

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

In the matter of the application of Val Energy,) Docket No: 25-CONS-3265-CWLE
Inc. for a well location exception and assignment)
of attributed acreage and oil allowables for its) CONSERVATION DIVISION
Rogers #1-20 well in Section 20, Township 32)
South, Range 6 East, Cowley County, Kansas.) License No.: 5822

PRE-FILED TESTIMONY OF

JAKE EASTES

ON BEHALF OF COMMISSION STAFF

SEPTEMBER 5, 2025

Q. What is your name and business address?

A. Jake Eastes, 266 N. Main St. Wichita, KS 67202.

Q. By whom are you employed and in what capacity?

A. I am employed by the Conservation Division of the Kansas Corporation Commission as a Professional Geologist and Research Analyst within the Conservation Division's Production and Underground Injection Control (UIC) Departments.

Q. Would you please briefly describe your educational background and work experience?

A. Yes. I graduated with a Bachelor of Science degree in Geology from Kansas State University (KSU) in 2015. While completing my studies at KSU, I worked as a Well Site Geologist for Musgrove Petroleum during the summer of 2014. After receiving my Bachelor's degree, I continued my studies at Fort Hays State University (FHSU) where I graduated with a Master of Science degree in Petroleum Geology in 2017. While at FHSU, I was employed by the United States Geological Survey for a year and six months as a Hydrologic Technician Student Trainee. After graduating from FHSU, I worked briefly for Impac Exploration Services as a Well Site/Mudlogging Geologist in the Texas Panhandle and later transitioned into my current role with the Kansas Corporation Commission in September 2017. I received my Kansas professional geologist licensure in November 2023.

Q. Have you previously testified before this Commission?

A. Yes.

Q. What duties does your position with the Conservation Division involve?

A. My primary duties include providing technical support on various applications involving UIC wells, unitizations, horizontal wells, well location exceptions, alternate tract units,

1 flaring, and vacuum or high-volume pumps. As part of these duties, I enforce the
2 Commission's gas gathering and UIC regulations, review gas well test reports, and monitor
3 monthly production from Hugoton/Panoma gas wells.

4 **Q. What is the purpose of your testimony in this matter?**

5 A. The purpose of my testimony is to inform the Commission about my review of the
6 application of Val Energy, Inc. (Operator) for a well location exception for the drilled
7 Rogers #1-20 well (Subject Well), API #15-035-24796.

8 **Q. What are the general setback requirements for wells in Kansas?**

9 A. Under K.A.R. 82-3-108(a) the general requirement for oil and gas wells in the State of
10 Kansas is that they need to be drilled at least 330 feet away from any lease or unit boundary
11 line. Additionally, there are separate setback requirements for oil wells located in eastern
12 Kansas contained in K.A.R. 82-3-108(b), however, those setback requirements do not
13 apply to oil wells in Cowley County.

14 **Q. Does the regulation allow for exceptions to the setback requirement?**

15 A. Yes. Under K.A.R. 82-3-108(c), a well location exception may be granted to permit drilling
16 within shorter distances than those provided in subsection (a) and subsection (b) and to the
17 acreage attributable and assigned allowable, if these exceptions are necessary either to
18 prevent waste or to protect correlative rights. Subsection (c) also provides that in granting
19 the exception, the acreage attributable to the well and the assigned allowable shall be
20 considered.

21 **Q. What information is required to be included in the exception application?**

22 A. Under K.A.R. 82-3-108(d), if an exception to the regulation is desired, then an application
23 shall be submitted to the Conservation Division. The application must contain (1) a brief

1 explanation of the exception requested; (2) the proposed location of the well, including the
2 distance to the nearest lease or unit boundary line; (3) a list of each offset operator whose
3 lease is located less than the required distance from the proposed location, each unleased
4 offset mineral owner whose property boundary is located less than the minimum distance
5 required from the proposed location, and the applicant's lessor or lessors, if the applicant
6 operates any lease that will be situated less than the minimum distance required from the
7 proposed well location; (4) the acreage attributable to the well; and (5) the allowable
8 requested. Additionally, under K.A.R. 82-3-108(e) each application shall be accompanied
9 by the proposed Notice of Intent to Drill (C-1) form and a plat that accurately shows the
10 property on which the well is sought to be drilled, all other completed, partially drilled, or
11 permitted wells on the property, and all adjacent properties and wells.

