

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

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

|                                    |   |                              |
|------------------------------------|---|------------------------------|
| IN THE MATTER OF THE APPLICATION   | ) | DOCKET NO. 18-CONS-3284-CWLE |
| OF URBAN OIL & GAS GROUP, LLC. FOR | ) |                              |
| A LOCATION EXCEPTION FOR           | ) |                              |
| THE CLARK No. 1 WELL IN THE        | ) | CONSERVATION DIVISION        |
| SOUTHWEST QUARTER OF SECTION 15,   | ) |                              |
| TOWNSHIP 26 SOUTH, RANGE 2 EAST,   | ) | LICENSE NO. 34381            |
| SEDGWICK COUNTY, KANSAS            | ) |                              |

**PRE-FILED DIRECT TESTIMONY**

**OF**

**CORALIN MODE**

**ON BEHALF OF**

**URBAN OIL & GAS GROUP, LLC**

Hearing Date

August 16, 2018

1 Q. Please state your name and business address.

2 A. Coralin Mode, 1000 East 14<sup>th</sup>, Suite 300, Plano, Texas 75074.

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

4 A. Urban Oil & Gas Group, LLC as a landman.

5 Q. Have you ever testified before the Kansas Corporation?

6 A. No.

7 Q. Please summarize your educational background and work experience.

8 A. I graduated with a Bachelor of Administration with a concentration in Energy  
9 Commerce Oil and Gas from Texas Tech University. From 2012 to 2014, I  
10 worked as a landman for Southwestern Energy Company in Houston, Texas,  
11 working primarily the Fayetteville shale play. My duties there included the land  
12 work for proposing and drilling new wells. From there, I went to work for  
13 Carrizo Oil and Gas in Houston. I was there for approximately for 1 year and  
14 worked as a landman for their non-operated properties. I joined Urban Oil and  
15 Gas Group in 2016 and have performed all duties standard and usual for a  
16 landman, including maintaining relationships with mineral and surface owners,  
17 obtaining right-of-ways and oil and gas leases, proposing projects and new drills,  
18 and negotiating farmouts and assignments.

19 Q. Are you familiar with the Application filed by Urban Oil & Gas Group, LLC in  
20 Docket No. 18-CONS-3284-CWLE?

21 A. Yes.

22 Q. In this Application, Urban Oil and Gas Group, LLC is requesting authority to  
23 drill the Clark No. 1 well at a location 1840 feet from the South line and 200 feet

24 from the East line of the SE/4 of Section 15, Township 26 South, Range 2 East,  
25 Sedgwick County, Kansas. Are you familiar with this request?

26 A. Yes.

27 Q. Has Urban Oil and Gas Group, LLC taken an oil and gas lease on the property  
28 described on the Application?

29 A. Yes. Urban has taken an oil and gas lease from Clark Land Company, Inc., dated  
30 January 24, 2017 recorded in the records of Sedgwick County, Kansas, on June  
31 13, 2017 covering approximately 84 acres of the SE/4 of Section 15. The area  
32 covered by the lease is outlined on Exhibit No. 1 attached hereto.

33 Q. Have you also included a survey plat from Abbott Land Survey showing a  
34 portion of the SE/4 Section 15 where the Clark No. 1 well is proposed to be  
35 drilled?

36 A. Yes, marked as Exhibit No. 2. The well is planned to be located 1840 feet from  
37 the South line and 200 feet from the East line of the SE/4 of Section 15.

38 Q. Are there any surface obstructions on the lease that may dictate where the well  
39 can be located?

40 A. Yes. If you will look at Exhibit No. 2, you see there is a lagoon, a house, a  
41 playground and a metal shed to the west of the proposed location. As currently  
42 proposed, the well will be only about 120 feet East and 67 feet South of the  
43 lagoon and only about 300 feet East of the house. If the well is to move any  
44 farther to the West, it must move all the way to the far West side of the lease.  
45 That would move the well more than 2,000 feet West of the East line of the SE/4  
46 of Section 15.

47 Q. Why is that not a viable location?

48 A. Our geologist Scott Ellingson will explain why he does not believe the targeted  
49 reservoir extends that far to the West.

50 Q. Has Urban Oil and Gas Group prepared a notice of intent to drill for this well?

51 A. Yes, it is attached as Exhibit No. 3.

52 Q. Do you request that the Application filed by Urban Oil and Gas Group be  
53 granted?

54 A. Yes.

55 Q. Does this complete your testimony?

56 A. Yes.

VERIFICATION

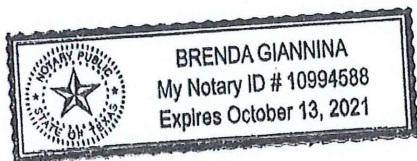
STATE OF TEXAS            )  
  )  
COUNTY OF Collin        )    ss:

Coralin Mode, of lawful age, being first duly sworn, disposes and states that he is the Coralin Mode referred to in the foregoing document entitled "Pre-filed Testimony of Coralin Mode" in Docket No. 18-CONS-3284-CWLE before the State Corporation Commission of the State of Kansas and the statements and attached exhibits therein were prepared by him or under his direction and control and are true and correct to the best of his information, knowledge, and belief.

