

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

DOCKET NO. 25-CONS-3265-CWLE

CON DIV

Received by
Kansas Corporation Commission

LICENSE NO. 5822

AUG 25 2025

Conservation Division, Wichita, KS

IN THE MATTER OF THE APPLICATION OF VAL ENERGY, INC. FOR A WELL
LOCATION EXCEPTION AND THE ASSIGNMENT OF ATTRIBUTED ACREAGE
AND OIL ALLOWABLE FOR ITS ROGERS 1-20 WELL IN SECTION 20,
TOWNSHIP 32 SOUTH, RANGE 6 EAST, COWLEY COUNTY, KANSAS

MOTION FOR EXTENSION OF TIME TO FILE PRE-FILED DIRECT AND
REBUTTAL TESTIMONY

COMES NOW, William H. Gates, and Pamela Gates, Protestants in the above-captioned matter, and respectfully requests that the Commission grant an extension of time to file his Pre-Filed Direct and Rebuttal Testimony. In support of this Motion, Mr. Gates states as follows:

Protestant Gates is preparing testimony relevant to issues of notice, spacing, correlative rights, and environmental concerns in this docket.

Due to the complexity of the issues involved, the need to compile supporting exhibits, and delays in obtaining necessary documents and technical data, additional time is required to complete accurate and complete testimony.

Granting this extension will not cause prejudice to any party and will allow for a more complete record for the Commission's consideration.

Protestant Gates therefore requests that the deadline for submission of Pre-Filed Direct and Rebuttal Testimony be extended by [X days/weeks], or such other time as the Commission deems just and reasonable.

WHEREFORE, Protestant Gates respectfully requests that the Commission grant this Motion and extend the filing deadline for Pre-Filed Direct and Rebuttal Testimony accordingly.

Respectfully submitted,

VERIFICATION

We, William H. Gates and Pamela M. Gates, declare under penalty of perjury that the foregoing testimony is true and correct to the best of our knowledge, information, and Belief

William Gates

Pamela Gates

18157 191st Rd.

Burden, KS 67019

William H. Gates

Pamela Gates

18157 191st Rd.

Burden, KS 67019

Protestants

Dated: August 25, 2025

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above Motion was served by U.S. Mail, postage prepaid, or by electronic mail, this 25 day of August, 2025, addressed to the following:

William H. Gates

William H. Gates

Pamela M. Gates

CERTIFICATE OF SERVICE

25-CONS-3265-CWLE

I, the undersigned, certify that a true copy of the attached ~~Order~~ ^{Motion} has been served to the following by means of first class mail and electronic service *ON 8-25-25*

JAKE EASTES, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jake.eastes@ks.gov

WILLIAM H AND PAMELA M GATES
WILLIAM H. AND PAMELA M. GATES
18157 191ST RD
BURDEN, KS 67019-9313
williamhg1942@gmail.com

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kelcey.marsh@ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jon.myers@ks.gov

THOMAS RHOADS, ATTORNEY
LAW OFFICE OF THOMAS M. RHOADS LC
200 E. 1st Street
Suite 301
WICHITA, KS 67202
tmrroads@sbcglobal.net

William H Gates

I hand delivered it to Kcd The amendment
I had it copied at the Winfield Library
and when The amendment was open
it was NOT double lined so THAT is
why i asked for an extension and
I am doing it over now and that
is why I ask for leniency I
still CAN'T believe it

Thanks - Bill Gates

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

DOCKET NO. 25-CONS-3265-CWLE

Lis 5822

CONSERVATION DIV

IN THE MATTER OF THE APPLICATION OF VAL ENERGY, INC. FOR A WELL
LOCATION EXCEPTION AND THE ASSIGNMENT OF ATTRIBUTED ACREAGE
AND OIL ALLOWABLE FOR ITS ROGERS 1-20 WELL IN SECTION 20,
TOWNSHIP 32 SOUTH, RANGE 6 EAST, COWLEY COUNTY, KANSAS

PRE-FILED DIRECT & REBUTTAL TESTIMONY OF
WILLIAM H. GATES AND PAMELA M. GATES

Q: Please state your names and address for the record ?

