

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

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the matter of the failure of Benjamin M.) Docket No. 17-CONS-3684-CPEN
Giles (“Operator”) to comply with K.A.R. 82-)
3-104 and K.A.R. 82-3-111 at the Flying J Geer) CONSERVATION DIVISION
#2 OWWO well in Butler County, Kansas.)
_____) License No. 5446

**REQUEST FOR HEARING AND
MOTION FOR SUMMARY ORDER ON THE PLEADINGS**

Benjamin M. Giles (“Operator”) respectfully requests a hearing in the above-captioned docket, and alternatively moves the State Corporation Commission of the State of Kansas (“Commission”) for a summary order voiding the Penalty Order entered in this docket and waiving the \$2,600 fine assessed therein. In support of his request and motion, Operator states and alleges as follows:

BACKGROUND

1. Operator is a sole proprietor with a mailing address of 346 S Lulu, Wichita, Kansas, 67211. The Commission has issued Operator oil and gas operator’s License No. 5446, which license is in effect through July 30, 2017.

Well History

2. Operator operates the Flying J Geer #2 OWWO (“Subject Well”), API No. 15-015-01490-0001, located approximately 1,320’ from the North line and 330’ from the East line of Section 32, Township 25 South, Range 4 East, Butler County, Kansas.

3. The Subject Well was originally drilled in June of 1963 and was operated as a producing oil well until it was plugged and abandoned in March of 1988.¹ In 2013, Operator decided to wash down the well plugs and workover the Subject Well as a producer of oil, thus preventing waste of the State's oil and gas resources and protecting the correlative rights of the royalty and working interest owners of the Flying J Geer lease.

4. On May 10, 2013, Operator made a written request to the Commission for a surface casing exception for the Subject Well pursuant to K.A.R. 82-3-106(f).² Operator intended to utilize the 130' of surface casing that was left in the hole when the Subject Well was originally plugged and abandoned in his workover operation so as to prevent economic waste. A surface casing exceptions was necessary because Commission regulations had evolved in the fifty years since the Subject Well was originally completed, and 130' of surface casing no longer satisfied Commission regulations.³

5. On May 14, 2013, the Director granted Operator's request for a surface casing exception for the Subject Well.⁴ The request was conditioned upon Operator cementing the long-string casing from a depth of at least 250' to surface, and required Operator to "[n]otify District #2 prior to spudding the well and one day before cementing the long string. . ." ⁵

6. Operator submitted a notice of intent to drill the Subject Well as an old well workover ("OWWO"), which Staff approved on June 4, 2013.⁶ Operator thereafter spudded the well and completed it on November 20, 2013.⁷ Operator notified Staff before spudding the Subject

¹ See Exhibit A, attached Commission well plugging record dated March 29, 1988.

² Exhibit A.

³ See K.A.R. 82-3-106(b)(2) (the referenced Table I Minimum Surface Casing Requirements require 200' of surface casing for wells located in Butler County, Kansas).

⁴ Exhibit B; Penalty Order, ¶ 6.

⁵ *Id.*; Penalty Order, ¶ 6.

⁶ Exhibit C.

⁷ Exhibit D; Penalty Order, ¶¶ 7-8.

Well.⁸ Contrary to Staff's contention⁹, Operator notified Staff by phone at least one day prior to cementing the long string casing into the Subject Well. It has long been Operator's policy to call Staff prior to performing cement work on any well.

7. After the Subject Well was completed, Operator submitted a Form ACO-1 Well Completion Report for the Subject Well, which was approved by Staff on January 29, 2014.¹⁰ Staff made no mention of Operator failing to call-in the cementing of the long string casing at that time. Furthermore, Operator cannot recall a single occasion when Staff has come to the site of one his wells to witness the cementing-in of the long string casing.

8. Operator does not recall receiving a Notice of Violation letter from Staff on or about October 19, 2016, nor receiving notice of a November 16, 2016 deadline date to "obtain" temporary abandonment status for the Subject Well.¹¹

9. In any event, on November 18, 2016, Operator submitted a temporary abandonment ("TA") application for the Subject Well.¹² At that time the fluid level in the Subject Well was 1,800' from surface as indicated by echometer, well below the fresh and usable water table in the area.¹³

Staff's 1st Condition

10. On December 1, 2016, Staff sent operator an email stating it had reviewed the TA application for the Subject Well (among other TA applications).¹⁴ Notably, Staff stated that the TA application for the Subject Well would not be approved until a "complete ACO-1" was

⁸ Penalty Order, ¶ 7.

⁹ Penalty Order, ¶ 8.

¹⁰ Exhibit D (the ACO-1 was approved by Deanna Garrison on January 29, 2014.)

¹¹ Penalty Order, ¶ 11.

¹² Exhibit E.

¹³ See n. 3, supra; see also Ex. B, letter granting surface casing exception.

¹⁴ Exhibit F.

submitted with attached cement tickets.¹⁵ Because the ACO-1 for the Subject Well had been previously approved by Staff, Operator assumed Staff was requesting a revised ACO-1. This was the 1st condition Staff placed on approving the TA application for the Subject Well.

11. On December 9, 2016, Staff denied Operator's November 18, 2016, TA application for the Subject Well. The letter from Staff stated that the TA application was denied for "**No current witnessed MIT**", and required Operator to obtain temporary abandonment status by January 6, 2017.¹⁶ The Staff comments section in the body of the returned TA application stated "Incomplete ACO-1 on file".¹⁷

12. On December 30, 2016, Operator contacted Staff through counsel for an explanation as to why an MIT test was now being required for the Subject Well.¹⁸

13. On January 4, 2017, Staff responded to Operator's inquiry concerning the MIT requirement for the Subject Well. In that email Staff referred to its December 1, 2016 email wherein Staff conditioned its approval of the TA application for the Subject Well upon receiving a revised ACO-1 for the Subject Well and the cement ticket.¹⁹ At this point, Operator was under the impression that submitting a revised ACO-1 for the Subject Well and the cement ticket was all that was required for the TA application for the Subject Well to be approved by Staff.

14. During a telephone conference on January 6, 2017, Staff agreed to extend Operator's deadline to submit the revised ACO-1 and cement ticket from January 6, 2017 to January 13, 2017.²⁰

¹⁵ *Id.*

¹⁶ Ex. E; *see also* Penalty Order, ¶ 12.

¹⁷ Ex. E.

¹⁸ Exhibit G.

¹⁹ Ex. F.

²⁰ *See* Exhibit H, which is an email memorializing the telephone agreement; Penalty Order, ¶ 12.

15. On January 13, 2017, Operator submitted a revised ACO-1 for the Subject Well along with the cement ticket for the long string casing.²¹ Believing he had satisfied Staff's condition to approve a TA application for the Subject Well, on January 17, 2017 Operator re-submitted the TA application for the Subject Well.²² It is important to note that this TA application remains pending with Staff.

One way an operator may become compliant under K.A.R. 82-3-111 is to "file an application with the Conservation Division requesting temporary abandonment ("TA") authority. . ."²³ Operator did that on January 17, 2017, and that application remains pending, therefore Operator cannot be found to be in violation of K.A.R. 82-3-111.

Staff's 2nd Condition

16. On February 1, 2017, Staff emailed counsel for Operator stating:

"Staff believes the recently-submitted ACO-1 for the [Subject Well] does not demonstrate that cement was circulated to surface. Staff would like evidence that the cement was circulated as required. I encourage either you or Mr. Giles to contact Jeff Klock if you have any questions regarding how to demonstrate cement was circulated"²⁴

This was the 2nd condition Staff placed on approving the TA application for the Subject Well.

17. Operator contacted Staff through counsel the same day. During that phone call Staff advised Operator that there should be two cement tickets for the Subject Well, one for the surface casing and one for the long string casing. Staff also contended that 150 sacks of cement was not sufficient to circulate cement from total depth of the Subject Well to surface.

18. Staff's contentions are not correct. First, Staff was aware that existing surface casing was being utilized in the Subject Well and that new surface casing was not being set as part

²¹ Exhibit I.

²² Exhibit J.

²³ K.A.R. 82-3-111(a)(2) (emphasis added).

²⁴ Exhibit K.

of Operator's workover operation. As a result, there obviously would not be a cement ticket for new surface casing. The surface casing exception granted by the Director and referred to by Staff on several occasions evidences Staff's knowledge of this fact.²⁵ Second, Staff's assumption that 150 sacks of cement is insufficient to circulate cement from total depth of the Subject Well to surface apparently failed to account for the narrower than typical annulus between the new 4.5" long string casing and the 5.5" production string left inside the Subject Well when it was originally plugged and abandoned.²⁶ If Staff would have accounted for the actual engineering of the Subject Well, it would realize that 150 sacks of cement is sufficient to circulate cement to surface.

19. Rather than argue with Staff about the cement, Operator sought the "evidence that the cement was circulated as required" requested by Staff in its February 1, 2017 email.²⁷ On or about February 10, 2017, Operator contacted Consolidated Oil Well Services, LLC ("Consolidated"), the contractor who cemented in the long string casing, and explained Staff's concerns regarding the cement ticket Consolidated had prepared for the Subject Well.²⁸ Operator requested that Consolidated correct the cement ticket.²⁹ Consolidated reviewed the cement ticket and consulted with the employee who conducted the cementing operation at the Subject Well.³⁰ The employee recalled the operation, recalled that cement had circulated to surface, and corrected the cement ticket so that showed that cement circulated to surface.³¹ On February 10, 2017, Operator re-submitted the revised ACO-1 along with the corrected cement ticket.³² Operator

²⁵ Ex. B.

²⁶ See Exhibit A, attached Commission well plugging record detailing that 445' of 5.5" production casing and 130' of 8.625" surface casing were left in the hole.

²⁷ See n. 24, *supra*.

²⁸ Affidavit of *Consolidated*, ¶ 5.

²⁹ Affidavit of *Consolidated*, ¶ 5.

³⁰ Affidavit of *Consolidated*, ¶ 6.

³¹ Affidavit of *Consolidated*, ¶¶ 6-7.

³² Exhibit L, a copy of the corrected cement ticket; Affidavit of *Consolidated*, ¶ 7.

believed this was sufficient evidence to satisfy Staff's second condition, and that his pending TA application would be approved.

Staff's 3rd Condition

20. On February 10, 2017, Staff rejected Operator's revised version of the previously approved ACO-1 with the corrected cement ticket.³³ This time, Staff rejected the revised ACO-1 because:

“Your ACO-1 for the Flying J Greer (sic.) 2 OWWO is being returned due to the lack of information regarding the cementing of the production casing from 250 feet back to surface. KCC records reflect that on May 14, 2013 a surface casing exception was granted by the Director requiring the additional cement work upon completion. District staff did not witness the work, therefore verification of the work must be provided with a cement ticket and bond log.”³⁴

This was the first time Staff had requested a cement bond log for the Subject Well. It was also the 3rd condition Staff placed on approving the TA application pending for the Subject Well. Operator advised Staff of the time and expense associated with pulling the tubing from the Subject Well to conduct the bond log, but Staff insisted that a bond log be performed.

21. Again, rather than argue with Staff, on February 17, 2017, Operator agreed to incur the extra time and expense of running a cement bond log on the Subject Well.³⁵ Operator believed that his pending TA application for the Subject Well would be approved if he satisfied Staff's now 3rd condition.

22. On April 14, 2017, Staff sent Operator a letter stating that “[t]he bond log must be run by April 28, 2017.”³⁶ Operator requested an extension from the April 28, 2017 deadline

³³ Exhibit M

³⁴ *Id.*

³⁵ Exhibit N

³⁶ Exhibit O.

because his pulling unit was stuck in the mud, but Staff stood firm by the April 28, 2017 deadline date.³⁷

23. On April 26, 2017, Dyna-Log, Inc. (“Dyna-Log”), conducted a cement bond on the Subject Well.³⁸ The bond log shows that cement circulated and set behind the long string casing of the Subject Well from its total depth to approximately 30’-50’ from surface, including from at least a depth of 250 feet to approximately 30’-50’ from surface.³⁹ There is no bond log data from approximately 30’-50’ up to surface because there was no fluid in the Subject Well from that depth to surface, and the bond log tool cannot obtain an accurate signal where this is no fluid.⁴⁰ Regardless, the results of the cement bond log taken together with the existing 130’ of surface casing and the Consolidated cement ticket are satisfactory to show that the cement in place behind the long string casing of the Subject Well is sufficient to seal off the formations penetrated by the wellbore to prevent migration of oil, gas or water from or into strata that would be damaged by such migration.⁴¹ These facts substantially marginalize the import of Staff’s suspicions regarding the cement behind the top 40’ of the long-string casing. All of this evidence taken together demonstrates that Operator has satisfied the requirements of the Commission’s surface casing exception.

24. Contrary to Staff’s contentions, there are no irregularities in the bond log nor are sections identical.⁴² The surface casing exception granted by the Commission only requires cement from “at least 250 feet back to surface”, so whatever irregularities Staff thinks exist between the depths of 776-889 feet and 899-1022 feet are not relevant.⁴³

³⁷ Exhibit P.

³⁸ Affidavit of Jerry Sullivan, ¶ 4.

³⁹ Affidavit of Jerry Sullivan, ¶ 5.

⁴⁰ Affidavit of Jerry Sullivan, ¶ 7; *see also* Penalty Order ¶ 15.

⁴¹ Affidavit of Jerry Sullivan, ¶ 9; *see also* K.A.R. 82-3-104.

⁴² Affidavit of Jerry Sullivan, ¶ 6.

⁴³ Ex. B; n. 34, *supra*; Penalty Order ¶ 15.

25. Thereafter, without further notice to Operator, the Penalty Order in this docket was entered on June 27, 2017. Operator's TA application for the Subject Well still remains pending with Staff.⁴⁴

REQUEST FOR RELIEF

Operator has done everything that Staff has asked him to do to demonstrate that the Subject Well has sufficient cement behind the long string casing to satisfy the requirements of the surface casing exception he obtained from the Commission. The experienced principals of the unaffiliated third-party contractors that cemented in the long string casing and conducted the cement bond log have attested that there is good cement behind the long string casing—not just from 250' to surface—but from total depth of the Subject Well to surface. By verifying this pleading, Operator has likewise attested to those facts.

The findings of fact contained in the Penalty Order seemingly contemplate a conspiracy among Operator, Consolidated, and Dyna-Log to misrepresent to Staff the status of the cement behind the long string casing of the Subject Well. There is no motive for Consolidated and Dyna-Log to engage in such an improbable conspiracy with Operator. It is unreasonable, arbitrary, capricious and entirely unfair for Staff to serially request evidence from Operator, only to deny the authenticity and veracity of the evidence, and then request additional evidence at an ever increasing expense to Operator. That type of conduct should not be condoned as an enforcement procedure.

The Penalty Order states Operator is in violation of 1) K.A.R. 82-3-104 because he has failed to demonstrate the effectiveness of the casing in the Subject Well, and 2) K.A.R. 82-3-111 because the Subject Well has not been "approved for TA status."⁴⁵ The pleadings show that Operator has demonstrated beyond doubt that the cement behind the long string casing is

⁴⁴ Ex. J.

⁴⁵ Penalty Order, ¶¶ 18-19.

satisfactory and complies—not only with the requirements of the surface casing exception granted—but also with the Commission’s regulations to protect fresh water and to prevent waste. Moreover, Operator is not in violation of K.A.R. 82-3-111, because he has “file[d] an application with the conservation division requesting temporary abandonment (“TA”) authority . . .” as the regulation requires. Operator’s TA application for the Subject Well has been pending before Staff since January 17, 2017, and the pleadings show Staff conditioned its approval of the TA application for the Subject Well upon Operator 1st) furnishing a revised ACO-1 and cement ticket, then 2nd) furnishing evidence cement was circulated to the surface, and then 3rd) providing a cement bond log for the Subject Well. Operator has satisfied all three of these conditions, yet Staff still refuses to approve (or deny) the TA application for the Subject Well. Staff has now caused Operator to be penalized for allegedly violating the aforementioned two Commission regulations, fined Operator \$2,600, and threatened to suspend his license—and livelihood—unless additional conditions are met. Staff should not be permitted to apply and enforce the Commission’s regulations in such an unfair, and unreasonable, arbitrary and capricious manner.

The Commission has the authority to rule on the merits of the pleadings through summary order.⁴⁶ The pleadings and affidavits show that Operator is compliant with Commission regulations. Operator requests that the Commission enter a summary order on the pleadings voiding the penalty order entered in this docket, waiving the \$2,600 fine charged thereunder, and to direct Staff to approve the TA application that has been pending since January 17, 2017, and to provide such other relief and the Commission deems just and proper.

⁴⁶ See K.S.A. 77-506; K.S.A. 77-537; K.A.R. 82-1-232(b)(2); *see also* K.S.A. 60-212(c).

Respectfully submitted,

MORRIS, LAING, EVANS, BROCK
& KENNEDY, CHARTERED

By: 

Jonathan A. Schlatter, #24848

300 N. Mead, Suite 200

Wichita, KS 67202-2745

Telephone - (316) 262-2671

Facsimile - (316) 262-6226

Email - jschlatter@morrislaing.com

Attorneys for Benjamin M. Giles

VERIFICATION

STATE OF KANSAS)
) ss.
COUNTY OF SEDGWICK)

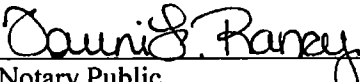
Benjamin M. Giles, being of lawful age and being first duly sworn upon his oath, deposes and says:

That he has read the above and forgoing pleading and is familiar with the contents and that the statements made therein are true and correct to the best of his knowledge and belief.



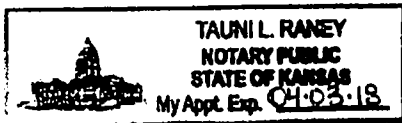
Benjamin M. Giles

SUBSCRIBED AND SWORN to before me this 28th day of July, 2017.



Notary Public

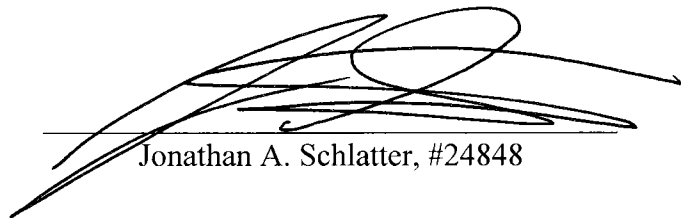
My Appointment expires: Apr. 3, 2018



CERTIFICATE OF SERVICE

I, Jonathan A. Schlatter, hereby certify that on this 31st day of July, 2017, I caused the original of the foregoing pleading to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and emailed true and correct copies of the same to the following individuals:

Joshua Wright, Litigation Counsel
Kansas Corporation Commission
j.wright@kcc.ks.gov



Jonathan A. Schlatter, #24848

AFFIDAVIT

STATE OF KANSAS; COUNTY OF BUTLER) ss:

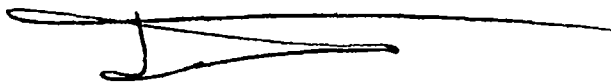
Jacob Storm, of lawful age, being first duly sworn, upon oath deposes and states:

1. Affiant is the manager of the El Dorado field office of Consolidated Oil Well Services, LLC ("Consolidated"), a Delaware limited liability company, and is authorized to make this affidavit on behalf of Consolidated.
2. For over 23 years Consolidated has performed oil and gas well services, including well cementing, acidizing, and plugging services, throughout Kansas under contract with oil and gas operators.
3. Under contract with Benjamin M. Giles, on or about July 23, 2014, Consolidated cemented the long string casing into the Flying J Geer #2 OWWO well ("Subject Well") located approximately 1,320' from the North line and 330' from the East line of Section 32, Township 25 South, Range 4 East, Butler County, Kansas.
4. The cementing operation was supervised by Ron "Fuzzy" McCullick ("Fuzzy"), who was then and continues to be an employee of Consolidated. A true and correct copy of the Field Ticket & Treatment Report Cement ("Cement Ticket") furnished to Mr. Giles at the conclusion of the operation is attached as Exhibit A. The Cement Ticket shows that 150 sacks of cement were mixed and run into the Subject Well.
5. On or about February 10, 2017, Mr. Giles contacted Affiant and advised that KCC Staff did not believe the Cement Ticket evidenced that cement was circulated to the surface of the Subject Well. Operator requested that Consolidated correct the cement ticket.
6. Affiant reviewed the cement ticket and consulted with Fuzzy about the July 23, 2014 cementing operation. Fuzzy recalled the operation, recalled that cement had circulated to surface, and recalled that approximately 4 barrels of excess cement had been disposed of in the surface pit.
7. Affiant directed Fuzzy to correct the Cement Ticket. Fuzzy corrected the Cement Ticket to show that cement circulated to surface and that 4 barrels of excess cement were disposed of in the surface pit. A true and correct copy of the corrected Cement Ticket is attached as Exhibit B.

Further affiant sayeth not.

Jacob Storm

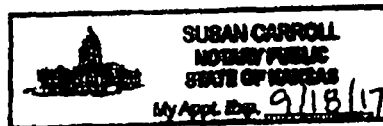
Print Name:



STATE OF KANSAS; COUNTY OF BUTLER) ss:

The foregoing affidavit was acknowledged before me this 27 day of July, 2017 by **Jacob Storm**, and at the same time the affiant was by me duly sworn to the foregoing affidavit.

My Commission Expires: September 18, 2017 Susan Carroll Notary Public





...ET NUMBER 48590
LOCATION El Dorado
FOREMAN Guzt

DATE	CUSTOMER #	WELL NAME & NUMBER	SECTION	TOWNSHIP	RANGE	COUNTY																				
7-23-14	3079	Elmore, S	32	25S	4E	Bullhead																				
CUSTOMER mwm oil Co. - BEN GILES			<table><tr><th>TRUCK #</th><th>DRIVER</th><th>TRUCK #</th><th>DRIVER</th></tr><tr><td>446</td><td>Togb</td><td></td><td></td></tr><tr><td>713</td><td>Dunlap</td><td></td><td></td></tr><tr><td>574</td><td>B. H</td><td></td><td></td></tr><tr><td>692</td><td>Tracy</td><td></td><td></td></tr></table>				TRUCK #	DRIVER	TRUCK #	DRIVER	446	Togb			713	Dunlap			574	B. H			692	Tracy		
TRUCK #	DRIVER	TRUCK #					DRIVER																			
446	Togb																									
713	Dunlap																									
574	B. H																									
692	Tracy																									
MAILING ADDRESS 532 S. Maryland St																										
CITY Wichita	STATE KS	ZIP CODE 67202																								

JOB TYPE <u>Line</u>	HOLE SIZE _____	HOLE DEPTH _____	CASING SIZE & WEIGHT <u>4 1/2 11.6</u>
CASING DEPTH <u>2545</u>	DRILL PIPE _____	TUBING _____	OTHER _____
SLURRY WEIGHT _____	SLURRY VOL _____	WATER gal/sk _____	CEMENT LEFT in CASING _____
DISPLACEMENT <u>39.2</u>	DISPLACEMENT PSI _____	MIX PSI _____	RATE _____

REMARKS: Safety meeting on location. Aug. land hole with 67 BSLs
no returns mix 150 cfs class A 4% coal 1/2% CH₄ 1/2% CO₂ 26
- 14% K CAS 38. Wash dump and lines. Press alum and disalco
39 1/2 BSLs, 600+ LBS - 1200+ land. Press casing to 500+ and
skid in.

