

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  
Susan K. Duffy, Commissioner

Laura Kelly, Governor

**NOTICE OF PENALTY ASSESSMENT**  
**21-CONS-3179-CPEN**

March 2, 2021

Curtis Clark dba Clark Exploration Co.  
120 S. Clermont Street  
Denver, CO 80246-1037

This is a notice of a penalty assessment for violation(s) of Kansas Oil and Gas Conservation Statutes, Rules, and Regulations. For a full description of the penalty and process please refer to the Penalty Order that is attached to this notice.

**IF YOU ACCEPT THE PENALTY:**

You have been assessed a \$900 penalty. You have 30 days from the service date of this Penalty Order to pay the fine amount. Check or money order must be made payable to the Kansas Corporation Commission and mailed to the Conservation Division of the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The payment must include a reference to the docket number of this proceeding. Payment by credit card may be made by calling the Conservation Division at 316-337-6200.

**IF YOU CONTEST THE PENALTY:**

You have the right to request a hearing. A written request for hearing must be made within 30 days after service of the Penalty Order. Respondent must submit the request to the Commission, at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The Commission shall conduct a hearing in accordance with the provisions of the Kansas administrative procedure act within 30 days after receipt of such request. K.S.A. 55-164; K.S.A. 77-542; K.A.R. 82-1-215.

**IF YOU FAIL TO ACT:**

Failure to pay the fine amount, or in the alternative, provide a written request for a hearing, within thirty (30) days of service of the Penalty Order, will result in the attached Penalty Order becoming a Final Order and may result in additional sanctions, including additional monetary penalties, the suspension of your oil and gas operating license, and the shutting-in of all operations until compliance is obtained. K.S.A. 55-162; K.S.A. 55-164; K.S.A. 77-537.

Respectfully,

Kelcey Marsh  
Litigation Counsel  
316-337-6200

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

Before Commissioners:            Andrew J. French, Chairperson  
   Dwight D. Keen  
   Susan K. Duffy

In the matter of the failure of Curtis Clark dba	)	Docket No.: 21-CONS-3179-CPEN
Clark Exploration Co. (Operator) to comply	)	
with K.A.R. 82-3-111 at the Ballet #2, Ballet	)	CONSERVATION DIVISION
#3, Ballet #12, Ballet Ranch #7, Ballet Ranch	)	
#8, Ballet Ranch A #11, Ballet Ranch Twin	)	License No.: 9026
#1, Clark Ranch #1 and Clark Ranch #2 in	)	
<u>Barber and Comanche County, Kansas.</u>	)	

**PENALTY ORDER**

The above captioned matter comes before the State Corporation Commission of the State of Kansas (Commission). Having examined the files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

**I. JURISDICTION**

1.        The Commission has the exclusive jurisdiction and authority to regulate oil and gas activities in Kansas.<sup>1</sup> The Commission has jurisdiction to regulate the “construction, operation, and abandonment of any well and the protection of the usable water of this state from any actual or potential pollution from any well.”<sup>2</sup> Every operator conducting oil and gas activity in Kansas must be licensed by the Commission.<sup>3</sup>

2.        The Commission has the authority to issue a Penalty Order for violation of any provision of K.S.A. 55-101 *et seq.*, rule, regulation, or order of the Commission.<sup>4</sup> The Commission shall take appropriate action which may include, but is not limited to, imposing a

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<sup>1</sup> K.S.A. 74-623.

<sup>2</sup> K.S.A. 55-152.

<sup>3</sup> K.S.A. 55-155.

<sup>4</sup> K.S.A. 55-162; K.S.A. 55-164.

monetary penalty “not to exceed \$10,000, which shall constitute an actual and substantial economic deterrent to the violation for which the penalty is assessed.”<sup>5</sup> “In the case of a continuing violation, every day such violation continues shall be deemed a separate violation.”<sup>6</sup>

3. Within 90 days after operations cease on any well drilled for the purpose of exploration, discovery, service, or production of oil, gas, or other minerals, the operator of that well shall: (1) plug the well, (2) return the well to service, or (3) file an application with the Conservation Division requesting temporary abandonment (TA) authority, on a form prescribed by the Conservation Division.<sup>7</sup> No well shall be temporarily abandoned unless first approved by the Conservation Division.<sup>8</sup> A well shall not be eligible for TA status if the well has been shut in for 10 years or more without an application for an exception pursuant to K.A.R. 82-3-100 and approval by the Commission.<sup>9</sup> The failure to file a notice of temporary abandonment shall be punishable by a \$100 penalty,<sup>10</sup> and the failure to obtain approval of temporary abandonment status shall subject the operator to additional administrative action.<sup>11</sup>

4. K.A.R. 82-3-111(e) provides an exemption for certain wells that are (1) fully equipped for production of oil or gas or for injection; (2) capable of immediately resuming production of oil or gas or of injection; (3) subject to a valid continuing oil and gas lease; when (4) the cessation period for the well is less than 365 days; and (5) the well is otherwise in full compliance with all of the Commission’s regulations.

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<sup>5</sup> K.S.A. 55-164.

<sup>6</sup> *Id.*

<sup>7</sup> *See* K.A.R. 82-3-111(a).