*Coralin Mode*

\_\_\_\_\_  
CORALIN MODE

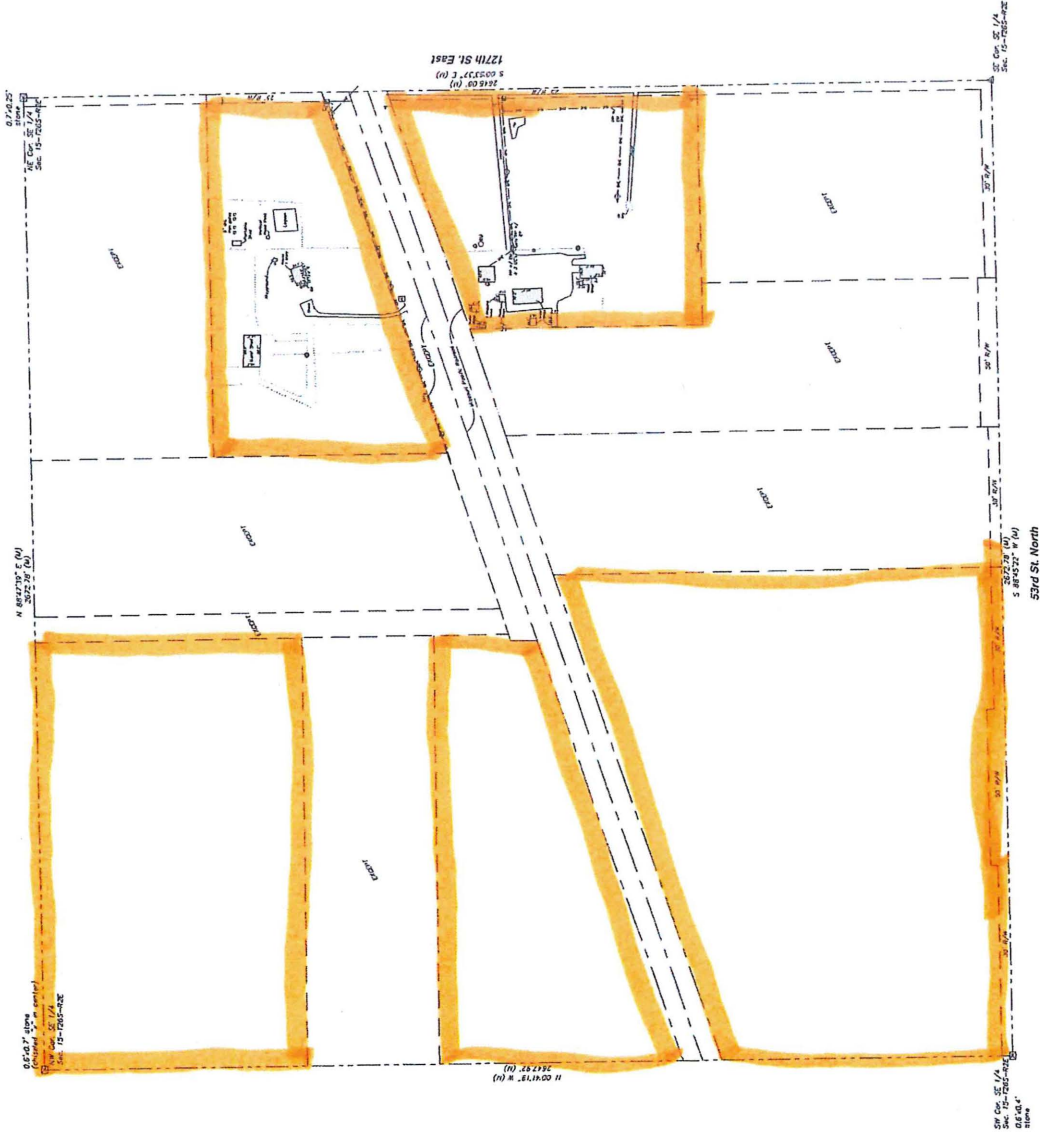
Subscribed and sworn for me this 13<sup>th</sup> day of July, 2018.



*[Signature]*

\_\_\_\_\_  
NOTARY PUBLIC

As-Built Survey



State of Minnesota }  
 County of Hennepin } ss

I, Chad B. Abbott, L.S. #12426 do hereby certify that this survey is a true and correct copy of the original survey as shown on the attached plan and that I am a duly Licensed Land Surveyor in the State of Minnesota.

Witness my hand and seal of office this 15th day of August, 2017.

