 Well #: 1

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

Surface Owner Information:  
Name: Michael Lawrence Amerin  
Address 1: 23463 V Road  
Address 2: \_\_\_\_\_  
City: Plains State: KS Zip: 67069 + \_\_\_\_\_

*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 Install), you must supply the surface owners and the KCC with a plat showing the predicted locations of house 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:

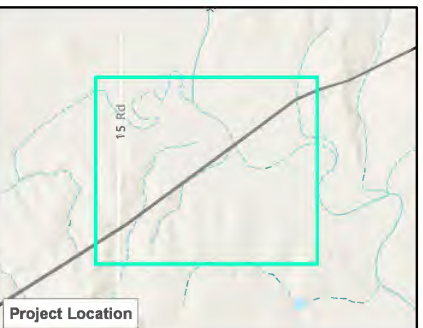
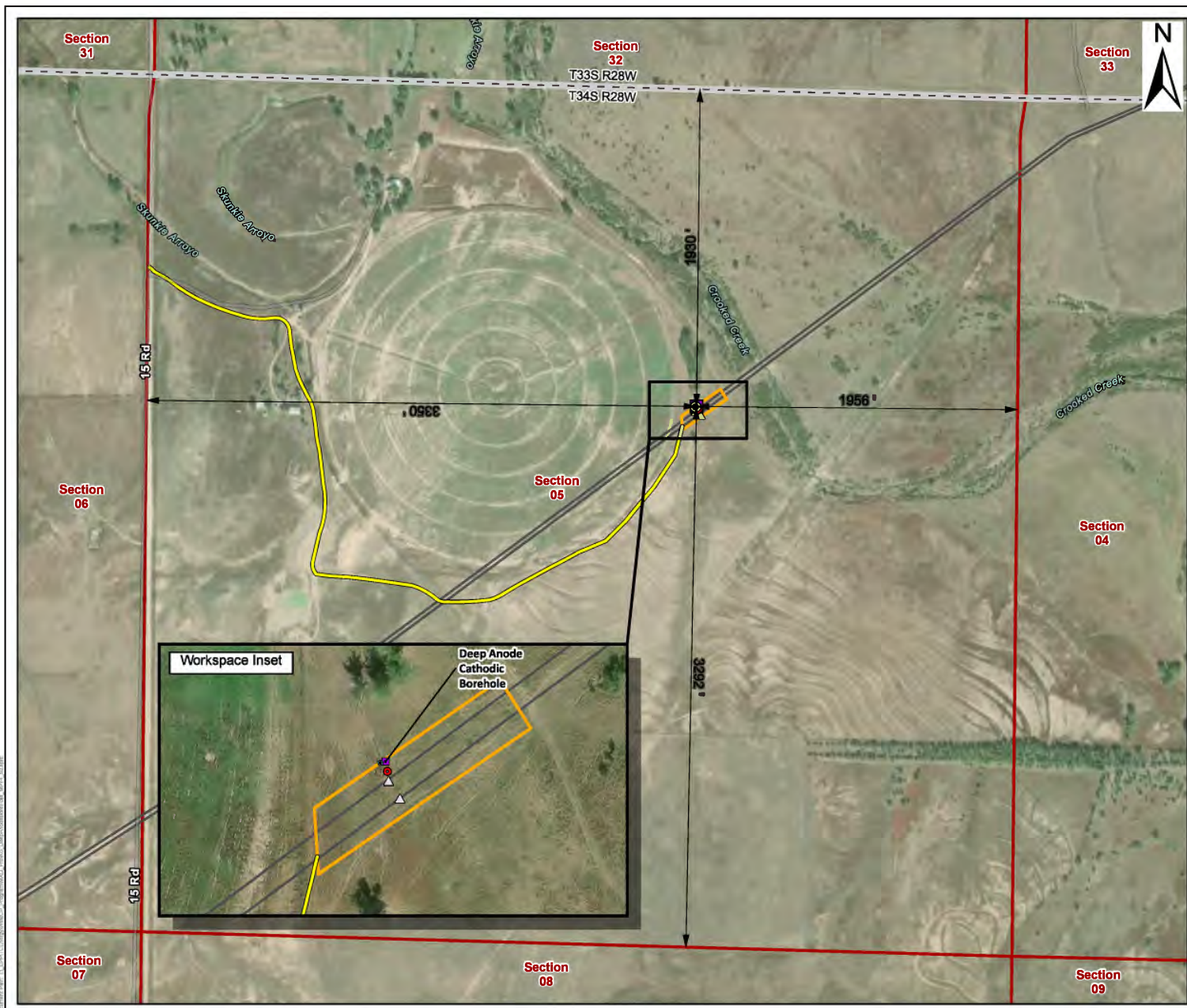
- ☒ I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that 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.*

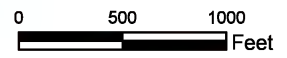
I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_





- PROJECT LOCATION
- RECTIFIER POWER POLE
- T/S AND NEGATIVE WIRES
- DEEP ANODE CATHODIC BOREHOLE
- ACCESS ROUTE (CENTERLINE)
- PIPELINE (APPROXIMATE)
- WORKSPACE
- TOWNSHIP BOUNDARY
- SECTION BOUNDARY



ANR PIPELINE COMPANY  
GROUNDBED ANR TRUNK 100 MP 74.80  
-RECTIFIER/DEEP BED REPLACEMENT  
MEADE COUNTY, KANSAS

AERIAL OVERVIEW

PN: 30200585  
Date: 9/25/2024

