

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

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

|  |   |                             |
|--|---|-----------------------------|
| In the matter of the failure Raney Oil   | ) | Docket No. 16-CONS-145-CPEN |
| Company, LLC (“Operator”) to comply with | ) |                             |
| K.A.R. 82-3-111 at the Cully #4-20 in    | ) | CONSERVATION DIVISION       |
| Sumner County, Kansas.                   | ) |                             |
| _____                                    | ) | License No. 32705           |

**PRE-FILED TESTIMONY**

**OF**

**DAN FOX**

1 Q. What is your name and business address?

2 A. Dan Fox, 3450 N. Rock Road, Suite 601, Wichita, Kansas 67226..

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

4 A. I'm employed by the Conservation Division of the Kansas Corporation Commission, as  
5 Compliance Officer for District #2, which covers most of central Kansas.

6 Q. How long have you been employed by the KCC?

7 A. Since April 2007. Before becoming Compliance Officer, I was an Underground Porosity  
8 Gas Storage Field Technician in District #2. I have been Compliance Officer since 2010.

9 Q. Have you previously testified before this Commission?

10 A. No, although I have submitted pre-filed testimony.

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

12 A. As compliance officer, I prepare evidence necessary to recommend penalties for  
13 violations of Commission regulations. My job includes reviewing Staff field reports,  
14 sending notice of violation letters, and generally trying to resolve compliance issues. I  
15 conduct inspections myself whenever necessary.

16 Q. Are you familiar with this KCC Docket, 16-CONS-145-CPEN?

17 A. Yes.

18 Q. How are you familiar with this Docket?

19 A. Commission regulations, specifically K.A.R. 82-3-111, require operators to receive  
20 Commission approval within 90 days after operations cease at any well. Staff inspections  
21 indicated that Operator's Cully #4-20 ("the subject well") was in violation of K.A.R. 82-  
22 3-111. As District #2 Compliance Officer, I made the penalty recommendation that  
23 resulted in the Commission issuing the penalty order.

24 Q. What specific data indicated the subject well was in violation of K.A.R. 82-3-111?

25 A. On February 23, 2015, I conducted an inspection and found the subject well to be  
26 inactive, with no equipment on the well (Exhibit A). So on February 24, 2015, I sent  
27 Operator a notice of violation letter, giving Operator a March 17, 2015, deadline to  
28 correct the violation and avoid a penalty recommendation (Exhibit B).

29 On March 3, 2015, Operator called to discuss the February 24, 2015, notice of  
30 violation letter, requesting a few weeks to file a temporary abandonment application. I  
31 documented the conversation at the time in Exhibit C. I also sent a letter to Operator,

1 reiterating that the deadline was March 17, 2015, and stating that if the deadline was not  
2 met then I would make a penalty recommendation (Exhibit D).

3 Q. What happened next?

4 A. Between March 3, 2015, and March 6, 2015, there was a lot of email correspondence  
5 between Operator, Jeff Klock, and myself (Exhibit E). Operator's correspondence  
6 became increasingly hostile, so Jeff Klock and I decided all future correspondence should  
7 be routed through our Legal Department (Exhibit E, Page 6). I would note that in the  
8 emails, Operator stated that he would plug the subject well within 90 days of March 4,  
9 2015, which would have been June 2, 2015 (Exhibit E, Page 2).

10 Q. Did Operator correct the violation by March 17, 2015, the deadline in your letters?

11 A. No. On March 9, 2015, Operator submitted a temporary abandonment application, which  
12 was denied because of the high fluid level at the well (Exhibit F). The same day, I mailed  
13 a letter to Operator, giving Operator an April 8, 2015, deadline to bring the well into  
14 compliance with K.A.R. 82-3-111 (Exhibit G). I would note that Operator's temporary  
15 abandonment application stated that the well had been shut-in since December 29, 2014.

16 Q. What happened next?

17 A. After March 6, 2015, we worked with the Legal Department to resolve this matter. On  
18 June 29, 2015, I inspected the subject well and determined that it was still in violation of  
19 K.A.R. 82-3-111 (Exhibit H). At that time, there was some email correspondence  
20 between our Legal Department and Operator's counsel, including a June 29, 2015 email  
21 from Operator's counsel, in which he told Operator that he had just received a call from  
22 the KCC, and that if a well plugging application was not filed, Staff was going to initiate  
23 legal proceedings (Exhibit I). On July 27, 2015, I conducted a file review and determined  
24 that no well plugging application was on file (Exhibit H). At that time, I made the penalty  
25 recommendation, and the Penalty Order was issued August 4, 2015. Operator filed a well  
26 plugging application the same day the Penalty Order was issued, and the well was  
27 plugged on August 5, 2015. On August 6, 2015, Staff received another email from  
28 Operator about the matter, stating among other things that he would be taking this matter  
29 to hearing (Exhibit J).

30 Q. Have you reviewed Operator's Request for Hearing?

31 A. Yes.

- 1 Q. Paragraph 4 of Operator's Request for Hearing states that "At no time did [Operator or  
2 Operator's Counsel] receive any indication from Commission Staff that this Penalty  
3 Order was forthcoming." Is that true?
- 4 A. No, definitely not. The February 24, 2015, letter warned of a penalty; the March 3, 2015,  
5 letter warned of a penalty; the March 9, 2015, temporary abandonment denial gave  
6 Operator a specific deadline; Operator did not plug the well within the 90 days he said he  
7 would; and Operator's own counsel sent an email to Operator on June 29, 2015, stating  
8 that Staff's Legal Counsel has stated that if a plugging form was not filed, we would be  
9 initiating legal proceedings.
- 10 Q. Paragraph 1 of Operator's Request for Hearing states that "Until KCC Staff began  
11 inquiring about the [subject well, Operator] was unaware that the Commission had  
12 accepted and approved a Change of Operator form [for the well]." Is that true?
- 13 A. That does not make sense. First, Operator admits it completed a Change of Operator  
14 form, so Operator clearly intended to take responsibility for the subject well. Also,  
15 Operator claimed the subject well in its August 18, 2014, certified well inventory  
16 (Exhibit K). Staff does not approve a well inventory without adequate documentation, so  
17 the well could not have been transferred to Operator's license without a Change of  
18 Operator form. Operator's insinuation that it did not know it was responsible for the well  
19 until Staff sent its February 24, 2015, notice of violation letter does not make sense.
- 20 Q. In your opinion, should the Penalty Order in this docket be affirmed?
- 21 A. Yes, Operator was in clear violation of Commission regulations, failed to comply with  
22 repeated deadlines given by Staff, and as you can see from Operator's emails, has not  
23 treated anybody involved with any sort of professionalism.
- 24 Q. Does this conclude your testimony as of this date, October 26, 2015?
- 25 A. Yes.



# KCC OIL/GAS REGULATORY OFFICES

Date: 02/23/15

District: 02

Case #: \_\_\_\_\_

☒ New Situation  
☐ Response to Request  
☐ Follow-Up

☒ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 32705

API Well Number: \_\_\_\_\_

Op Name: Raney Oil Company, LLC

Spot: SW Sec 20 Twp 34 S Rng 2 ☒ E ☐ W

Address 1: 4665 Bauer Brook Ct.

Feet from ☐ N ☒ S Line of Section

Address 2: \_\_\_\_\_

Feet from ☒ E ☐ W Line of Section

City: Lawrence

GPS: Lat: \_\_\_\_\_ Long: \_\_\_\_\_ Date: 2/23/15

State: KS Zip Code: 66049

Lease Name: Cully Well #: \_\_\_\_\_

Operator Phone #: (785) 749-0672

County: Sumner

**Reason for Investigation:**

Response to inactive wells on operators well inventory submitted to central office

**Problem:**

Abandoned wells

**Persons Contacted:**

Tom Raney-Operator

**Findings:**

2/23/2015-Upon arrival I found the Cully 4-20 and the Cully 5-20 abandoned (these wells were listed on the operators well inventory as active wells) no equipment on wells. The tank battery was in good shape. The Cully 6-20 and the Cully 7-20 were in service. The Cully 2-20 is listed as an injection well for EOR. After I visually inspected the lease and took my photos I returned to the office and started conducting my research and found there was another well that could not be found at the lease site, the Cully 3-20 it is also listed on the operators well inventory as inactive but I could not find a 3-20 during my field inspection. 2/24/2015-Upon further investigation I could find no record of the 3-20 ever being plugged or even a plugging application submitted to the KCC. 3/3/15 to 3/6/15-After I asked Mr. Raney for documentation to verify well operation, along with proof that the #3-20 had actually been plugged the content of Mr. Raney's e-mails had become more heated with anger. Mr Raney stated he felt he was being singled out.