12 **Q. When did Operator file its application?**

13 A. Operator filed its application on February 13, 2025. On March 3, 2025, Operator submitted
14 an amended application.

15 **Q. Have you reviewed Operator's amended application?**

16 A. Yes, I have thoroughly reviewed the amended application. I would note that a copy of the
17 C-1 form is not attached to the application indicating the application is not in compliance
18 with K.A.R. 82-3-108(e).

19 **Q. Where did Operator drill the Subject Well?**

20 A. The situation presented in the captioned docket is a little different than usual as the C-1
21 form and Well Completion Form (ACO-1) for the Subject Well indicates the well was
22 drilled as an oil well 2,310 feet from the North line and 2,895 feet from the West line of
23 Section 20, Township 32 South, Range 6 East in Cowley County, Kansas. I have attached a

1 copy of page 1 of the ACO-1 to my testimony as *Exhibit JE-1*. After the Subject Well was
2 drilled, an offset mineral owner brought it to Staff's attention that the well was drilled
3 closer to the lease boundary than what is allowed by the Commission's regulations. The
4 survey provided to Staff indicates the Subject Well was drilled 2,362 feet from the North
5 line and 2,048 feet from the East line of Section 20, Township 32 South, Range 6 East. A
6 copy of this survey is attached to Operator's Application as Exhibit B.

7 **Q. Does Operator's amended application appear to include all required information?**

8 A. Most of the required information is included but not all. A brief explanation of the
9 exception requested is included in paragraph 4 of the application. Paragraph 3 of the
10 application includes the location listed on the C-1 form for the Subject Well and distance to
11 the nearest lease or unit boundary line. Exhibit D to the application identifies the necessary
12 persons that are required to receive notice of the application. Paragraph 5 of the application
13 includes the requested allowable and acreage attributable to the well. Here, Operator
14 requests a full daily oil allowable and a full attribution unit be assigned to the Subject Well.
15 As I stated above, a copy of the C-1 form for the Subject Well is not included with the
16 application. A plat map that accurately shows the property the well will be drilled upon, as
17 well as all other completed, partially drilled, or permitted wells on the property, and all
18 adjacent properties and wells is attached to the application.

19 **Q. What amount of daily production would be allowed by a full allowable?**

20 A. Operator's application indicates that the Subject Well was drilled to a total vertical depth of
21 3251 feet before being plugged back to a depth of 3226 feet to produce from the
22 Mississippian formation. Under K.A.R. 82-3-203 any well in a nonprorated pool that is
23 drilled from 0 to 4000 feet is assigned a daily production allowable of 100 barrels of oil.

Attached to my testimony as ***Exhibit JE-2*** are the production records for the Subject Well available through the KGS website. The Subject Well appears to have been most productive in August 2024 when it produced an average of 31-32 barrels of oil per day.

Q. What notice is required for a well location exception application?

A. K.A.R. 82-3-108(f) provides that notice of the application shall be provided to all parties specified in paragraphs (d)(3)(A), (d)(3)(B), and (d)(3)(C) of the regulation and shall be published as required by K.A.R. 82-3-135a(d).

Q. Does it appear that Operator has provided proper notice of its application?

A. Yes. Exhibit C to the application appears to include all persons which are required to receive notice of the application. Further, a certificate of service and proof of publication of notice of amended application was filed in the docket on March 24, 2025. The certificate of service indicates a copy of the amended application was served by first-class mail on or before the date the application was filed with the Commission. Operator included affidavits of publication from The Wichita Eagle and the Cowley Courier Traveler. In consulting with the KCC legal department, it appears that the notice provided for Operator's Application in The Wichita Eagle and Cowley Courier Traveler is sufficient.

Q. Have you reviewed the testimony provided by Mr. K. Todd Allam on behalf of Operator?

A. Yes.

Q. Is there any additional information that you believe would be helpful for you to review based upon that testimony?

A. No, not at this time.

1 **Q. Have you reviewed the testimony provided by Mr. William Gates on behalf of the**
2 **protestor?**

3 A. Yes.

4 **Q. Is there any additional information that you believe would be helpful for you to**
5 **review based upon that testimony?**

6 A. No, not at this time.

7 **Q. Do you have a recommendation regarding Operator's Application?**

8 A. I would like Operator to supplement its amended application with a copy of the C-1, so that
9 the application fully complies with 82-3-108. Once that is done, I recommend the
10 Commission grant the Operator's application and recommend it be assigned a 16% reduced
11 allowable of 84 barrels of oil per day.

