

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

Before Commissioners: Shari Feist Albrecht, Chair
 Jay Scott Emler
 Dwight D. Keen

In the Matter the Application of IGWT,)	Docket No: 18-CONS-3383-CWLE
Inc., for the assignment of and a location)	
exemption for the Varner Farms #1 located)	CONSERVATION DIVISION
990' FNL and 1500' FWL of Section 33,)	
Township 25 South, Range 4 East, Butler)	License No: 3167
County, Kansas.)	

PREFILED TESTIMONY OF BILL JACKSON
ON BEHALF OF IGWT, INC.

1 Q: Would you please state your name, position, employer, and office address?

2 A: My name is Bill Jackson. I am a self-employed petroleum geologist consulting with
3 IGWT, Inc. My business office address is 315 Main, El Dorado, Kansas.

4 Q: Would you please relate your educational background?

5 A: I received Bachelor's Degree in 1973 and a Master's degree in geology in 1979 from
6 Wichita State University

7 Q: Do you have experience in the geology of the area covered by the application in this
8 docket?

9 A: Yes, I have approximately 30 years of experience in this area.

10 Q: What has been your involvement in this Application?

11 A: IGWT, Inc., the Applicant, has an oil and gas lease covering the intended drill site in the
12 Northeast quarter of the Northwest quarter of Section 33, Township 25 South, Range 4
13 East. They have an issue with surface contour and drainage at a location that would be 330

1 feet from the West line of their lease and asked me to review the geology to see where the
2 wellsite could be moved that would be clear of the surface problem but also retain the
3 likelihood of a successful well.

4 Q: Did you reach a conclusion?

5 A: Yes.

6 Q: Can you explain your conclusion?

7 A: Yes. This proposed well is a Mississippian Chert objective. It is my opinion that the Chert
8 is present in Section 33, but thins out as you move East through the Section. In my opinion,
9 the farther you move East from the original planned drill site, the more you reduce your
10 chances of a successful well, and therefore from a geologic perspective you should stay as
11 far West as permitted.