Thanks Every one

ACCOUNT CODE	QUANTITY or UNITS	DESCRIPTION of SERVICES or PRODUCT	UNIT PRICE	TOTAL
5401	1	PUMP CHARGE	1085 ⁰⁰	1085 ⁰⁰
5406	15	MILEAGE	4.20	63 ⁰⁰
5407A	7.1 hrs	Ten Mileage Delivery (extra)	368 ⁰⁰	368 ⁰⁰
5501C	3 hrs	water Transport	120 ⁰⁰ /hr	360 ⁰⁰
11045	150 gals	Class "A"	15 ⁰⁰	2250 ⁰⁰
1119B	56 gal	Berdomo	122	124 ⁰⁰
1135A	70 th	CFL-115	11 ⁰⁰	770 ⁰⁰
1137	70 th	CDJ-26	94 ⁰⁰	593 ⁰⁰
1146	21 th	CAG-38	8 ⁰⁰	178 ⁰⁰
4404	1	4 1/2 - D-bbed plug	4725	4725
415C	1	4 1/2 - Black shop	238 ⁰⁰	238 ⁰⁰
5502C	3 hrs	80 BBL UAC	90 ⁰⁰ /hr	270 ⁰⁰
				6458 ⁰⁰
		302adiss - cement materials only		1208 ⁰⁰
		subtotal		5250 ¹²
			SALES TAX	198.66
			ESTIMATED TOTAL	5448.81

Ref: 3737

AUTHORIZATION**TITLE**

DATE _____

I acknowledge that the payment terms, unless specifically amended in writing on the front of the form or in the customer's account records, at our office, and conditions of service on the back of this form are in effect for services identified on this form.



CONSOLIDATED
Oil Well Services, LLC

SEND TO
Consolidated Oil Well Services, LLC
Dept. 970
P.O. Box 4346
Houston, TX 77210-4346

MAIN OFFICE
P.O. Box 884
Chanute, KS 66720
620/431-9210 • 1-800/467-8878
Fax 620/431-0012

INVOICE

Invoice # 269685

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Invoice Date: 07/31/2014 Terms: 0/30/10,n/30 Page 1

GILES, BEN
DBA MWM OIL CO., INC.
346 S. LULU
WICHITA KS 67211
(316) 265-1992

FLYING J
48590
32/258/4E
07/23/2014
KS

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Description	Hours	Unit Price	Total
MIN. BULK DELIVERY	1.00	368.00	368.00

Part Number	Description	Qty	Unit Price	Total
11048	CLASS "A" CEMENT (SALE)	150.00	15.7000	2355.00
1118B	PREMIUM GEL / BENTONITE	564.00	.2200	124.08
1135A	FL- 115 (FLUID LOSS)	70.00	11.0800	775.60
1137	CEMENT FRICTION REDUCER	70.00	8.4800	593.60
1146	CAF - 38	21.00	8.5100	178.71
4404	4 1/2" RUBBER PLUG	1.00	47.2500	47.25
4156	FLOAT SHOE 4 1/2"	1.00	238.0000	238.00

Sublet Performed	Description	Total
9996-180	CEMENT MATERIAL DISCOUNT	-1208.09

Description	Hours	Unit Price	Total
446 CEMENT PUMP	1.00	1085.00	1085.00
446 EQUIPMENT MILEAGE (ONE WAY)	15.00	4.20	63.00
574 WATER TRANSPORT (CEMENT)	3.00	120.00	360.00
692 80 BBL VACUUM TRUCK (CEMENT)	3.00	90.00	270.00

Amount Due 6734.22 if paid after 08/10/2014

=====

Parts:	4312.24	Freight:	.00	Tax:	198.66	AR	5448.81
Labor:	.00	Misc:	.00	Total:	5448.81		
Sublt:	-1208.09	Supplies:	.00	Change:	.00		

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Signed _____

Date _____

BARTLESVILLE, OK 918/338-8888 EL DORADO, KS 316/322-7022 EUREKA, KS 620/683-7684 PONCA CITY, OK 580/62-2353 OAKLEY, KS 785/672-4422 OTTAWA, KS 785/242-4644 THAYER, KS 620/339-3269 OLLLETTE, WY 307/866-4914 CUSHING, OK 918/225-2830

AFFIDAVIT

STATE OF KANSAS; COUNTY OF BUTLER) ss:

Jerry Sullivan, of lawful age, being first duly sworn, upon oath deposes and states:

1. Affiant is the President of Dyna-Log, Inc. ("Dyna-Log"), a Kansas corporation, and is authorized to make this affidavit on behalf of Dyna-Log.

2. Affiant is a professional engineer, and has 40 years of experience analyzing and interpreting cement bond logs.

3. For nearly 17 years Dyna-Log has performed complete cased hole services to oil and gas operators throughout Kansas. Dyna-Log has performed cement bond logs on thousands of wells in Kansas under contract with oil and gas operators.

4. On April 26, 2017, under contract with Benjamin M. Giles, Dyna-Log conducted a cement bond on the Flying J Geer #2 OWWO well ("Subject Well") located approximately 1,320' from the North line and 330' from the East line of Section 32, Township 25 South, Range 4 East, Butler County, Kansas. A true and correct copy of the cement bond log is attached to this affidavit.

5. The cement bond log shows that cement circulated and set behind the long string casing of the Subject Well from its total depth to approximately 30'-50' from surface, including from at least a depth of 250 feet to approximately 30'-50' from surface.

6. There are no irregularities in the cement bond log, nor are certain sections identical.

7. In order for the cement bond log tool to obtain accurate data there must be fluid in the wellbore. At the time I conducted the cement bond log on the Subject Well I attempted to fill the wellbore full of fluid, however, I was unable to keep fluid in the top 30'-50' of the wellbore. I believe this is because the Subject Well is perforated at bottom. This is why the cement bond log I conducted has no data for the top 30'-50' of the Subject Well.

8. I have reviewed the Affidavit of Jacob Storm dated July 27, 2017, and the cement tickets exhibits attached as Exhibit A and Exhibit B.

9. The results of the cement bond log from total depth to 30'-50' from surface, together with the existing 130' of surface casing, the Affidavit of Jacob Storm and cement tickets attached thereto are satisfactory to show that the cement in place behind the long string casing of the Subject Well is sufficient to seal off the formations penetrated by the wellbore to prevent migration of oil, gas or water from or into strata that would be damaged by such migration.

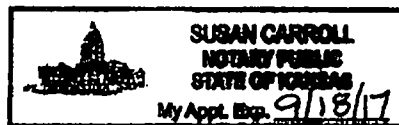
Further Affiant sayeth not.


JERRY SULLIVAN

STATE OF KANSAS; COUNTY OF BUTLER) ss:

The foregoing affidavit was acknowledged before me this 31st day of July, 2017 by **Jerry Sullivan**, and at the same time the affiant was by me duly sworn to the foregoing affidavit.

My Commission Expires:  September 19, 2017 Notary Public



Dyna-Log

INCORPORATED

Complete Cased Hole Services

EL DORADO, KS

SONIC BOND LOG

Company BEN GILES Well FLYING J GEER Field Country U.S.A. State/Prv KANSAS	Company BEN GILES						
	Well FLYING J GEER						
	Field						
	Country U.S.A. State/Prv KANSAS						
Location				Other Services			
SEC. 32 TWP. 26s RGE. 4 E							
BUTLER COUNTY							
Permanent Datum GROUND LEVEL Elevation				G. L.			
Log Measured From KELLY BUSHING 5' A.G.L.				K. B.			
Drilling Measured From							
Date	4-26-17						
Run Number	ONE						
Depth Driller	2550						
Depth Logger	2530						
Bottom Logged Interval	2517						
Top Log Interval	30						
Open Hole Size							
Type Fluid	WATER						
Density / Viscosity							
Max. Well Deviation							
Estimated Cement Top	SURFACE						
Time Well Ready							
Time Logger on Bottom							
Equipment Number	103						
Location	ELDORADO						
Recorded By	SULLIVAN						
Witnessed By	B. GILES						
Borehole Record				Tubing Record			
Run Number	Bit	From	To	Size	Weight	From	To
Casing Record		SIZE	WEIGHT	FROM	TO		
Surface String							
Prot. String							
Production String		5 1/2					
Liner		4 1/2					

NOTES

LOAD HOLE WITH TANK TRUCK- WATER RUNNING WHILE SURVEY BEING CONDUCTED

RUN: SONIC BOND LOG

DIR: UP

DATE: 04/26/17

TIME: 14:28:51

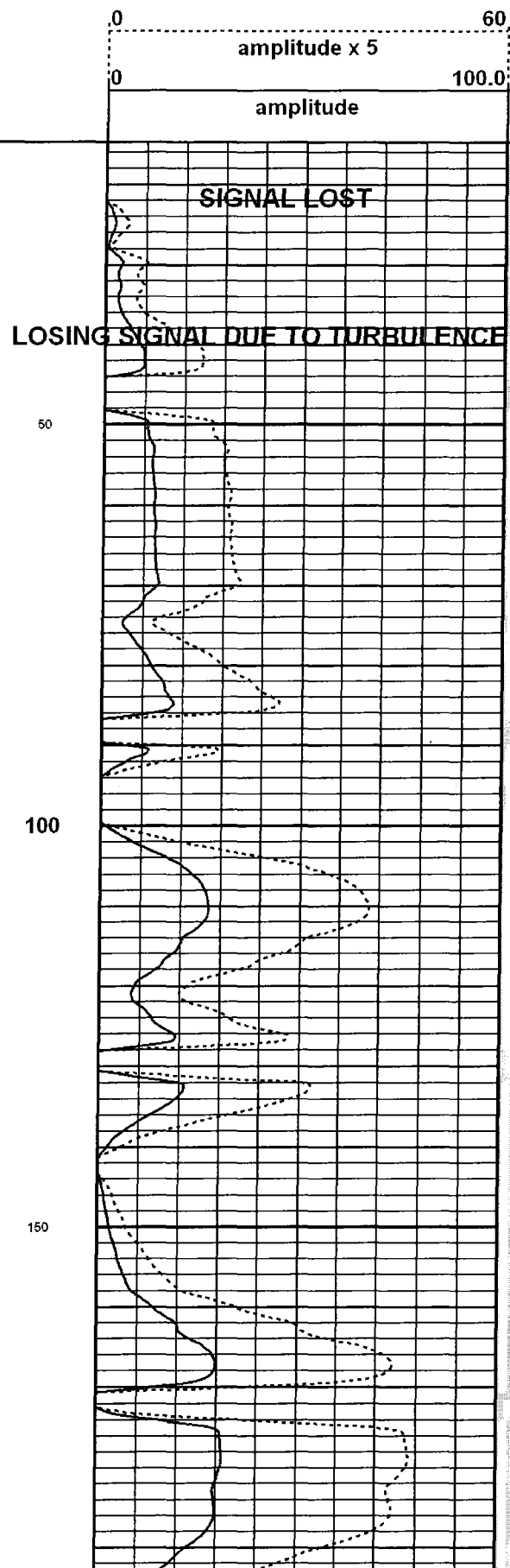
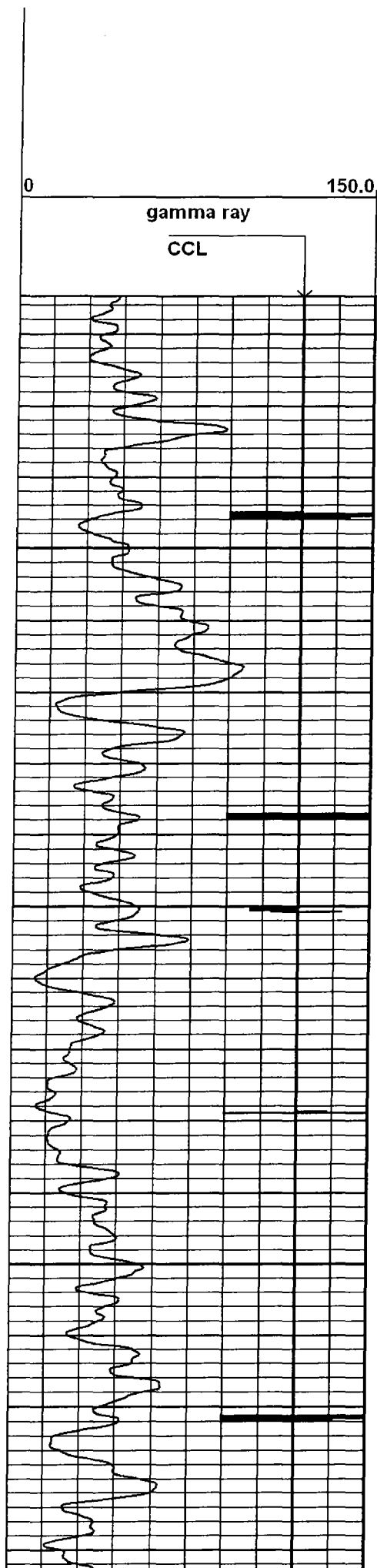
SONIC BOND LOG

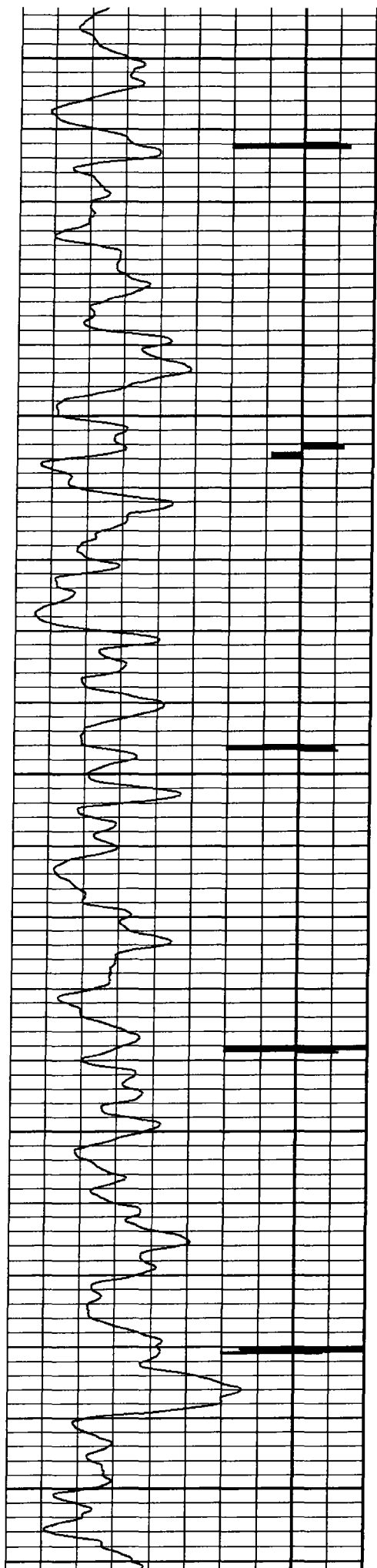
START: 2517.75ft

STOP: 9.25ft

RES: 0.25ft

SCALE: 5"/100'





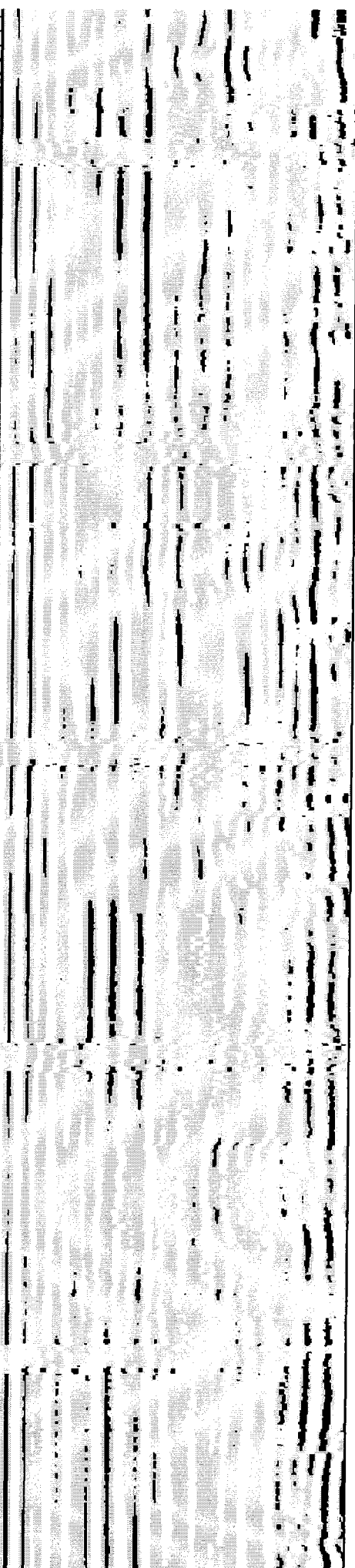
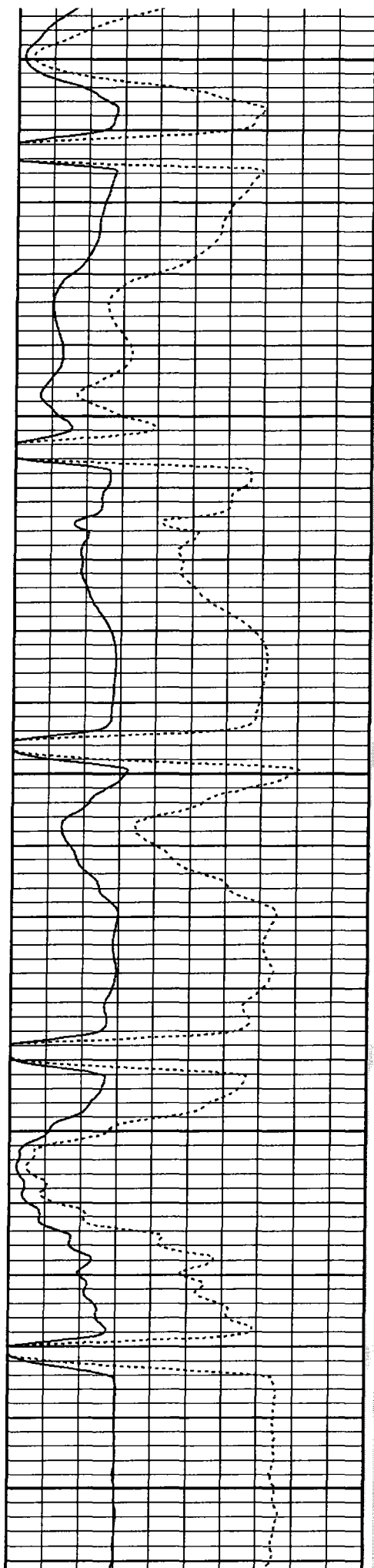
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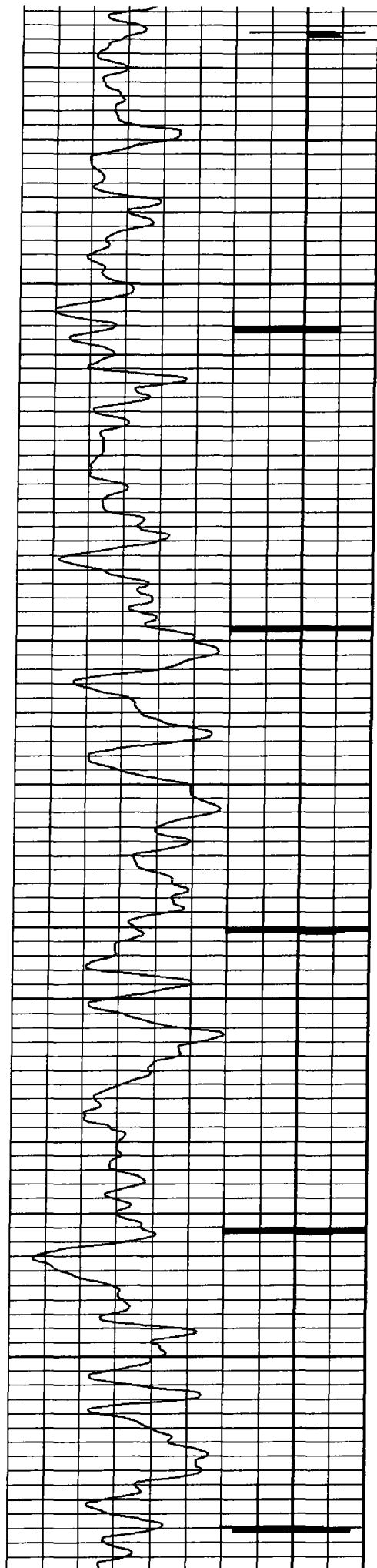
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300

