BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of the Application of PRAIRIE) WOLF OPERATING, LLC for an exception) to the 10-year time limitation of K.A.R. 82-3-) 111 for its AURELL #1-20A well located in the) (SE/4 NW/4) of Section 20, Township 25 South) Range 9 West, Reno County Kansas.)

Docket No.: 25-CONS-3021-CEXC

CONSERVATION DIVISION

License No. 35822

APPLICATION for EXCEPTION TO K.A.R. 82-3-111

COMES NOW PRAIRIE WOLF OPERATING, LLC ("Applicant"), and in support

of its Application in the above-captioned matter, states and alleges as follows:

1. Applicant is a Kansas limited liability company, with its principal place of business

located at 225 S. 2nd St., Stilwell, OK 74960.

2. Applicant has been issued by the Kansas Corporation Commission Operator's

License #35822, which expires on March 30, 2025.

3. Applicant is the owner and operator of the Aurell #1-20A well API # 15-155-21276

("Subject Well"), which is located in the Southeast Quarter of the Northwest Quarter (SE/4 NW/4)

of Section Twenty (20), Township Twenty-five (25) South, Range Nine (9) West, Reno County, Kansas.

4. The Subject Well part of the Langdon Waterflood Unit created pursuant to the February 16, 2017 Kansas Corporation Commission Order in Docket No. 17-CONS-3012-CUNI ("Langdon Unit"). The Langdon Unit is comprised of the following lands:

Township 25 South, Range 9 West

Section 15: W/2 Section 16: All
 Section 17:
 E/2

 Section 20:
 N/2

 Section 21:
 N/2; SE/4

 Section 22:
 W/2

5. Applicant is the operator and sole working interest owner of the Langdon Unit, and is the direct successor in interest to Unit Petroleum Company. Applicant acquired the Subject Well and Langdon Unit from Unit Petroleum Company on May 6, 2021.

6. Since being created in 2017, the Langdon Unit has been in a constant fill-up stage in order to charge the reservoir, and all producing wells in the Langdon Unit (including the Subject Well) have been shut-in pending satisfactory increase in fluid levels and bottomhole pressure ("<u>BHP</u>").

7. Since taking over operations of the Langdon Unit in 2021, Applicant has actively monitored fluid levels and BHP for producing wells in the Langdon Unit in efforts to bring the unit into production. The most recent fluid level for the Subject Well was shot by Applicant using an Echometer indicating a fluid level measured depth of 3,278.93' below surface as of June 26, 2024.

8. The bottom of the freshwater reservoir in in the wellbore is 50' below surface and the bottom of the usable water reservoir is 110' below surface; therefore, the Subject Well's fluid level is well below the fresh and usable water formations and Applicant's request for exception will not cause pollution to fresh and usable water resources.

9. Pursuant to K.A.R. 82-3-111, Unit Petroleum Company first applied for and was granted temporary abandonment status for the Subject Well on October 22, 2019. The Subject Well has maintained such status from October 22, 2019 to the present date.

10. On or about July 1, 2024, the Kansas Corporation Commission denied Applicant's Temporary Abandonment Application for the Subject Well as the Subject Well has been temporarily abandoned for more than ten (10) years.

2

11. K.A.R. 82-3-111 imposes a 10-year limitation on the amount of time during which wells may be temporarily abandoned, but an exception to the 10-year limitation may be obtained pursuant to said regulation through an Application filed with the Commission pursuant to K.A.R. 82-3-100. Applicant seeks such an exception.

12. Applicant wishes to continue TA status for the Subject Well, because Applicant intends to test the Subject Well as a producing well in Langdon Unit within the next ninety (90) days.

13. Applicant submits the following information regarding the well in support of the Application, attached as Exhibit 'A' hereto.

14. Applicant has included a plat map showing the locations of all producing, injection, temporarily abandoned, abandoned, and plugged wells located on the same leased premises as the Subject Well.

15. Based on the foregoing, Applicant requests the Commission grant an exception to the 10-year limitation, specifically to allow the Subject Well to remain eligible for temporary abandonment status for three (3) years following the expiration of the 10-year limitation. Applicant understands that the exception would be valid for three (3) years, but Applicant would still need to apply annually to the Conservation Division District Office for approval of an application for temporary abandonment status.

16. Listed in the attached Exhibit 'B' are the names and addresses of the following persons

Each operator of each oil and gas lease covering lands within one-half (1/2)
 mile radius of the Subject Well; and

b. Each person who owns any mineral interest of record in and under any lands

3

located within one-half (1/2) mile radius of the Subject Well (provided that such mineral interest is not covered by any oil and gas lease).

17. Notice of this Application will be published pursuant to K.A.R. 82-3-135a. In addition, notice of the hearing to be held in this matter will be provided as prescribed by K.A.R. 82-3-135.

WHEREFORE, Applicant prays that this matter be granted administratively without a hearing, or in the alternative be set for hearing, and upon hearing that the Commission grant Applicant's request, for an exception to the K.A.R. 82-3-111 ten (10) year limitation, to allow the Subject Well to remain temporarily abandoned for three (3) years, subject to annual approval by the Conservation Division District Office of an application for temporary abandonment status.