12 Q: Do you sponsor any Exhibits of the area?

13 A: Yes.

14 Q: Was that Exhibit or Exhibits prepared by you or under your supervision?

15 A: Yes.

16 Q: Can you explain your Exhibit or Exhibits?

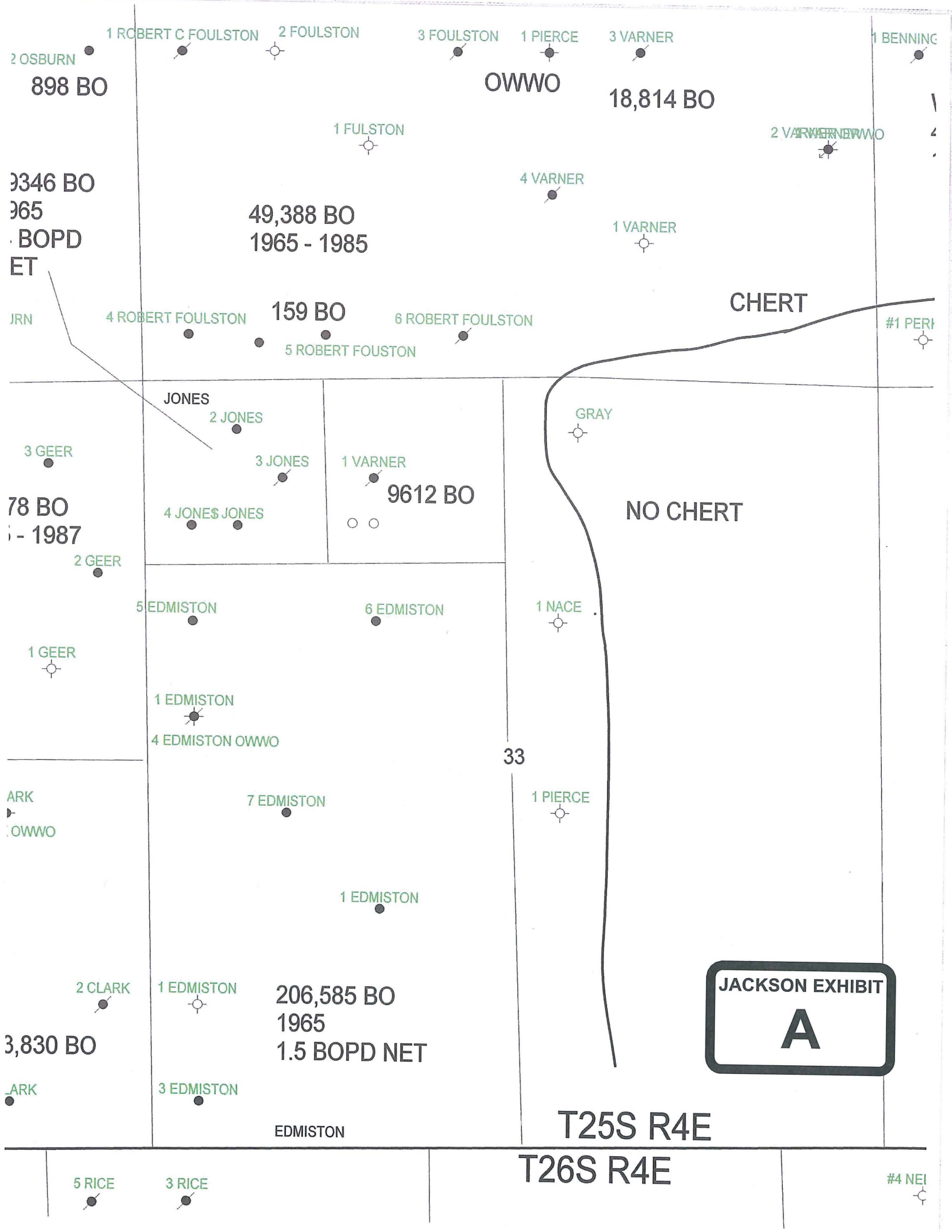
17 A: Yes. My Exhibit A shows IGWT's original proposed location in the NE/4 NW/4 of Section
18 33, and the proposed location just to the West., as well as the wells on the Jones lease and
19 the plugged #1 Varner Farms well. It also shows the remainder of Section 33 and the line
20 where it appears that the Chert is lost. We know that the Chert was present in the Jones
21 wells in the NW/4 NW/4 of Section 33, and was present in the plugged #1 Varner well in
22 the NE/4 NW/4 of Section 33. We also know that the Chert was not present in the Gray
23 well in the NW/4 NE/4 of Section 33.

1 Q: What do you conclude from that information?

2 A: It is my conclusion that the farther you move to the East in Section 33, the lower the chance
3 that you will achieve a successful completion in the Chert, and that therefore moving to the
4 West is the better location.

5 Q: Does this conclude your testimony?

6 A: Yes.



2 OSBURN
898 BO

1 ROBERT C FOULSTON
2 FOULSTON
3 FOULSTON
1 PIERCE
3 VARNER
1 BENNING

OWWO

18,814 BO

1 FULSTON

2 VARNER

4 VARNER

1 VARNER

3346 BO
365
BOPD
ET

49,388 BO
1965 - 1985

159 BO

4 ROBERT FOULSTON
6 ROBERT FOULSTON
5 ROBERT FOUSTON

CHERT

JRN

2 JONES
3 JONES
4 JONES
JONES

3 GEER
2 GEER
1 GEER

78 BO
- 1987

1 VARNER
9612 BO

5 EDMISTON
6 EDMISTON
1 EDMISTON
4 EDMISTON OWWO
7 EDMISTON
1 EDMISTON

GRAY

1 NACE

NO CHERT

33

1 PIERCE

ARK
OWWO

2 CLARK
1 EDMISTON
3 EDMISTON

206,585 BO
1965
1.5 BOPD NET

EDMISTON

JACKSON EXHIBIT
A

ARK

5 RICE
3 RICE

T25S R4E
T26S R4E

#4 NEI