350

400



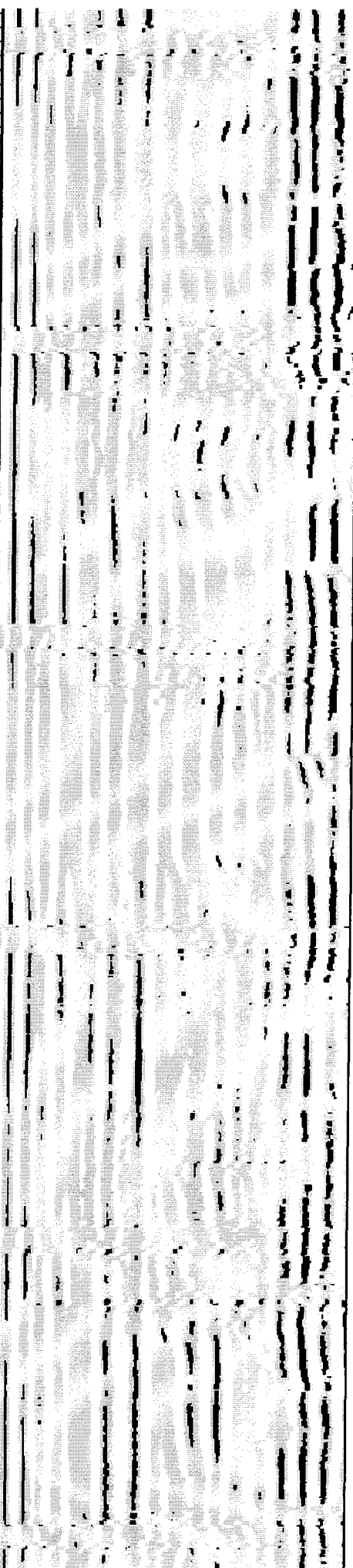
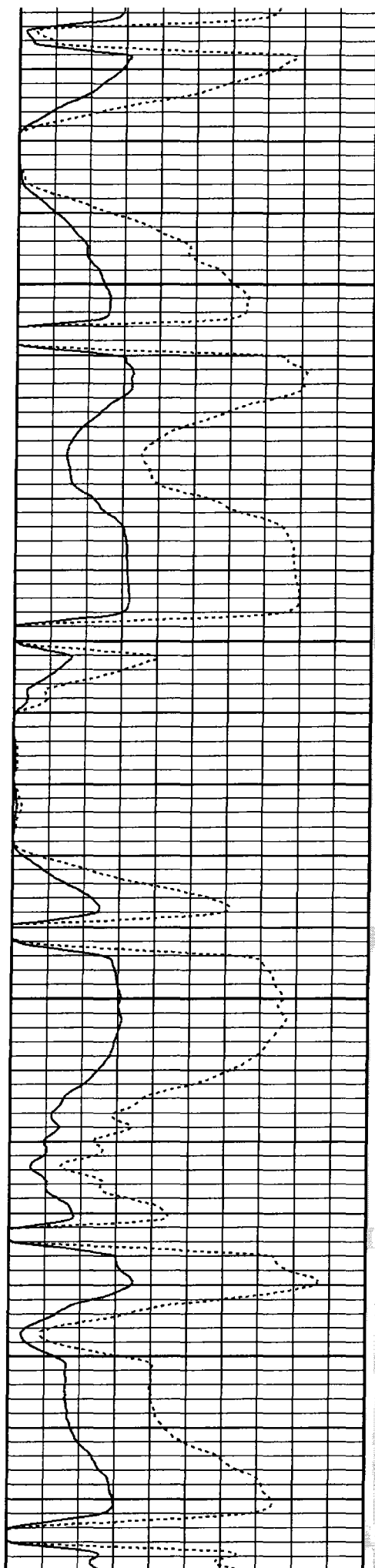


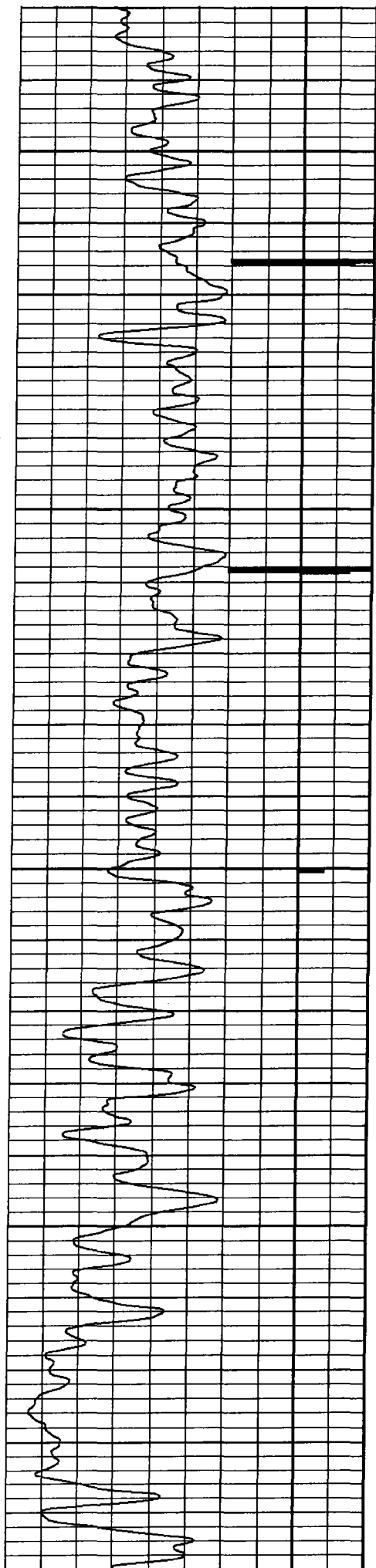
450

500

550

600



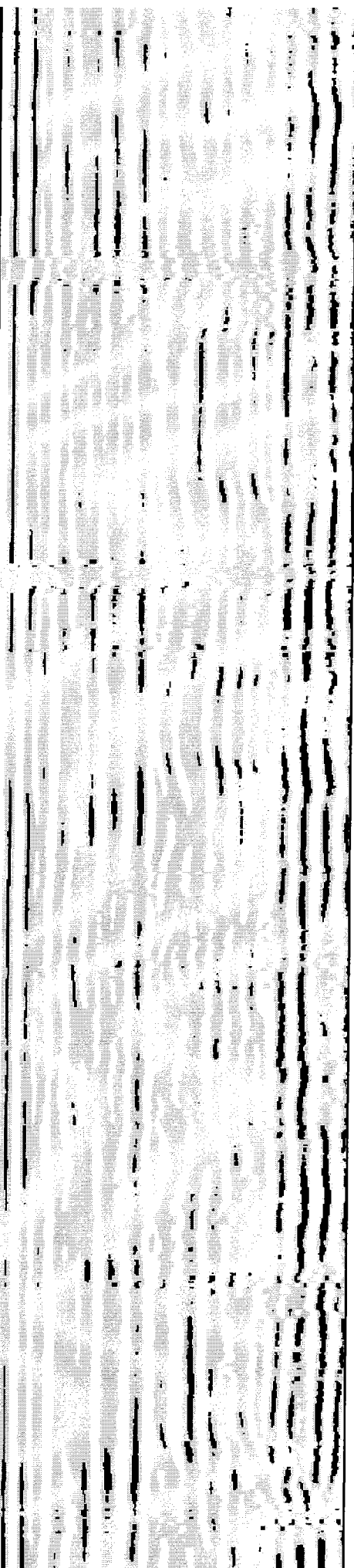
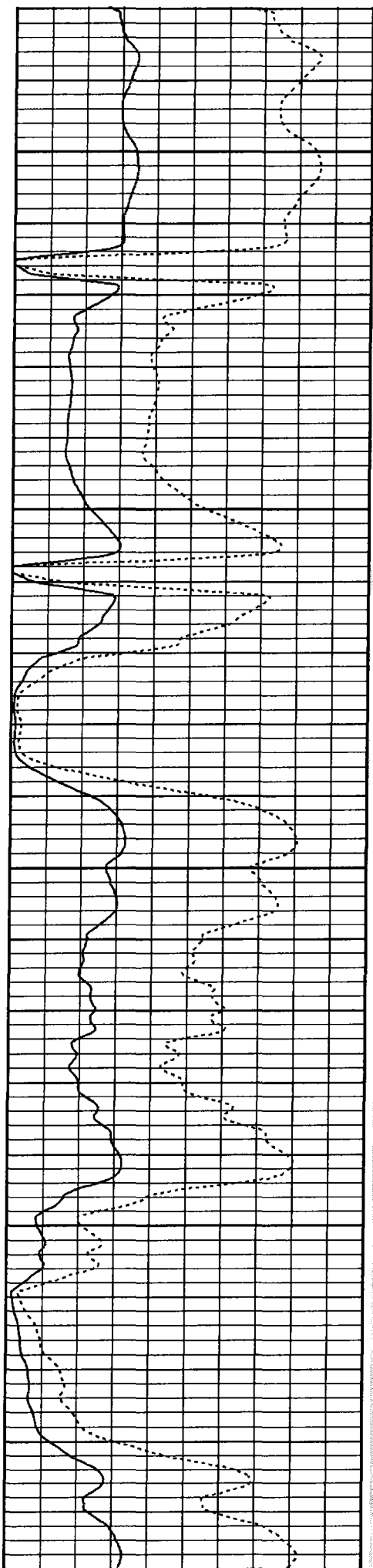


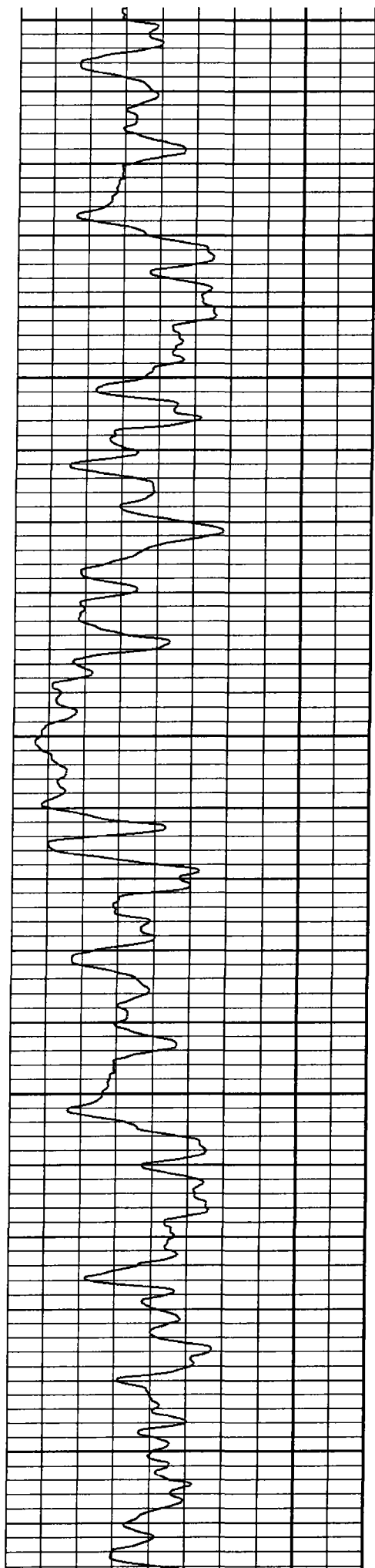
650

700

750

800





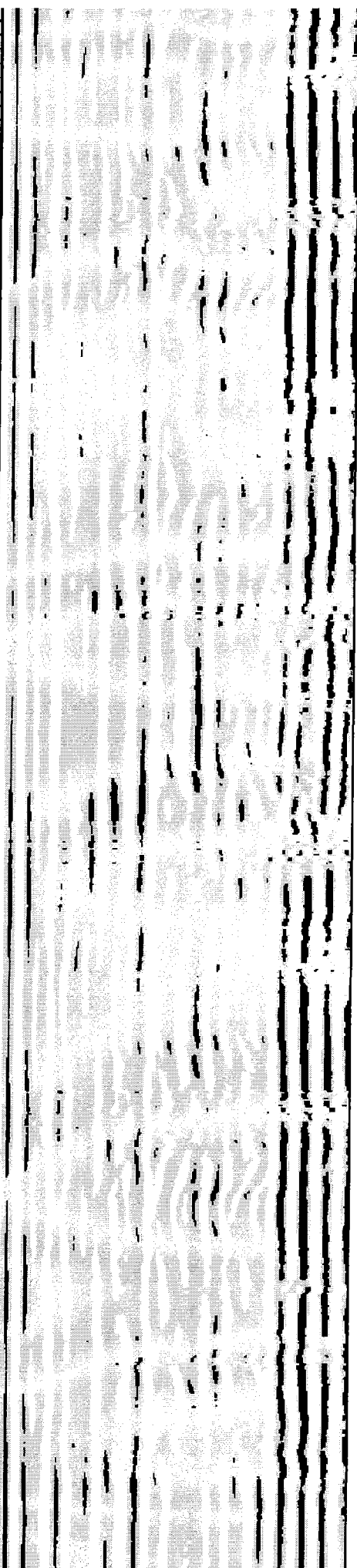
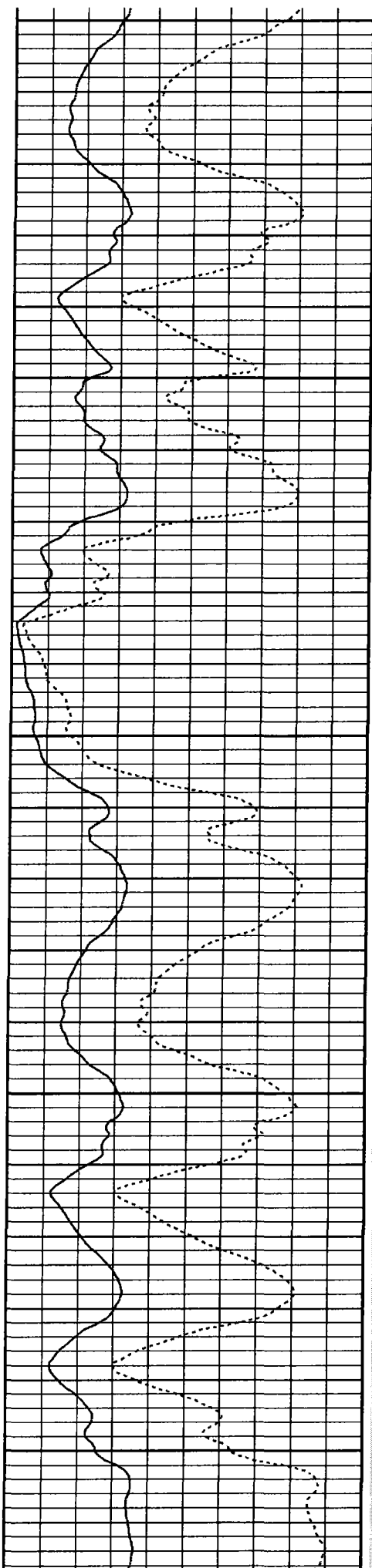
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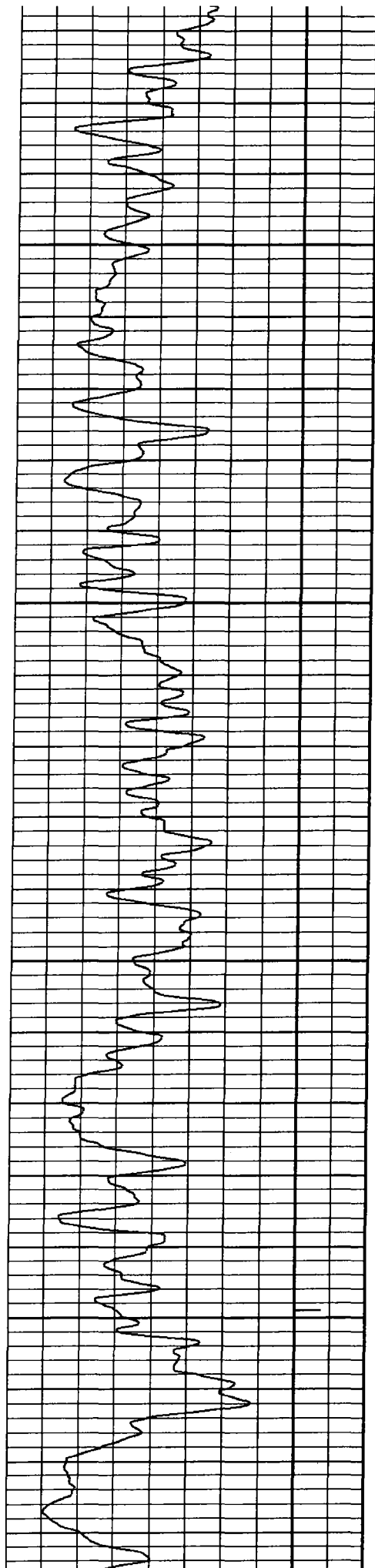
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950

1000

1050



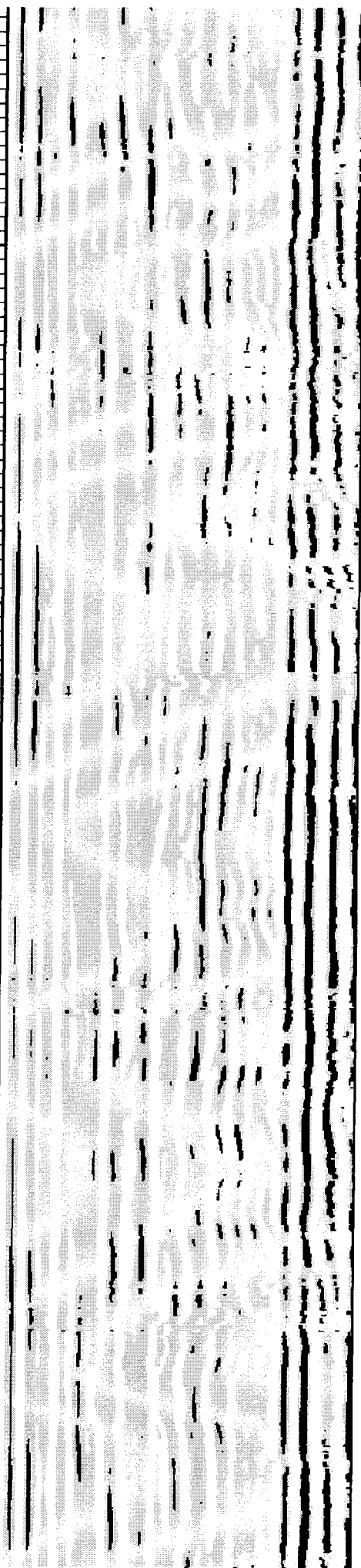
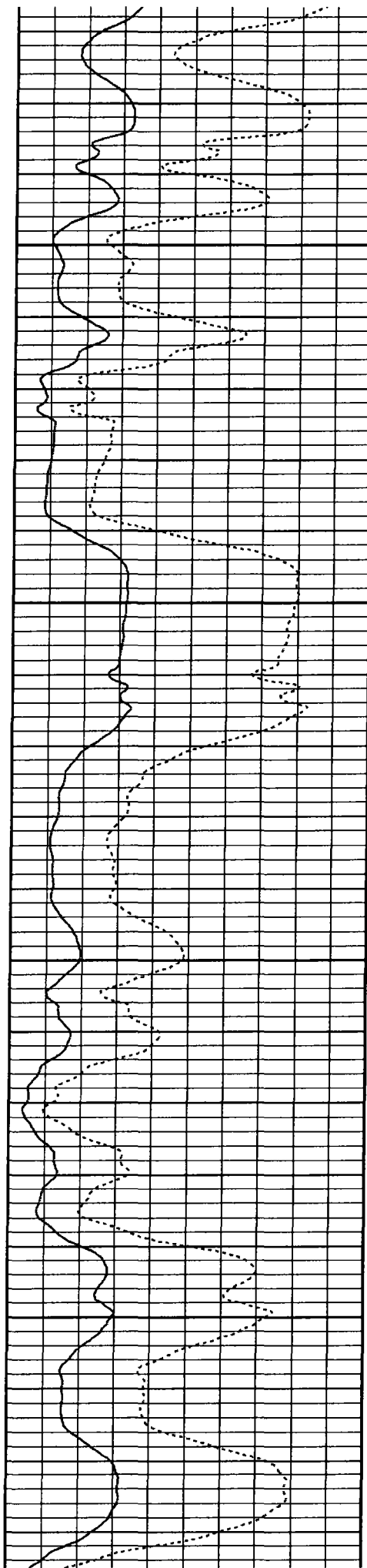


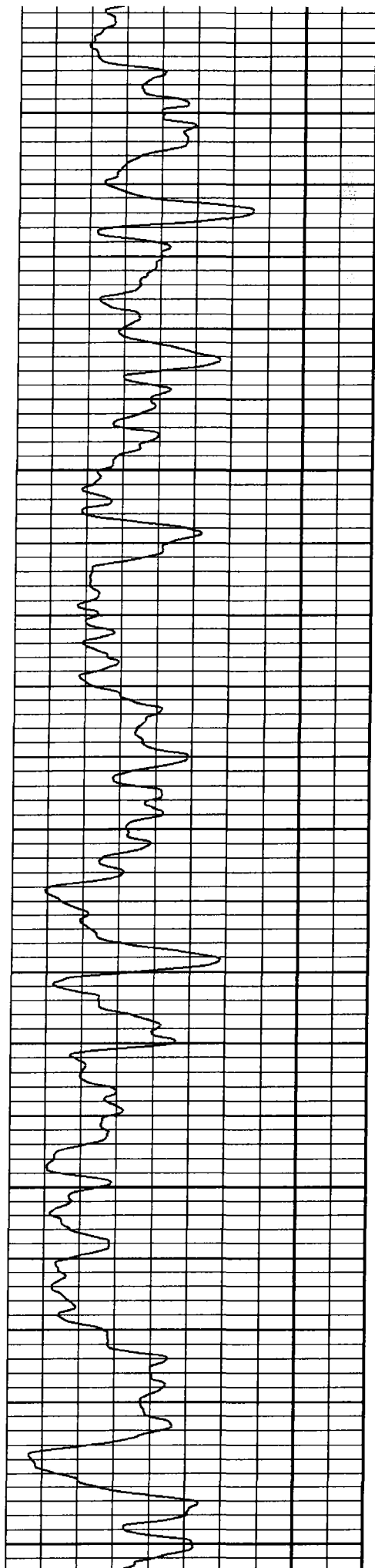
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1150