<sup>8</sup> K.A.R. 82-3-111(b).

<sup>9</sup> *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> K.S.A. 55-164; K.A.R. 82-3-111(b).

## II. FINDINGS OF FACT

5. Operator conducts oil and gas activities in Kansas under active license number 9026.
6. Operator is responsible for the care and control of the following wells (Subject Wells):
  - a. Ballet #2, API #15-007-30267-00-00, located in Section 5, Township 35 South, Range 15 West, Barber County, Kansas;
  - b. Ballet #3, API #15-007-30272-00-00, located in Section 5, Township 35 South, Range 15 West, Barber County, Kansas;
  - c. Ballet #12, API #15-007-22428-00-01, located in Section 6, Township 35 South, Range 15 West, Barber County, Kansas;
  - d. Ballet Ranch #7, API #15-033-20001-00-00, located in Section 1, Township 35 South, Range 16 West, Comanche County, Kansas;
  - e. Ballet Ranch #8, API #15-007-20010-00-00, located in Section 31, Township 34 South, Range 15 West, Barber County, Kansas;
  - f. Ballet Ranch A #11, API #15-007-20045-00-00, located in Section 32, Township 34 South, Range 15 West, Barber County, Kansas;
  - g. Ballet Ranch Twin #1, API #15-007-30206-00-00, located in Section 27, Township 34 South, Range 15 West, Barber County, Kansas;
  - h. Clark Ranch #1, API #15-007-22596-00-00, located in Section 32, Township 33 South, Range 13 West, Barber County, Kansas; and
  - i. Clark Ranch #2, API #15-007-22771-00-00, located in Section 32, Township 33 South, Range 13 West, Barber County, Kansas.



7. Between August 18, 2020 and December 11, 2020, Commission records indicated the Subject Wells had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111, and that the wells were not exempt under K.A.R. 82-3-111(e). Thus, between October 2, 2020, and December 11, 2020, District Staff sent letters to Operator, requiring Operator to bring the Subject Wells into compliance with K.A.R. 82-3-111 by various deadlines between October 30, 2020, and January 8, 2021.<sup>12</sup>

8. Between February 1, 2021 and February 4, 2021, District Staff inspected the Subject Wells, because the deadlines in the letters had passed and the violations had not been resolved, verifying that the wells continued to be inactive and unplugged.<sup>13</sup>

### **III. CONCLUSIONS OF LAW**

9. The Commission concludes that it has jurisdiction over Operator and this matter under K.S.A. 55-152 and K.S.A. 74-623.

10. The Commission concludes Operator committed nine violations of K.A.R. 82-3-111 because the Subject Wells have been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.<sup>14</sup>

#### **THEREFORE, THE COMMISSION ORDERS:**

A. Operator shall pay a \$900 penalty.

B. Operator shall plug the Subject Wells, or return the wells to service, or obtain TA status for the wells if eligible. Obtaining TA status shall include application for an exception to the 10-year limit on TA status, if applicable.

C. Any party may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, to the Commission at

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<sup>12</sup> Exhibit A.

<sup>13</sup> Exhibit B.

<sup>14</sup> K.S.A. 55-164; K.A.R. 82-3-111(b).

266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. Hearings will be scheduled only upon written request. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing.

D. If no party requests a hearing, and Operator is not in compliance with this Order within 30 days, then Operator's license shall be suspended without further notice and shall remain suspended until Operator complies with this Order. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding license suspension. The Commission may impose further sanctions, including additional monetary penalties and any other remedies available to the Commission by law, without further notice.

E. Checks and money orders shall be payable to the Kansas Corporation Commission. Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The payment must include a reference to the docket number of this proceeding. Credit card payments may be made by calling the Conservation Division at 316-337-6200.

F. A corporation shall appear before the Commission by a Kansas licensed attorney.<sup>15</sup>

**BY THE COMMISSION IT IS SO ORDERED.**

French, Chairperson; Keen, Commissioner; Duffy, Commissioner

Dated: 03/02/2021



Lynn M. Retz  
Executive Director

Mailed Date: 03/02/2021

KAM

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<sup>15</sup> K.S.A. 77-515(c); K.A.R. 82-1-228(d)(2).



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

October 02, 2020

KCC Lic.-9026

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

**RE: TEMPORARY ABANDONMENT**

API Well No. 15-007-30267-00-00  
BALLET 2  
5-35S-15W, NWNESE  
BARBER County, Kansas

Operator:

On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
DAVID RING  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

October 02, 2020  
KCC Lic.-9026

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-007-30272-00-00  
BALLET 3  
5-35S-15W, SW  
BARBER County, Kansas

Operator:

On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
DAVID RING  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

October 02, 2020  
KCC Lic.-9026

**RE: TEMPORARY ABANDONMENT**  
API Well No. 15-007-22428-00-01  
BALLET 12  
6-35S-15W, NE  
BARBER County, Kansas

Operator:

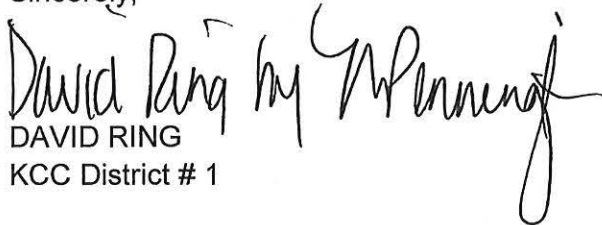
On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
DAVID RING  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