A: William H. Gates and Pamela M. Gates, 18157 191st Rd., Burden, Kansas 67019.

Q: What is your interest in this matter?

A: We are mineral owners of approximately 70.16 acres in Section 20, Township 32
South, Range 6 East, Cowley County, Kansas, with ownership of 25% of the minerals. As

such, we have standing and a direct interest in this proceeding.

I. Notice Deficiencies

Q: Did you receive proper notice of the Rogers 1-20 drilling?

A: No. We did not receive any notice of drilling activity, nor did we observe any signs posted. This prevented us from exercising our rights to protest timely. See Exhibit A

II. Spacing Violation and Correlative Rights

Q: What did you discover regarding the well location?

A: Surveys show the Rogers 1-20 well is only 276 feet from our lease boundary, not the required 330 feet. This variance is significant and violates setback rules under K.A.R. 82-3-108. See Exhibits B and C. Both surveys conducted did not meet requirements Smith and Oakes and Advantage Elevations

Q: Why does this matter?

A: The well's proximity increases the risk of drainage from our minerals without fair compensation, directly violating our correlative rights.

III. Fracture Radius Concerns

Q: What are your concerns about hydraulic fracturing near your property?

A: While the operator claims fractures do not extend beyond 230 feet, independent data shows fractures can extend farther. At only 276 feet, the risk to our minerals is real. See

Exhibit F.

IV. Leasing and Rights Protection

Q: Why do you oppose VAL Energy's claims regarding your mineral interest?

A: Although VAL holds leases on the majority of the tract, our 25% mineral ownership remains valid until 2046. Our participation in this proceeding is to protect those rights.

EXHIBIT LIST

Exhibit A: Notice to Intent to Drill stating min requirements required

Exhibit B: Commission staff letter (Jan 17, 2025) citing 276 ft

Exhibit C: Smith & Oakes survey showing 276 ft setback

Exhibit D: County-level parcel map with boundaries and well locations

Exhibit E: Well location map showing surrounding wells and stakes

Exhibit F: Independent industry study on frack radius and example

Exhibit H: Answers to First Discovery

VERIFICATION

We, William H. Gates and Pamela M. Gates, declare under penalty of perjury that the foregoing testimony is true and correct to the best of our knowledge, information, and

belief.

William H Gates

William H. Gates

Pamela M. Gates

Pamela M. Gates

State of Kansas
County of Cowley

Sworn before me this 25th Day of August 2025.

Gloria R. Ulbrich
Notary Public



For KCC Use:

Effective Date: 04/17/2024

District # 2

SGA? ☐ Yes ☒ NoKANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

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.

Form C-1

March 2010

Form must be Typed

Form must be Signed

All blanks must be Filled

Expected Spud Date: 04/13/2024
month day year

OPERATOR: License# 5822

Name: Val Energy, Inc.

Address 1: 125 N MARKET ST STE 1110

Address 2:

City: WICHITA State: KS Zip: 67202 + 1728

Contact Person: DUSTIN WYER

Phone: 316-263-6688

CONTRACTOR: License# 5822

Name: Val Energy, Inc.

Well Drilled For:

Well Class:

Type Equipment:

<input checked="" type="checkbox"/> Oil	<input type="checkbox"/> Enh Rec	<input checked="" type="checkbox"/> Infield	<input checked="" type="checkbox"/> Mud Rotary
<input type="checkbox"/> Gas	<input type="checkbox"/> Storage	<input type="checkbox"/> Pool Ext.	<input type="checkbox"/> Air Rotary
	<input type="checkbox"/> Disposal	<input type="checkbox"/> Wildcat	<input type="checkbox"/> Cable
<input type="checkbox"/> Seismic ; # of Holes	<input type="checkbox"/> Other		
<input type="checkbox"/> Other:			

☐ If OWWO: old well information as follows:

Operator:

Well Name:

Original Completion Date: Original Total Depth:

Directional, Deviated or Horizontal wellbore? ☐ Yes ☒ No

If Yes, true vertical depth:

Bottom Hole Location:

KCC DKT #:

NLUB Notice Attached / Replaces 15-035-24795-00-00
filed in wrong township

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 - 15-035-24796-00-00

Conductor pipe required 0 feet

Minimum surface pipe required 300 feet per ALT. ☒ I ☐ II

Approved by: CeLena Peterson 04/12/2024

This authorization expires: 04/12/2025

(This authorization void if drilling not started within 12 months of approval date.)

