

**PICKRELL DRILLING COMPANY, INC.**

100 SOUTH MAIN - SUITE 505  
WICHITA, KANSAS 67202-3738  
(316) 262-8427 • FAX (316) 262-0893

March 20, 2012

Administrative Appeal of Failure  
to run MIT at designated time  
Seacat D-3 (SE/4 31-30S-21W)  
Wells F #1 (NW/4 36-20S-21W)

Mr. Ryan A. Hoffman  
Litigation Council  
Kansas Corporation Commission  
130 S. Market, Suite 2078  
Wichita, Kansas 67202-3802

**RECEIVED**  
KANSAS CORPORATION COMMISSION

**MAR 21 2012**

**LEGAL SECTION**

Dear Mr. Hoffman:

I had planned to wait until we had successfully ran MIT's on both of the captioned wells, however, time seems to be getting away and I did not want to wait too long before responding.

We did immediately complete a successful test on the Wells F-1. This was completed on March 8, 2012. We ran into a few delays on the Seacat D-3, first personnel and equipment scheduling and then being able to coordinate with a K.C.C. observer. The Dodge City office apparently had one of their personnel retire and other activities. The MIT was scheduled to be performed yesterday, March 19, but it rained enough in that area to make getting to location difficult. We tried to reschedule for today (Tuesday) but had to postpone until Thursday to coordinate with the K.C.C. observer. The test is currently scheduled for 10:00 A.M. on Thursday, March 22. We will, of course, advise you immediately when it has been successfully completed.

Pickrell Drilling Company, Inc. failed to have the required five-year MIT's ran on the two captioned wells within the properly designated time. This was strictly an oversight on our part. This office sent the requirements to the field foreman but, him being busy, it slipped by. This office failed to monitor and advise him again when they were not performed.

We agree that failing to run the MIT's is unacceptable, but we think \$1,000.00 each is somewhat more than necessary to get someone's attention and get an oversight corrected. This, especially to a company that makes every effort to conform to and comply with the State rules and regulations. It is our belief that a fine of \$100.00 each would be both more just and reasonable. We respectfully ask you to consider making this downward adjustment.

Yours very truly,

PICKRELL DRILLING COMPANY, INC.

  
Jack Gurley

Encls.

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



Phone: 620-225-8888  
Fax: 620-225-8885  
<http://kcc.ks.gov/>

Mark Sievers, Chairman  
Ward Loyd, Commissioner  
Thomas E. Wright, Commissioner

Sam Brownback, Governor

September 1, 2011

**NOTICE OF VIOLATION**

CARL W SEBITS  
PICKRELL DRILLING COMPANY INC.  
100 S MAIN STE 505  
WICHITA KS 67202

Re: WELLS F 1  
36-208-21W, NENW  
NESS County, Kansas  
Docket # D12411  
Operator License No. 5123

*K - Sent to Ed 9-2-11*

Dear Operator:

According to K.C.C. records, the above-referenced well is in probable violation of the following regulation:

K.A.R. 82-3-407. Mechanical Integrity Requirements; Penalty.

Please contact me at the number listed below to discuss how to cure the above-listed violation. **If I have not heard from you by September 15, 2011, or the violation has not been otherwise cured by September 15, 2011, this matter will be referred to our legal department with a recommendation that the Commission take formal enforcement action, including assessment of monetary penalties, for the violation. In the event the Commission issues a penalty order for the above-listed violation, the recommended monetary penalty would total \$1,000.00.** I urge you to give me a call immediately regarding this serious matter.

Very truly yours,

*Richard W. Lacey*

Richard W. Lacey  
Compliance Officer

CC: District Supervisor  
Legal Department

*Sent to field 9-2-11*

Conservation Division  
District Office No. 1  
210 E. Frontview, Suite A  
Dodge City, KS 67801



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Fax: 620-225-8885  
<http://kcc.ks.gov/>

Mark Sievers, Chairman  
Ward Loyd, Commissioner  
Thomas E. Wright, Commissioner

Sam Brownback, Governor

January 3, 2012

**NOTICE OF VIOLATION**

CARL W SEBITS  
PICKRELL DRILLING COMPANY INC.  
100 S MAIN STE 505  
WICHITA KS 67202

Re: SEACAT D 3  
31-30S-21W, NESE  
CLARK County, Kansas  
Docket # E21001  
Operator License No. 5123

Dear Operator:

According to K.C.C. records, the above-referenced well is in probable violation of the following regulation:

K.A.R. 82-3-407. Mechanical Integrity Requirements; Penalty.

Please contact me at the number listed below to discuss how to cure the above-listed violation. **If I have not heard from you by January 17, 2012, or the violation has not been otherwise cured by January 17, 2012, this matter will be referred to our legal department with a recommendation that the Commission take formal enforcement action, including assessment of monetary penalties, for the violation. In the event the Commission issues a penalty order for the above-listed violation, the recommended monetary penalty would total \$1,000.00.** I urge you to give me a call immediately regarding this serious matter.

Very truly yours,

*Richard W. Lacey*

Richard W. Lacey  
Compliance Officer

CC: District Supervisor  
Legal Department

CONSERVATION DIVISION • DISTRICT OFFICE NO. 1

210 E. Frontview, Suite A, Dodge City, KS 67801

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