**Action/Recommendations:**

Follow Up Required ☒ Yes ☐ No ☐

Date: 3/18/15

2/24/2015-NOV letters were sent to operator on the Cully #4-20 and the 5-20 with a deadline to respond of March 17, 2015. 3/3/2015-Mr. Raney called me in response to the NOV letters and stated he thought he could get the T/A applications completed on KOLAR within a couple of weeks therefore he may need additional time. I sent Mr. Raney another letter as per our conversation acknowledging the additional time of two weeks to submit T/A applications for both wells. I also sent Mr. Raney an e-mail with instructions to assist him in getting the Cully lease into compliance. I mentioned the Cully #3-20 asking him to provide a plugging report for verification the well had been plugged. And in a March 5th e-mail I asked Mr. Raney to either provide proof the well had actually been plugged or Mr. Raney will have to expose the well and a visual inspection will need to take place. Jeff Klock and Mr. Raney worked out an agreement to MIT the 5-20 and to have a backhoe out to try and expose the 3-20 and see if the well is actually plugged. 5/5/2015-I Met with Mr. R.L. Jordan (pumper) and contractor to MIT the 5-20 for T/A purposes. Well passed MIT. Then located the 3-20 with a metal detector and exhumed the well and found it maybe insufficiently plugged. I recommend a commission order for operator to plug both the 4-20 and the 3-20 immediately.

**Verification Sources:**

Photos Taken: Yes

☒ RBDMS ☒ KGS ☒ TA Program  
☐ T-I Database ☒ District Files ☐ Courthouse  
☐ Other: field inspection, photos.

By: Daniel K. Fox-Compliance Officer

Retain 1 Copy District Office  
 Send 1 Copy to Conservation Division

Form: \_\_\_\_\_



Cu 1/2 4-20 Raney Oil  
SW/4 of 20-34-2E.

Abandoned well

Photo taken by  
Dan Fox



02/23/2015





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

Corporation Commission

Sam Brownback, Governor

## **NOTICE OF VIOLATION**

THOMAS RANEY  
RANEY OIL COMPANY, LLC  
4665 BAUER BROOK CT.  
LAWRENCE KS 66049

February 24, 2015  
KCC Lic.-32705

RE: API Well No. 15-191-21150-00-00  
CULLY 4-20  
20-34S-2E, SWNWSW  
SUMNER County, Kansas

Dear Operator:

During a lease inspection conducted on February 23, 2015, on the above-referenced well, a KCC representative documented the following probable regulatory violation:

**K.A.R. 82-3-111, Temporary Abandonment; penalty; plugging.**

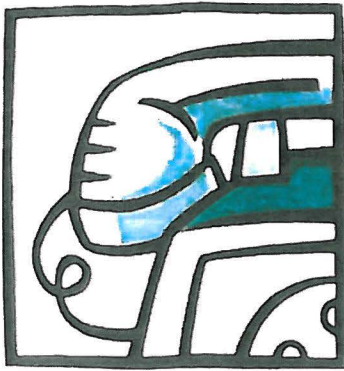
Within 90 days after operations cease on a well, the operator must either return the well to service, plug the well, or obtain approval for temporary abandonment status from the District Office.

If you do not correct this violation and contact me by MARCH 17, 2015, I will refer this matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty for the violation and an order for you to plug the well.

Sincerely,

DAN FOX  
KCC District # 2

CONSERVATION DIVISION • DISTRICT OFFICE NO. 2  
3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226  
(316) 630-4000 • Fax (316) 630-4005 • <http://kcc.ks.gov/>



### RECORD OF PHONE CONVERSATION

STAFF: Dan Fox recieved a call from Tom Raney

DATE: 3/3/15

TIME: 10:45 A

PERSON CONTACTED Tom Raney

REGARDING: Cully lease in the SW/4 of  
20-34-2E

WELL NAME / LEASE NAME \_\_\_\_\_

LOCATION: \_\_\_\_\_

### RECORD OF CONVERSATION:

Tom called responding to NOV Htr. on inactive wells on the Cully lease.  
I told Tom he would need a 7/11 app.  
turned in on these wells. He thought he could get it done within two weeks.

March 3, 2015

Mr. Thomas Raney  
Raney Oil Company, LLC  
4665 Bauer Brook Ct.  
Lawrence, KS. 66049

Mr. Raney:

Per our phone conversation on March 3, 2015 at approximately 10:45 am where you called in to discuss the NOV letter(s) you received in regards to the inactive well(s) on the Cully lease in the SW/4 of 20-34-2E Sumner County.

You had asked for additional time to acquire the actuate information to formally temporary abandon the wells in question.

Your request for an additional two weeks to file the CP-111 forms on the well(s) you were sent NOV letters on is granted as discussed on the phone.

Deadline for you to have filed actuate CP-111 forms on KOLAR and a response to the Cully 3-20 inactive well is March 17<sup>th</sup> 2015.

There will be no further communication from our office in this matter, if you do not meet the deadline as per our conversation, I will refer the matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty and an order for you to plug the well.

Thank you for your cooperation in this matter.

You may contact me at the number below if you have any more questions.

Respectfully,

Daniel K. Fox  
Compliance Officer  
District 2 Field Office  
3450 N. Rock Rd., Bldg. 600, Ste. 601  
Wichita, KS. 67226  
Office: (316) 630-4004 or Business cell (316) 303-5698  
[d.fox@kcc.ks.gov](mailto:d.fox@kcc.ks.gov)

**Dan Fox**

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**From:** Dan Fox  
**Sent:** Tuesday, March 03, 2015 3:09 PM  
**To:** 'Ann Raney'  
**Subject:** RE: cully T-1

*2nd*

Mr. Raney, you will need to fill out the CP-111 form on KOLAR to best of your ability as we discussed on the phone, please make sure the information is accurate. Correct shut in dates, current fluid level with a copy of the echo-meter submitted with form, is there junk in the hole? If so please describe, what is wrong with the well? Do you have a current, valid oil and gas lease? Submit the form and I will review it and determine whether I can approve or deny based on information provided.

Can you or Mr. Carageannis provide a plugging report (CP-4) on the 3-20? I have been with the KCC for quite a while now and have never known the personnel in the downtown central office to loose plugging reports.

We will need a plugging report or the well is considered insufficiently plugged and you could still be responsible, you may be asked to dig up the insufficiently plugged well and prove to the KCC it was actually plugged correctly, tag top plug etc..... I hope you can understand as a state agency, we are charged by the people of the state to verify, so a document with signatures by people of authority is appropriate (a CP-4 form).

Hope this helps.

Daniel K. Fox, Compliance Officer  
Conservation Division District 2 Office  
Kansas Corporation Commission  
3450 N. Rock Rd., Bldg. 600, Ste. 601,  
Wichita, KS 67226 / Phone (316) 630-4004 Fax (316) 630-4005

-----Original Message-----

**From:** Ann Raney [<mailto:annraney@me.com>]  
**Sent:** Tuesday, March 03, 2015 2:28 PM  
**To:** Dan Fox  
**Subject:** cully T-1

Hi Dan, working on TA forms now. Know the TD's and casing size, but no cement records on file. How do I do that if I din't know and can't get? Also, Paul Carageannis told me Daystar plugged the 3-20 years ago and that KCC lost the records. He said he has belling KCC that for years. Does not show up on my T-1 that I enclosed, and my pumper says there is no well there any more and that it was plugged long ago. will send in what I know on the T-1's and you let me know from there. Thanks! Tom

information needed to approve the application, along with a copy of the echo-meter from Jason. I will accept a shut in date to reflect the July 2012 date from the KGS lease production report.

Finally on the Cully #3-20 I could find no plugging report on record in any of the District 2 plugging files, I even asked our Central office downtown to check all historical files and found no plugging record of the 3-20, I need you to please conduct the necessary research to provide our office with a plugging record of the this well, if not I will have to recommend to the District you expose the surface casing and both parties visually inspect to verify the well has be plugged sufficiently.