**NOTICE OF VIOLATION**

October 02, 2020

KCC Lic.-9026

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

**RE: TEMPORARY ABANDONMENT**

API Well No. 15-033-20001-00-00  
BALLET RANCH 7  
1-35S-16W, E2  
COMANCHE County, Kansas

*Producing 11/23/20*

Operator:

On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

*David Ring by [Signature]*  
DAVID RING  
KCC District # 1





Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

October 02, 2020  
KCC Lic.-9026

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-007-20010-00-00  
BALLET RANCH 8  
31-34S-15W, SE  
BARBER County, Kansas

Operator:

On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
DAVID RING  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

October 02, 2020

KCC Lic.-9026

CLARK, CURTIS DBA CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER CO 80246-1037

**RE: TEMPORARY ABANDONMENT**

API Well No. 15-007-20045-00-00  
BALLET RANCH A 11  
32-34S-15W, SE  
BARBER County, Kansas

Operator:

On August 18, 2020, a lease inspection documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by OCTOBER 30, 2020  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
DAVID RING  
KCC District # 1





Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

**NOTICE OF VIOLATION**

CLARK, CURTIS  
120 S CLERMONT ST  
DENVER CO, 80246

December 11, 2020  
KCC Lic. 9026

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-007-30206-00-00  
BALLET RANCH TWIN 1  
27-34S-15W, W2NWSW  
BARBER County, Kansas

Operator:

On December 11, 2020, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by JANUARY 08, 2021  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
MICHAEL MAIER  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

CLARK, CURTIS  
120 S CLERMONT ST  
DENVER CO, 80246

December 11, 2020  
KCC Lic. 9026

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-007-22596-00-00  
CLARK RANCH 1  
32-33S-13W, SWNE  
BARBER County, Kansas

Operator:

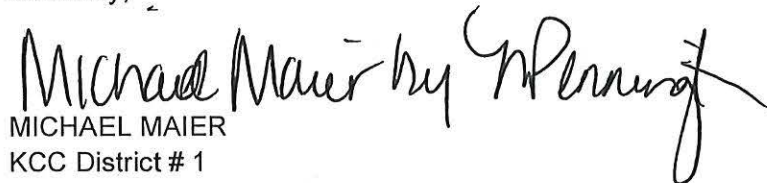
On December 11, 2020, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by JANUARY 08, 2021  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
MICHAEL MAIER  
KCC District # 1



Susan K. Duffy, Chair  
Dwight D. Keen, Commissioner  
Andrew J. French, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

CLARK, CURTIS  
120 S CLERMONT ST  
DENVER CO, 80246

December 11, 2020  
KCC Lic. 9026

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-007-22771-00-00  
CLARK RANCH 2  
32-33S-13W, NENENE  
BARBER County, Kansas

Operator:

On December 11, 2020, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by JANUARY 08, 2021  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
MICHAEL MAIER  
KCC District # 1

# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

☐ New Situation  
☐ Response to Request  
☒ Follow-Up

☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-30267-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: NW NW NE SE Sec 5 Twp 35 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

2419 Feet from ☐ N / ☒ S Line of Section

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

971 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.02672 Long: 98.96809 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Ranch Well #: 2

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint/Production Check  
2/1/21 CP Check

## Problem:

2/1/21 Possible violations.

## Persons Contacted:

8/18/20 Mike Miller, 208-755-3393 Landowner on complaint.  
2/1/21 Curtis Clark, Operator on CP-111 application.

## Findings:

Well #2 located next to tank battery and gas flow meter. Gas flow meter not operating. All valves closed. 1 210 bbl tank. 1 horizontal knock-out tank. No dike. Fenced. Last record of gas production on KGS March 2020. No evidence of any recent activity. 2/1/21 No change since last inspection. No evidence of any recent activity. Valves closed. Curtis Clark informed me that a TA would be filed. He had Ryan w/Fluid Level Diagnostics, LLC send me the fluid level. 4,331'. See attached. Anhydrite +/- 801'. Curtis also stated that he uses Donna w/CMX, Inc to complete KOLAR. Waiting to here from Donna.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to legal if no CP-111 approved. *TKMS*

## Verification Sources:

☒ RBDMS ☒ KGS ☐ TA Program  
☐ T-I Database ☒ District Files ☐ Courthouse  
☒ Other: Leo 7

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

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing West.      Ballet Ranch #2      15-007-30272-00-00  
GPS: 37.02608,-98.97779    2207'FSL, 3802' FEL    SW NW NW NW      BA Sec. 5-T35S-R15W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
No Fuel Source.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

☐ New Situation

☐ Lease Inspection

☐ Response to Request

☐ Complaint

☒ Follow-Up

☒ Field Report

Operator License No: 9026

API Well Number: 15-007-30272-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: SW NW NW SW Sec 5 Twp 35 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

2207 Feet from ☐ N / ☒ S Line of Section

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

3802 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.02608 Long: 98.97779 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Ranch Well #: 3

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint/Production Check  
2/1/21 CP Check

## Problem:

Unknown status.  
2/1/21 Possible violations.