Spud date: Agent:

Spot Description: W2 - SW - SW - NE Sec. 20 Twp. 32 S. R. 6 ☒ E ☐ W
(Q/Q/Q/Q) 2310 feet from ☒ N / ☐ S Line of Section
2895 feet from ☐ E / ☒ W Line of Section

Is SECTION: ☒ Regular ☐ Irregular?

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

County: Cowley

Lease Name: ROGERS Well #: 1-20

Field Name: Bolak

Is this a Prorated / Spaced Field? ☐ Yes ☒ No

Target Formation(s): MISS

Nearest Lease or unit boundary line (in footage): 330

Ground Surface Elevation: 1311 Surveyed feet MSL

Water well within one-quarter mile: ☐ Yes ☒ NoPublic water supply well within one mile: ☐ Yes ☒ No

Depth to bottom of fresh water: 200

Depth to bottom of usable water: 280

Surface Pipe by Alternate: ☒ I ☐ II

Length of Surface Pipe Planned to be set: 300

Length of Conductor Pipe (if any):

Projected Total Depth: 3300

Formation at Total Depth: MISS

Water Source for Drilling Operations:

☐ Well ☒ Farm Pond ☐ Other:DWR Permit #: (Note: Apply for Permit with DWR ☐)Will Cores be taken? ☐ Yes ☒ No

If Yes, proposed zone:

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:20 32 6 ☒ E ☐ W

Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513



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

Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Laura Kelly, Governor

January 17, 2025

Todd Allam
Val Energy, Inc.
8625 E. 37th Street North, Suite 104
Wichita, KS 67226-2008

Re: Rogers #1-20, Section 20, Township 32 South, Range 6 East, Cowley County, Kansas

Operator,

Commission Staff has received a complaint and received documentation that indicates the referenced well is located closer than allowed to the nearest lease or unit boundary. K.A.R. 82-3-108 provides that an oil and gas well drilled in Cowley County shall not be drilled nearer than 330 feet from any lease or unit boundary line. I have attached a copy of the documentation received by Staff to this letter. The survey included in the documentation indicates the Rogers #1-20 well, API #15-035-24796, is located 276 feet from the nearest lease or unit boundary line.