**Daniel K. Fox**, *Compliance Officer*  
Conservation Division District 2 Office  
Kansas Corporation Commission  
3450 N. Rock Rd., Bldg. 600, Ste. 601,  
Wichita, KS 67226 / Phone (316) 630-4004 Fax (316) 630-4005

**From:** Ann Raney [<mailto:annraney@mac.com>]  
**Sent:** Wednesday, March 04, 2015 5:37 PM  
**To:** Dan Fox  
**Cc:** Jason Bruns  
**Subject:** Fwd: Cully #5

Dan, I hope this answers any questions you might have. I will get the 4 plugged in the next 90 days, and hope you ok the TA for the 5 so I can convert to stalnaker disposal when priced get better and I can afford it. Still trying to figure out how the hell the wells sat there for over 15 years without producing with no action against the prior operators, and suddenly there is this huge sense of urgency against me, one of the good guys who actually gives a shit, to do something immediately or I will be fined . I tried to make these wells work and spent a lot of money doing so ! I just don't get it. Anyway, see if you can on the TA for the 5 and I will get the 4 taken care of. Also, we looked and the #3 has no signs of existence, so I presume the earlier reports of it being plugged and paperwork to that effect lost have some merit. Take care and let me know. Tom

Sent from my iPhone

Begin forwarded message:

**From:** RL Jordan <[rljordan1970@gmail.com](mailto:rljordan1970@gmail.com)>  
**Date:** March 4, 2015 at 4:58:51 PM CST  
**To:** [annraney@mac.com](mailto:annraney@mac.com)  
**Subject:** Cully #5

Tom,

My paperwork shows I pumped the Cully #5 well to the end of August 2014. In August we went in pulled the well then went back in to try to retrieve the drill collars, with no success. We left the Cully # 5 down in August of 2014.

In January 2015, I moved tubing and pumping unit from the Cully # 5 to test another well we recompleted.

I hope this answers your question.

R.L. Jordan

(3rd)

E-112 - 2nd  
R.L. Jordan  
1/15/15



## Dan Fox

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**From:** Ann Raney <annraney@mac.com>  
**Sent:** Thursday, March 05, 2015 12:05 PM  
**To:** Dan Fox  
**Cc:** Jason Bruns  
**Subject:** Re: Cully #5

I told you that you that there were 4 wells producing on the lease last year after I tried to rework the 4 and 5. I produced all of them until late last year. RL's paperwork he is referring to is his pumper gauge report. **In 25 years plus of dealing with the KCC I have never heard of anything so absolutely ridiculous as trying to find a well.** The well was NOT on the T-1 when it was signed off on by the KCC with me as the new operator. How can your actions possibly be construed as "trying to work with me" as you said the other day. The frickin wells sat there for 15 years with the prior operators and none of this crap happened!! I am taking it personally, because I am trying to do the right thing by getting old crappy wells going again to everyone's benefit, and all I am getting from you is grief, with absolutely no compassion or caring that prices suck and we are all trying to eke out a living ! I will have R L send in guage reports showing the well. You people are truly amazing. I have my blood pressure really up now so I am done for now !

Sent from my iPhone

On Mar 5, 2015, at 11:09 AM, Dan Fox <[d.fox@kcc.ks.gov](mailto:d.fox@kcc.ks.gov)> wrote:

Mr. Raney in your e-mail you forwarded me from Mr. Jordan, what paperwork is he referring to? Can your or he forward on to me what specifically he is talking about? All I need is documented proof the wells in question produced up to August of 2014, again there has been no physical evidence to show me the last time the Cully #4-20 or the #5-20 have been in production, all you have been able to provide me is conversations. As I stated to you in a previous e-mail my job is to verify. I have not been able to verify what you are saying, all I have is KGS lease production records and goggle earth aerial historical photos, and I don't see where the wells have ever produced. The aerial photos show a pump jack over the well but no horse head is visible from any of the most recent photos in Nov. of 2012 or 2014....I did received a call from Jason Bruns yesterday stating he had done some work for you, and that drill collars were stuck in the casing. Our office is not your word, this is nothing personal and our agency singles no one out, before I will put my signature on a state document, I must have proof the information is actuate.

I have a KGS lease production sheet that shows 3 wells produced in Dec. of 2011 and then it dropped down to 1 well in July of 2012, nothing in-between. I will accept a shut in date of July of 2012 even though Dec. of 2011 is the last reported production from all 3 wells. (I will send you a copy of the KGS report I'm referring to)

**You stated you would be plugging the #4-20 in the next 90 days.** This would be acceptable and you would not need to do anything with the CP-111 on the #4-20 I will deny it, and then you will need to submit a plugging application (CP-1) on the #4 ASAP. The #5-20 however the CP-111 will need to be cancelled and resubmitted with the information updates I have mentioned in this e-mail plus the previous e-mails stating the

**Dan Fox**

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**From:** Ann Raney <annraney@icloud.com>  
**Sent:** Thursday, March 05, 2015 8:35 PM  
**To:** Jeff Klock  
**Cc:** Doug Raney; Ragusa; paul Carageannis; Joseph H. Cassell; Dan Fox  
**Subject:** Cully

Gave this a lot of thought this afternoon while going out to Clinton Lake to watch the sunset and try to chill. You can sugarcoat it all you want Jeff, but at the end of the day, I am being stuck with other people's screw ups and negligence , partially due to the lack of oversight by you guys. Many people ahead of me bore this responsibility, and no one ever made them do what I am now being made to do. Hope you remember this going forward and TRULY work with me and cut me some slack! Will get things done. Tom Raney

Sent from my iPhone

**Dan Fox**

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**From:** Jeff Klock  
**Sent:** Friday, March 06, 2015 9:16 AM  
**To:** Dan Fox  
**Subject:** Tom Raney\_Cully Lease

Dan,

Do not respond to Tom Raney. I forwarded his email to the director and legal with an explanation of what was going on. Tom Raney's email was cc'd to Carageannis and Joe Cassel their attorney so I want all further correspondence to come from either myself or legal. Of course I'm not going to jump in here and take over all compliance on the Cully lease, I just want to be careful with the people involved since I have a lot of background with these folks.

Jeff

**Dan Fox**

---

**From:** Ann Raney <annraney@icloud.com>  
**Sent:** Friday, March 06, 2015 9:59 AM  
**To:** Jeff Klock  
**Cc:** Dan Fox; Ragusa  
**Subject:** Fwd: Cully lease

If Paul is correct than I am not responsible for this well, assuming it has not been plugged. Please check your T-1 histories. Tom

Sent from my iPhone

Begin forwarded message:

**From:** paul carageannis <[paul.carageannis@sbcglobal.net](mailto:paul.carageannis@sbcglobal.net)>  
**Date:** March 6, 2015 at 7:58:57 AM CST  
**To:** Ann Raney <annraney@icloud.com>  
**Subject:** Re: Cully lease

ONE MORE TIME.....get facts straight! DAYSTAR (KCC LIKES THEM) never signed t-1 tranfering well(#3) to me because it was plugged prior to my purchase.....KCC had no leg to stand on when they approached me because I was never transferred the #3.....

I only transferred wells I purchased to M&M in '05 bcuz I didn't have anything to do with the #3.....BTW KCC likes M&M too!

When ECK "Fucked me out of my wells just like he's trying to fuck me out of my equipment right now....He was forced by KCC to accept Cully#3....when ECK tranfered T-1 to you I omitted #3 because I would not accept the KCC forcing anything on YOU!!!!

LOOK UP COLT LAWSUIT.....You are not responsible.

Paul C. Carageannis, Managing Member  
Consulting Petroleum Geologist  
NETGORD, LLC  
P O Box 771188  
Wichita, Kansas 67277  
Phone 316-807-1209  
[Paul.Carageannis@sbcglobal.net](mailto:Paul.Carageannis@sbcglobal.net)

On Thu, 3/5/15, Ann Raney <[annraney@icloud.com](mailto:annraney@icloud.com)> wrote:

Subject: Re: Cully lease

To: "paul carageannis" <[paul.carageannis@sbcglobal.net](mailto:paul.carageannis@sbcglobal.net)>

Cc: "John Eck" <[john@eck.net](mailto:john@eck.net)>

Date: Thursday, March 5, 2015, 8:44 PM

Did you not know about  
the 3??? Jeff Klock said you purposely omitted it from all  
the reports. I tend to believe him. Did you tell Eck ??