## Persons Contacted:

8/18/20 Mike Miller, 208-755-3393 Landowner on complaint.  
2/1/21 Curtis Clark, Operator on CP-111 application.

## Findings:

8/18/20 Well #3 located next to tank battery and gas flow meter. Gas flow meter not operating. Well fully equipped. Valves closed.  
1 100 bbl fiberglass tank. 1 horizontal heater treater tank. No dike. Fenced.  
Last KGS gas production record listed: July 1996.  
No evidence of recent activity at the well sight.  
2/1/21 No evidence of any recent activity. Valves closed. Fuel line disconnected.  
Curtis Clark informed me that a TA would be filed. He had Ryan w/Fluid Level Diagnostics, LLC send me the fluid level. 746'. See attached. Anhydrite +/- 792'.  
Curtis also stated that he uses Donna w/CMX, Inc to complete KOLAR. Waiting to here from Donna.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to legal if no CP-111 approved. -LMS

## Verification Sources:

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

<input checked="" type="checkbox"/> RBDMS	<input checked="" type="checkbox"/> KGS	<input type="checkbox"/> TA Program
<input type="checkbox"/> T-I Database	<input type="checkbox"/> District Files	<input type="checkbox"/> Courthouse
<input checked="" type="checkbox"/> Other: <u>Leo 7</u>		

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing East.      Ballet Ranch #3      15-007-30272-00-00

GPS: 37.02608,-98.97779    2207'FSL, 3802' FEL    SW NW NW NW      BA Sec. 5-T35S-R15W

Clark, Curtis dba Clark Exploration Company      KLN# 9026

No Fuel Source.





2/1/21      Facing West.      Ballet Ranch #3      15-007-30272-00-00  
GPS: 37.02608,-98.97779    2207' FSL, 3802' FEL    SW NW NW NW      BA Sec. 5-T35S-R15W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Valves closed.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

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

- ☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-22428-00-01

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: SE NE SW NE Sec 6 Twp 35 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

3394 Feet from ☐ N / ☒ S Line of Section

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

1358 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.02940 Long: 98.98688 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Well #: 12

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint. Production Check  
2/1/21 CP Check

## Problem:

Unknown Status  
2/1/21 Possible violations.

## Persons Contacted:

8/18/20 Mike Miller, 208-755-3393 Landowner about complaint.  
2/1/21 Curtis Clark, Operator about CP-111 application.

## Findings:

8/18/20 Well #12 located next to tank battery and gas flow meter. Gas flow meter not in operation. Gas leaking around a regulator hooked to knock-out tank. Valves closed.  
1 250 bbl tank. 1 vertical knock-out tank. No dike. No fence.  
No evidence of recent activity at the well sight. Last record of gas production on KGS March 2020.  
2/1/21 No evidence of any recent activity. Valves closed.  
Curtis Clark informed me that a TA would be filed. He had Ryan w/Fluid Level Diagnostics, LLC send me the fluid level. 4,174'. See attached. Anhydrite +/- 779'.  
Curtis also stated that he uses Donna w/CMX, Inc to complete KOLAR. Waiting to here from Donna.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to legal if no CP-111 approved. -LMS

## Verification Sources:

☒ RBDMS ☒ KGS ☐ TA Program  
☐ T-I Database ☐ District Files ☐ Courthouse  
☒ Other: Leo 7

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

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing North.      Ballet Ranch #12      15-007-22428-00-01  
GPS: 37.02940,-98.98688    3394'FSL, 1358' FEL    SE NE SW NE      BA Sec. 6-T35S-R15W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Valves closed.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

☐ New Situation  
☐ Response to Request  
☒ Follow-Up

☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-033-20001-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: NE NE NW SE Sec 1 Twp 35 S Rng 16 ☐ E / ☒ W

Address 1: 120 S. Clermont St.

2568 Feet from ☐ N / ☒ S Line of Section

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

1346 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.02735 Long: 99.00513 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Ranch Well #: 7

Operator Phone #: (303) 470-9043

County: Comanche

## Reason for Investigation:

8/18/20 Complaint/Production Check  
2/1/21 CP Check

## Problem:

Potential violations.

## Persons Contacted:

8/18/20 Mike Miller, 208-755-3393 Landowner on complaint.  
2/1/21 Curtis Clark, Operator on CP-111 application.

## Findings:

Well #7 has not changed since the August 18, 2020 complaint investigation. Fuel source pot is leaning on belts as it was in August 2020. Photos taken. Valves closed.  
Curtis Clark sent fluid level on January 28, 2021 for CP-111 application. I informed him he needed to complete that on KOLAR. He stated he has Donna w/CMX, Inc. process his paperwork. Waiting on response from Donna.  
Fluid level: 3,870'. Fluid level was taken by Ryan w/Fluid Level Diagnostics, LLC on December 8, 2020. Anhydrite depth +/-825'. Surface casing @1014'.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

If CP-111 not received and approved, forward to legal. *kms*

## Verification Sources:

☒ RBDMS ☒ KGS ☐ TA Program  
☐ T-I Database ☒ District Files ☐ Courthouse  
☒ Other: Leo 7

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

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing West.      Ballet Ranch #7      15-033-20001-00-00  
GPS: 37.02735,-99.00513    2568' FSL, 1346' FEL    NE NE NW SE    CM Sec. 1-T35S-R16W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

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

- ☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-20010-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: SE SE NW SE Sec 31 Twp 34 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

1359 Feet from ☐ N / ☒ S Line of Section

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

1374 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.03849 Long: 98.98705 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Ranch Well #: 8

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint. Production Check  
2/1/21 CP Check

## Problem:

Unknown Status  
2/1/21 Possible violations.

