

APR 01 2015

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Kansas Corporation Commission
/S/ Neysa Thomas

LEGAL SECTION

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
 Jay Scott Elmer
 Pat Apple

In the matter of the Application of Tapstone)	Docket No. 15-CONS-759-CWLE
Energy, Inc. for the Assignment of Allowable at)	
the appropriate time and a location exception for)	CONSERVATION DIVISION
the Diel Farms 31-33-8 1H well located in Section)	
31, Township 33 South, Range 8 West, in)	License No.: 35053
Harper County, Kansas.)	
)	

OBEJCTION TO APPLICATION FOR EXCEPTION

COMES NOW American Warrior, Inc. ("AWI"), by and through in-house counsel, Jacob

B. Price and for its Objection to Application for Exception and states as follows:

1. AWI is a corporation authorized to do business in the State of Kansas. Applicant's address is P.O. Box 399, Garden City, KS 67846.
2. AWI has been issued by the Kansas Corporation Commission Operator's License 4058, which expires on November 30, 2015.
3. AWI is the owner and operator of the Smith 1-6 producing oil well, which is located in the Northwest Quarter of the Northeast Quarter (NW NE) of 6, Township 34 South, Range 8 West, Harper County, Kansas. The Smith 1-6 shares a common lease boundary with the proposed well and has a valid interest in the Application.
4. The Smith 1-6 is located approximately 761 feet from the Koblitz 2 well, approximately 813 feet from the proposed bottom hole location of the Diel Farms 31-33-8 1H and approximately 981 feet from the Koblitz 1. The Smith 1-6, Koblitz 1 and Koblitz 2 currently

produce oil from the Mississippi formation. The Diel Farms 31-33-8 1H is also proposed to produce oil from the Mississippi formation

4. On March 18, 2018, Tapstone Energy, Inc published notice in the Wichita Eagle of its Application for Assignment of Allowable at the Appropriate Time and a Location Exception for the Diel Farms 31-33-8 1H well located in Section 31-Township 33 South, Range 8 West, in Harper County, Kansas.

5. Applicant has requested an exception for the location of the Diel Farms 31-33-8 1H. The proposed location is 335 feet from the Koblitz 1 well and 324 feet from Koblitz 2 well. The Koblitz 1, the Koblitz 2 and the proposed Diel Farms 31-33-8 1H are located 330 feet from the boundary line between the leases held by Tapstone Energy, Inc. and AWI.

6. The proposed combination of three wells operated by Tapstone Energy, Inc. all located 330 feet from the lease boundary and all producing from the same formation would create a cluster of three wells on two 10 acre oil well units. This exceeds the limits set by K.A.R. 82-3-207(a) which states a standard drilling unit for oil shall be 10 acres per well.


7. Further, the proposed well is a horizontal well with potential for a greater withdrawal rate than the existing conventional wells. Any fracturing of the proposed horizontal well would also potentially cause fractures and associated fluids to cross the lease boundary and create additional potential for drainage across lease boundaries.

8. Based on the foregoing, AWI requests that the Commission deny the Application as the proposed location would be in excess of established spacing rules, create a high probability of drainage across lease boundary lines and cause injury to the correlative rights of AWI.

WHEREFORE, Applicant prays that this matter be set for hearing, and upon hearing that the Commission deny Applicant's well location and request for an exception to the K.A.R. 82-3-108.

Respectfully Submitted,

AMERICAN WARRIOR, INC.

By: 

Jacob B. Price #20386

In-House Counsel

P.O. Box 399

Garden City, KS 67846

Phone: (620) 275-2963

Fax: (620) 275-5067

law@awioil.com

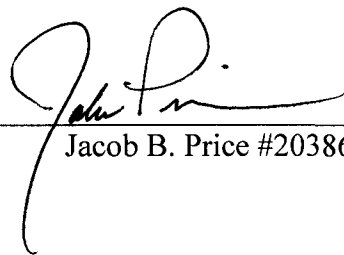
CERTIFICATE OF SERVICE

I hereby certify on this 31th day of March, 2015, true and correct copies of the above and foregoing OBJECTION TO APPLICATION FOR EXCEPTION were served by depositing copies of the same with Federal Express for overnight delivery, postage prepaid, and properly addressed to:

Corporation Commission of the State of Kansas
Conservation Division
266 Main Street, Suite 220
Wichita, Kansas 67202-1513

and the Applicant:

Tapstone Energy, Inc.
Attn: Clay Hubbard, Senior Landman
210 Park Avenue, Suite 1350
Oklahoma City, OK 73102



Jacob B. Price #20386