1200

1250





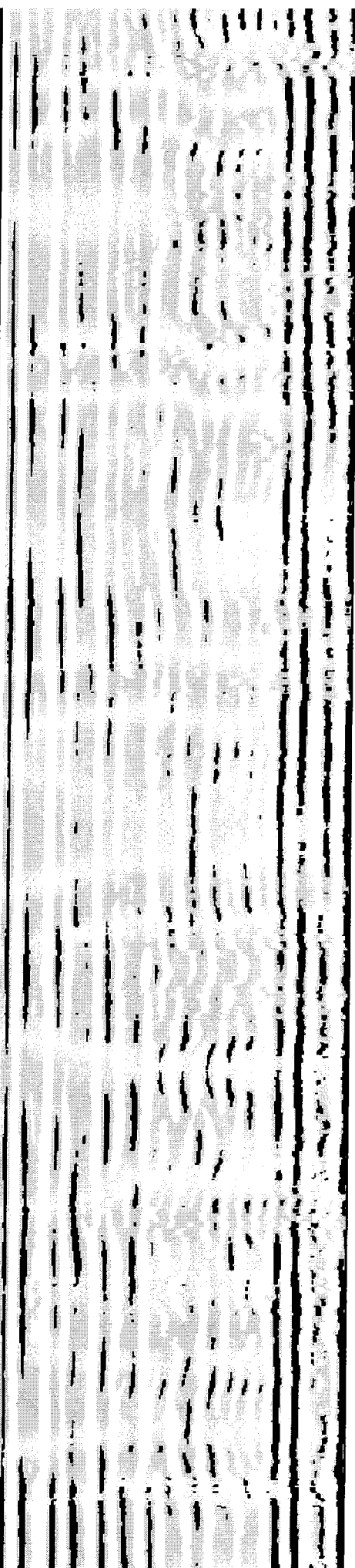
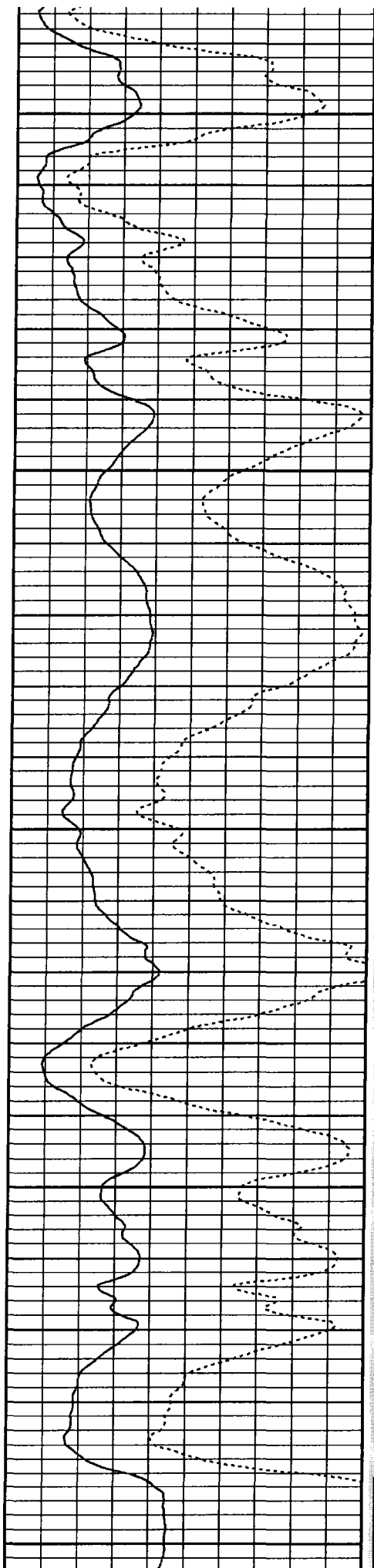
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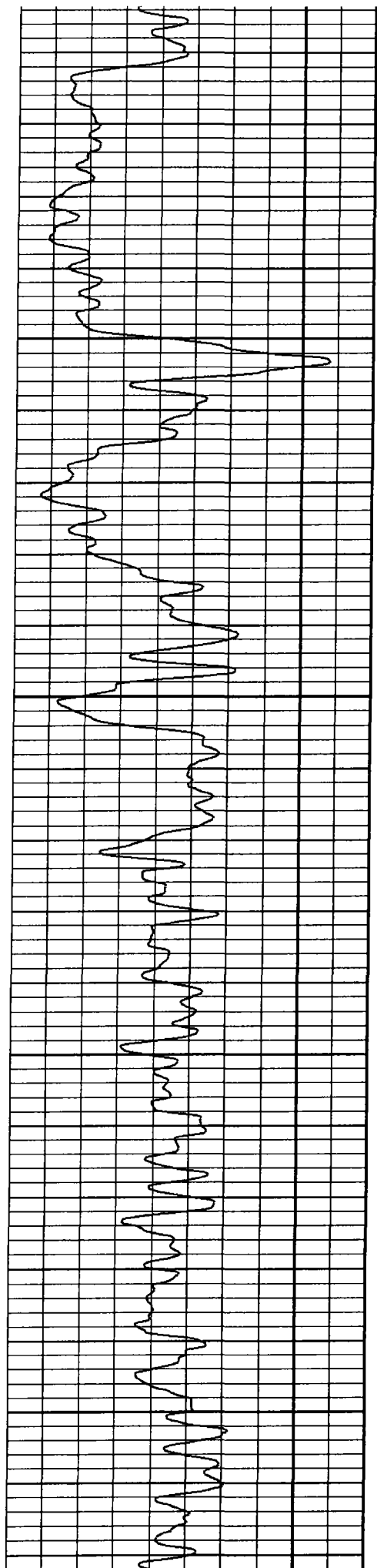
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1400

1450

1500



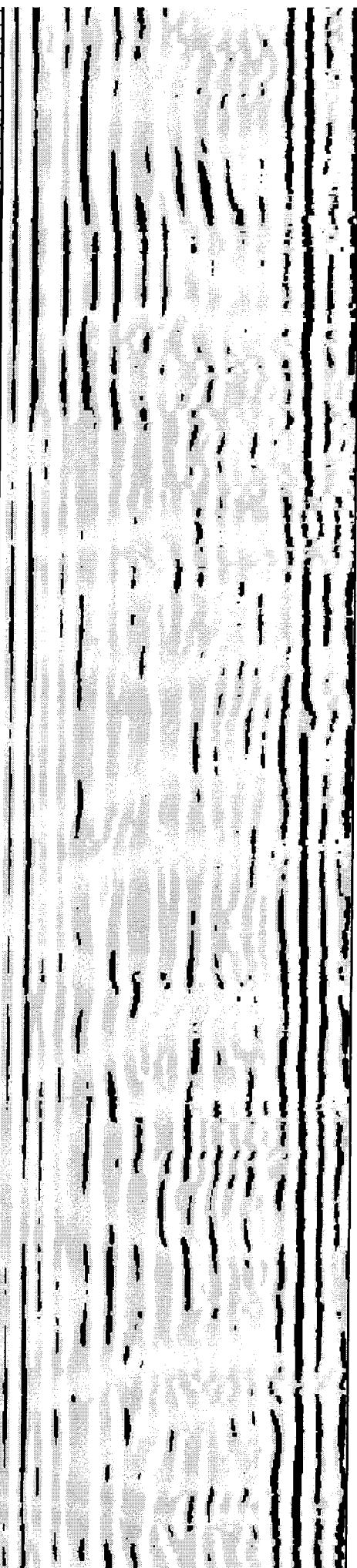
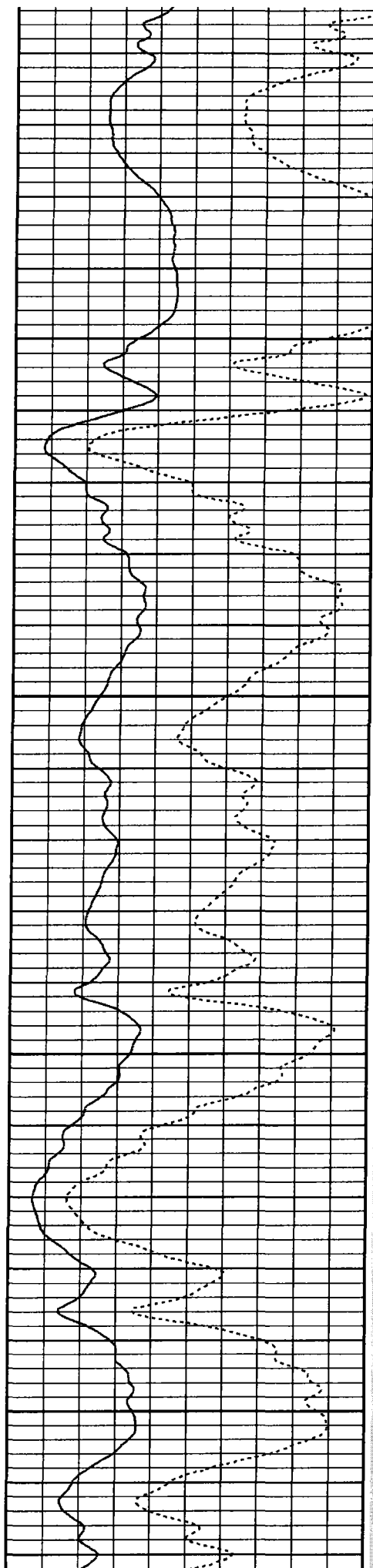


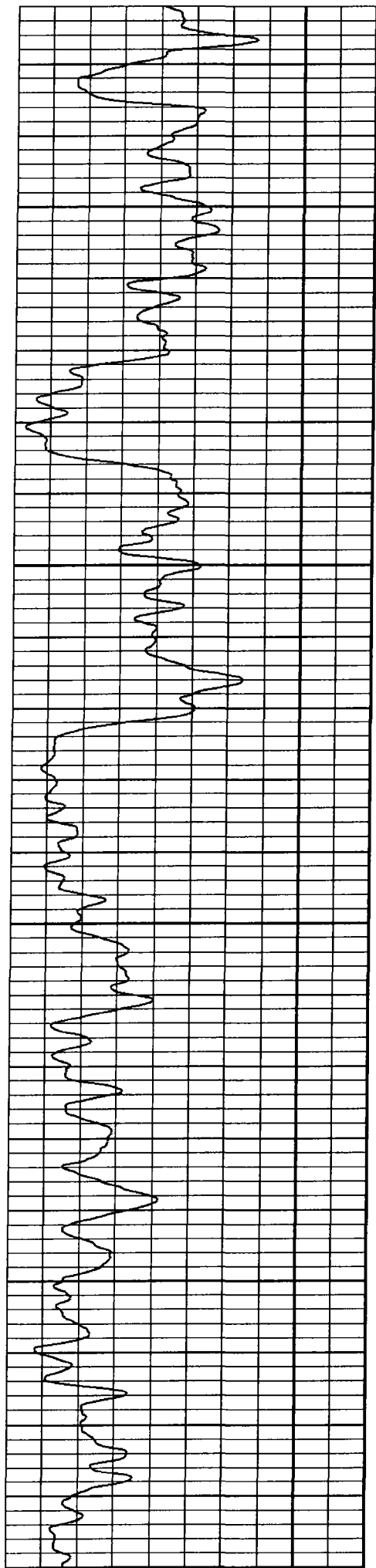
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1600

1650

1700



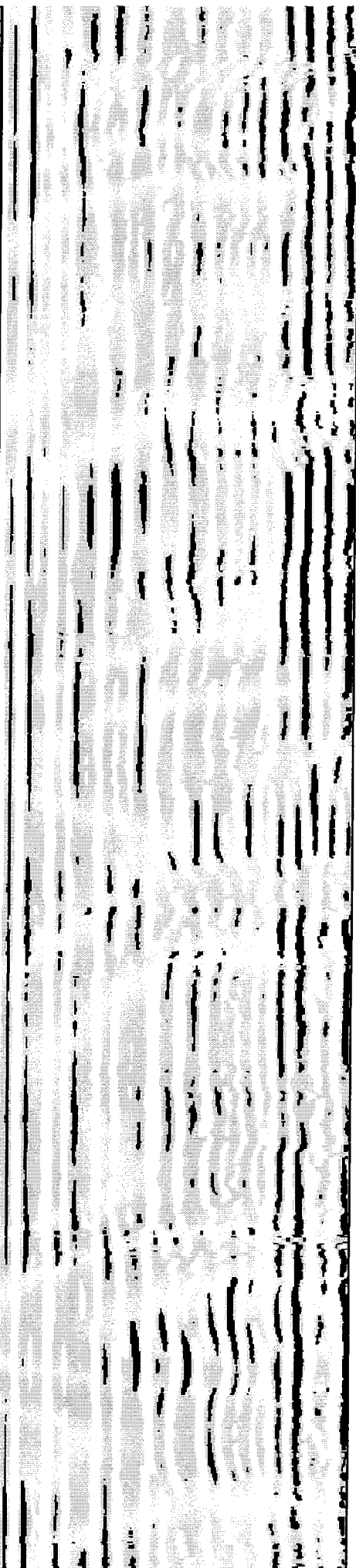
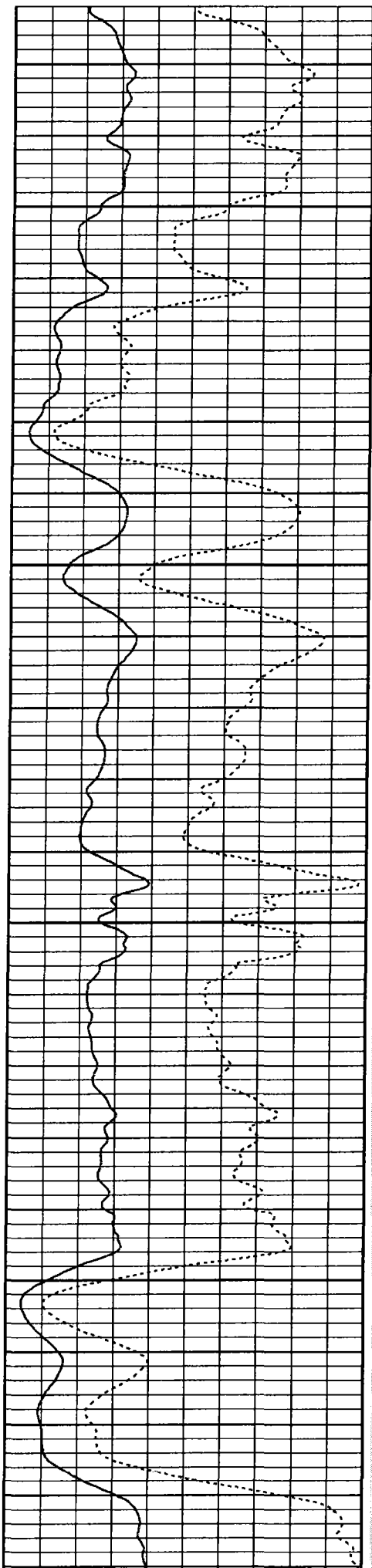


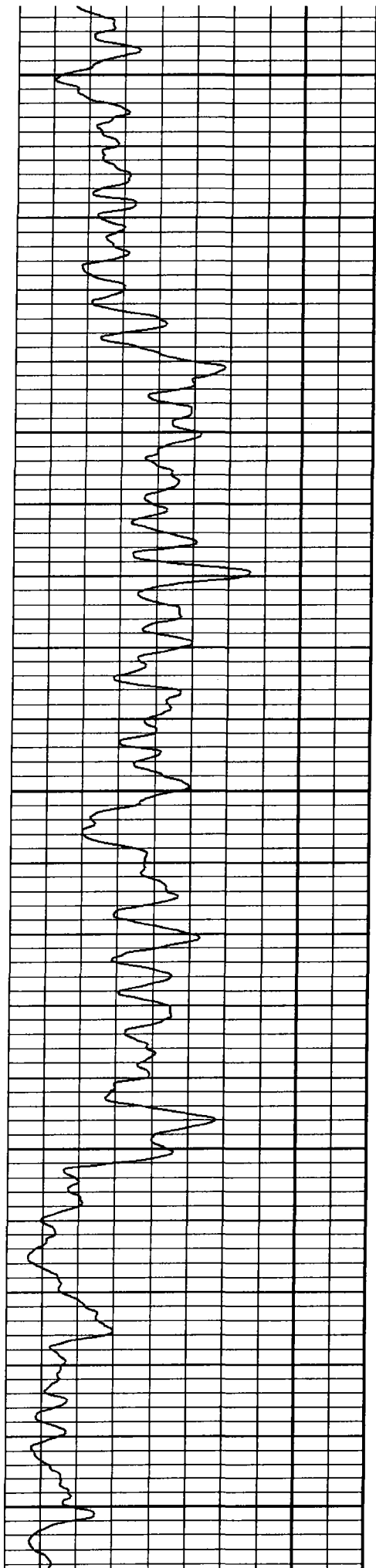
1750

1800

1850

1900





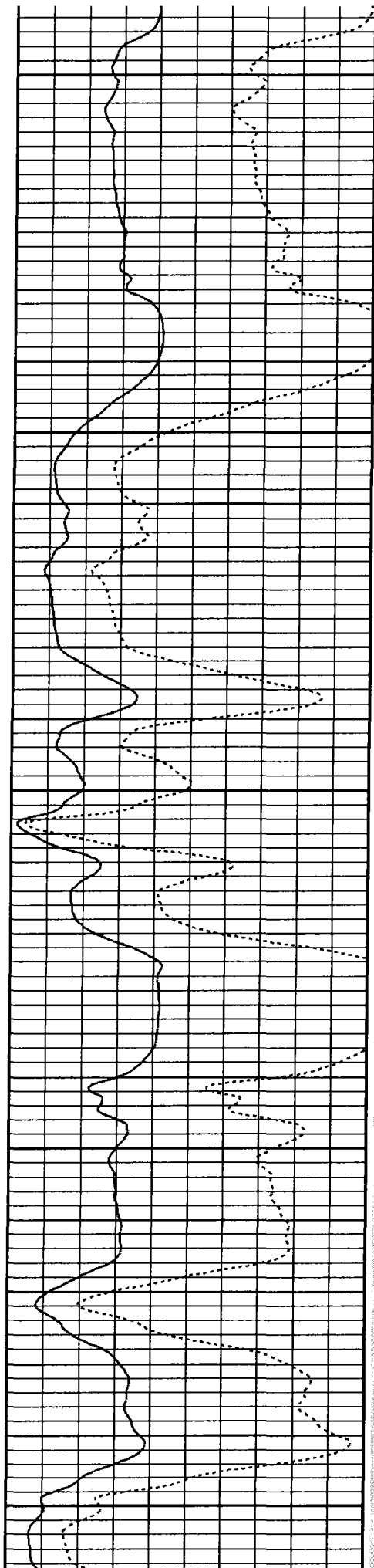
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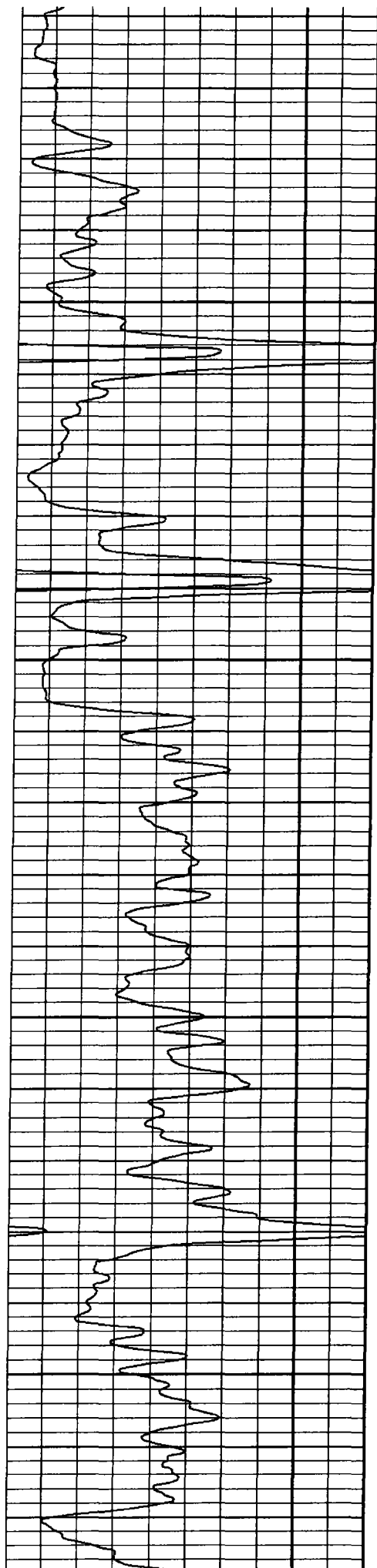
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2050

2100

2150



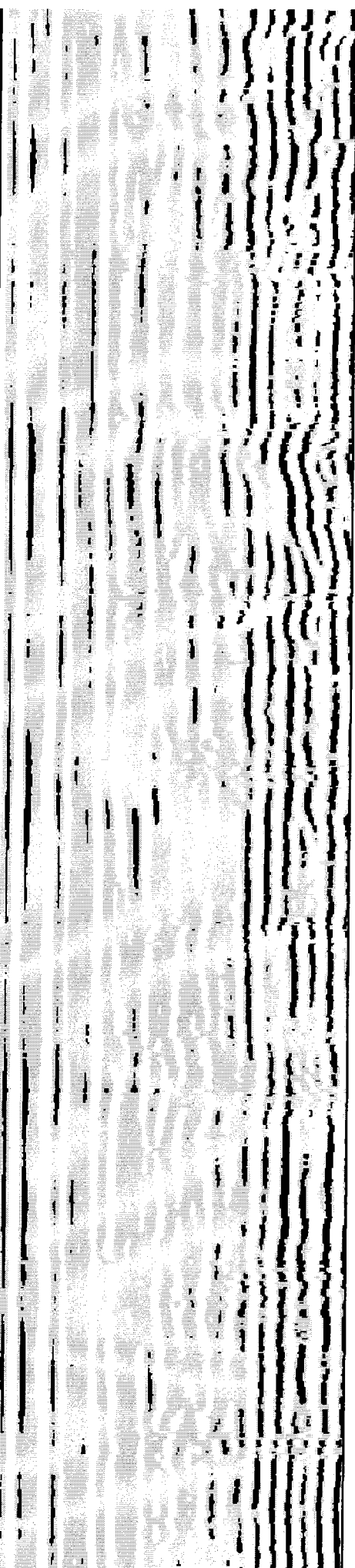
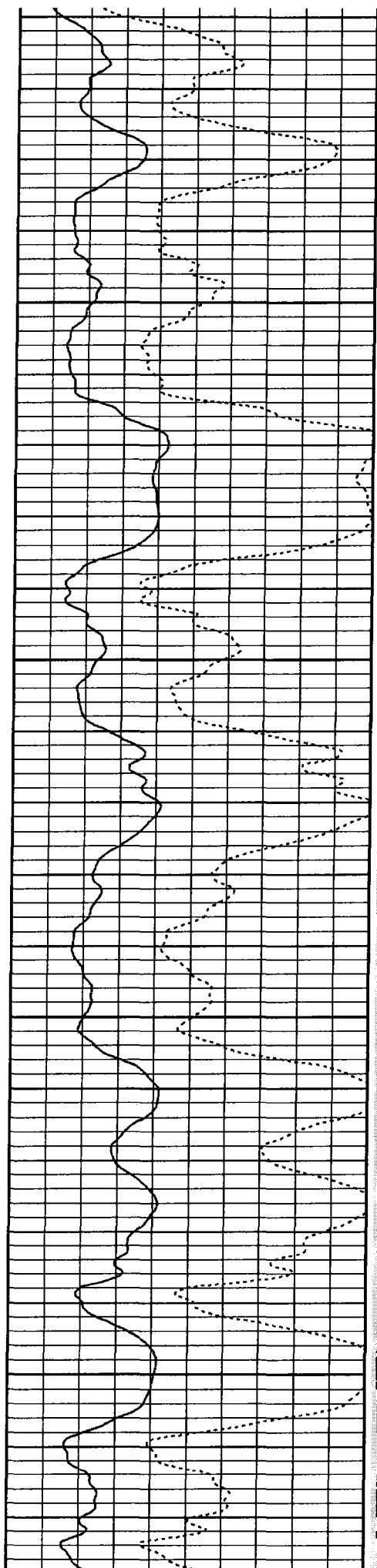