## Persons Contacted:

Mike Miller, 208-755-3393 Landowner about complaint.  
2/1/21 Curtis Clark, Operator about CP-111 application.

## Findings:

8/18/20 Well #8 located next to a tank battery and gas flow meter. Gas flow meter not functioning.  
Valves closed.  
1 200 bbl fiberglass tank.  
1 horizontal heater treater tank.  
No dike around the tank battery. Overgrown.  
Last record of gas production on KGS March 2020.  
No evidence of recent activity at the well sight.  
2/1/21 No evidence of any recent activity. Valves closed.  
Curtis Clark informed me that a TA would be filed. He had Ryan w/Fluid Level Diagnostics, LLC send me the fluid level. 1012".  
See attached. Anhydrite +/- 680'.  
Curtis also stated that he uses Donna w/CMX, Inc to complete KOLAR. Waiting to here from Donna.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to legal if no CP-111 approved. -KMS

## Verification Sources:

Photos Taken: 2/1/21

☒ RBDMS ☒ KGS ☐ TA Program  
☐ T-I Database ☐ District Files ☐ Courthouse  
☒ Other: Leo 7

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing Southwest.      Ballet Ranch #8      15-007-20010-00-00

GPS: 37.03849,-98.98705    1359' FSL, 1374' FEL    SE SE NW SE      BA Sec. 31-T34S-R15W

Clark, Curtis dba Clark Exploration Company      KLN# 9026

Valves closed.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/1/21

District: 1

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

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

- ☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-20045-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: SE SE NW SE Sec 32 Twp 34 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

1421 Feet from ☐ N / ☒ S Line of Section

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

1300 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.03872 Long: 98.96920 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet Ranch Well #: 11

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint. Production Check  
 2/1/21 CP Check

## Problem:

Unknown Status  
 2/1/21 Possible Violations.

## Persons Contacted:

Mike Miller, 208-755-3393  
 2/1/21 None

## Findings:

8/18/20 Well #11 located next to a tank battery and gas flow meter. Gas flow meter not functioning. Valves closed. No motor. The well is not listed on Clark Exploration inventory list. However, the sign at the tank battery shows Clark Exploration. Photo taken.  
 1 200 bbl fiberglass tank.  
 1 horizontal heater treater tank.  
 No dike around the tank battery. Overgrown. No evidence of recent activity at the well sight.  
 No KDOR #. No listed KGS gas production.  
 Lease road to well is washed out. Photos taken.  
 The well is not listed on Clark Exploration inventory list.  
 RBDMS lists well as Inactive and has operator listed as See Original/Legacy Operator.  
 2/1/21 No change in the condition at the site since the last inspection. No motor. Valves closed.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

8/18/20 Send CP-111 NOV letter.  
 2/1/21 Forward to Legal. -LMS

## Verification Sources:

Photos Taken: 2/1/2021

- |   |   |                                     |
|---|---|-------------------------------------|
| <input checked="" type="checkbox"/> RBDMS               | <input checked="" type="checkbox"/> KGS | <input type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database                   | <input type="checkbox"/> District Files | <input type="checkbox"/> Courthouse |
| <input checked="" type="checkbox"/> Other: <u>Leo 7</u> |   |                                     |

By: David Ring, ECRS

Retain 1 Copy District Office  
 Send 1 Copy to Conservation Division

Form: 02/01/2021





2/1/21      Facing West.      Ballet Ranch #11      15-007-20045-00-00

GPS: 37.03872,-98.96920    1421' FSL, 1300' FEL    SE SE NW SE    BA Sec. 32-T34S-R15W

Clark, Curtis dba Clark Exploration Company      KLN# 9026

No Motor.





2/1/21      Facing South.      Ballet Ranch #11      15-007-20045-00-00

GPS: 37.03872,-98.96920    1421'FSL, 1300' FEL    SE SE NW SE    BA Sec. 32-T34S-R15W

Clark, Curtis dba Clark Exploration Company      KLN# 9026

Water crossing washed-out.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/4/21

District: 1

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

☐ New Situation  
☒ Response to Request  
☒ Follow-Up

☐ Lease Inspection  
☒ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-30206-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: NE SW NW SW Sec 27 Twp 34 S Rng 15 ☐ E / ☒ W

Address 1: 120 S Clermont St.

1765 Feet from ☐ N / ☒ S Line of Section

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

4807 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.05455 Long: 98.94514 Date: 8/18/20

State: Colorado Zip Code: 80246 -1037

Lease Name: Ballet (Twin) Well #: 1

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

8/18/20 Complaint. Production Check  
2/4/21 Production check for no response to CP-111 NOV letter dated December 11, 2020.