Chad B. Abbott, L.S. #12426  
 State of Minnesota  
 County of Hennepin

DATE OF SURVEY: November 20, 2017  
 DATE OF INSTRUMENT: November 2, 2017

DATE OF SURVEY: 11/20/17



**Abbott**  
**S**urvey  
**and**  
**S**urvey

127th St. East, Suite 100  
 Minneapolis, MN 55425  
 Tel: 612-338-1111  
 Fax: 612-338-1112

CHAD B. ABBOTT, L.S. #12426  
 Approved for: CBA  
 Date: 11/15/17  
 Scale: 1" = 150'

Staking For: Urban Oil and Gas Group, LLC  
 SE 1/4 Sec. 15-T26S-R2E  
 Sedgwick County

NE Cor. SE 1/4  
 Sec. 15-T26S-R2E  
 0.7'x0.25'  
 stone

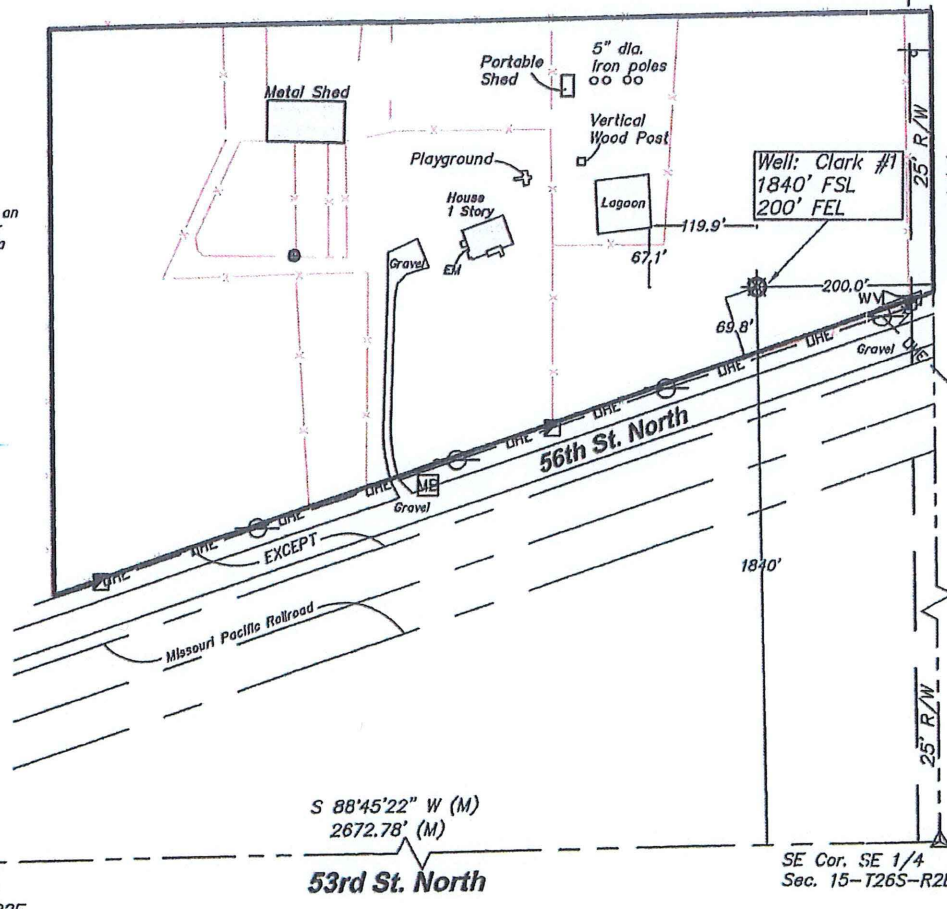
Well Name: Clark #1  
 Operator: Urban Oil and Gas Group, LLC  
 Topography & Vegetation: Grass  
 Elevation of Ground at Stake: 1407.74' (NAVD88)  
 Coordinates existing well:  
 Datum: NAD 83  
 State Plane Coordinates: Kansas South Zone  
 North: 1722770' East: 1690733'  
 1840' FSL and 200' FEL  
 Latitude: 37°47'11.63017120"  
 Longitude: 97°11'25.87589264"

State of Kansas }  
 County of Sedgwick } SS

I, Chad R. Abbott, P.S. #1340 do hereby certify that this is a true representation of an Oil Well Location Survey performed by me or under my direct supervision and that I am a duly licensed Land Surveyor in the State of Kansas.

Date of Survey: December, 17, 2017  
 Date of Preparation: Jan. 8, 2018

*Chad R. Abbott*  
 Chad R. Abbott P.S. #1340



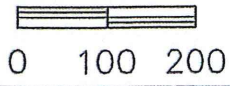
0.6'x0.4'  
 stone  
 SW Cor. SE 1/4  
 Sec. 15-T26S-R2E

S 88°45'22" W (M)  
 2672.78' (M)  
 53rd St. North

SE Cor. SE 1/4  
 Sec. 15-T26S-R2E

**LEGEND**

- (M) Measured or Calculated from Measurement
- Found 3/4" Iron Pipe (Origin Unknown)
- Found Stone (size noted)
- Water Valve
- Water Spigot
- Sign
- Telephone Riser
- Mailbox
- Fence
- OHE Overhead Electric Line
- Power Pole



FILE: C:\drawings\oilwell\urbanoil\A15609



631 N. Kessler, Wichita, KS 67203  
 Ph. 316.262.2262 Fax 316.262.2268  
 surveyors@benchmarkls.net

|                 |                  |
|-----------------|------------------|
| Dwn. By: AMF    | Aprvd. By: CRA   |
| Dwg. No. A16009 | Scale: 1" = 200' |