Sent from my iPhone

On Mar 5, 2015, at 8:40 PM, Ann Raney

<[annraney@icloud.com](mailto:annraney@icloud.com)>

wrote:

Yeah

right. You have nothing to say about all the fucking grief  
you have caused me. My reward for being nice to you. What do  
you have to say about my e mail and all the shit!? There was  
nothing mentioned about the fucking 3 cully. I am now stuck  
with this goddamn thing, plus the 5, plus the fucking  
squeeze jobs I have to do on 4 wells to get them producing  
right. What do you say about that shit Paul?? Nothing I said  
today is not true. A minion bucks plus for 5 barrels a day  
bro. Truly makes me sad.

Sent from my iPhone

On Mar 5, 2015, at 7:46 PM, paul  
carageannis <[paul.carageannis@sbcglobal.net](mailto:paul.carageannis@sbcglobal.net)>  
wrote:



You are wrong about me again...concerning these matters....no biggie...people with money always blame the broke guy...

Paul C.  
Carageannis, Managing Member

Consulting Petroleum Geologist

NETGORD, LLC

P O Box 771188

Wichita, Kansas 67277

Phone 316-807-1209

[Paul.Carageannis@sbcglobal.net](mailto:Paul.Carageannis@sbcglobal.net)

-----  
On Thu, 3/5/15, Ann Raney <[annraney@icloud.com](mailto:annraney@icloud.com)>  
wrote:

Subject: Cully lease

To: "John

Eck" <[john@eck.net](mailto:john@eck.net)>

Cc: "Jason Bruns" <[jaboilman7@gmail.com](mailto:jaboilman7@gmail.com)>,

"paul Carageannis" <[paul.carageannis@sbcglobal.net](mailto:paul.carageannis@sbcglobal.net)>,  
"Ragusa" <[ragusafamily@hotmail.com](mailto:ragusafamily@hotmail.com)>,  
"Doug Raney" <[notredoug@gmail.com](mailto:notredoug@gmail.com)>

Date: Thursday, March 5, 2015, 4:11

PM

Hi

John. Well, my experience with

paul

has been just as good as yours and keeps getting

better. We have spent at least a half

million on top of the

half million

we gave you and have a grand total of 6 net

barrels a day or less, after doing

every single thing that

paul said

to do, that was gonna give us at least 20 or 30

bbls a day, blah, blah, blah.

Now the really good news....

We still

have 4 wells pumping under

packers that have to be squeezed

at

25 grand a piece to get pumping properly and treated

chemically. Plus , he had tubing stuck

in the hole on the #4

cully, which

I never knew about(did you know, because no one  
told me?) I finally got that out after  
paul was unable to,  
but it has a  
bad casing leak up high as well, and the state  
will not TA it and now wants it  
plugged immediately. On top  
of that  
, paul left 4 drill collars in the hole on the #5,  
which cost me 25 grand to buy, plus 50  
grand in unsuccessful  
rework costs.  
Now, the coup de gras... The State says there  
is a Cully 3-30 that you had listed as  
abandoned on the T-1,  
and I  
naturally thought meant plugged and abandoned. Well  
guess what, the well was apparently  
NOT plugged and Jeff  
Klock from the  
KCC says Paul knew this and said tried to  
keep it off all the transfers he made  
over the years. He now  
wants me to  
get out with a fucking backhoe, find the goddamn  
well, see if and how it is plugged ,  
and if not correct,  
plug it to



their satisfaction, on top of the # 4 and 5

bullshit they are putting me through.

I asked him if he was

really

serious, and of course, he is. He said to contact you

since there was incorrect information

on the T-1 you signed

and see if

you would plug it or at least help. This has

truly been a fucking nightmare , John.

Get back to me and we

can discuss.

Thanks, Tom Raney

Sent from my

iPhone

## Dan Fox

---

**From:** Ann Raney <annraney@me.com>  
**Sent:** Friday, March 06, 2015 3:52 PM  
**To:** Jeff Klock  
**Cc:** Dan Fox; Jeff Kennedy; Doug Raney; Ragusa; Jason Bruns  
**Subject:** cully 3-30

Just talked to Chuck from Daystar and he is almost positive that he plugged the well. He is looking for the paperwork, and said he will get back to me soon. Even if he can't find it, we should be able to ascertain this once we find the well with a backhoe and your metal detector. Gee I wonder who is going to pay for that? Plus pay for the plugging of the 4 that I was falsely told was a producer on the T-1? Regardless of what happens here, I will never feel the same about the KCC. I have always tried to do the right thing and Dan's actions in this matter have been unconscionable, trying to railroad me into doing all these things after 20 years. He says not to take it personally. i most certainly am, and everyone I have spoken to about his actions agrees with me 100%. I will have Jason get in touch with you when he is out there, and will send the pumper's reports per Dan's request when I get them tonight. Tom Raney

## Dan Fox

---

**From:** Ann Raney <annraney@me.com>  
**Sent:** Friday, March 06, 2015 2:58 PM  
**To:** Dan Fox  
**Cc:** Jeff Kennedy; Jeff Klock; Doug Raney; Ragusa  
**Subject:** cully 3-30

10

Hi Jeff. Just received Dan's letter giving me until March 17 to plug the well or he is going to take enforcement action. Truly frickin amazing, especially since the well has been around for 20 years plus. Why the sudden urgency without having all the facts??? So much for working with me as you said. Did you see the fax of the T-1 I sent you that I got from ECK when he sold me this deal listing the 3 as a producer? That is false information. Why was there no action against him when he had the lease? It was just like now! Did you try to get a hold of Chuck Schmidt fro Daystar to see if he had any records? Why was there no action against him when he had the lease??Did you get my e mail from Carageannis about the Colt Energy case? Have you guys done anything to try to ascertain more facts before Rambo Dan sends me threatening letters? If you want to meet my guys out there with a detector assuming you are unable to get a hold of Daystar and get any more info, I will do so. I want to make it perfectly clear that this by no means I am assuming liability for the well, as I do not believe I am responsible and my attorney concurs. Before we get into a big legal battle over this and waste everyone's time and money, please see if you can get Daystar to provide you any info. Paul is positive that they plunged this well years ago. Let me know what you find out. I am having Jason plug the 4, and set a bridge plu on the 5 to MIT per our discussion. For the record, I believe Dan's actions are totally extreme, and as I said to you, I would prefer to deal with some one rational like you in the future. Thanks and I will keep you appraised of the plugging and bridge plug. Truly amazes me about the sudden sense of urgency after 20 years and 4 operators, with the exact same conditions as now! Tom

Dan Fox

---

**From:** Ann Raney <annraney@icloud.com>  
**Sent:** Friday, March 06, 2015 10:13 PM  
**To:** Dan Fox  
**Cc:** Jeff Klock  
**Subject:** Cully

Dan, after giving this much thought, I have decided to let your inappropriate conduct go, and move on in a positive mode. Sending me a ridiculous letter demanding plugging for a well within 2 weeks for a well made known to me 3 days ago is absolutely outrageous , and I did in fact take it personal , as everyone with whom I discussed it, including 2 of my attorneys, said I had every right to do. That having been said, life is way too short to dwell on negatives, and your boss Jeff has calmed me down and made me feel better. I have Jason Bruns set up to plug the 4, and when the backhoe is there digging the work over pit, I will see if we can find the 3. Jeff said you will provide a fairly precise location and a man with a metal detector. Jason will be in touch. I do not know how long you have been with the KCC, but it is arguable that we are all on the same bus, since we operators are the reason you all have jobs. Let us move forward on a positive note. Sending threatening letters and asserting your perceived authority serves no useful purpose and only serves to alienate people. I will be sending you the pumper guage reports showing 4 producers on the cully tomorrow . This is also a ridiculous request and now largely an exercise in semantics, since I am doing everything asked of me. We will be in touch when we are ready. As I told Jeff, I am extremely curious as to why no actions were taken against the 4 prior operators while the lease was exactly in this same condition . Regards , Tom Raney