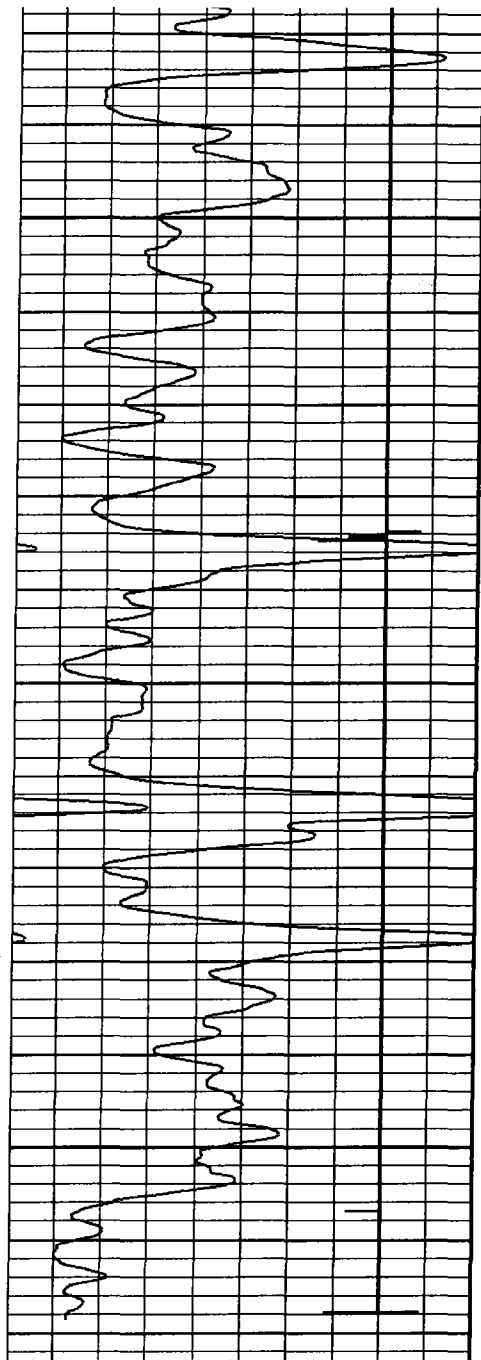
2200

2250

2300

2350





2400

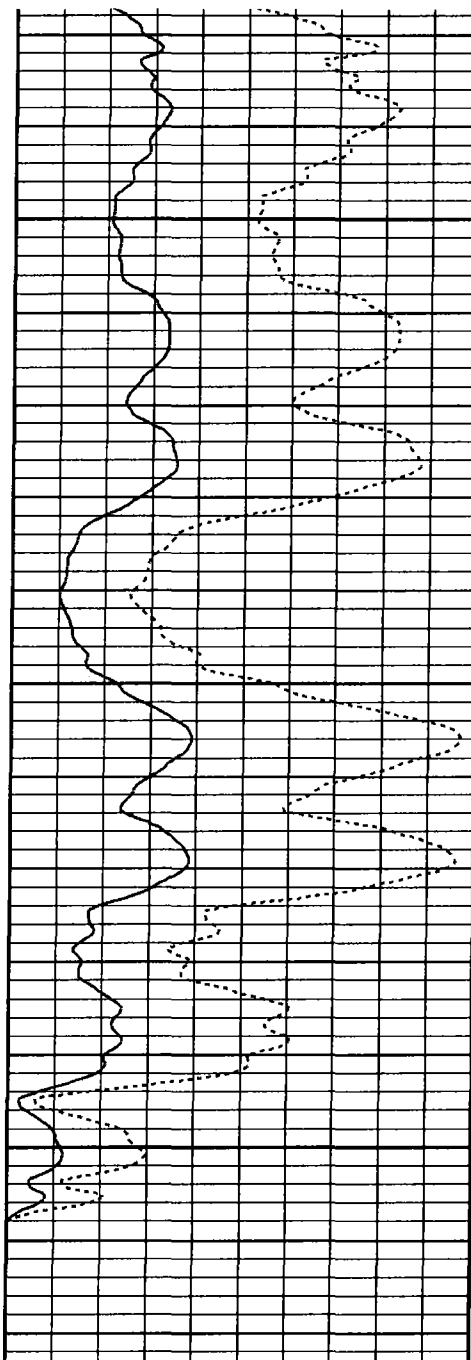
2450

2500

CCL

0 150.0

gamma ray



0 100.0

amplitude

0 60.0

amplitude x 5



VDL

RUN: SONIC BOND LOG

DIR: UP

DATE: 04/26/17

TIME: 14:28:51

SONIC BOND LOG

START: 2517.75ft

STOP: 9.25ft

RES: 0.25ft

SCALE: 5"/100'

DYNALOG INC.

well

FLYING J GEER

Field

Country

U.S.A.

State/Prv KANSAS



MWM Oil Co., Inc.
346 S. Lulu St.
Wichita, KS 67211
Phone: (316) 265-1992
Fax: (316) 265-1999

May 10, 2013

Kansas Corporation Commission
130 S. Market
Wichita, KS 67202

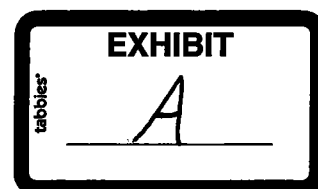
Dear friends,

I have attached this letter with the electronic submission of the Intent to Drill for the Flying J Geer #2 OWWO. I have also attached a copy of the scout card and the KCC plugging report. I am requesting an exception to the 200 feet of surface casing requirement. If this well is successful and casing is set, the top 200 feet of production casing will be cemented in place.

Thank you very much for your consideration to this matter.

Very truly yours,

Benjamin M. Giles



To:
STATE CORPORATION COMMISSION
CONSERVATION DIVISION - PLUGGING SECTION
200 COLORADO DERBY BUILDING
WICHITA, KANSAS 67202

TECHNICIAN'S PLUGGING REPORT

Operator License # 6484Operator: Thornton E. AndersonName: Thornton E. AndersonAddress: 212 N. Market, Suite 508Wichita, KS 67202

API NUMBER 15- Comp. 6-13-63

E/2 E/2 NE, SEC. 32, T. 25 S, R. 4 XX/E

_____ feet from S section line

_____ feet from E section line

Lease Name Geer Well # 2County ButlerWell Total Depth 2543 feetConductor-Pipe: Size 5 1/2" feet 2507Surface Casing: Size 8 5/8" feet 130Abandoned Oil Well ☒ Gas Well _____ Input Well _____ SWD Well _____ DAA _____

Other well as hereinafter indicated _____

Plugging Contractor Kelso Casing Pulling License Number 6050Address Box 347, Chase, KansasCompany to plug at: Hour: 09:00 Day: 17 Month: 3 Year: 1988Plugging proposal received from Mark McCabe(company name) Kelso Casing Pulling (phone) _____were: Fill hole with sand 2450', dump 5 sxs cement. Shoot and pull 5 1/2" casing.Set rock bridge @300' and fill to surface with redimix.Plugging Proposal Received by District #2 Office
(TECHNICIAN)Plugging Operations attended by Agent?: All _____ Part ☒ None _____Operations Completed: Hour: 16:30 Day: 28 Month: 3 Year: 1988ACTUAL PLUGGING REPORT Filled hole with sand to 2450' and dumped 5 sxs cement w/bailer.Shot and pulled 2085' of 5 1/2" casing. Allied Cementing Co., Inc. #3519 pumped300# hulls, 12 sxs gel, 100 sxs 60/40 pozmix, 4% gel down 8 5/8" casing.Pump pressure 600# Shut in pressure 200#Remarks: top plug

If additional description is necessary, use BACK of this form.)

I (did / did not) observe this plugging.

DATE 4-13-88WCM, NO. 20356Signed Thornton E. Anderson
(TECHNICIAN)

STATE OF KANSAS
STATE CORPORATION COMMISSION
200 Colorado Derby Building
Wichita, Kansas 67202

WELL PLUGGING RECORD
K.A.R.-82-3-117

API NUMBER 15-015014900000

LEASE NAME Geer

WELL NUMBER # 2

 Ft. from S Section Line

 Ft. from E Section Line
E/2 E/2 NE

SEC. 32 TWP. 25 RGE. 4 (E) or (W)

COUNTY Butler

Date Well Completed 6-13-63

Plugging Commenced 3-16-88

Plugging Completed 3-28-88

TYPE OR PRINT
NOTICE: Fill out completely
and return to Cons. Div.
office within 30 days.

LEASE OPERATOR Thornton E. Anderson

212 N. Market Suite 508

ADDRESS Wichita, Kansas 67202

PHONE # (316) 265-7929 OPERATORS LICENSE NO. 6484

Character of Well Oil

(Oil, Gas, D&A, SWD, Input, Water Supply Well)

Did you notify the KCC District Office prior to plugging this well? Yes

Which KCC Office did you notify? Dist. #2 Wichita, Kansas

Is ACO-1 filed? If not, is well log attached?

Producing Formation Depth to Top Bottom T.D. 2543'

Show depth and thickness of all water, oil and gas formations.

OIL, GAS OR WATER RECORDS

CASING RECORD

Formation	Content	From	To	Size	Put In	Pulled out
				8-5/8"	130'	none
				5-1/2"	2507'	2062'

Describe in detail the manner in which the well was plugged, indicating where the mud fluid was placed and the method or methods used in introducing it into the hole. If cement or other plugs were used, state the character of same and depth placed, from feet to feet each set.

Plugged off bottom with sand to 3150' and 5 sacks cement. Shot pipe @2062'.

pulled a total of 75 joints of 5-1/2" casing. Plugged surface with 3 bulls,

12 gal. 100 cement, 60/40 pos, 4% gel.

Plugging Complete.

(If additional description is necessary, use BACK of this form.)

Name of Plugging Contractor Kelso Casing Pulling, Inc. License No. 6050

Address P.O. Box 347 Chase, Kansas 67524

STATE OF Kansas COUNTY OF Rice, ss.

R. Darrell Kelso

(Employee of Operator) or (Operator) of

above-described well, being first duly sworn on oath, says: That I have knowledge of the facts, statements, and matters herein contained and the log of the above-described well as filed that the same are true and correct, so help me God.

(Signature) R. Darrell Kelso

(Address) Box 347
Chase, Kansas 67524

SUBSCRIBED AND SWORN TO before me this 29th day of March, 19 88

[Signature]
Notary Public

My Commission Expires:



Conservation Division
Finney State Office Building
130 S. Market, Rm. 2078
Wichita, KS 67202-3802



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shan Ferst Albrecht, Commissioner

Sam Brownback, Governor

May 14, 2013

Benjamin M. Giles
346 S. Lulu
Wichita, KS 67211

RE: Table I Exception
Flying J Greer 2 OWWO, E2-E2-NE Sec.32-T25S-R4E, Butler County, Kansas

Dear Mr. Giles:

The Kansas Corporation Commission (KCC) has received your request, dated May 10, 2013, for an exception to the Table 1 minimum surface pipe requirement of 200 feet for the proposed well. From your request, the KCC understands that you are to utilize the existing 130 feet of surface casing in this well bore and Alternate II cementing rules.

After review of this matter by technical staff it was determined that:

1. Bedrock at this location is the Permian Chase Group and is located at or near surface.
2. The depth of the deepest water well of record within one mile of the proposed location is 147 feet.

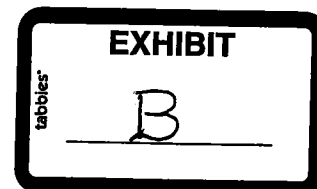
Based on this information, an exception is granted for the Table 1 Minimum Surface Casing Requirements with the following stipulations:

1. Upon completion of the well, the production or long string casing nearest the formation wall shall be immediately cemented from a depth of at least 250 feet back to the surface. Notify the KCC District #2 office prior to spudding the well and one day before cementing the longstring so they may have the opportunity to witness the procedure.
2. In the event the well is dry and no additional production pipe has been cemented in-place, plugging will be performed according to KCC rules and KCC District #2 requirements.

Sincerely Yours,

Doug Louis
Director

cc: Steve Bond *SB*
Jeff Klock - Dist #2 *via e-mail*





For KCC Use:
Effective Date: 06/09/2013
District # 2
SGA? ☐ Yes ☒ No

KANSAS CORPORATION COMMISSION 1138926
OIL & GAS CONSERVATION DIVISION

Form C-1
March 2010
Form must be Typed
Form must be Signed
All blanks must be Filled

NOTICE OF INTENT TO DRILL

Must be approved by KCC five (5) 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: 05/20/2013
month day year

OPERATOR: License# 5446
Name: Giles, Benjamin M.
Address 1: 346 S. LULU
Address 2:
City: WICHITA State: KS Zip: 67211 +
Contact Person: BEN GILES
Phone: 316-265-1992

CONTRACTOR: License# 5446
Name: Giles, Benjamin M.

Well Drilled For: Well Class: Type Equipment:
☒ Oil ☐ Enh Rec ☒ Infield ☒ Mud Rotary
☐ Gas ☐ Storage ☐ Pool Ext. ☐ Air Rotary
☐ Disposal ☐ Wildcat ☐ Cable
☐ Seismic; # of Holes ☐ Other
☐ Other:

☒ If OWWO: old well information as follows:

Operator: SACO OIL CO
Well Name: GEER #2
Original Completion Date: 06/13/1963 Original Total Depth: 2543

Directional, Deviated or Horizontal wellbore? ☐ Yes ☒ No
If Yes, true vertical depth:
Bottom Hole Location:
KCC DKT #:

Spot Description: E2 E2 NE
E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ E ☐ W
(Q/Q/Q/Q) 1320 feet from ☒ N / ☐ S Line of Section
330 feet from ☒ E / ☐ W Line of Section
Is SECTION: ☒ Regular ☐ Irregular?

(Note: Locate well on the Section Plat on reverse side)

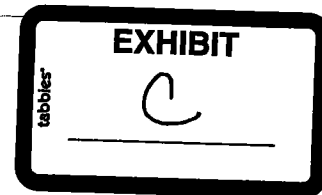
County: Butler
Lease Name: FLYING J GEER Well #: 2 OWWO
Field Name: PIERCE
Is this a Prorated / Spaced Field? ☐ Yes ☒ No
Target Formation(s): MISSISSIPPI
Nearest Lease or unit boundary line (in footage): 330
Ground Surface Elevation: 1338 Operator Supplied feet MSL
Water well within one-quarter mile: ☐ Yes ☒ No
Public water supply well within one mile: ☐ Yes ☒ No
Depth to bottom of fresh water: 150
Depth to bottom of usable water: 180
Surface Pipe by Alternate: ☐ I ☒ II
Length of Surface Pipe Planned to be set: 130
Length of Conductor Pipe (if any): 0
Projected Total Depth: 2543
Formation at Total Depth: MISSISSIPPI
Water Source for Drilling Operations:
☐ Well ☐ Farm Pond ☒ Other: HAULED
DWR Permit #:
(Note: Apply for Permit with DWR ☐)
Will Cores be taken? ☐ Yes ☒ No
If Yes, proposed zone:

AFFIDAVIT

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

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

1. Notify the appropriate district office **prior** to spudding of well;
2. A copy of the approved notice of intent to drill **shall be** posted on each drilling rig;
3. The minimum amount of surface pipe as specified below **shall be set** by circulating cement to the top; in all cases surface pipe **shall be set** through all unconsolidated materials plus a minimum of 20 feet into the underlying formation.
4. If the well is dry hole, an agreement between the operator and the district office on plug length and placement is necessary **prior to plugging**;
5. The appropriate district office will be notified before well is either plugged or production casing is cemented in;
6. If an ALTERNATE II COMPLETION, production pipe shall be cemented from below any usable water to surface within **120 DAYS** of spud date. Or pursuant to Appendix "B" - Eastern Kansas surface casing order #133,891-C, which applies to the KCC District 3 area, alternate II cementing must be completed within 30 days of the spud date or the well shall be plugged. **In all cases, NOTIFY district office** prior to any cementing.



Submitted Electronically

For KCC Use ONLY
API # 15 - 15-015-01490-00-01
Conductor pipe required 0 feet
Minimum surface pipe required 130 feet per ALT ☐ I ☒ II
Approved by: Rick Hestermann 06/04/2013
This authorization expires: 06/04/2014
(This authorization void if drilling not started within 12 months of approval date.)
Spud date: Agent:

Remember to:

- File Certification of Compliance with the Kansas Surface Owner Notification Act (KSONA-1) with Intent to Drill;
- File Drill Pit Application (form CDP-1) with Intent to Drill;
- File Completion Form ACO-1 within 120 days of spud date;
- File acreage attribution plat according to field proration orders;
- Notify appropriate district office 48 hours prior to workover or re-entry;
- Submit plugging report (CP-4) after plugging is completed (within 60 days);
- Obtain written approval before disposing or injecting salt water.
- If well will not be drilled or permit has expired (See: authorized expiration date) please check the box below and return to the address below.

☐ Well will not be drilled or Permit Expired Date: Signature of Operator or Agent:

Mail to: KCC - Conservation Division,
130 S. Market - Room 2078, Wichita, Kansas 67202

32 25 4 ☒ E ☐ W



1138926

For KCC Use ONLY

API # 15 - 15-015-01490-00-01

IN ALL CASES PLOT THE INTENDED WELL ON THE PLAT BELOW

In all cases, please fully complete this side of the form. Include items 1 through 5 at the bottom of this page.

Operator: Giles, Benjamin M.
 Lease: FLYING J GEER
 Well Number: 2 OWWO
 Field: PIERCE

Number of Acres attributable to well: 10
 QTR/QTR/QTR/QTR of acreage: - E2 - E2 - NE

Location of Well: County: Butler
1320 feet from ☒ N / ☐ S Line of Section
330 feet from ☒ E / ☐ W Line of Section
 Sec. 32 Twp. 25 S. R. 4 ☒ E ☐ W

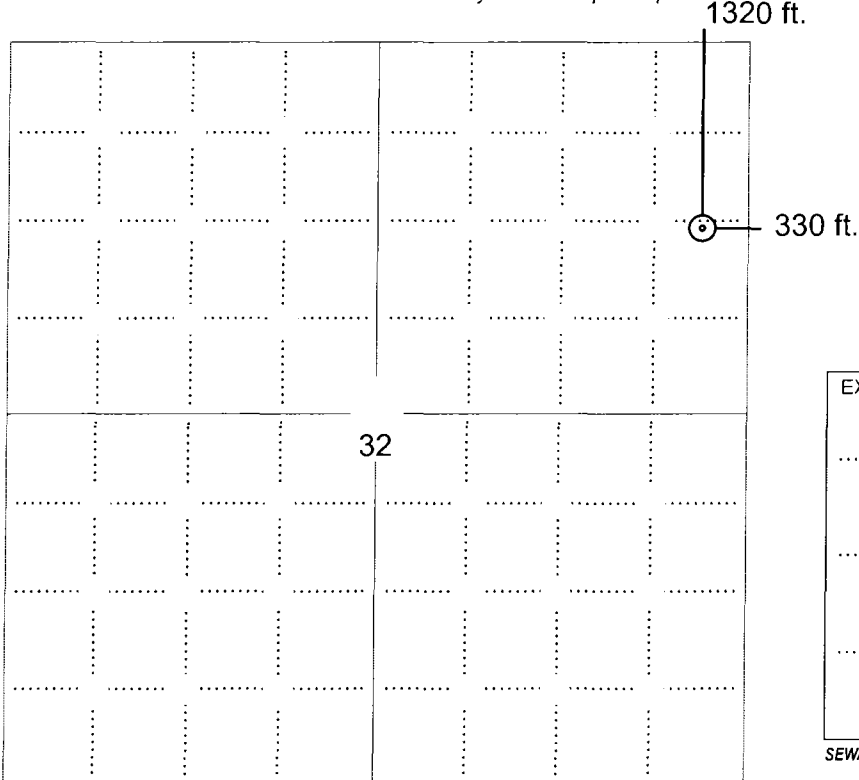
Is Section: ☒ Regular or ☐ Irregular

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

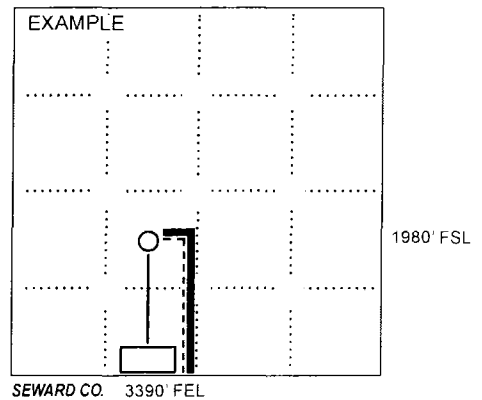
Section corner used: ☐ NE ☐ NW ☐ SE ☐ SW

PLAT

Show location of the well. 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 south / north and east / west outside section lines.
3. The distance to the nearest lease or unit boundary line (in footage).
4. If proposed location is located within a prorated or spaced field a certificate of acreage attribution plat must be attached: (C0-7 for oil wells; CG-8 for gas wells).
5. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

KANSAS CORPORATION COMMISSION 1138926
OIL & GAS CONSERVATION DIVISION
APPLICATION FOR SURFACE PIT

Form CDP-1
May 2010
Form must be Typed

Submit in Duplicate

Operator Name: Giles, Benjamin M.		License Number: 5446
Operator Address: 346 S. LULU		WICHITA KS 67211
Contact Person: BEN GILES		Phone Number: 316-265-1992
Lease Name & Well No.: FLYING J GEER 2 OWWO		Pit Location (QQQQ): _____ E2 _____ E2 _____ NE Sec. 32 Twp. 25 R. 4 <input checked="" type="checkbox"/> East <input type="checkbox"/> West 1320 Feet from <input checked="" type="checkbox"/> North / <input type="checkbox"/> South Line of Section 330 Feet from <input checked="" type="checkbox"/> East / <input type="checkbox"/> West Line of Section Butler _____ County
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input checked="" 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 checked="" type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: 160 _____ (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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	How is the pit lined if a plastic liner is not used? BENTONITE
Pit dimensions (all but working pits): _____ 8 _____ Length (feet) _____ 20 _____ Width (feet) <input type="checkbox"/> N/A: Steel Pits Depth from ground level to deepest point: _____ 8 _____ (feet) <input type="checkbox"/> No Pit		
If the pit is lined give a brief description of the liner material, thickness and installation procedure.		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring.
Distance to nearest water well within one-mile of pit: _____ 3148 _____ feet Depth of water well _____ 117 _____ feet		Depth to shallowest fresh water _____ 110 _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input checked="" type="checkbox"/> KDWR
Emergency, Settling and Burn Pits ONLY: 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		Drilling, Workover and Haul-Off Pits ONLY: Type of material utilized in drilling/workover: WATER Number of working pits to be utilized: 2 Abandonment procedure: LET PITS DRY, FILL IN WITH DIRT Drill pits must be closed within 365 days of spud date.
Submitted Electronically		

KCC OFFICE USE ONLY			
Date Received: 05/10/2013	Permit Number: 15-015-01490-00-01	Permit Date: 06/04/2013	Lease Inspection: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
		<input type="checkbox"/> Liner <input type="checkbox"/> Steel Pit <input checked="" type="checkbox"/> RFAC <input type="checkbox"/> RFAS	

Mail to: KCC - Conservation Division, 130 S. Market - Room 2078, Wichita, Kansas 67202

KANSAS CORPORATION COMMISSION 1138926
OIL & GAS CONSERVATION DIVISION

Form KSONA-1
July 2010
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 Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit 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 Intent) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 5446
Name: Giles, Benjamin M.
Address 1: 346 S. LULU
Address 2: _____
City: WICHITA State: KS Zip: 67211 + _____
Contact Person: BENJAMIN M. GILES
Phone: (316) 265-1992 Fax: (316) 265-1999
Email Address: BEN@BENGILES.KSCOXMAIL.COM

Well Location:
E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ East ☐ West
County: Butler
Lease Name: FLYING J GEER Well #: 2 OWWO
If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

Surface Owner Information:

Name: FLYING J TRUST, JANET G. CHAPMAN, TRUSTEE
Address 1: PO BOX 263
Address 2: _____
City: CONCORDIA State: KS Zip: 66901 + _____

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.