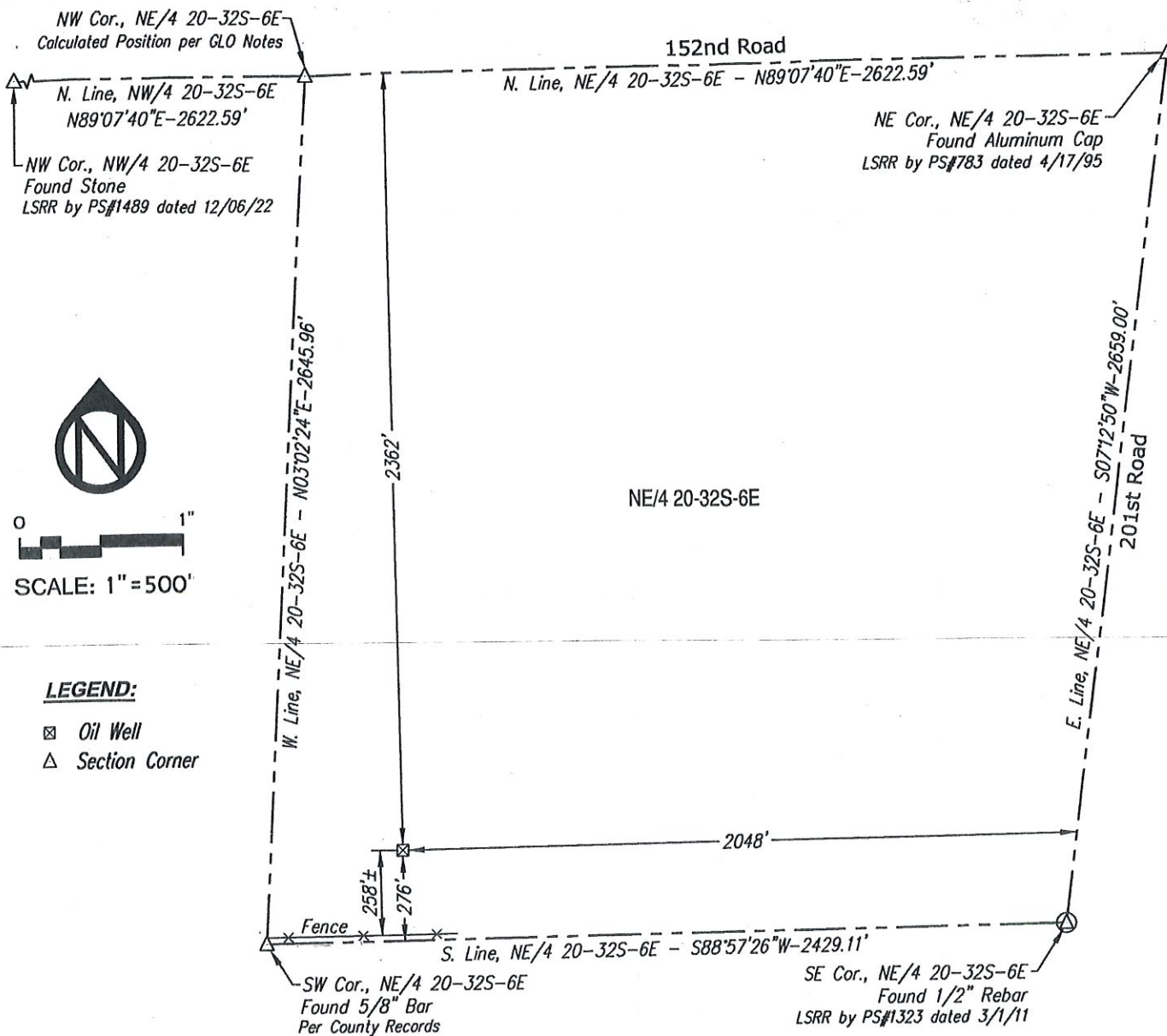
To correct this issue, please file a well location exception no later than **February 17, 2025**. Failure to file an application by the referenced date will result in Staff opening a docket and filing a motion requesting a presiding officer be assigned and a prehearing conference set. The motion will be filed in anticipation of a hearing where you will be required to appear before the Commission to provide evidence why a well location exception is not required.

You are welcome to contact me directly to discuss this matter in further detail. I can be reached at Kelcey.Marsh@ks.gov or the phone number above. I am hopeful that we can resolve this matter short of the Commission taking formation enforcement action.

Sincerely,

/s/ Kelcey Marsh
Kelcey A. Marsh, #28300
Litigation Counsel | Conservation Division
Kansas Corporation Commission

cc: Jeff Klock, Dan Fox, District #2
Jake Eastes, Central Office



LEGEND:

- ☒ Oil Well
- △ Section Corner

DESCRIPTION OF SURVEY:

Locate Oil Well in the Northeast Quarter of Section 20, Township 32 South, Range 6 East of the 6th Principal Meridian, Cowley County, Kansas.

NOTES:

—Bearings for this survey are based on an assumed $S88^{\circ}57'26''W$ for the South Line of the Northeast Quarter, 20-32S-6E. All distances shown are as measured in the field.

—Surveyor has made no investigation or independent search for easements of record, encumbrances, vacated lands, restrictive covenants, ownership title evidence, or any other facts that an accurate and current title search may disclose.