## Problem:

8/18/20 Unknown Status  
2/4/21 Potential violations.

## Persons Contacted:

8/18/20 Mike Miller, 208-755-3393 Landowner.

## Findings:

8/18/20 Well #1 located next to the tank battery and gas flow meter. Gas flow meter locked out.  
Fully equipped.  
1 200 bbl tank.  
1 horizontal heater treater tank.  
No dike. Fence down. Overgrown with weeds.  
Last listed KGS production recorded May 2011. KDOR # 205436  
No evidence of any recent activity at the well sight.  
Approved TA: 11/12/2019  
2/4/21 No change at the site since the previous inspection. Gas flow meter still locked out.  
No evidence of any recent activity.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

8/18/20 Inspection is satisfactory.  
2/4/21 Forward to legal for no response to NOV letter dated 12/11/2020. -LMS

## Verification Sources:

Photos Taken: 2/4/21

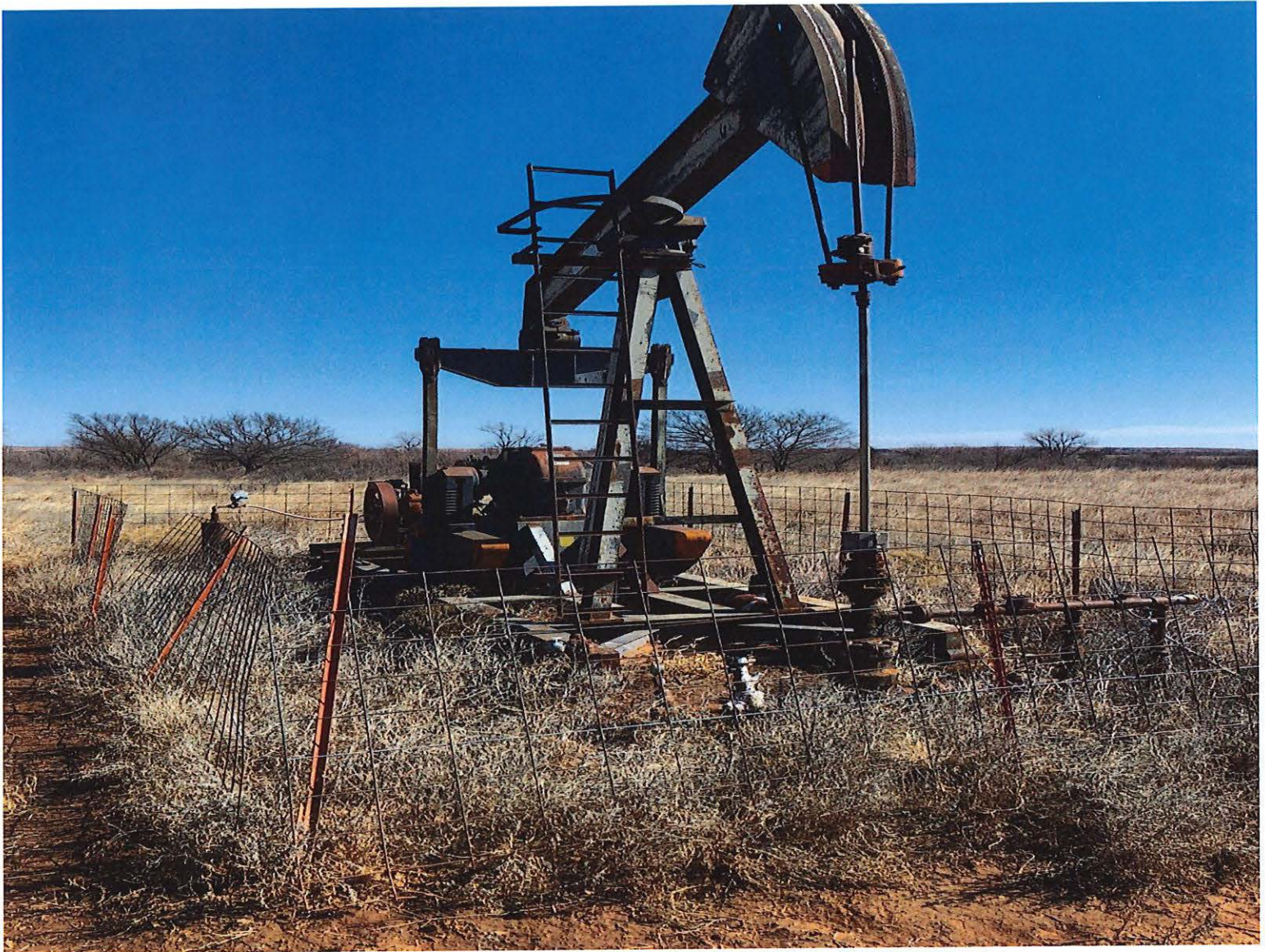
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<input type="checkbox"/> T-I Database	<input checked="" type="checkbox"/> District Files	<input type="checkbox"/> Courthouse
<input checked="" type="checkbox"/> Other: <u>Leo 7</u>		