Sent from my iPhone

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

1244672

Form CP-111

June 2011

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 32705  
Name: Raney Oil Company, LLC  
Address 1: 4665 BAUER BROOK CT.  
Address 2: \_\_\_\_\_  
City: LAWRENCE State: KS Zip: 66049 + \_\_\_\_\_  
Contact Person: Thomas Raney  
Phone: ( 785 ) 749-0672  
Contact Person Email: \_\_\_\_\_  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-191-21150-00-00  
Spot Description: \_\_\_\_\_  
SW NW SW Sec. 20 Twp. 34 S. R. 2 ☒ E ☐ W  
1650 feet from ☐ N / ☒ S Line of Section  
330 feet from ☐ E / ☒ W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84  
County: Sumner Elevation: 1207 ☐ GL ☒ KB  
Lease Name: CULLY Well #: 4-20  
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_  
☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_  
☐ Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 11/26/1980 Date Shut-In: 12/29/2014

|                  | Conductor | Surface | Production | Intermediate | Liner | Tubing |
|------------------|-----------|---------|------------|--------------|-------|--------|
| Size             | 0         | 8.625   | 4.5        | 0            | 0     | 2.375  |
| Setting Depth    | 0         | 225     | 3250       | 0            | 0     | 3150   |
| Amount of Cement | 0         | 125     | 200        | 0            | 0     | 0      |
| Top of Cement    | 0         | 0       | 2500       | 0            | 0     | 0      |
| Bottom of Cement | 0         | 225     | 3250       | 0            | 0     | 0      |

Casing Fluid Level from Surface: 260 How Determined? fluid shot Date: 03/03/2015  
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: 3250 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

Geological Data:

Formation Name \_\_\_\_\_ Formation Top \_\_\_\_\_ Formation Base \_\_\_\_\_ Completion Information \_\_\_\_\_  
1. \_\_\_\_\_ At: \_\_\_\_\_ to \_\_\_\_\_ Feet Perforation Interval 3051 to 3058 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

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>Daniel K. Fox</u> Comments: <u>Operator stated he would be plugging well.</u> |          |               |                |                           |
| TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied | Date: <u>03/09/2015</u>   |          |               |                |                           |

Mail to the Appropriate KCC Conservation Office:

|  |   |                    |
|--|---|--------------------|
|  | KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801                      | Phone 620.225.8888 |
|  | KCC District Office #2 / UPGS - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226 | Phone 316.630.4000 |
|  | 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 785.625.0550 |

Exhibit F

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



Phone: 316-630-4000  
Fax: 316-630-4005  
<http://kcc.ks.gov/>

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

Sam Brownback, Governor

March 09, 2015

Thomas Raney  
Raney Oil Company, LLC  
4665 BAUER BROOK CT.  
LAWRENCE, KS 66049

Re: Temporary Abandonment  
API 15-191-21150-00-00  
CULLY 4-20  
SW/4 Sec.20-34S-02E  
Sumner County, Kansas

Dear Thomas Raney:

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

**High Fluid Level**

In accordance with K.A.R. 82-3-111, this well must be plugged or returned to service by April 08, 2015.

Sincerely,

Daniel K. Fox

# KCC OIL/GAS REGULATORY OFFICES

Date: 06/29/15

District: 02

Case #: \_\_\_\_\_

- ☐ New Situation  
☐ Response to Request  
☒ Follow-Up

- ☒ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 32705

API Well Number: \_\_\_\_\_

Op Name: Raney Oil Company, LLC

Spot: SW Sec 20 Twp 34 S Rng 2 ☒ E ☐ W

Address 1: 4665 Bauer Brook Ct.

Feet from ☐ N ☒ S Line of Section

Address 2: \_\_\_\_\_

Feet from ☒ E ☐ W Line of Section

City: Lawrence

GPS: Lat: \_\_\_\_\_ Long: \_\_\_\_\_ Date: 6/29/15

State: KS Zip Code: 66049 -

Lease Name: Cully Well #: \_\_\_\_\_

Operator Phone #: (785) 749-0672

County: Sumner

## Reason for Investigation:

Response to inactive wells on operators well inventory submitted to central office

## Problem:

Abandoned wells

## Persons Contacted:

Tom Raney-Operator

## Findings:

6/29/15-A follow up lease inspection was conducted to find no changes to lease since the Cully 3-20 was exhumed, no CP-1 has been filed on the Cully #4-20, or the Cully #3-20 which was insufficiently plugged.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

Date: \_\_\_\_\_

7/27/2015-No plugging application (CP-1) has been filed, I recommend a Commission order for operator to plug the Cully #4-20 and the Cully 3-20 immediately.

## Verification Sources:

Photos Taken: \_\_\_\_\_

|  |   |                                     |
|--|---|-------------------------------------|
| <input checked="" type="checkbox"/> RBDMS    | <input type="checkbox"/> KGS            | <input type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database        | <input type="checkbox"/> District Files | <input type="checkbox"/> Courthouse |
| <input type="checkbox"/> Other: <u>KOLAR</u> |   |                                     |

By: Daniel K. Fox-Compliance Officer

*Daniel K. Fox*

Retain 1 Copy District Office  
 Send 1 Copy to Conservation Division

Form: \_\_\_\_\_



## Jon Myers

---

**From:** Kennedy, Jeff <jkennedy@martinpringle.com>  
**Sent:** Tuesday, June 30, 2015 10:38 AM  
**To:** Ann Raney  
**Cc:** Jon Myers; Jeff Klock; TOM RAGUSA  
**Subject:** RE: Eck

The folks at the KCC are just doing their jobs. I suspect they could care less whether Raney Oil or AGV plugged the well; they just want it plugged. Send in the plugging form and we will try to recover from AGV.

-----Original Message-----

From: Ann Raney [mailto:annraney@icloud.com]  
Sent: Monday, June 29, 2015 6:12 PM  
To: Kennedy, Jeff  
Cc: Jon Myers; Jeff Klock; TOM RAGUSA  
Subject: Re: Eck

Guess you can tell him I will plug it, and try to recover ex post facto with Eck. you agree? Would think with the Goddamn thing having sat there for 15 years another 3 or 4 months would not be a huge deal, but apparently it is. Especially since I just spent 5 grand to find the old well and verify it has been plugged, plus MIT the #5. Have done everything they asked of me. i just do not understand them at times, Jeff, especially since I am one of the good guys. They let this go for almost 20 years, now there is is this huge sense of urgency. don't get it, especially with Lis Pendens. ! Let me know your thoughts, counselor, and Happy fourth. Still glad to be living in America, but I sometimes have doubts these days! Tom  
> On Jun 29, 2015, at 4:07 PM, Kennedy, Jeff <jkennedy@martinpringle.com> wrote:

>

> Jon Myers at the KCC just called me about plugging the Cully 4-20 well. If you don't file a plugging form they are going to initiate a proceeding to force you to plug it.

>

> -----Original Message-----

> From: Ann Raney [mailto:annraney@icloud.com]  
> Sent: Thursday, June 25, 2015 10:37 AM  
> To: Kennedy, Jeff  
> Subject: Re: Eck

>

> Okey dokey. Let me know what happens and have a great Fourth! Tom

>

> Sent from my iPhone

>

>> On Jun 25, 2015, at 10:04 AM, Kennedy, Jeff <jkennedy@martinpringle.com> wrote:

>>

>> Until AGV has to file its Answer, we are in a holding pattern. That should happened around July 8th. I did get a call from Jeff Jordan, an attorney at Foulston Siefkin here in Wichita, and he indicated that he may be getting involved for AGV. I don't know anything I would take to the bank on Paul.