CERTIFICATION:

I hereby certify that the above is an accurate plat of the survey completed by me on the 27th day of November, 2024.

Chris A. Meinen

Kansas LIC. NO.: PS 1489

PREPARED FOR:

Bill Gates
18157 191st Road
Burden, KS 67019



SMITH + OAKES
110 W BRYANT RD, ARKANSAS CITY, KS 67005
620-442-4756 / INFO@SMITHANDOAKES.COM

DATE: 12/03/2024 DRAWN BY: RMK SHEET: 1 OF 1 PROJECT # 44-190





United States
Department of
Agriculture

Cowley County, Kansas




ex D



Common Land Unit PLSS

-  Non-Cropland
-  Tract Boundary

Wetland Determination Identifiers

-  Restricted Use
-  Limited Restrictions
-  Exempt from Conservation Compliance Provisions

Unless noted on field:

- | | |
|-----------------------------|--------------------------------|
| 1/ All Wheat HRW, NI, GR | 6/ Grass SMO, NI, FG |
| 2/ All Sorghum GRS, NI, GR | 7/ Alfalfa, NI, FG |
| 3/ All Corn YEL, NI GR | 8/ Sorghum Forage Cane, NI, FG |
| 4/ All Soybeans COM, NI, GR | 9/ Cotton, Upland, NI, GR |
| 5/ Grass NAG, NI, GZ | 10/ Grass NAG, NI, LS |

Tract Cropland Total: 0.00 acres

2025 Program Year

Map Created October 23, 2024

Farm 7455
Tract 12506

20-32-6

Displayed over 2023 NAIP

United States Department of Agriculture (USDA) Farm Service Agency (FSA) maps are for FSA Program administration only. This map does not represent a legal survey or reflect actual ownership; rather it depicts the information provided directly from the producer and/or National Agricultural Imagery Program (NAIP) imagery. The producer accepts the data 'as is' and assumes all risks associated with its use. USDA-FSA assumes no responsibility for actual or consequential damage incurred as a result of any user's reliance on this data outside FSA Programs. Wetland identifiers do not represent the size, shape, or specific determination of the area. Refer to your original determination (CPA-026 and attached maps) for exact boundaries and determinations or contact USDA Natural Resources Conservation Service (NRCS).