Respectfully submitted,

STULL, BEVERLIN, NICOLAY & HAAS, LLC

/s/Josh V.C. Nicolay Josh V.C. Nicolay #25119 420 S. Jackson, Ste. 100 Pratt, Kansas 67124 (620) 672-9446 (phone) (620) 672-3228 (fax) joshn@stull-law.com Attorney for Applicant Prairie Wolf Operating, LLC

VERIFICATION

STATE OF OKLAHOMA

COUNTY OF ADAIR

SS:

))

)

Daniel Scott, of lawful age and being duly sworn, upon oath states and alleges as follows:

He is the Managing Member of Prairie Wolf Operating, LLC, applicant herein; he has read the above and foregoing <u>APPLICATION for EXCEPTION TO K.A.R. 82-3-111</u> and is familiar with the contents thereof; and, that the statements made therein are true and correct to the best of his knowledge and belief.

Daniel Scott

SUBSCRIBED AND SWORN to before me this $\frac{19^{44}}{100}$ day of July, 2024.

Notary Public

My appointment expires:

5-24-2027

JESSICA PAULINE FULLERTON Notary Public, State of Oklahoma Commission # 23007157 My Commission Expires 05-24-2027

Exhibit 'A'

						Year PWO Assumed				
A.	Lease	Status	Well Count	API #	Year Drilled	Responsibility	Depth	Zone	County	S-T-R
	AURELL #1-20A (LANGDON WF)	TA	1	15155212760000	1993	2021	4,028	Miss.	Reno	20-25S-9W
	AURELL #2-20A (LANGDON WF)	TA	1	15155213120000	1994	2021	4,121	Miss.	Reno	20-25S-9W
	*The Aurells are part of the Langdon Waterflood Unit which contains 11 wells total. In addition to the Aurells there are there are 5 other producers and 4 injectors.									

B. Breakdown of estimated plugging expenses to plug the Aurell #1-20A

Workover Rig, Pit, TBG	
Rental	\$12,725
Wireline	\$4,810
Pump Truck & Cement	\$6,350
Roads & Location	\$7,500
Total	\$31,385

C. Langdon Waterflood has been in fill-up stage since inception, being February 16, 2017.





- D. Based upon the Langdon Water Flood Study dated August 18, 2014, PWO estimates that the secondary recovery operations will recover approximately barrels of oil that would not be recovered without planned waterflood operations.
- E. PWO has begun work in order to prepare the well for production.
 Completed items: 1. Replace Engine. 2. Lower Tubing to 3,993. 2. RIH with BHP and Rods.
 Items to be completed: Repair Heater Treater

The Waterflood Unit has been in fill-up stage in order to charge the reservoir. All producers have been idle pending fillup and PWO has been monitoring the fluid levels and BHP. Beginning in 2020, the Aurell #1-20A began indicating an increase in fluid levels and currently has a BHP of psi. The study predicted a starting BHP of psi.

F. Estimated cost to return the well to production is \$22,500, with approximately \$18,000 having already been expended.





Acquire Mode	Select Liquid Level Depth Determination	Casing Pressure BHP Collars	
Becall Mode	Production Current Potential	Casing Pressure	Well State:
	Oil BBL/D	-0.4 psi (g)	Producing
F2 Setup	Water BBL/D	Casing Pressure Buildup	Annular
-D- Ris	Gas Mscf/D	0.2 psi	Gas Flow Mscf/D
V Torell		0.75 min	I American and the second s
	IPR Method Vogel	Gas/Liquid Interface Pres.	% Liquid
F3	PBHP/SBHP	psi (g)	1100
Base	Producting Efficiency 0.0 %	Liquid Level Depth	
Well File	Oil 40 deg.API	MD 3278.93 ft	
E4 FICI	Water 1.05 Sp.Gr.H20		A REAL PROPERTY AND
DYN ACU EE	Gas Gravity 0.73 Air = 1	Pump Intake Depth MD ft	
Select Test			
	Acoustic Velocity 1277.34 ft/s	Formation Depth	
F5 Acquire Data		MD 3906.00 R	
			Pump Intake Pressure
- gene	Pump Submergence		РВНР
F6 Analyze	Total Gaseous Liquid Column HT (pei (g)
	Comment Equivalent Gas Free Uquid HT (TVD) ft	Reservoir Pressure (55/-9
TAN .	Acoustic Test		3506.0





Exhibit B.

BCE-Mach III, LLC	W/2	19-25S-9W	Reno	KS
14201 Wireless Way # 300				
Oklahoma City, OK 73134				
Praire Wolf Operating, LLC	SE/4	18-25S-9W	Reno	KS
Praire Wolf Operating, LLC PO Box 1447	SE/4 E/2	18-25S-9W 17-25S-9W	Reno Reno	KS KS

Unleased Mineral Owners				
Katerine V. Conkling, Trustee	SW/4	20-25S-9W	Reno	KS
The John L. Conkling and Katherine V. Conkling Revocable Trust, dated May 21, 2003 7515 W. Quail Lane Wichita, KS 67212				
Steven Richard Dillon, Trustee	SW/4	20-25S-9W	Reno	KS
The Steven Richard Dillon Trust dated February 4, 2009, restated July 5, 2012 1 Compound Dr. Hutchinson, KS 67502	SW/4	17-25S-9W	Reno	KS
Alva L. Gaston and Phyllis Gaston, Trustees The Alva L. Gaston and Phyllis A. Gaston Revocable Trust dated April 30, 2002. 27716 West Castleton Road Langdon, KS 67583	SW/4	17-25S-9W	Reno	KS