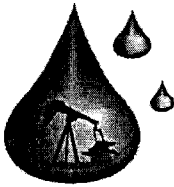
If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary 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 (House Bill 2032), 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 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 Submitted Electronically



MWM Oil Co., Inc.
346 S. Lulu St.
Wichita, KS 67211
Phone: (316) 265-1992
Fax: (316) 265-1999

May 10, 2013

Kansas Corporation Commission
130 S. Market
Wichita, KS 67202

Dear friends,

I have attached this letter with the electronic submission of the Intent to Drill for the Flying J Geer #2 OWWO. I have also attached a copy of the scout card and the KCC plugging report. I am requesting an exception to the 200 feet of surface casing requirement. If this well is successful and casing is set, the top 200 feet of production casing will be cemented in place.

Thank you very much for your consideration to this matter.

Very truly yours,

Benjamin M. Giles

SACO OIL CO

#2 GEER

32-25-4E

E2 E2 NE

Contr WILSON DRILLING

BUTLER County

E 1338 KB Comm 3/16/63 Comp. 6/13/63 IP 25 BOPD + 5% WTR
MISS 2507-43

SMPTops	Depth	Datum
LANS	1839	-497
KC	2102	-764
MISS CH	2504	-1166
TD	2543	-1205

Casing

8" 140/125 SX

5 1/2" 2507/75 SX

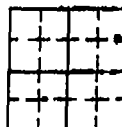
NO TESTS

DD 2543; A 250; FU 100' OIL/

14 HRS, FRAC 60,000# SNO+3420

BW, POP

WHITENATER



GEOL-CHRIS STARK

INDEPENDENT OIL & GAS SERVICE
WICHITA, KANSAS

2 07-277

2-28-88

To:
STATE CORPORATION COMMISSION
CONSERVATION DIVISION - PLUGGING SECTION
200 COLORADO DERBY BUILDING
WICHITA, KANSAS 67202

API NUMBER 15- Comp. 6-13-63

E/2 E/2 NE, SEC. 32 T 25 S, R 4 XX/E

feet from S section line

feet from E section line

TECHNICIAN'S PLUGGING REPORT

Operator License # 6484

Lease Name Geer Well # 2

Operator: Thornton E. Anderson

County Butler

Name:

Address 212 N. Market, Suite 508

Well Total Depth 2543 feet

Wichita, KS 67202

Conductor-Pipe: Size 5 1/2" feet 2507

Surface Casing: Size 8 5/8" feet 130

Abandoned Oil Well ☒ Gas Well ☐ Input Well ☐ SWD Well ☐ D&A ☐

Other well as hereinafter indicated

Plugging Contractor Kelso Casing Pulling License Number 6050

Address Box 347, Chase, Kansas

Company to plug at: Hour: 09:00 Day: 17 Month: 3 Year: 19 88

Plugging proposal received from Mark McCabe

(company name) Kelso Casing Pulling (phone)

were: Fill hole with sand 2450', dump 5 sxs cement. Shoot and pull 5 1/2" casing.

Set rock bridge @300' and fill to surface with redimix.

Plugging Proposal Received by District #2 Office
(TECHNICIAN)Plugging Operations attended by Agent?: All ☐ Part ☒ None ☐

Operations Completed: Hour: 16:30 Day: 28 Month: 3 Year: 19 88

ACTUAL PLUGGING REPORT Filled hole with sand to 2450' and dumped 5 sxs cement w/bailer.

Shot and pulled 2085' of 5 1/2" casing. Allied Cementing Co., Inc. #3519 pumped

300# hulls, 12 sxs gel, 100 sxs 60/40 pozmix, 4% gel down 8 5/8" casing.

Pump pressure 600# Shut in pressure 200#

SLIP CEMENTED

281100

Remarks: top plug

(Without additional description is necessary, use BACK of this form.)

INVOICED

(did / did not) observe this plugging.

DATE

4-13-88

Signed

Don Thompson
(TECHNICIAN)

INV. NO.

20356

FORM CP-2/3
Rev. 01-84

For KCC Use ONLY

API # 15 - _____

IN ALL CASES PLOT THE INTENDED WELL ON THE PLAT BELOW

In all cases, please fully complete this side of the form. Include items 1 through 5 at the bottom of this page.

Operator: BENJAMIN M. GILES

Lease: FLYING J GEER

Well Number: 2 OWWO

Field: PIERCE

Number of Acres attributable to well: 10

QTR/QTR/QTR/QTR of acreage: _____ - E2 - E2 - NE

Location of Well: County: BUTLER

1,320

feet from



N

/



S

Line of Section

330

feet from



E

/



W

Line of Section

Sec. 32

Twp. 25

S. R. 4



E



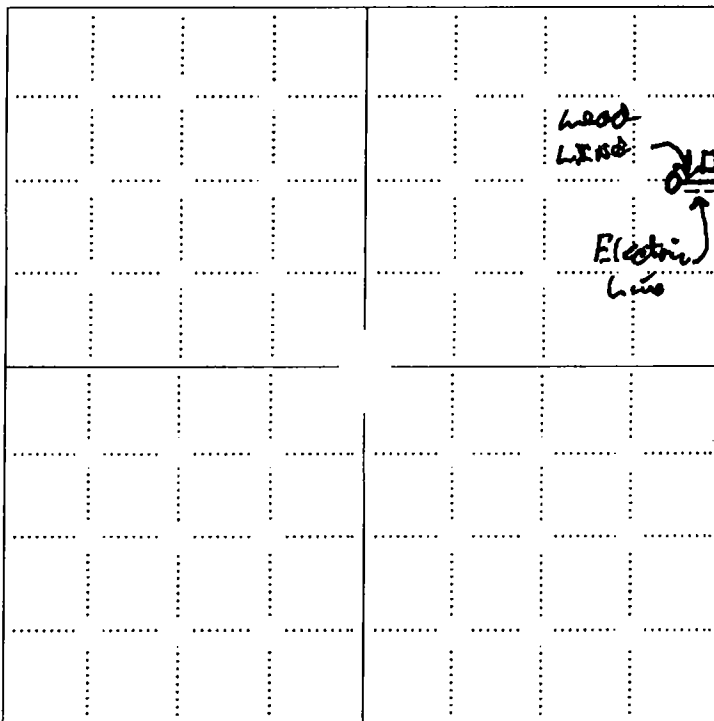
W

Is Section: ☒ Regular or ☐ Irregular

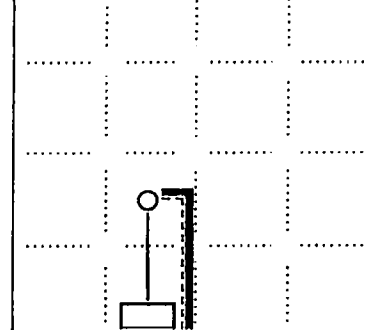
If Section Is Irregular, locate well from nearest corner boundary.

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

Show location of the well. 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

EXAMPLE**NOTE: In all cases locate the spot of the proposed drilling location.****In plotting the proposed location of the well, you must show:**

- 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.
- The distance of the proposed drilling location from the south / north and east / west outside section lines.
- The distance to the nearest lease or unit boundary line (in footage).
- If proposed location is located within a prorated or spaced field a certificate of acreage attribution plat must be attached: (CO-7 for oil wells; CG-8 for gas wells).
- The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

STATE OF KANSAS
STATE CORPORATION COMMISSION
200 Colorado Derby Building
Wichita, Kansas 67202

WELL PLUGGING RECORD
K.A.R.-82-3-117

API NUMBER 15-01501490000

LEASE NAME Geer

WELL NUMBER # 2

TYPE OR PRINT
NOTICE: Fill out completely
and return to Cons. Div.
office within 30 days.

 Ft. from S Section Line

 Ft. from E Section Line
E/2 E/2 NE

SEC. 32 TWP. 25 RGE. 4 (E) or (W)

COUNTY Butler

Date Well Completed 6-13-63

Plugging Commenced 3-16-88

Plugging Completed 3-28-88

LEASE OPERATOR Thornton E. Anderson

212 N. Market Suite 508

ADDRESS Wichita, Kansas 67202

PHONE # (316) 265-7929 OPERATORS LICENSE NO. 6484

Character of Well Oil

(Oil, Gas, D&A, SWD, Input, Water Supply Well)

Did you notify the KCC District Office prior to plugging this well? Yes

Which KCC Office did you notify? Dist. #2 Wichita, Kansas

Is ACO-1 filed? If not, is well log attached?

Producing Formation Depth to Top Bottom T.D. 2543'

Show depth and thickness of all water, oil and gas formations.

OIL, GAS OR WATER RECORDS

CASING RECORD

Formation	Content	From	To	Size	Put In	Pulled out
				8-5/8"	130'	none
				5-1/2"	2507'	2062'

Describe in detail the manner in which the well was plugged, indicating where the mud fluid was placed and the method or methods used in introducing it into the hole. If cement or other plugs were used, state the character of same and depth placed, from feet to feet each set.

Plugged off bottom with sand to 3150' and 5 sacks cement. Shot pipe @2062',
pulled a total of 75 joints of 5-1/2" casing. Plugged surface with 3 bulls,
12 gal. 100 cement, 60/40 pos, 4% gel.
Plugging Complete.

(If additional description is necessary, use BACK of this form.)

Name of Plugging Contractor Kelso Casing Pulling, Inc. License No. 6050

Address P.O. Box 347 Chase, Kansas 67524

STATE OF Kansas COUNTY OF Rice, ss.

R. Darrell Kelso (Employee of Operator) or (Operator) of
above-described well, being first duly sworn on oath, says: That I have knowledge of the facts,
statements, and matters herein contained and the log of the above-described well as filed that
the same are true and correct, so help me God.

(Signature) R. Darrell Kelso

(Address) Box 347
Chase, Kansas 67524

SUBSCRIBED AND SWORN TO before me this 29th day of March, 19 88

[Signature]
Notary Public

My Commission Expires:



May 14, 2013

Benjamin M. Giles
346 S. Lulu
Wichita, KS 67211

RE: Table I Exception
Flying J Greer 2 OWWO, E2-E2-NE Sec.32-T25S-R4E, Butler County, Kansas

Dear Mr. Giles:

The Kansas Corporation Commission (KCC) has received your request, dated May 10, 2013, for an exception to the Table 1 minimum surface pipe requirement of 200 feet for the proposed well. From your request, the KCC understands that you are to utilize the existing 130 feet of surface casing in this well bore and Alternate II cementing rules.

After review of this matter by technical staff it was determined that:

1. Bedrock at this location is the Permian Chase Group and is located at or near surface.
2. The depth of the deepest water well of record within one mile of the proposed location is 147 feet.

Based on this information, an exception is granted for the Table 1 Minimum Surface Casing Requirements with the following stipulations:

1. Upon completion of the well, the production or long string casing nearest the formation wall shall be immediately cemented from a depth of at least 250 feet back to the surface. Notify the KCC District #2 office prior to spudding the well and one day before cementing the longstring so they may have the opportunity to witness the procedure.
2. In the event the well is dry and no additional production pipe has been cemented in-place, plugging will be performed according to KCC rules and KCC District #2 requirements.

Sincerely Yours,



Doug Louis
Director

cc: Steve Bond *SB*
Jeff Klock - Dist #2 */via e-mail*

Conservation Division
Finney State Office Building
130 S. Market, Rm. 2078
Wichita, KS 67202-3802



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shari Feist Albrecht, Commissioner

Sam Brownback, Governor

June 04, 2013

BEN GILES
Giles, Benjamin M.
346 S. LULU
WICHITA, KS 67211

Re: Drilling Pit Application
FLYING J GEER 2 OWWO
NE/4 Sec.32-25S-04E
Butler County, Kansas

Dear BEN GILES:

District staff has inspected the above referenced location and has determined that an unsealed condition will present a pollution threat to water resources.

District staff has recommended that the reserve pit be lined with bentonite or native clay, constructed **without slots**, the bottom shall be flat and reasonably level and the free fluids must be removed. The fluids are to be removed from the reserve pit after drilling operations have ceased.

If production casing is set all completion fluids shall be removed from the working pits daily. NO completion fluids or non-exempt wastes shall be placed in the reserve pit.

The fluids should be taken to an authorized disposal well. Please call the District Office at (316) 630-4000 when the fluids have been removed. Please file form CDP-5 (August 2008), Exploration and Production Waste Transfer, through KOLAR within 30 days of fluid removal.

A copy of this letter should be posted in the doghouse along with the approved Intent to Drill. If you have any questions or concerns please feel free to contact the District Office at (316) 630-4000.



Confidentiality Requested:

☐ Yes ☒ NoKANSAS CORPORATION COMMISSION 1185051
OIL & GAS CONSERVATION DIVISION

Form ACO-1

August 2013

Form must be Typed

Form must be Signed

All blanks must be Filled

WELL COMPLETION FORM
WELL HISTORY - DESCRIPTION OF WELL & LEASE

OPERATOR: License # 5446

Name: Giles, Benjamin M.

Address 1: 346 S. LULU

Address 2:

City: WICHITA State: KS Zip: 67211 +

Contact Person: Ben Giles

Phone: (316) 265-1992

CONTRACTOR: License # 5446

Name: Giles, Benjamin M.

Wellsite Geologist: none

Purchaser: Maclaskey Oilfield Services

Designate Type of Completion:

- ☐ New Well ☐ Re-Entry ☒ Workover
- ☒ Oil ☐ WSW ☐ SWD ☐ SLOW
- ☐ Gas ☐ D&A ☐ ENHR ☐ SIGW
- ☐ OG ☐ GSW ☐ Temp. Abd.
- ☐ CM (Coal Bed Methane)
- ☐ Cathodic ☐ Other (Core, Expl., etc.):

If Workover/Re-entry: Old Well Info as follows:

Operator: Saco Oil Co

Well Name: Geer #2

Original Comp. Date: 06/13/1963 Original Total Depth: 2543

- ☐ Deepening ☒ Re-perf. ☐ Conv. to ENHR ☐ Conv. to SWD
- ☐ Plug Back ☐ Conv. to GSW ☐ Conv. to Producer

- ☐ Commingled Permit #: _____
- ☐ Dual Completion Permit #: _____
- ☐ SWD Permit #: _____
- ☐ ENHR Permit #: _____
- ☐ GSW Permit #: _____

11/20/2013 11/20/2013

Spud Date or Date Reached TD Completion Date or Recompletion Date

API No. 15 - 15-015-01490-00-01

Spot Description: E2 E2 NE

E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ East ☐ West1320 Feet from ☒ North / ☐ South Line of Section330 Feet from ☒ East / ☐ West Line of Section

Footages Calculated from Nearest Outside Section Corner:

☒ NE ☐ NW ☐ SE ☐ SWGPS Location: Lat: _____, Long: _____
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Butler

Lease Name: FLYING J GEER Well #: 2 OWWO

Field Name: PIERCE

Producing Formation: MISSISSIPPI

Elevation: Ground: 1322 Kelly Bushing: 1338

Total Vertical Depth: 2543 Plug Back Total Depth:

Amount of Surface Pipe Set and Cemented at: 130 Feet

Multiple Stage Cementing Collar Used? ☐ Yes ☒ No

If yes, show depth set: _____ Feet

If Alternate II completion, cement circulated from: _____

feet depth to: _____ w/ _____ sx cmt.

Drilling Fluid Management Plan

(Data must be collected from the Reserve Pit)

Chloride content: _____ ppm Fluid volume: _____ bbls

Dewatering method used: _____

Location of fluid disposal if hauled offsite:

Operator Name: _____

Lease Name: _____ License #: _____

Quarter _____ Sec. _____ Twp. _____ S. R. _____ ☐ East ☐ West

County: _____ Permit #: _____

EXHIBIT

tabbles

D

AFFIDAVIT

I am the affiant and I hereby certify that all requirements of the statutes, rules and regulations promulgated to regulate the oil and gas industry have been fully complied with and the statements herein are complete and correct to the best of my knowledge.

Submitted Electronically

KCC Office Use ONLY

☐ Confidentiality Requested

Date: _____

☐ Confidential Release Date: _____☐ Wireline Log Received☐ Geologist Report Received☐ UIC DistributionALT ☐ I ☒ II ☐ III Approved by: Deanna Garrison Date: 01/29/2014

1185051

Operator Name: Giles, Benjamin M. Lease Name: FLYING J GEER Well #: 2 OWWO
 Sec. 32 Twp. 25 S. R. 4 ☒ East ☐ West County: Butler

INSTRUCTIONS: Show important tops of formations penetrated. Detail all cores. Report all final copies of drill stems tests giving interval tested, time tool open and closed, flowing and shut-in pressures, whether shut-in pressure reached static level, hydrostatic pressures, bottom hole temperature, fluid recovery, and flow rates if gas to surface test, along with final chart(s). Attach extra sheet if more space is needed.

Final Radioactivity Log, Final Logs run to obtain Geophysical Data and Final Electric Logs must be emailed to kcc-well-logs@kcc.ks.gov. Digital electronic log files must be submitted in LAS version 2.0 or newer AND an image file (TIFF or PDF).