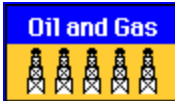
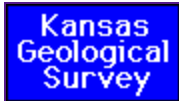
12 **Q. Why do you recommend granting the application with a reduced allowable?**

13 A. Operator has submitted the information required for approval of a well location exception.
14 The Subject Well has been drilled and completed and oil production in commercial
15 quantities has been established. The oil production records indicate that the Subject Well,
16 during its most productive month, averaged 31-32 barrels of oil per day. Additionally, I
17 agree with page five, lines five through eleven of Mr. Allam's testimony that production
18 from the Subject Well will not drain any offsetting Mississippian reserves approximately
19 276 feet from the well impacting the protesters correlative rights because the fracture
20 envelope does not extend more than 230 feet on either side of the wellbore along the
21 azimuth of the frac plane in Mississippian wells in South Central Kansas. However, since
22 the present location of the Subject Well is 54 feet or 16% closer to the offsetting lease

1 boundary than allowed by regulation, I recommend the 100 barrels per day allowable be
2 reduced by 16% to 84 barrels per day.

3 **Q. Does this conclude your testimony?**

4 A. Yes.



Yearly and monthly production



ROGERS 1-20 Lease

Lease: ROGERS 1-20**Operator:** Val Energy, Inc.**Location:** T32S, R6E, Sec. 20**Cumulative Production:** 5683.2 barrels (from 2024 to 2025)**KS Dept. of Revenue Lease Code:** 148614**KS Dept. of Revenue Lease Name:** ROGERS 1-20**Field:** [Unknown](#)**County:** Cowley**Producing Zone:****Well Data (may be an incomplete list):**[T32S R6E, Sec. 20, W2 SW SW NE](#)**Lease:** ROGERS 1-20**Operator:** Val Energy, Inc.**Current Operator:** Val Energy, Inc.**API Number:** 15-035-24796

Data are received monthly from the Kansas Department of Revenue.

Annual Oil Production,
(bbls)

Year	Production	Wells
Production Plots		
2024	3,837	1
2025	1,846	1

Reported through 4-2025.

Note: bbls is barrels; mcf is 1000 cubic feet.

Recent Monthly Oil Production, (bbls)

(Complete production available in file saved
using blue button at top of page.)

Year	Month	Production	Wells	Reporter or Purchaser/ Reporting Customer
2024	7	342.06	1	KELLY L. MACLASKEY OIL (100%)
2024	8	989.49	1	KELLY L. MACLASKEY OIL (100%)
2024	9	830.58	1	KELLY L. MACLASKEY OIL (100%)
2024	10	824.45	1	KELLY L. MACLASKEY OIL (100%)
2024	11	356.22	1	KELLY L. MACLASKEY OIL (100%)
2024	12	494.27	1	KELLY L. MACLASKEY OIL (100%)
2025	1	493.95	1	KELLY L. MACLASKEY OIL (100%)
2025	2	513.67	1	KELLY L. MACLASKEY OIL (100%)
2025	3	520.28	1	KELLY L. MACLASKEY OIL (95%) , Gusher Energy Services, Inc. (5%)

Exhibit JE-2

2025	4	318.23	1	KELLY L. MACLASKEY OIL (100%)
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Pre-1987 cumulative data and monthly volume data is provided under license agreement to the KGS by IHS Energy. As such, it may be reviewed and used for public service and research purposes. It may not be downloaded or used for purposes of re-packaging, reselling or dissemination to third parties.

Kansas Geological Survey

Comments to webadmin@kgs.ku.edu

URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014

Data from Kansas Dept. of Revenue files monthly.

CERTIFICATE OF SERVICE

25-CONS-3265-CWLE

I, the undersigned, certify that a true and correct copy of the attached Testimony has been served to the following by means of electronic service on September 5, 2025.

JAKE EASTES, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jake.eastes@ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kelcey.marsh@ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jon.myers@ks.gov

THOMAS RHOADS, ATTORNEY
LAW OFFICE OF THOMAS M. RHOADS LC
200 E. 1st Street
Suite 301
WICHITA, KS 67202
tmrroads@sbcglobal.net

WILLIAM H AND PAMELA M GATES
WILLIAM H. AND PAMELA M. GATES
18157 191ST RD
BURDEN, KS 67019-9313
williamhg1942@gmail.com

/s/ Sara Graves

Sara Graves