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 08/18/2020





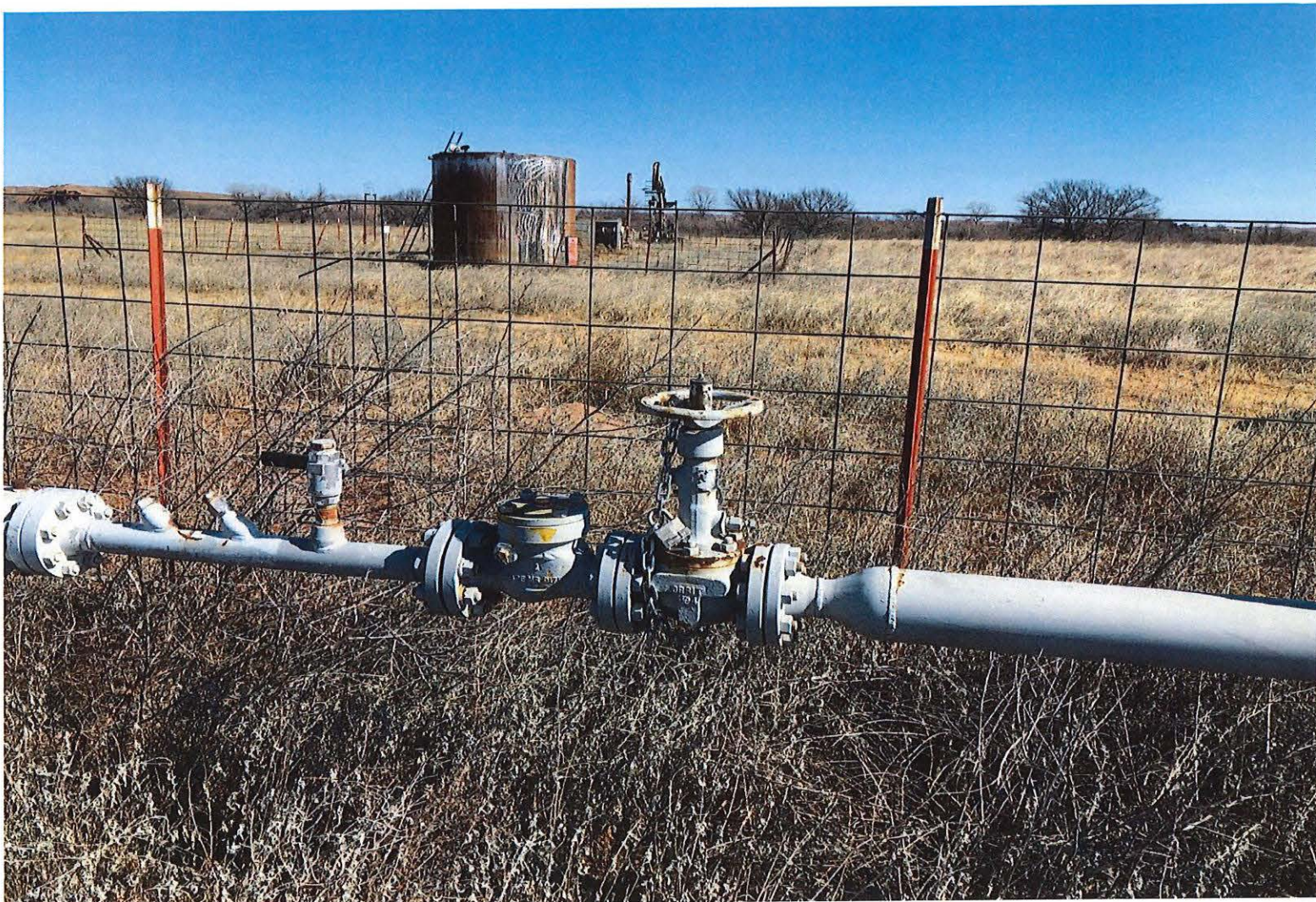
2/4/21      Facing East.      Ballet Ranch (Twin) #1      15-007-30206-00-00

GPS: 37.05455, - 98.94514    1765' FSL, 4807' FEL    NE SW NW SW      BA Sec. 27-T34S-R15W

Clark, Curtis dba Clark Exploration Company      KLN# 9026

Inactive





2/4/21      Facing East.      Ballet Ranch (Twin) #1      15-007-30206-00-00  
GPS: 37.05455, - 98.94514    1765'FSL, 4807' FEL    NE SW NW SW      BA Sec. 27-T34S-R15W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Gas flow line locked-out.



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/4/21

District: 1

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

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

- ☒ Lease Inspection  
☐ Complaint  
☐ Field Report

Operator License No: 9026

API Well Number: 15-007-22596-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: NW SW NE NE Sec 32 Twp 33 S Rng 13 ☐ E / ☒ W

Address 1: 120 S Clermont St.

4347 Feet from ☐ N / ☒ S Line of Section

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

1188 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.13507 Long: 98.75388 Date: 2/4/21

State: Colorado Zip Code: 80246 -1037

Lease Name: Clark Ranch Well #: 1

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

Routine Lease Inspection and production check for no response to NOV CP-111 letter dated December 11, 2020.