Drill Stem Tests Taken (Attach Additional Sheets)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Log	Formation (Top), Depth and Datum	<input checked="" type="checkbox"/> Sample
Samples Sent to Geological Survey	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Name	Top	Datum
Cores Taken	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	LANSING	1835	-497
Electric Log Run	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	KANSAS CITY	2102	-764
List All E. Logs Run:		MISSISSIPPI	2504	-1166

CASING RECORD <input type="checkbox"/> New <input type="checkbox"/> Used							
Report all strings set-conductor, surface, intermediate, production, etc.							
Purpose of String	Size Hole Drilled	Size Casing Set (In O.D.)	Weight Lbs. / Ft.	Setting Depth	Type of Cement	# Sacks Used	Type and Percent Additives

ADDITIONAL CEMENTING / SQUEEZE RECORD				
Purpose:	Depth Top Bottom	Type of Cement	# Sacks Used	Type and Percent Additives
<input type="checkbox"/> Perforate				
<input type="checkbox"/> Protect Casing				
<input type="checkbox"/> Plug Back TD				
<input type="checkbox"/> Plug Off Zone				

Did you perform a hydraulic fracturing treatment on this well? ☐ Yes ☒ No (If No, skip questions 2 and 3)
 Does the volume of the total base fluid of the hydraulic fracturing treatment exceed 350,000 gallons? ☐ Yes ☐ No (If No, skip question 3)
 Was the hydraulic fracturing treatment information submitted to the chemical disclosure registry? ☐ Yes ☐ No (If No, fill out Page Three of the ACO-1)

Shots Per Foot	PERFORATION RECORD - Bridge Plugs Set/Type Specify Footage of Each Interval Perforated	Acid, Fracture, Shot, Cement Squeeze Record (Amount and Kind of Material Used)	Depth

TUBING RECORD:		Size:	Set At:	Packer At:	Liner Run: <input type="checkbox"/> Yes <input type="checkbox"/> No
Date of First, Resumed Production, SWD or ENHR.			Producing Method: <input type="checkbox"/> Flowing <input type="checkbox"/> Pumping <input type="checkbox"/> Gas Lift <input type="checkbox"/> Other (Explain) _____		
Estimated Production Per 24 Hours	Oil Bbls.	Gas Mcf	Water Bbls.	Gas-Oil Ratio	Gravity

DISPOSITION OF GAS: <input type="checkbox"/> Vented <input type="checkbox"/> Sold <input type="checkbox"/> Used on Lease (If vented, Submit ACO-18.)	METHOD OF COMPLETION: <input type="checkbox"/> Open Hole <input type="checkbox"/> Perf. <input type="checkbox"/> Dually Comp. <input type="checkbox"/> Commingled (Submit ACO-5) (Submit ACO-4) <input type="checkbox"/> Other (Specify) _____	PRODUCTION INTERVAL: _____ _____
--	---	--

Manage Forms

[Start a New Well Completion Form](#)

Queue	Documents
Unsubmitted ACO1s	0
Submitted ACO1s	0
ACO1s Returned for Additional Work	0
Approved NonConfidential ACO1s •	12
Approved Confidential ACO1s	0
Canceled ACO1s	0
Unsubmitted ACO1 Corrections	0
Submitted ACO1 Corrections	0
ACO1 Corrections Returned for Additional Work	0
Total	12

Approved NonConfidential ACO1s

Show 10 ▾ entries		Search:					
Action	County	Section	Well Name	API Number	Date Approved	Release Date	Corrections
Correction Clone Remarks View Attach	Butler	32-25S-04E	WRIGHT 1 OWWO	15-015-01211-00-02	01/19/2017		0
Correction Clone Remarks View Attach	Butler	32-25S-04E	MCCULLOCH 2A	15-015-24061-00-00	04/19/2016		0
Correction Clone Remarks View Attach	Butler	10-26S-04E	RALSTON OWWO 11	15-015-40321-00-01	02/10/2016		0
Correction Clone Remarks View Attach	Butler	32-25S-04E	MCCULLOCH 12 SWD	15-015-40467-00-01	11/02/2015		0
Correction Clone Remarks View Attach	Butler	34-25S-03E	SEIDL 1 OWWO	15-015-20127-00-02	12/08/2014		0
Correction Clone Remarks View Attach	Butler	35-25S-03E	VARNER DIEMART 2 OWWO	15-015-01389-00-01	03/11/2014		0
Correction Clone Remarks View Attach	Butler	32-25S-04E	FLYING J GEER 2 OWWO	15-015-01490-00-01	01/29/2014		0
Correction Clone Remarks View Attach	Sedgwick	11-26S-02E	M & L LAND STOLLEI 1A	15-173-21023-00-00	08/22/2013		0
Correction Clone Remarks View Attach	Sedgwick	11-26S-02E	ERDWIEN 1A	15-173-21021-00-00	08/22/2013		0
Correction Clone Remarks View Attach	Butler	10-26S-04E	MELVILLE 5 OWWO	15-015-30332-00-02	04/11/2013		0
Showing 1 to 10 of 12 entries					Previous	1	2
							Next

For any filing made by the operator or on behalf of the operator, the operator on whose behalf the filing was made is responsible for compliance with all Commission rules and regulations relating to the filing and any permit issued by the Commission.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

1322589

Form CP-111

March 2017

Form must be Typed

Form must be signed

All blanks must be complete

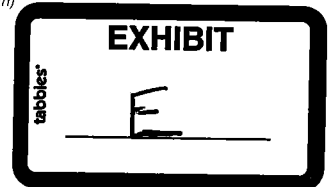
TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 5446
Name: Giles, Benjamin M.
Address 1: 346 S. LULU
Address 2: _____
City: WICHITA State: KS Zip: 67211 + _____
Contact Person: Ben Giles
Phone: (316) 265-1992
Contact Person Email: _____
Field Contact Person: Dusty Green
Field Contact Person Phone: (316) 655-7542

API No. 15- 15-015-01490-00-01
Spot Description: E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ E ☐ W
1376 feet from ☒ N ☐ S Line of Section
311 feet from ☒ E ☐ W Line of Section
GPS Location: Lat: _____, Long: _____
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
County: Butler Elevation: _____ ☐ GL ☐ KB
Lease Name: FLYING J GEER Well #: 2 OWWO
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
Spud Date: 11/20/2013 Date Shut-In: 01/29/2014

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	8.625	5.5	NA	4.5	2.375
Setting Depth		140	2507		2543	2530
Amount of Cement		125	75		150	NA
Top of Cement		0	2085		0	NA
Bottom of Cement		140	2507		2543	NA

Casing Fluid Level from Surface: 1800 How Determined? ECHOMETER FLUID SERVICE Date: 11/17/2016
Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement, Date: _____
(top) (bottom) (top) (bottom)
Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No
Depth and Type: ☐ Junk in Hole at _____ (depth) ☐ Tools in Hole at _____ (depth) Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)
Packer Type: _____ Size: _____ Inch Set at: _____ Feet
Total Depth: 2543 Plug Back Depth: _____ Plug Back Method: _____



Geological Date:

Formation Name _____ Formation Top _____ Formation Base _____ Completion Information
1. _____ At: _____ to _____ Feet Perforation Interval 2511 to 2517 Feet or Open Hole Interval _____ to _____ Feet
2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

I, _____, UNITED BENEFIT OF DERIVATIVE, HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Jeff Klock, District Supervisor</u> Comments: <u>Incomplete ACO-1 on file.</u>				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied	Date: <u>12/09/2016</u>				

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 1500 SW Seventh Steet, Chanute, KS 66720	Phone 620.432.2300
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

11-18-16 10:41 FROM: Mc Collom Constructi 3167756509

Echometer Fluid Level Measurements

ECHOMETER SERVICE, CO.

518 State St.
Augusta, KS 67010
(316) - 775- 3333

COMPANY: BEN GILES

POOL:

LOCATION: BUTLER CO KS

DATE: 11-17-14

17-18-16

ECHOMETER OPERATOR: MARK McCOLLUM

[illegible]

Conservation Division
District Office No. 2
3450 N. Rock Road
Building 600, Suite 601
Wichita, KS 67226



Phone: 316-337-7400
Fax: 316-630-4005
<http://kcc.ks.gov/>

Jay Scott Emler, Chairman
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

Sam Brownback, Governor

December 09, 2016

Ben Giles
Giles, Benjamin M.
346 S. LULU
WICHITA, KS 67211

Re: Temporary Abandonment
API 15-015-01490-00-01
FLYING J GEER 2 OWWO
NE/4 Sec.32-25S-04E
Butler County, Kansas

Dear Ben Giles:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**No current
witnessed MIT**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by January 06, 2017.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Jeff Klock, District Supervisor
KCC DISTRICT 2

Jonathan Schlatter

From: Jeff Klock <j.klock@kcc.ks.gov>
Sent: Wednesday, January 4, 2017 2:54 PM
To: Jonathan Schlatter
Cc: Jon Myers; Jonathan Hill
Subject: FW: Temporaty Abandonment Applications

Jon,

It is apparent that you were not provided with my email to Mr. Giles office regarding the CP-111 applications for the Whipple #2, Hinnenkamp #1, Hinnenkamp #2, Holdreth 6-A and the Flying J Greer 2 OWWO. I sent this email to clarify the issues with each application and asked for any verification / job logs / work tickets / etc be attached. As you can see my email was sent December 1, 2016 and after not receiving any reply back for a week I denied the applications. I will call you to discuss.

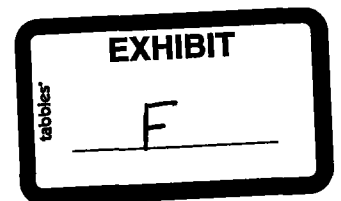
Jeff Klock
District 2 Supervisor




Conservation Division
Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

From: Jeff Klock
Sent: Thursday, December 01, 2016 5:05 PM ✕
To: 'tauni@bengiles.kscoxmail.com'
Cc: Jonathan Hill; Jon Myers; Dan Fox; Duane Krueger
Subject: Temporaty Abandonment Applications

Tauni,



I have reviewed the Temporary Abandonment Applications that have been filed on KOLAR and the following are the issues and/or clarifications needed to process the applications.

1. Whipple #2, NW NW NE, Sec. 7-26-5E, Butler County
 - a. A lease inspection was performed on 11-2-2016 due to a landowner complaint about the well. Staff found the well open ended with no equipment. The CP-111 states the well was shut-in 7/25/2014 which we believe to be incorrect and there is no tubing in the well as indicated on the CP-111. When was the well last equipped and in service?
2. Hinnenkamp #1, SW SE NE, Sec. 7-26-3E, Butler County
 - a. There is no lease road to the Hinnenkamp #1, and from reviewing records from mineral tax only one well is reported to have produced on the lease since Mr. Giles took it over in late 2002. The last recorded sales were in 2014 and there was less than 30 bbl of sales reported. It appears that this well has never produced according to available records. If this well has been inactive over 10 years an exception to the 10 Year TA rule must be filed and approved to receive TA status.
3. Hinnenkamp #2, NW SW NE, Sec. 7-26-3E, Butler County
 - a. The shut in date needs to be corrected. The electric box for this well has been on the ground since last summer. It appears that the production shown from mineral tax for past years is probably from the Hinnenkamp #2.
4. Hildreth 6-A, SE SE NW SE, Sec. 3-26-4E, Butler County
 - a. From reviewing Google Earth photos the tubing and rods are laid out next to the well prior to the reported shut-in date of 6/15/2012. The well looks like it was pulled somewhere in the 2007 / 2008 range. A good shut-in date needs to be reported.
-  5. Flying J Greer 2 OWWO
 - a. Last October when staff met with Mr. Giles a request for a complete ACO-1 was made and to date no information has been provided. Side 2 of the ACO-1 form was submitted as blank with no cement tickets attached. This well received a surface casing exception from the Commission therefore a complete ACO-1 with required attachments must be submitted prior to any approval of the CP-111. Is there a valid lease covering the Flying J Greer 2 OWWO?

If there is verification / job logs / work tickets / etc that can be attached as supporting documentation for any of the wells shown above please attach that information to the application(s).

Jeff Klock
District 2 Supervisor



Conservation Division
Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

Jonathan Schlatter

From: Jonathan Schlatter
Sent: Friday, December 30, 2016 2:22 PM
To: j.myers@kcc.ks.gov
Cc: Carnella Anderson
Subject: TA Rejection Letters - Ben Giles #5446
Attachments: TA Rejection Letters (Giles - 5446).pdf

Jon,

Please reference the attached TA rejection letters from District 2 Staff. Note the deadline date to take corrective action for each well is January 6, 2017. Following are my comments and proposed corrective action or concerns with respect to each well:

Whipple #2 – We will file a 10-year TA Exception Application. The casing pressure test has not been scheduled, and won't have been conducted before the application is filed.

Hildreth 6A – The basis for denying the application—shut-in over 10 years—is unfounded. The well has produced in the last several years. I am preparing an affidavit to that effect for the pumper to attest to. I expect that the TA application will be approved upon furnishing the affidavit to staff.

* Flying J Geer #2 OWWO – The application was denied for “no current witnessed MIT”. No explanation is required for why that test would be a requirement to TA this well. The well is not an injection well and not subject to the periodic UIC testing requirements. The echometer showed the fluid level 1800' below surface. Please advise why an MIT is necessary.

Hinnekamp #1 – The basis for denying the application—shut-in over 10 years—is unfounded. The well has produced in the last several years. I am preparing an affidavit to that effect for the pumper to attest to. I expect that the TA application will be approved upon furnishing the affidavit to staff.

Hinnekamp #2 – The application was denied because “fluid level test must be witnessed”. I have never heard of such a requirement. I can produce the echometer tape showing the fluid is 810' from surface. If necessary, I can obtain an affidavit from the well service company who conducted the fluid level test.

Please let me know if the proposed corrective action for the Whipple #2, Hildreth 6A, Hinnekamp #1 and #2 are acceptable. Please clarify the basis for denying the TA applications for the Flying J Geer #2 OWWO as soon as possible. Per the denial letters, corrective action is required by the end of next week.

Thank you,

Jon Schlatter
Attorney
Morris Laing Evans Brock & Kennedy, Cht.
300 N Mead Ste 200
Wichita KS 67202-2745
316-262-2671
316-262-5991 (FAX)
jschlatter@morrislaing.com



CONFIDENTIALITY NOTICE; This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transaction is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify us by rely e-mail, by forwarding this to jblack@morrislaing.com or by telephone at (316) 262-2671, and destroy the original transmission and its attachments without reading or saving in any manner. Thank you.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, please note that to the extent this communication and any attachments contain any federal tax advice, such advice is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code, or for promoting, marketing, or recommending to another person any transaction, arrangement or matter addressed herein.

Jonathan Schlatter

From: Jonathan Schlatter
Sent: Friday, January 6, 2017 1:48 PM
To: 'Jeff Klock'
Cc: Jon Myers; Jonathan Hill; Carnella Anderson
Subject: RE: Temporaty Abandonment Applications

Jeff,

Thank you for taking my call today. Thank you for extending the deadline from 1/6/17 to 1/13/17 to submit the relevant applications we respect to the wells described below. I appreciate your assistance in this matter, and will be in touch if I have any questions.

Jon Schlatter
Morris Laing Evans Brock & Kennedy, Cht.
316-262-2671
jschlatter@morrislaing.com

From: Jeff Klock [mailto:j.klock@kcc.ks.gov]
Sent: Wednesday, January 4, 2017 2:54 PM
To: Jonathan Schlatter <jschlatter@morrislaing.com>
Cc: Jon Myers <j.myers@kcc.ks.gov>; Jonathan Hill <j.hill@kcc.ks.gov>
Subject: FW: Temporaty Abandonment Applications

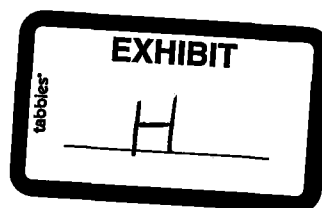
Jon,

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Jeff Klock
District 2 Supervisor



Conservation Division
Kansas Corporation Commission



3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

From: Jeff Klock
Sent: Thursday, December 01, 2016 5:05 PM
To: 'tauni@bengiles.kscoxmail.com'
Cc: Jonathan Hill; Jon Myers; Dan Fox; Duane Krueger
Subject: Temporaty Abandonment Applications

Tauni,

I have reviewed the Temporary Abandonment Applications that have been filed on KOLAR and the following are the issues and/or clarifications needed to process the applications.

1. Whipple #2, NW NW NE, Sec. 7-26-5E, Butler County
 - a. A lease inspection was performed on 11-2-2016 due to a landowner complaint about the well. Staff found the well open ended with no equipment. The CP-111 states the well was shut-in 7/25/2014 which we believe to be incorrect and there is no tubing in the well as indicated on the CP-111. When was the well last equipped and in service?
2. Hinnenkamp #1, SW SE NE, Sec. 7-26-3E, Butler County
 - a. There is no lease road to the Hinnenkamp #1, and from reviewing records from mineral tax only one well is reported to have produced on the lease since Mr. Giles took it over in late 2002. The last recorded sales were in 2014 and there was less than 30 bbl of sales reported. It appears that this well has never produced according to available records. If this well has been inactive over 10 years an exception to the 10 Year TA rule must be filed and approved to receive TA status.
3. Hinnenkamp #2, NW SW NE, Sec. 7-26-3E, Butler County
 - a. The shut in date needs to be corrected. The electric box for this well has been on the ground since last summer. It appears that the production shown from mineral tax for past years is probably from the Hinnenkamp #2.
4. Hildreth 6-A, SE SE NW SE, Sec. 3-26-4E, Butler County
 - a. From reviewing Google Earth photos the tubing and rods are laid out next to the well prior to the reported shut-in date of 6/15/2012. The well looks like it was

pulled somewhere in the 2007 / 2008 range. A good shut-in date needs to be reported.

5. Flying J Greer 2 OWWO

- a. Last October when staff met with Mr. Giles a request for a complete ACO-1 was made and to date no information has been provided. Side 2 of the ACO-1 form was submitted as blank with no cement tickets attached. This well received a surface casing exception from the Commission therefore a complete ACO-1 with required attachments must be submitted prior to any approval of the CP-111. Is there a valid lease covering the Flying J Greer 2 OWWO?

If there is verification / job logs / work tickets / etc that can be attached as supporting documentation for any of the wells shown above please attach that information to the application(s).

Jeff Klock
District 2 Supervisor



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Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

Jonathan Schlatter

From: Jonathan Schlatter
Sent: Friday, January 13, 2017 3:07 PM
To: 'Jeff Klock'
Cc: 'Jon Myers'; 'Jonathan Hill'; Carnella Anderson; 'Tauni Raney'
Subject: RE: Temporaty Abandonment Applications
Attachments: Flying J Geer #2 OWWO (ACO-1) Final.pdf

Jeff,

A brief update. I believe the TA Applications for the Hinnekamp #1 and #2, and the Hildreth 6A have all been submitted, or are in process of being submitted. I will be filing the 10-year TA Exception Application for the Whipple #2 shortly.

Mr. Giles' office is having technical difficulties submitting the ACO-1 for the Flying J Geer #2 OWWO. The ACO-1 has been prepared and filed, but KOLAR keeps rejecting the filing for "invalid license". Mr. Giles' assistant attempted to contact the KCC's help desk, but it appears all KCC offices are closed in anticipation of the approaching severe weather. I've attached the the completed ACO-1 and associated cement ticket from Consolidated for your reference. It will be submitted through KOLAR as soon as the technical glitch is resolved. In light of these circumstances, I assume you will treat the ACO-1 as submitted in compliance with the agreed up deadline date.

Please let me know if you have any questions regarding any of the foregoing filings.

Thank you,

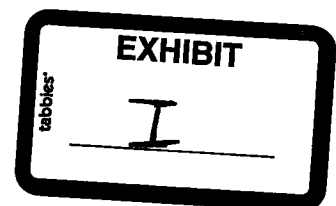
Jon Schlatter
Morris Laing Evans Brock & Kennedy, Cht.
316-262-2671
jschlatter@morrislaing.com

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Cc: Jon Myers; Jonathan Hill; Carnella Anderson
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316-262-2671
jschlatter@morrislaing.com



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Jeff Klock
District 2 Supervisor



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Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
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Cc: Jonathan Hill; Jon Myers; Dan Fox; Duane Krueger
Subject: Temporaty Abandonment Applications

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Jeff Klock
District 2 Supervisor



Conservation Division
Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

[Home](#) [KCC Forms](#) [Licensing](#) [Settings](#) [Tools](#) [Help](#)**KOLAR**

Group ID 14735 • KCC License 5446 • User ID 29183 Towns Raney Logout Benjamin Giles

Form Details

[Back to Well Completion](#)

FLYING J GEER 2 OWWO (1327479)

Actions

View PDF
Delete
Edit
Cannot Submit

Attachments

OPERATOR	Additional Surface Owner	View PDF
		Delete
Add Attachment		

[Download Fracking Disclosure Template](#)**Remarks**

Remarks to KCC	
Add Remark	

Remarks

No Remarks

Problems Preventing Submission

Form Field	Error Message
Contractor License Number	Contractor License is invalid.

For any filing made by the operator or on behalf of the operator, the operator on whose behalf the filing was made is responsible for compliance with all Commission rules and regulations relating to the filing and any permit issued by the Commission.

Confidentiality Requested:

☐ Yes ☒ No

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form ACO-1

August 2013

Form must be Typed

Form must be Signed

All blanks must be Filled

WELL COMPLETION FORM
WELL HISTORY - DESCRIPTION OF WELL & LEASE

OPERATOR: License # 5446

Name: Giles, Benjamin M.

Address 1: 346 S. LULU

Address 2:

City: WICHITA State: KS Zip: 67211

Contact Person: Ben Giles

Phone: (316) 265-1992

CONTRACTOR: License # 5446

Name:

Wellsite Geologist: none

Purchaser: Maclaskey Oilfield Services

Designate Type of Completion:

☐ New Well ☐ Re-Entry ☒ Workover

☒ Oil ☐ WSW ☒ SWD ☐ SIOW

☐ Gas ☐ D&A ☒ ENHR ☐ SIGW

☐ OG ☐ GSW ☐ Temp. Abd.

☐ CM (Coal Bed Methane)

☐ Cathodic ☐ Other (Core, Expl., etc.):

If Workover/Re-entry: Old Well Info as follows:

Operator: Saco Oil Co

Well Name: Geer #2

Original Comp. Date: 06/13/1963 Original Total Depth: 2543

☐ Deepening ☒ Re-perf. ☐ Conv. to ENHR ☐ Conv. to SWD

☐ Plug Back ☐ Conv. to GSW ☐ Conv. to Producer

☐ Commingled

☐ Dual Completion

☐ SWD

☒ ENHR

☐ GSW

Permit #:

Permit #:

Permit #:

Permit #:

Permit #:

11/20/2013

Spud Date or
Recompletion Date

Date Reached TD

11/20/2013

Completion Date or
Recompletion Date

API No. 15 - 15-015-01490-00-01

Spot Description: E2 E2 NE

. E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ East ☐ West

1376 Feet from ☒ North / ☐ South Line of Section

311 Feet from ☒ East / ☐ West Line of Section

Footages Calculated from Nearest Outside Section Corner:

☒ NE ☐ NW ☐ SE ☐ SW

GPS Location: Lat: Long:

(e.g. xx.xxxxx)

(e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: Butler

Lease Name: FLYING J GEER Well #: 2 OWWO

Field Name:

Producing Formation: Mississippi

Elevation: Ground: 1322 Kelly Bushing: 1338

Total Vertical Depth: 2543 Plug Back Total Depth:

Amount of Surface Pipe Set and Cemented at: 130 Feet

Multiple Stage Cementing Collar Used? ☐ Yes ☒ No

If yes, show depth set: Feet

If Alternate II completion, cement circulated from:

feet depth to: w/ sx cmt.

Drilling Fluid Management Plan

(Data must be collected from the Reserve Pit)

Chloride content: ppm Fluid volume: bbls

Dewatering method used:

Location of fluid disposal if hauled offsite:

Operator Name:

Lease Name: License #:

Quarter Sec. Twp. S. R. ☐ East ☐ West

County: Permit #:

AFFIDAVIT

I am the affiant and I hereby certify that all requirements of the statutes, rules and regulations promulgated to regulate the oil and gas industry have been fully complied with and the statements herein are complete and correct to the best of my knowledge.

Signature: _____

Title: _____ Date: _____

KCC Office Use ONLY

☐ Confidentiality Requested

Date: _____

☐ Confidential Release Date: _____

☐ Wireline Log Received

☐ Geologist Report Received

☐ UIC Distribution

ALT ☐ I ☐ II ☐ III Approved by: _____ Date: _____

Operator Name: Giles, Benjamin M. Lease Name: FLYING J GEER Well #: 2 OWWO
 Sec. 32 Twp. 25 S. R. 4 ☐ East ☐ West County: Butler

INSTRUCTIONS: Show important tops of formations penetrated. Detail all cores. Report all final copies of drill stems tests giving interval tested, time tool open and closed, flowing and shut-in pressures, whether shut-in pressure reached static level, hydrostatic pressures, bottom hole temperature, fluid recovery, and flow rates if gas to surface test, along with final chart(s). Attach extra sheet if more space is needed.

Final Radioactivity Log, Final Logs run to obtain Geophysical Data and Final Electric Logs must be emailed to kcc-well-logs@kcc.ks.gov. Digital electronic log files must be submitted in LAS version 2.0 or newer AND an image file (TIFF or PDF).