>>

>> -----Original Message-----

>> From: Ann Raney [mailto:annraney@icloud.com]  
>> Sent: Wednesday, June 24, 2015 1:43 PM  
>> To: Kennedy, Jeff  
>> Subject: Eck



>>

>> Hi Esquire. So tell me what is happening? By when does Eck have to respond? Heard from Cecil the other day that Carageannis may be going to jail. True? You heard anything? What about his and Joe Cassel's complicity in this deal? Hope all is well. Tom

>>

>> Sent from my iPhone

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## Jon Myers

---

**From:** Ann Raney <annraney@me.com>  
**Sent:** Thursday, August 06, 2015 2:27 PM  
**To:** Jeff Klock  
**Cc:** Jeff Kennedy; Jon Myers; Doug Raney; Ragusa; Jason Bruns  
**Subject:** cully 4-20  
**Attachments:** KOLAR-51.pdf

I presume you did not see that this had been filed?? This was before both Jeff Kennedy and Jason Bruns contacted you about plugging. Jason and Jeff both told you I would go ahead and plug this well subsequent to this filing. How you could file for a penalty order given these facts is truly beyond comprehension. The lunatics are truly running the asylum down there apparently, and common sense and logic is no where in evidence. I am filing a formal complaint with the disciplinary administrator about Jon, who is the laughingstock of KCC employees I have spoken with. He is a disgrace to the KCC and has done more to cause rifts between the industry and KCC than any individual on the planet. Dan Fox is another individual I am now working with the Commission on how to discipline. He is also completely out of control and continues to exhibit a counterproductive, blockheaded military mentality. I bet 5 to 1 he was in the Military. In the interim, we will be wasting more time and money on utterly frivolous litigation brought forth by informed people with nothing to do, given these horrific oil prices that have staggered the industry and us operators. I hope you are all really proud of yourselves! I can't wait to see Dan, Jeff, and Jon at the hearing myself. Have already Tom Raney

# Well Inventory Certification Detail

For print, click on Print icon. KCC

Logout

Back to Well Inventory Certifications

## Raney Oil Company, LLC

Process Approve Return

Hide Additional Details

| Additional Details |                                    |  |    |
|--------------------|------------------------------------|--|----|
| Certification SID  | 1039187040                         | Total Rows in Certification                | 40 |
| Certified Date     | August 18, 2014                    | Wells Claimed by Operator                  | 40 |
| Certified By       | Thomas Raney • annraney@mac.com    | Wells Added, Deleted or Edited by Operator | 0  |
| Approved Date      | August 18, 2014                    | Wells Unchanged by Operator                | 40 |
| Approved by        | Oracle Daemon - User ID 3480       | Wells Added by Operator                    | 0  |
| Operator           | Raney Oil Company, LLC             | Wells Deleted by Operator                  | 0  |
| Group ID           | 2061                               | Wells Edited by Operator                   | 0  |
| KCC License        | 32705 • expires September 30, 2016 |  |    |

Remarks

Add Remark

Add Remark

The operator certified the KCC's version of the well inventory without making any edits, additions or deletions.

Select Wells to View All 40

- ☒ Show Operator's Certified Well Inventory
- ☐ Show KCC's Well Inventory
- ☒ Show Merged Inventories

## Operator's Certified Well Inventory rows: 40

| API Number KCC  | Operator Comments | Operator Edits | Operator Added | Operator Deleted | Lease Name     | Well No. | API Number      | Year D. | Year A | Depth | County | Sec |
|-----------------|-------------------|----------------|----------------|------------------|----------------|----------|-----------------|---------|--------|-------|--------|-----|
| 1519121149000   |                   |                |                |                  | CULLY          | 2-20     | 1519121149000   | 1980    |        | 3251  | Sumner | 20  |
| 15191211150000  |                   |                |                |                  | CULLY          | 3-20     | 15191211150000  | 1980    |        | 3257  | Sumner | 20  |
| 15191211500000  |                   |                |                |                  | CULLY          | 4-20     | 15191211500000  | 1980    |        | 3250  | Sumner | 20  |
| 15191211510000  |                   |                |                |                  | CULLY          | 5-20     | 15191211510000  | 1980    |        |       | Sumner | 20  |
| 15191211590000  |                   |                |                |                  | CULLY          | 6-20     | 15191211590000  | 1981    |        |       | Sumner | 20  |
| 15191224710000  |                   |                |                |                  | CULLY          | 7-20     | 15191224710000  | 2006    |        | 3855  | Sumner | 20  |
| 15061353810000  |                   |                |                |                  | ERBERT         | 3        | 15061353810000  | 2005    |        | 3916  | Ellis  | 20  |
| 15163239210000  |                   |                |                |                  | GUNN / GIBSON  | 2        | 15163239210000  | 2011    |        | 3779  | Rooks  | 18  |
| 15163237340000  |                   |                |                |                  | GUNN/GIBSON    | 1        | 15163237340000  | 2008    |        | 3841  | Rooks  | 18  |
| 15163240920000  |                   |                |                |                  | GUNN/GIBSON    | 3        | 15163240920000  | 2012    |        | 3845  | Rooks  | 18  |
| 15065215820000  |                   |                |                |                  | MILLER         | 3        | 15065215820000  |         |        | 4200  | Graham | 3   |
| 15065010640000  |                   |                |                |                  | MILLER         | 9        | 15065010640000  | 2006    |        | 3905  | Graham | 3   |
| 15163021220001  |                   |                |                |                  | MILLER - SUT   | 4        | 15163021220001  | 2007    |        | 3780  | Rooks  | 14  |
| 15065234520000  |                   |                |                |                  | MILLER LAMB    | 13       | 15065234520000  | 2009    |        | 3815  | Graham | 3   |
| 15065234100000  |                   |                |                |                  | MILLER-LAMB    | 12       | 15065234100000  | 2008    |        | 3869  | Graham | 3   |
| 15163234130001  |                   |                |                |                  | MILLER-LAMB    | 2        | 15163234130001  | 2006    |        | 3870  | Graham | 3   |
| 15163011440001  |                   |                |                |                  | MILLER-SUTOR   | 6        | 15163011440001  | 2007    |        | 3790  | Rooks  | 14  |
| 15163240050000  |                   |                |                |                  | MILLER-SUTO    | 1 A      | 15163240050000  | 2012    |        | 3840  | Rooks  | 14  |
| 15065236650000  |                   |                |                |                  | Miller         | 14       | 15065236650000  | 2010    |        | 3872  | Graham | 3   |
| 15191224750000  |                   |                |                |                  | PADGETT        | 4A       | 15191224750000  | 2006    |        | 3930  | Sumner | 23  |
| 15191205370000  |                   |                |                |                  | PADGETT WAL    | 1        | 15191205370000  | 1975    |        |       | Sumner | 23  |
| 15191210350000  |                   |                |                |                  | PADGETT WAL    | 3        | 15191210350000  | 1980    |        | 3510  | Sumner | 23  |
| 15163228210000  |                   |                |                |                  | ROGERS         | 1        | 15163228210000  | 1987    |        | 3781  | Rooks  | 23  |
| 15163232350000  |                   |                |                |                  | ROGERS-SUT     | 1        | 15163232350000  | 2008    |        | 3790  | Rooks  | 23  |
| 15163021360001  |                   |                |                |                  | ROGERS-SUT     | 6        | 15163021360001  | 2009    |        | 3780  | Rooks  | 23  |
| 15163241910000  |                   |                |                |                  | Rogers         | 4        | 15163241910000  | 2014    |        | 3803  | Rooks  | 23  |
| 15162239540000  |                   |                |                |                  | SUTOR          | C-1      | 15162239540000  | 2011    |        | 3729  | Rooks  | 13  |
| 15163234390000  |                   |                |                |                  | SUTOR B        | 1        | 15163234390000  | 2005    |        | 3752  | Rooks  | 13  |
| 15163020930002  |                   |                |                |                  | SUTOR B        | 2        | 15163020930002  | 2009    |        | 3967  | Rooks  | 13  |
| 15163237520000  |                   |                |                |                  | SUTOR B        | 3        | 15163237520000  | 2008    |        | 3850  | Rooks  | 13  |
| 15163239220000  |                   |                |                |                  | SUTOR B        | 4        | 15163239220000  | 2011    |        | 3600  | Rooks  | 13  |
| 15163241920000  |                   |                |                |                  | Sutor C        | 2        | 15163241920000  |         |        |       | Rooks  | 13  |
| 150652325270000 |                   |                |                |                  | VERA WHITE     | 1        | 150652325270000 | 1989    |        | 3900  | Graham | 2   |
| 15065237280000  |                   |                |                |                  | VERA WHITE     | 9        | 15065237280000  | 2011    |        | 3840  | Graham | 2   |
| 15065235880000  |                   |                |                |                  | Vera White     | 10       | 15065235880000  | 2012    |        | 3866  | Graham | 2   |
| 15191205480000  |                   |                |                |                  | WOLF           | 1        | 15191205480000  | 1976    |        | 3518  | Sumner | 29  |
| 15191234770000  |                   |                |                |                  | WOLF           | 2        | 15191234770000  | 2006    |        | 3857  | Sumner | 29  |
| 15191234820000  |                   |                |                |                  | WOLF           | 3        | 15191234820000  | 2006    |        | 3980  | Sumner | 29  |
| 15191201830001  |                   |                |                |                  | Walter Padgett | 2        | 15191201830001  | 2014    |        | 3180  | Sumner | 23  |
| 15163240700000  |                   |                |                |                  | sutor          | B-5      | 15163240700000  | 2012    |        | 3836  | Rooks  | 13  |