1/27/25, 2:58 PM

KS Oil & Gas

Oil & Gas Research and Exploration

Oil and Gas Map

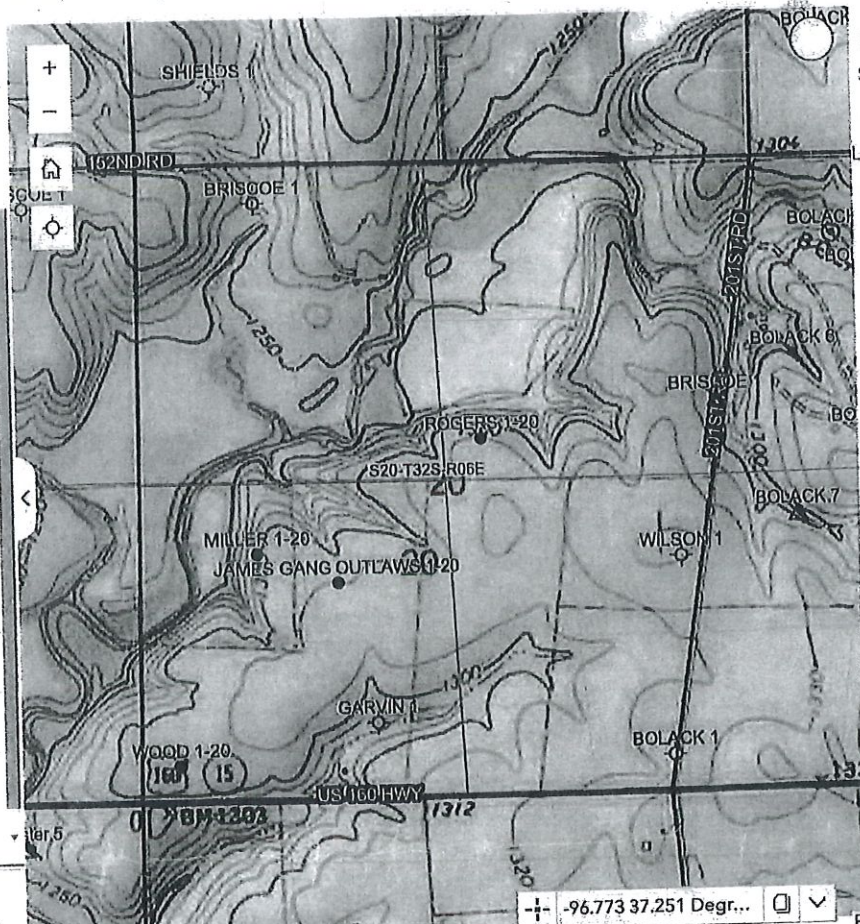
Help

Ab

Display

- ☒ Other Wells and Energy Data
- ☐ Oil and Gas Leases
- ☒ Counties
- ☒ Road Labels
- ☐ Alternate Road Labels
- ☒ Section-Township-Range
- ☐ Waterflood
- ☐ Oil and Gas Fields
- ☒ Gravity/Magnetic
- ☒ Regional Geology
- ☒ Topography
- ☒ Imagery
- ☐ Blank White Basemap

Some layers are only visible when zoomed in.
Layers draw on top of one another in the order listed.



- ☐ Search
- ☐ Lat/Long
- ☐ Filter
- ☐ Select
- ☐ Table
- ☐ Draw
- ☐ Print
- ☐ Bookm...
- ☐ Basemap
- ☐ Legend

-96.773 37.251 Degr...

Esri, HERE, Garmin, INCREMENT P, USGS, ME... Powered by Esri

Revised Details:

Exhibit F

Formation: Limestone

Well type: Vertical

Depth: ~3,500 ft

Frac fluid used:

> 22 frac tanks \times 500 barrels = 11,000
barrels of fluid

Frac method: Slickwater hydraulic
fracturing

Key Insight:

Using 11,000 barrels of fluid on a vertical limestone well is a massive frac job, especially in a carbonate formation where fractures can extend further due to natural fracturing and higher brittleness.



Revised Drainage Area Estimate

Step 1: Estimate Lateral Fracture Radius

In limestone, slickwater fracs can extend 300 to 800 ft or more from the wellbore — sometimes exceeding 1,000 ft with this much fluid.

Let's take a reasonable range for fracture radius:

800 to 1,200 ft from the wellbore

Use circular drainage approximation:

$A = \pi r^2$ \quad \text{then divide by 43,560 to convert to acres}

Lower Bound (800 ft radius):

$$A = \pi \times (800)^2 = 2,010,619 \text{ ft}^2$$

$$\text{Acres} = \frac{2,010,619}{43,560} \approx 46.1 \text{ acres}$$

Upper Bound (1,200 ft radius):

Natural fractures in limestone can cause even larger drainage footprints than tight sands or shales.


If there's a lot of karst, vugs, or faulting, this number could be higher, but less uniform.

Actual drainage area also depends on production drawdown, reservoir pressure, and time.

$$A = \pi \times (1200)^2 = 4,523,893 \text{ ft}^2$$

$$\text{Acres} = \frac{4,523,893}{43,560} \approx 103.9 \text{ acres}$$

Final Estimate:

>  Approx. 46–104 acres of potential depletion area for your vertical limestone well using 11,000 barrels of frac fluid.