Drill Stem Tests Taken ☐ Yes ☒ No ☐ Log Formation (Top), Depth and Datum ☒ Sample
 (Attach Additional Sheets)
 Samples Sent to Geological Survey ☐ Yes ☒ No
 Cores Taken ☐ Yes ☒ No
 Electric Log Run ☐ Yes ☒ No
 List All E. Logs Run:

Name	Top	Datum
Lansing	1835	-497
Kansas City	2102	-764
Mississippi	2504	-1166

CASING RECORD <input type="checkbox"/> New <input type="checkbox"/> Used							
Report all strings set conductor, surface, intermediate, production, etc.							
Purpose of String	Size Hole Drilled	Size Casing Set (In O.D.)	Weight Lbs. / Ft.	Selling Depth	Type of Cement	# Sacks Used	Type and Percent Additives
Production	7.875	4.5	10.5	2545	Class A Common	150	CAF-38 21

ADDITIONAL CEMENTING / SQUEEZE RECORD				
Purpose:	Depth Top Bottom	Type of Cement	# Sacks Used	Type and Percent Additives
Perforate				
Protect Casing				
Plug Back TD				
Plug Off Zone				

Did you perform a hydraulic fracturing treatment on this well? ☐ Yes ☒ No (If No, skip questions 2 and 3)
 Does the volume of the total base fluid of the hydraulic fracturing treatment exceed 350,000 gallons? ☐ Yes ☐ No (If No, skip question 3)
 Was the hydraulic fracturing treatment information submitted to the chemical disclosure registry? ☐ Yes ☐ No (If No, fill out Page Three of the ACO-1)

Shots Per Foot	PERFORATION RECORD - Bridge Plugs Set/Type Specify Footage of Each Interval Perforated	Acid, Fracture, Shot, Cement Squeeze Record (Amount and Kind of Material Used)	Depth
2	2511 to 2517	none	

TUBING RECORD: Size: <u>2.375</u> Set At: <u>2480</u> Packer At: <u> </u> Liner Run: <input type="checkbox"/> Yes <input type="checkbox"/> No	
Date of First, Resumed Production, SWD or ENHR. <u>09/20/2014</u>	Producing Method: <input type="checkbox"/> Flowing <input type="checkbox"/> Pumping <input type="checkbox"/> Gas Lift <input checked="" type="checkbox"/> Other (Explain) <u>Swabbing</u>
Estimated Production Per 24 Hours	Oil Bbls. <u>2</u> Gas Mcf <u> </u> Water Bbls. <u>2</u> Gas-Oil Ratio <u> </u> Gravity <u> </u>

DISPOSITION OF GAS: <input type="checkbox"/> Vented <input type="checkbox"/> Solid <input type="checkbox"/> Used on Lease (If vented, Submit ACO-18.)	METHOD OF COMPLETION: <input type="checkbox"/> Open Hole <input type="checkbox"/> Perf. <input type="checkbox"/> Dually Comp. (Submit ACO-5) <input type="checkbox"/> Commingled (Submit ACO-4) <input type="checkbox"/> Other (Specify) <u> </u>	PRODUCTION INTERVAL: <u> </u> <u> </u>
---	---	--

Form	ACO1 - Well Completion
Operator	Giles, Benjamin M.
Well Name	FLYING J GEER 2 OWWO
Doc ID	1327479

Casing

Purpose Of String	Size Hole Drilled	Size Casing Set	Weight	Setting Depth	Type Of Cement	Number of Sacks Used	Type and Percent Additives
Production	7.875	4.5	10.5	2545	Class A Common	150	CAF-38 21



CEMENT

...ET NUMBER 48590
LOCATION El Dorado
FOREMAN Evans

DATE	CUSTOMER #	WELL NAME & NUMBER		SECTION	TOWNSHIP	RANGE	COUNTY
7-23-14	3079	Flanagan, J		32	255	4E	Burt Co
CUSTOMER mwm oil Co. - BEN GILES				TOWNSHIP			
MAILING ADDRESS 532 S. Main St				RANGE			
CITY		STATE	ZIP CODE	TRUCK #		DRIVER	
Wichita		Ks	67202	446		Togh	
				713		Dunlin	
				574		B: 4	
				692		Tracy	

JOB TYPE <u>Line</u>	HOLE SIZE _____	HOLE DEPTH _____	CASING SIZE & WEIGHT <u>4 1/2 11.6</u>
CASING DEPTH <u>2545'</u>	DRILL PIPE _____	TUBING _____	OTHER _____
SLURRY WEIGHT _____	SLURRY VOL _____	WATER gal/ek _____	CEMENT LEFT in CASING _____
DISPLACEMENT <u>39.2</u>	DISPLACEMENT PSI _____	MIX PSI _____	RATE _____

REMARKS: Safety meeting on location. Accup land hole with 6" BSLs
no returns mix 150 sfs class A 49000 1/2% C.F.H.S., 1/2% C.F.E. 26
-14% C.F.S. Wash pump and lines, Dress blue and disallow
39 1/2 BSLs 600' lift - 1200' land. Press casing to 500' and
skid in.

Thanks Every one

ACCOUNT CODE	QUANTITY or UNITS	DESCRIPTION of SERVICES or PRODUCT	UNIT PRICE	TOTAL
5401	1	PUMP CHARGE	108 ⁰⁰	108 ⁰⁰
5406	15	MILEAGE	4 ²⁰	63 ⁰⁰
5407A	7.1 hrs	Ten mileage Delivery (min)	368 ⁰⁰	368 ⁰⁰
5501C	3 hrs	water Transport	120 ⁰⁰ /hr	360 ⁰⁰
1104G	190 gals	Class "A"	15 ²²	2353 ⁰⁰
1119B	56 gal	Berdondie	12 ²²	124 ⁰²
1135A	70 ⁰⁰	CFL-115	11 ⁰⁰	770 ⁰⁰
1137	70 ⁰⁰	CDJ-26	8 ⁴²	593 ⁴⁰
1146	21 ⁰⁰	CAG-38	8 ³¹	174 ⁵¹
11404	1	4 1/2 - D-bbed plug	47 ²⁵	47 ²⁵
115C	1	4 1/2 - Black shop	238 ⁰⁰	238 ⁰⁰
5507C	3 hrs	80 BSH UAC	90 ⁰⁰ /hr	270 ⁰⁰
				6458 ²⁴
		30% disc - cement materials only		1208 ⁰²
		subtotal		5250 ¹²
			Sales Tax	198.66
			ESTIMATED TOTAL	5448.81

Pubn 3737

AUTHORIZATION [Signature]

TITLE

DATE _____

I acknowledge that the payment terms, unless specifically amended in writing on the front of the form or in the customer's account records, at our office, and conditions of service on the back of this form are in effect for services identified on this form.



CONSOLIDATED
Oil Well Services, LLC

REMIT TO
FINV
Consolidated Oil Well Services, LLC
Dept. 970
P.O. Box 4346
Houston, TX 77210-4346

MAIN OFFICE
P.O. Box 884
Chanute, KS 66720
620/431-9210 • 1-800/467-8876
Fax 620/431-0012

INVOICE

Invoice # 269685

Invoice Date: 07/31/2014 Terms: 0/30/10,n/30

Page 1

GILES, BEN
DBA MWM OIL CO., INC.
346 S. LULU
WICHITA KS 67211
(316)265-1992

FLYING J
48590
32/258/4E
07/23/2014
KS

Description	Hours	Unit Price	Total
MIN. BULK DELIVERY	1.00	368.00	368.00

Part Number	Description	Qty	Unit Price	Total
1104S	CLASS "A" CEMENT (SALE)	150.00	15.7000	2355.00
1118B	PREMIUM GEL / BENTONITE	564.00	.2200	124.08
1135A	FL- 115 (FLUID LOSS)	70.00	11.0800	775.60
1137	CEMENT FRICTION REDUCER	70.00	8.4800	593.60
1146	CAF - 38	21.00	8.5100	178.71
4404	4 1/2" RUBBER PLUG	1.00	47.2500	47.25
4156	FLOAT SHOE 4 1/2"	1.00	238.0000	238.00

Sublet Performed	Description	Total
9996-180	CEMENT MATERIAL DISCOUNT	-1208.09

	Description	Hours	Unit Price	Total
446	CEMENT PUMP	1.00	1085.00	1085.00
446	EQUIPMENT MILEAGE (ONE WAY)	15.00	4.20	63.00
574	WATER TRANSPORT (CEMENT)	3.00	120.00	360.00
692	80 BBL VACUUM TRUCK (CEMENT)	3.00	90.00	270.00

Amount Due 6734.22 if paid after 08/10/2014

Parts:	4312.24	Freight:	.00	Tax:	198.66	AR	5448.81
Labor:	.00	Misc:	.00	Total:	5448.81		
Sublt:	-1208.09	Supplies:	.00	Change:	.00		

Signed _____

Date _____

BARTLESVILLE, OK
918/338-0808

EL DORADO, KS
316/322-7022

EUREKA, KS
620/583-7684

PONCA CITY, OK
580/762-2303

OAKLEY, KS
785/672-8822

OTTAWA, KS
785/242-4044

THAYER, KS
620/839-6269

GILLETTE, WY
307/686-4914

CUSHING, OK
918/225-2850

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form CP-111

March 2017

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 5446
Name: Giles, Benjamin M.
Address 1: 346 S. LULU
Address 2: _____
City: WICHITA State: KS Zip: 67211
Contact Person: Ben Giles
Phone: (316) 265-1992
Contact Person Email: _____
Field Contact Person: Dusty Green
Field Contact Person Phone: (316) 655-7542

API No. 15- 15-015-01490-00-01
Spot Description: E2 E2 NE Sec. 32 Twp. 25 S. R. 4 ☒ E ☐ W
1376 feet from ☒ N ☐ S Line of Section
311 feet from ☒ E ☐ W Line of Section
GPS Location: Lat: _____, Long: _____
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
County: Butler Elevation: _____ ☐ GL ☐ KB
Lease Name: FLYING J GEER Well #: 2 OWWO
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
Spud Date: 11/20/2013 Date Shut-In: 01/29/2014

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	8.625	5.5	NA	4.5	2.375
Setting Depth		140	2507		2543	2530
Amount of Cement		125	75		150	NA
Top of Cement		0	2085		0	NA
Bottom of Cement		140	2507		2543	NA

Casing Fluid Level from Surface: 1800 How Determined? ECHOMETER FLUID SERVICE Date: 11/17/2016
Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement, Date: _____
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No
Depth and Type: ☐ Junk in Hole at _____ (depth) ☐ Tools in Hole at _____ (depth) Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____
Type Completion: ☒ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement
(depth) (depth)
Packer Type: _____ Size: _____ Inch Set at: _____ Feet
Total Depth: 2543 Plug Back Depth: _____ Plug Back Method: _____

Geological Data:

Formation Name _____ Formation Top / Formation Base _____ Completion Information
1. _____ At: _____ to _____ Feet Perforation Interval 2511 to 2517 Feet or Open Hole Interval _____ to _____ Feet
2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date: _____ Signature: _____ Title: _____


Do NOT Write in This
Space - KCC USE ONLY

Date Tested: _____ Results: _____ Date Plugged: _____ Date Repaired: _____ Date Put Back in Service: _____

Review Completed by: _____ Comments: _____

TA Approved: ☐ Yes ☐ Denied Date: _____

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 1500 SW Seventh Steet, Chanute, KS 66720	Phone 620.432.2300
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

COMPANY: BEN GILES

POOL: _____ LOCATION: BUTLER CO KS

DATE: 11-17-14 11-18-16 ECHOMETER OPERATOR: MARK McCOLLUM

[illegible]

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[Server: VFEy18a](#)
[Group: 03-14733](#)
[Status: Active](#)
[M46](#)
[User ID: 1000909280](#)
[Tauni Raney](#)
[Logout](#)
[Benjamin Giles](#)

Manage Forms

[Start a New Temporary Abandonment Well Application Form](#)

Queue	Documents
Unsubmitted CP111	0
Submitted CP111	4
Approved CP111	18
Canceled CP111	0
Denied CP111	30
Total	52

Submitted CP111

Show 10 entries		Search:			
Action	District	County	Location	Well Name	Submitted
View Cancel Attach	2	Butler	34-25S-03E	RAY A-1	01/20/2017
View Cancel Attach	2	Butler	33-25S-03E	CLEARWATER 5	06/08/2017
View Cancel Attach	2	Butler	33-25S-03E	CLEARWATER 2	05/03/2017
View Cancel Attach	2	Butler	32-25S-04E	FLYING J GEER 2 OWWO	01/17/2017
Showing 1 to 4 of 4 entries					
Previous		1	Next		



For any filing made by the operator or on behalf of the operator, the operator on whose behalf the filing was made is responsible for compliance with all Commission rules and regulations relating to the filing and any permit issued by the Commission.

Jonathan Schlatter

From: Jon Myers <j.myers@kcc.ks.gov>
Sent: Wednesday, February 1, 2017 4:49 PM
To: Jonathan Schlatter
Subject: Ben Giles, Various Issues

Jon,

Here's an update on a few Ben Giles issues you and I have been discussing.

- Staff has approved the CP-111 for the Ray C #2.
- Staff does not believe the shut-in dates on the recently-submitted CP-111s for the Ray A #1 and Ray C #1 are accurate, based upon previous Staff inspections, Google Earth imaging, and K.G.S. production data. Please have your client either correct the shut-in dates or provide an affidavit explaining why your client believes the shut-in dates are accurate.
- Staff believes the recently-submitted ACO-1 for the Flying J Geer #2 does not demonstrate that cement was circulated to surface. Staff would like evidence that the cement was circulated as required. I encourage either you or Mr. Giles to contact Jeff Klock if you have questions regarding how to demonstrate cement was circulated.

Sincerely,

Jon Myers

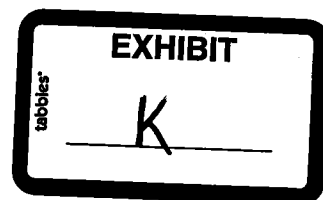
Litigation Counsel

Conservation Division

Kansas Corporation Commission

266 N. Main, Suite 220 | Wichita, KS | 67202-1513

Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>





FIELD TICKET & TREATMENT REPORT

...ET NUMBER 48590
LOCATION El Dorado
FOREMAN Evans

DATE	CUSTOMER #	WELL NAME & NUMBER	SECTION	TOWNSHIP	RANGE	COUNTY
7-23-14	3079	Flynn, T	32	25S	4E	Bullhead
CUSTOMER mwm o.i Co. - BEN GILES			TOWN 112N			
MAILING ADDRESS 532 S. market st			to 2500E			
CITY Wichita	STATE KS	ZIP CODE 67202	TRUCK # 446	DRIVER Togh	TRUCK #	DRIVER
			713	Duplin		
			574	B: 4		
			692	Tracy		

JOB TYPE <u>Isat</u>	HOLE SIZE _____	HOLE DEPTH _____	CASINO SIZE & WEIGHT <u>4 1/2 11.6</u>
CASINO DEPTH <u>2545</u>	DRILL PIPE _____	TUBING _____	OTHER _____
SLURRY WEIGHT _____	SLURRY VOL _____	WATER gal/ok _____	CEMENT LEFT in CASINO _____
DISPLACEMENT <u>39.2</u>	DISPLACEMENT PSI _____	MIX PSI _____	RATE _____

REMARKS: Safety meeting on location. Airup lead hole with 67 B&Ls
no returns mix 150 cfs class A 4900psi 42% CHLIS, 11% to CO₂ & 26
-14% SK CAGSS. Wash pump and lines. Dred blue and displace
390 B&Ls, 600+ lift. 1200+ land. Press casing to 500' and
skirt in.

Circuito del circulato ≈ 4500 Tot. 7

Thanks Every4 you

[illegible]

Page 3737

AUTHORETION

TITLE

DATE:

I acknowledge that the payment terms, unless specifically amended in writing on the front of the form or in the customer's account records, at our office, and conditions of service on the back of this form are in effect for services identified on this form.

Form Details

Back to Well Completion

FLYING J GEER 2 OWWO (1334157)

Actions

View PDF
Delete
Edit
Certify & Submit

Attachments

Flying J Geer	Cementing	View PDF
- Cement	Reports/Cement	Delete
Ticket	Tickets	
OPERATOR		

[Add Attachment](#)

Download Fracking Disclosure Template

Remarks

Remarks to KCC

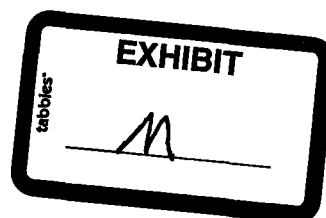
[Add Remark](#)

Remarks

Karen Ritter
02/10/2017 12:43 pm

Your ACO-1 for the Flying J Greer 2 OWWO is being returned due to a lack of information regarding the cementing of the production casing from 250 feet back to surface. KCC records reflect that on May 14, 2013 a surface casing exception was granted by the Director requiring the additional cement work upon completion. District staff did not witness the work, therefore verification of the work must be provided with a cement ticket and bond log. Visible to Operator

For any filing made by the operator or on behalf of the operator, the operator on whose behalf the filing was made is responsible for compliance with all Commission rules and regulations relating to the filing and any permit issued by the Commission.



Jonathan Schlatter

From: Jonathan Schlatter
Sent: Friday, February 17, 2017 3:13 PM
To: 'Jeff Klock'
Cc: j.myers@kcc.ks.gov
Subject: RE: Flying J Greer

Jeff,

Ben is going to run a bond log on the Flying J Geer #2 OWWO after he does the MIT's on the Ralston #1 and #6, and the Ray A1.

Jon

From: Jeff Klock [mailto:j.klock@kcc.ks.gov]
Sent: Friday, February 17, 2017 11:04 AM
To: Jonathan Schlatter <jschlatter@morrislaing.com>
Subject: Flying J Greer

Jon,

Attached are the documents for the Flying J Greer that we spoke about.

Jeff Klock
District 2 Supervisor



Conservation Division
Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005



Conservation Division
District Office No. 2
3450 N. Rock Road
Building 600, Suite 601
Wichita, KS 67226



Phone: 316-337-7400
Fax: 316-630-4005
<http://kcc.ks.gov/>

Pat Apple, Chairman
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Sam Brownback, Governor

April 14, 2017

Benjamin M. Giles
346 S. Lulu
Wichita, KS 67211

KCC #5446

APR 17 2017

Re: Seidl 1 OWWO, SE SE NE, Sec. 34-25-3E, BU Co. – 15-015-20127-00-02
Flying J Geer 2 OWWO, E2 E2 NE, Sec. 32-25-4E, BU Co. – 15-015-01490-00-01
Ray A 1, NW NW SW, Sec. 34-25-3E, BU Co. – 15-015-20784-00-00
Ralston 1, NE NW SE, Sec. 10-26-4E, BU Co. – 15-015-40140-00-00

Dear Mr. Giles,

The top plug on the Seidl #1 OWWO fell back to 61' from surface and must be topped off prior to cutting the casing below grade and restoring the location. If the casing fills with water you must bail the water out of the casing prior to dumping any cement from the surface. The open workover pits must be emptied and closed by April 28, 2017.

This office has not received the bond log required on the Flying J Geer 2 OWWO. The bond log must be run by April 28, 2017. Notify this office when the log will be run so staff can be onsite to witness.

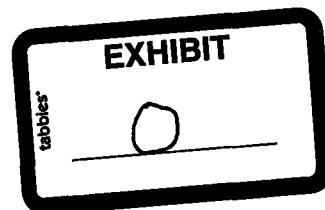
The Ralston #1 was tested on March 23, 2017 and passed a casing MIT. A CP-111 must be filed by April 21, 2017 for Temporary Abandonment approval.

The Ray A #1 must have an MIT of the casing for Temporary Abandonment approval.

Sincerely,

Jeff Klock
District 2 Supervisor

Cc: Jon Myers – Litigation Counsel
Jonathan Hill – ECRS
Dan Fox – Compliance Officer
Jon Schlatter – Morris Laing Evans Brock & Kennedy, Cht.



Jonathan Schlatter

From: Jeff Klock <j.klock@kcc.ks.gov>
Sent: Friday, April 21, 2017 10:43 AM
To: Jonathan Schlatter
Cc: Jon Myers; Tauni Raney; Benjamin M Giles; Jonathan Hill
Subject: RE: Flying J Geer #2 OWWO

Mr. Schlatter,

The deadline on the Flying J Geer #2 will not be extended.

Jeff Klock
District 2 Supervisor



Conservation Division
Kansas Corporation Commission
3450 N Rock Road, Building 600, Suite 601
Wichita, KS 67226
Phone (316) 337-7405 Fax (316) 630-4005

From: Jonathan Schlatter [mailto:jschlatter@morrislaing.com]
Sent: Wednesday, April 19, 2017 4:47 PM
To: Jeff Klock
Cc: Jon Myers; Tauni Raney; Benjamin M Giles
Subject: Flying J Geer #2 OWWO

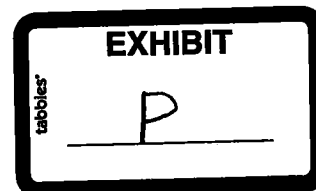
Jeff,

Mr. Giles is in receipt of your letter (attached). The Ralston TA was filed and approved. Via settlement agreement, Ben will be obligated to TA the Ray A1 and top off the cement in the Seidl #1 by the end of May. Beyond that, he has an existing deadline for the Clearwater wells, where his rig is currently marooned in the water, along with other ordinary well maintenance to attend to. The recent heavy rains have stalled a lot of these operations.

With all of these deadlines and obligations it will be nearly impossible to get in on the Flying J Geer #2 to conduct the cement bond log by your 4/28/17 deadline. Would you consider granting additional time to get to that project. The well is currently shut-in. Please advise.

Thank you,

Jon Schlatter
Attorney



Morris Laing Evans Brock & Kennedy, Cht.
300 N Mead Ste 200
Wichita KS 67202-2745
316-262-2671
316-262-5991 (FAX)
jschlatter@morrislaing.com

CONFIDENTIALITY NOTICE; This e-mail transmission, and any documents, files or previous e-mail messages attached to it may contain confidential information that is legally privileged. If you are not the intended recipient, or a person responsible for delivering it to the intended recipient, you are hereby notified that any disclosure, copying, distribution or use of any of the information contained in or attached to this transaction is STRICTLY PROHIBITED. If you have received this transmission in error, please immediately notify us by rely e-mail, by forwarding this to jblack@morrislaing.com or by telephone at (316) 262-2671, and destroy the original transmission and its attachments without reading or saving in any manner. Thank you.

IRS CIRCULAR 230 DISCLOSURE: To ensure compliance with requirements imposed by the IRS, please note that to the extent this communication and any attachments contain any federal tax advice, such advice is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code, or for promoting, marketing, or recommending to another person any transaction, arrangement or matter addressed herein.