## Operator's and KCC's Well Inventories, Merged rows: 108

| API Number KCC | Operator Comments | Operator Edits | Operator Added | Operator Deleted | Source | Lease Name | Well No. | API Number | Year D. | Year A | Depth | County |
|----------------|-------------------|----------------|----------------|------------------|--------|------------|----------|------------|---------|--------|-------|--------|
|----------------|-------------------|----------------|----------------|------------------|--------|------------|----------|------------|---------|--------|-------|--------|

Exhibit K

|                 |          |              |      |                   |      |             |
|-----------------|----------|--------------|------|-------------------|------|-------------|
| 1505514640000   | KCC      | Houk         | B-1  | 15-025-24649-0000 |      | Cowley      |
| 15051212010001  | KCC      | ERBERT       | 4    | 15-051-21202-0001 |      | 3950 Ellis  |
| 15051236000001  | KCC      | OTT          | 2-31 | 15-051-23600-0001 | 1993 | 827 Ellis   |
| 15051244780000  | KCC      | WOLF         | 3-30 | 15-051-24478-0000 | 1987 | 3600 Ellis  |
| 15051246490000  | KCC      | DINKEL       | 10   | 15-051-24649-0000 | 1990 | 3867 Ellis  |
| 15051253810000  | KCC      | ERBERT       | 3    | 15-051-25381-0000 | 2005 | 3916 Ellis  |
| 15051253810000  | Operator | ERBERT       | 3    | 15-051-25381-0000 | 2005 | 3916 Ellis  |
| 15065019040001  | KCC      | MILLER       | 9    | 15-065-01004-0001 | 1984 | 3905 Graham |
| 15065019040002  | KCC      | MILLER       | 9    | 15-065-01004-0002 | 2006 | 3905 Graham |
| 15065019040002  | Operator | MILLER       | 9    | 15-065-01004-0002 | 2006 | 3905 Graham |
| 15065019040002  | KCC      | MILLER       | 4    | 15-065-01002-0002 | 2007 | 380 Graham  |
| 15065019040001  | KCC      | JOHNSON      | 1    | 15-065-01029-0001 | 1995 | 3650 Graham |
| 15065019040001  | KCC      | MILLER       | 5    | 15-065-01026-0001 | 2007 | 1985 Graham |
| 15065019040001  | KCC      | BELLERIVE    | 1    | 15-065-02162-0001 | 2003 | 4060 Graham |
| 15065019040001  | KCC      | MILLER-LAMB  | 2    | 15-065-21423-0001 | 2006 | 3870 Graham |
| 15065019040001  | Operator | MILLER-LAMB  | 2    | 15-065-21423-0001 | 2006 | 3870 Graham |
| 15065019040001  | KCC      | MILLER       | 3    | 15-065-21532-0000 | 1982 | 3834 Graham |
| 15065019040001  | KCC      | MILLER       | 3    | 15-065-21532-0000 | 2006 | 3845 Graham |
| 15065019040002  | KCC      | MILLER       | 3    | 15-065-21532-0000 |      | 4200 Graham |
| 15065019040002  | Operator | MILLER       | 3    | 15-065-21532-0002 |      | 4200 Graham |
| 15065022270000  | KCC      | VERA WHITE   | 1    | 15-065-22522-0000 | 1989 | 3900 Graham |
| 15065022270000  | Operator | VERA WHITE   | 1    | 15-065-22522-0000 | 1989 | 3900 Graham |
| 15065024100000  | KCC      | MILLER-LAMB  | 12   | 15-065-23410-0000 | 2008 | 3869 Graham |
| 15065024100000  | Operator | MILLER-LAMB  | 12   | 15-065-23410-0000 | 2008 | 3869 Graham |
| 15065024100000  | KCC      | MILLER-LAMB  | 13   | 15-065-23412-0000 | 2009 | 3915 Graham |
| 15065024100000  | Operator | MILLER-LAMB  | 13   | 15-065-23412-0000 | 2009 | 3915 Graham |
| 15065026650000  | KCC      | Miller       | 14   | 15-065-22665-0000 | 2010 | 3872 Graham |
| 15065026650000  | Operator | Miller       | 14   | 15-065-22665-0000 | 2010 | 3872 Graham |
| 15065027270000  | KCC      | VERA WHITE   | 9    | 15-065-22727-0000 | 2011 | 3840 Graham |
| 15065027270000  | Operator | VERA WHITE   | 9    | 15-065-22727-0000 | 2011 | 3840 Graham |
| 15065027270000  | KCC      | Vera White   | 10   | 15-065-22858-0000 | 2012 | 3866 Graham |
| 15065027270000  | Operator | Vera White   | 10   | 15-065-22858-0000 | 2012 | 3866 Graham |
| 15163017330001  | KCC      | KEAS         | 4    | 15-163-02733-0001 |      | Rooks       |
| 15163020930001  | KCC      | SUTOR B      | 2    | 15-163-02093-0001 |      | Rooks       |
| 15163020930002  | KCC      | SUTOR B      | 2    | 15-163-02093-0002 | 2009 | 3967 Rooks  |
| 15163020930002  | Operator | SUTOR B      | 2    | 15-163-02093-0002 | 2009 | 3967 Rooks  |
| 15163021220001  | KCC      | SUTOR        | 3    | 15-163-02122-0001 |      | Rooks       |
| 15163021220001  | KCC      | SUTOR        | 4    | 15-163-02122-0001 | 1952 | 3772 Rooks  |
| 15163021220001  | KCC      | MILLER - SUT | 4    | 15-163-02122-0001 | 2007 | 3780 Rooks  |
| 15163021220001  | Operator | MILLER - SUT | 4    | 15-163-02122-0001 | 2007 | 3780 Rooks  |
| 15163021240000  | KCC      | MILLER-SUTOR | 6    | 15-163-02124-0000 | 1954 | 3784 Rooks  |
| 15163021240001  | KCC      | MILLER-SUTOR | 6    | 15-163-02124-0001 | 2007 | 3790 Rooks  |
| 15163021240001  | Operator | MILLER-SUTOR | 6    | 15-163-02124-0001 | 2007 | 3790 Rooks  |
| 15163021860001  | KCC      | ROGERS-SUT   | 6    | 15-163-02186-0001 | 2009 | 3780 Rooks  |
| 15163021860001  | Operator | ROGERS-SUT   | 6    | 15-163-02186-0001 | 2009 | 3780 Rooks  |
| 15163021860001  | KCC      | SUTOR        | 3    | 15-163-02228-0001 | 2006 | 1700 Rooks  |
| 15163022270000  | KCC      | ROGERS       | 1    | 15-163-22270-0000 | 1987 | 3781 Rooks  |
| 15163022270000  | Operator | ROGERS       | 1    | 15-163-22270-0000 | 1987 | 3781 Rooks  |
| 15163023300000  | KCC      | KEAS         | 1    | 15-163-23300-0000 | 2000 | 3858 Rooks  |
| 15163023300000  | KCC      | KEAS         | A-1  | 15-163-23300-0000 |      | Rooks       |
| 151630234890000 | KCC      | SUTOR B      | 1    | 15-163-23489-0000 | 2005 | 3752 Rooks  |
| 151630234890000 | Operator | SUTOR B      | 1    | 15-163-23489-0000 | 2005 | 3752 Rooks  |
| 151630237340000 | KCC      | GUNN/GIBSON  | 1    | 15-163-23734-0000 | 2008 | 3841 Rooks  |
| 151630237340000 | Operator | GUNN/GIBSON  | 1    | 15-163-23734-0000 | 2008 | 3841 Rooks  |
| 151630237350000 | KCC      | ROGERS-SUT   | 1    | 15-163-23735-0000 | 2008 | 3790 Rooks  |
| 151630237350000 | Operator | ROGERS-SUT   | 1    | 15-163-23735-0000 | 2008 | 3790 Rooks  |
| 151630237520000 | KCC      | SUTOR B      | 3    | 15-163-23752-0000 | 2008 | 3850 Rooks  |
| 151630237520000 | Operator | SUTOR B      | 3    | 15-163-23752-0000 | 2008 | 3850 Rooks  |
| 151630237520000 | KCC      | ROGERS       | 2    | 15-163-23752-0000 | 2010 | 3820 Rooks  |
| 151630237520000 | KCC      | GUNN / GIBS  | 2    | 15-163-23752-0000 | 2011 | 3779 Rooks  |
| 151630237520000 | Operator | GUNN / GIBS  | 2    | 15-163-23752-0000 | 2011 | 3779 Rooks  |
| 151630239230000 | KCC      | SUTOR B      | 4    | 15-163-23923-0000 | 2011 | 3800 Rooks  |
| 151630239230000 | Operator | SUTOR B      | 4    | 15-163-23923-0000 | 2011 | 3800 Rooks  |
| 151630239540000 | KCC      | SUTOR        | C-1  | 15-163-23954-0000 | 2011 | 3729 Rooks  |
| 151630239540000 | Operator | SUTOR        | C-1  | 15-163-23954-0000 | 2011 | 3729 Rooks  |
| 151630240070000 | KCC      | GUNN/GIBSON  | 3    | 15-163-24007-0000 | 2012 | 3845 Rooks  |
| 151630240070000 | Operator | GUNN/GIBSON  | 3    | 15-163-24007-0000 | 2012 | 3845 Rooks  |
| 151630240080000 | KCC      | MILLER-SUTO  | 1-A  | 15-163-24008-0000 | 2012 | 3840 Rooks  |
| 151630240080000 | Operator | MILLER-SUTO  | 1-A  | 15-163-24008-0000 | 2012 | 3840 Rooks  |
| 151630240080000 | KCC      | sutor        | B-5  | 15-163-24008-0000 | 2012 | 3836 Rooks  |
| 151630240080000 | Operator | sutor        | B-5  | 15-163-24008-0000 | 2012 | 3836 Rooks  |
| 151630241910000 | KCC      | Rogers       | 3    | 15-163-24190-0000 | 2014 | 3838 Rooks  |
| 151630241910000 | KCC      | Rogers       | 4    | 15-163-24191-0000 | 2014 | 3803 Rooks  |
| 151630241910000 | Operator | Rogers       | 4    | 15-163-24191-0000 | 2014 | 3803 Rooks  |
| 151630241910000 | KCC      | Sutor C      | 2    | 15-163-24191-0000 | 2014 | 3727 Rooks  |