Bonus Tips:

Ex H
BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

IN THE MATTER OF THE APPLICATION)	
OF VAL ENERGY, INC. FOR A WELL)	DOCKET NO. 25-CONS-3265-CWLE
LOCATION EXCEPTION AND THE ASSIGN-)	
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OIL ALLOWABLE FOR ITS ROGERS 1-20)	
WELL IN SECTION 20, TOWNSHIP 32 SOUTH)	LICENSE NO. 5822
RANGE 6 EAST, COWLEY COUNTY, KANSAS)	

FIRST DISCOVERY REQUESTS OF APPLICANT, VAL ENERGY, INC.,
TO PROTESTERS, WILLIAM H. GATES AND PAMELA M. GATES

COMES NOW the Applicant, VAL Energy, Inc. ("Applicant"), and pursuant to the Presiding Officer Discovery Order entered in this docket on May 16, 2025 (the "Commission Discovery Order"), submits to the Protesters, William H. Gates and Pamela M. Gates ("Protesters"), Applicant's First Discovery Requests consisting of the following Interrogatories and Requests for Production of Documents.

All discovery herein has been requested by Applicant, and shall be answered or responded to by Protesters, in accordance with the Commission Discovery Order, K.A.R. 82-3-234a, and K.S.A. 77-522.

Answers to interrogatories shall consist of all information available to Protesters, including information in the possession of their agents, representatives, attorneys, and any other person or persons acting on Protesters' behalf.

Documents to be produced shall include, but are not limited to, written, printed, typewritten, recorded, or graphic matter, photographic matter, sound reproduction, or computer input or output,

and electronically stored information in the possession, custody or control of Protesters, or any of them, including, without limitation, correspondence, memoranda, handwritten notes, computer printouts, tapes and records of all kinds, studies, books, pamphlets, schedules, pictures and voice recordings, electronic or digital communications, and every other device or medium on which or through which information of any type is transmitted, recorded or preserved. Documents to be produced further include copies of written, printed, or recorded instruments which are not identical duplicates of the original.

Protesters' answers to interrogatories and responses to requests for production of documents are required to be made under oath, using the form of Verification provided, and served on counsel for the Applicant electronically or by first class United States mail, postage prepaid, at the addresses shown below, within ten (10) days following Protesters' receipt of these requests by mail.

INTERROGATORIES

Please answer the following interrogatories:

INTERROGATORY NO. 1: State the names, addresses, telephone numbers and email addresses, if any, of all persons consulted or involved in the preparation of the answers to these interrogatories, and the submission of documents responsive to the requests herein.

ANSWER: None

INTERROGATORY NO. 2: State the names, addresses, telephone numbers and email addresses, if any, of all persons having knowledge or information relevant to the protest of Protesters to the Application in this docket, and for each such person, provide a brief summary of his or her knowledge or information.

ANSWER:

Chris A. Meinen, 110 W. Bryant Rd., Arkansas City, KS 67005
info@smithhandcakes.com (620) 442-4756

Mr. Meinen conducted a survey and determined that Applicant's well was nearer than 330 feet from the South boundary line of the property covered by Applicant's lease.

INTERROGATORY NO. 3: State all facts, identify all supporting documents, communications, and other evidence, and identify all persons by name, address, telephone number and email address, if any, having any knowledge specifically related to the claim in Protesters' Request for Hearing that Protesters' property boundaries are affected by Applicant's Rogers 1-20 well location as shown by the Application in this docket.

ANSWER:

Attached is a copy of the survey conducted by Chris A. Meinen November 27, 2024. According to this survey, Applicant's well is 258 feet from the south fence line of the property. Said fence line has been the North/South boundary for upwards of 80 years. The surveyor also measured the distance from Applicant's well to the location of the south boundary line (assuming the absence of a fence) and that distance was 276 feet.

INTERROGATORY NO. 4: State all facts, identify all supporting documents, communications, and other evidence, and identify all persons by name, address, telephone number and email address, if any, having any knowledge specifically related to the claim in Protesters' Request for Hearing that the well subject to the Application in this docket will potentially impact correlative rights, drainage, and the fair distribution of production revenues.

ANSWER:

See Answer to Interrogatory No. 5.

INTERROGATORY NO. 5: State all facts, identify all supporting documents, communications, and other evidence, and identify all persons by name, address, telephone number and email address, if any, having any knowledge specifically related to the claim in Protesters' Request for Hearing that approval of the well location exception requested by the Application in this docket may unfairly allocate production without just compensation.