Exhibit K

|                 |          |                |      |                   |      |              |
|-----------------|----------|----------------|------|-------------------|------|--------------|
| 15162041920000  | Operator | Sutor C        | 2    | 15 163 21107 0000 |      | Rooks        |
| 15163241000000  | KCC      | Rogers         | 5    | 15 163 24300 0000 |      | Rooks        |
| 15163243000000  | KCC      | Rogers         | 6    | 15 163 24303 0000 | 2015 | 3824 Rooks   |
| 151672111250000 | KCC      | BOXBERGER      | 1    | 15 167 21125 0000 |      | 3439 Russell |
| 15161205270000  | KCC      | PADGETT WAL    | 1    | 15 191 20527 0000 | 1975 | Sumner       |
| 15191205370000  | Operator | PADGETT WAL    | 1    | 15 191 20537 0000 | 1975 | Sumner       |
| 15191205480000  | KCC      | WOLF           | 1    | 15 191 20548 0000 | 1976 | 3518 Sumner  |
| 15191205480000  | Operator | WOLF           | 1    | 15 191 20548 0000 | 1976 | 3518 Sumner  |
| 15191205500000  | KCC      | PADGETT WAL    | 2    | 15 191 20550 0000 | 1976 | Sumner       |
| 15191205580000  | KCC      | Walter Padgett | 2    | 15 191 20558 0000 | 2014 | 3180 Sumner  |
| 15191205880000  | Operator | Walter Padgett | 2    | 15 191 20588 0000 | 2014 | 3180 Sumner  |
| 15191203500000  | KCC      | PADGETT WAL    | 3    | 15 191 20035 0000 | 1980 | 3510 Sumner  |
| 15191203500000  | Operator | PADGETT WAL    | 3    | 15 191 20035 0000 | 1980 | 3510 Sumner  |
| 151912111430000 | KCC      | CULLY          | 2-20 | 15 191 21114 0000 | 1980 | 3251 Sumner  |
| 15191211140000  | Operator | CULLY          | 2-20 | 15 191 21114 0000 | 1980 | 3251 Sumner  |
| 15191211150000  | KCC      | CULLY          | 3-20 | 15 191 21115 0000 | 1980 | 3257 Sumner  |
| 15191211150000  | Operator | CULLY          | 3-20 | 15 191 21115 0000 | 1980 | 3257 Sumner  |
| 15191211150000  | KCC      | CULLY          | 4-20 | 15 191 21115 0000 | 1980 | 3200 Sumner  |
| 15191211150000  | Operator | CULLY          | 4-20 | 15 191 21115 0000 | 1980 | 3250 Sumner  |
| 15191211610000  | KCC      | CULLY          | 5-20 | 15 191 21161 0000 | 1980 | Sumner       |
| 15191211610000  | Operator | CULLY          | 5-20 | 15 191 21161 0000 | 1980 | Sumner       |
| 15191211980000  | KCC      | CULLY          | 6-20 | 15 191 21198 0000 | 1981 | Sumner       |
| 15191211980000  | Operator | CULLY          | 6-20 | 15 191 21198 0000 | 1981 | Sumner       |
| 15191224710000  | KCC      | CULLY          | 7-20 | 15 191 22471 0000 | 2006 | 3855 Sumner  |
| 15191224710000  | Operator | CULLY          | 7-20 | 15 191 22471 0000 | 2006 | 3855 Sumner  |
| 15191224720000  | KCC      | WOLF           | 2    | 15 191 22472 0000 | 2006 | 3857 Sumner  |
| 15191224720000  | Operator | WOLF           | 2    | 15 191 22472 0000 | 2006 | 3857 Sumner  |
| 15191224750000  | KCC      | PADGETT        | 4A   | 15 191 22475 0000 | 2006 | 3930 Sumner  |
| 15191224750000  | Operator | PADGETT        | 4A   | 15 191 22475 0000 | 2006 | 3930 Sumner  |
| 15191224820000  | KCC      | WOLF           | 3    | 15 191 22482 0000 | 2006 | 3980 Sumner  |
| 15191224820000  | Operator | WOLF           | 3    | 15 191 22482 0000 | 2006 | 3980 Sumner  |
| 15195226400000  | KCC      | WEBER          | 3    | 15 195 22640 0000 | 2000 | 4190 Trego   |
| 15195226420000  | KCC      | MILLER-LAMB    | 13   | 15 195 22642 0000 |      | Trego        |

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

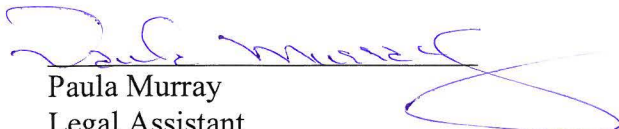
Before Commissioners:            Shari Feist Albrecht, Chair  
   Jay Scott Emler  
   Pat Apple

|  |   |                             |
|--|---|-----------------------------|
| In the matter of the failure Raney Oil     | ) | Docket No. 16-CONS-145-CPEN |
| Company, LLC ("Operator") to comply        | ) |                             |
| with K.A.R. 82-3-111 at the Cully #4-20 in | ) | CONSERVATION DIVISION       |
| Sumner County, Kansas.                     | ) |                             |
| _____                                      | ) | License No. 32705           |

**CERTIFICATE OF SERVICE**

I, Paula Murray, certify that on October 24, 2015, I did cause a true and correct copy of the Pre-Filed Testimony of Dan Fox to be served by United States mail, first class, postage prepaid to the following:

Jeff Kennedy  
Martin, Pringle, et al.  
100 North Broadway, Suite 500  
Wichita, Kansas 67202  
*Attorney for Raney Oil Company, LLC*

  
Paula Murray  
Legal Assistant  
Kansas Corporation Commission