ANSWER:

Applicant has producing wells West of my property, and this well Northeast of my property. All wells are in the Mississippi formation. By drilling the subject well closer to my property than permitted by the set back requirements, Applicant seeks to deplete that oil under my property that may be derived from the Mississippi formation without a lease on my property.

INTERROGATORY NO. 6: State the quantity of oil and/or natural gas that Protesters contend will be unfairly drained from their land by the well subject to the Application in this docket, identify all supporting documents, communications and other evidence, including reports of petroleum engineers, geologists, and other experts consulted by Protesters, and identify all other persons by name, address, telephone number and email address, if any, having any knowledge specifically related to this determination.

ANSWER:

Applicant's well will deplete that oil in the Mississippi formation within a 40 acre area. My property is included within that 40 acres. This well appears to be producing about 500 barrels per month. Some quantity of that production is likely from the Mississippi zone below my property within the 40 acre area of this well.

INTERROGATORY NO. 7: State all facts, identify all supporting documents, communications, and other evidence, and identify all persons by name, address, telephone number and email address, if any, having any knowledge specifically related to the claim in Protesters' Request for Hearing that a hearing in this docket is necessary to evaluate whether Applicant's requested well location exception and assignment of oil allowables are consistent with Kansas statutes and regulations, and to ensure the protection of correlative rights.

ANSWER:

Petitioners and Chris A. Meinen

INTERROGATORY NO. 8: Identify all Kansas statutes and regulations which Protesters contend in their Request for Hearing may be violated by grant of the Application in this docket

ANSWER:

Kansas Administrative Regulation 82-3-108.

INTERROGATORY NO. 9: Identify all persons by name, address, telephone number and email address, if any, specifically including petroleum engineers, geologists, or other experts, you intend to call as witnesses at the hearing on the Application in this docket, and for each witness, provide a brief summary of his or her expected testimony.

ANSWER:

Chris A. Meinen

INTERROGATORY NO. 10: Identify all documents which Protesters intend to offer as exhibits at the hearing on the Application in this docket.

ANSWER:

Survey of Chris A. Meinen dated November 27, 2024.

REQUESTS FOR PRODUCTION OF DOCUMENTS

Please produce the following documents:

REQUEST NO. 1: Produce all documents identified or referred to in response to each of the foregoing Interrogatories.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

REQUEST NO. 2: Produce copies of all written correspondence and communications by and between Protesters, or Protesters' agents, representatives, attorneys, and any other person or persons acting on Protesters' behalf, and any other person or persons, related in any way to the issues raised by Protesters' Request for Hearing in this docket.

RESPONSE:

None.

REQUEST NO. 3: Produce copies of all documents specifically related in any way to the claim in Protesters' Request for Hearing that Applicant's Rogers 1-20 well location affects Protesters' property boundaries.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

REQUEST NO. 4: Produce copies of all documents specifically related in any way to the claim in Protesters' Request for Hearing that the well subject to the Application in this docket will potentially impact correlative rights, drainage, and the fair distribution of production revenues.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

REQUEST NO. 5: Produce copies of all documents specifically related in any way to the claim in Protesters' Request for Hearing that approval of the well location exception requested by the Application in this docket may unfairly allocate production without just compensation.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

REQUEST NO. 6: Produce all documents including, without limitation, reports of petroleum engineers, geologists and other experts retained or consulted by Protesters, that support the the quantity of oil and/or natural gas that Protesters contend in their Answer to the foregoing Interrogatory No. 6 will be unfairly drained from their land by the well subject to the Application in this docket

RESPONSE:

None.

REQUEST NO. 7: Produce copies of all documents related in any way to the claim in Protesters' Request for Hearing that a hearing in this docket is necessary to evaluate whether Applicant's requested well location exception and assignment of oil allowables are consistent with Kansas statutes and regulations, and to ensure the protection of correlative rights.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

REQUEST NO. 8: Produce copies of all documents which Protesters intend to offer as exhibits at the hearing on the Application in this docket.

RESPONSE:

Survey of Chris A. Meinen dated November 27, 2024.

Respectfully submitted,

/s/Thomas M. Rhoads

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