## Problem:

Potential violations.

## Persons Contacted:

None

## Findings:

Well #1 located next to the tank battery and gas flow meter. Gas flow line valves closed.  
1 300 bbl tank.  
1 horizontal heater treater tank.  
1' dike around tank. Fenced.  
Last approved CP-111 TA dated 11/2/19.  
Last gas production record listed on KGS; June 2011.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to Legal for no response to NOV CP-111 letter dated December 11, 2020. -KMS

## Verification Sources:

Photos Taken: 2/4/21

- |   |  |                                     |
|---|--|-------------------------------------|
| <input checked="" type="checkbox"/> RBDMS               | <input checked="" type="checkbox"/> KGS            | <input type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database                   | <input checked="" type="checkbox"/> District Files | <input type="checkbox"/> Courthouse |
| <input checked="" type="checkbox"/> Other: <u>Leo 7</u> |  |                                     |

By: David Ring, ECRS

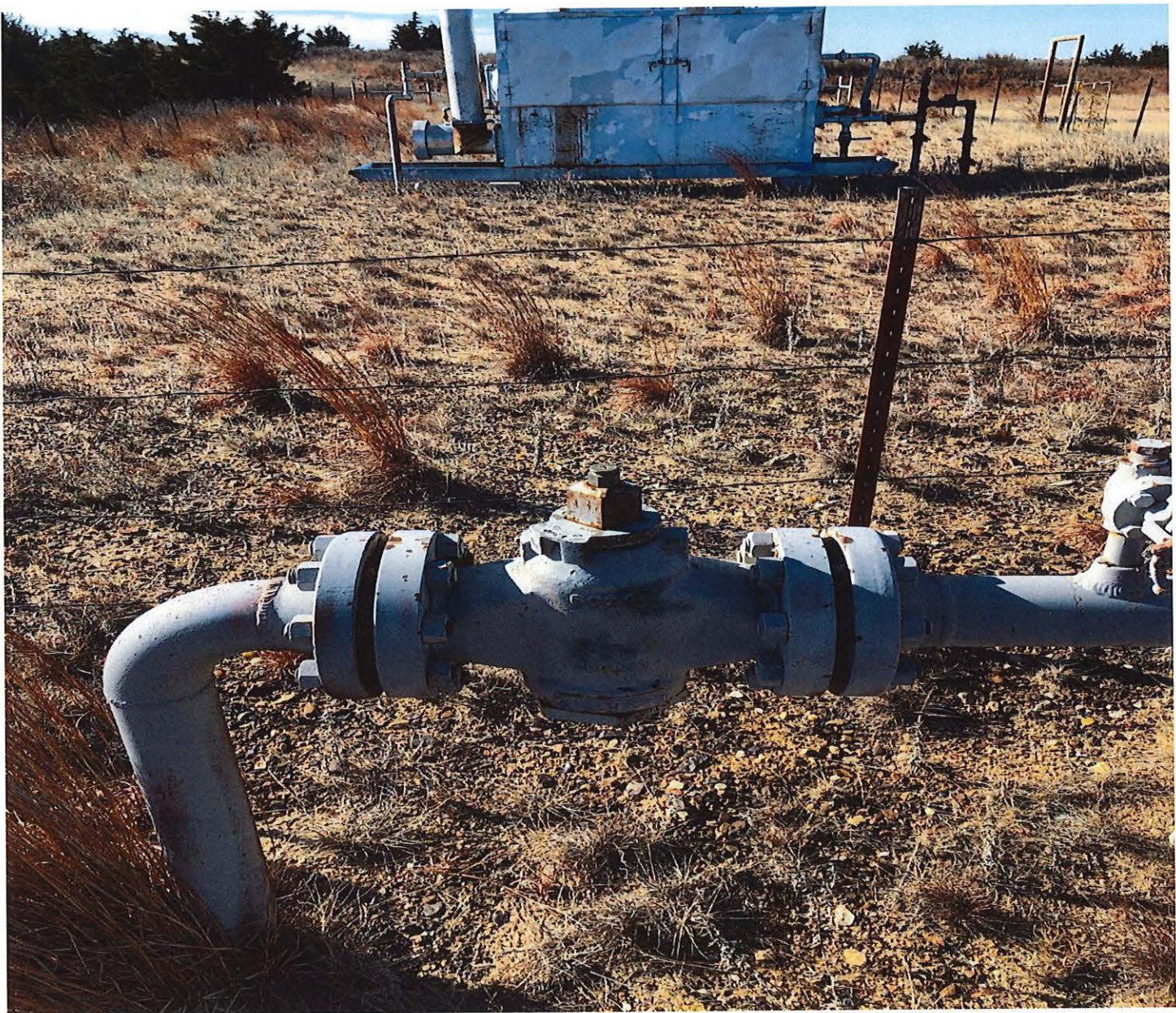
Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/04/2021



2/4/21      Facing East.      Clark Ranch #1      15-007-22596-00-00  
GPS: 37.13507, - 98.75388    4347'FSL, 1188' FEL    NW SW NE NE      BA Sec. 32-T33S-R13W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Inactive





2/4/21      Facing South.      Clark Ranch #1      15-007-22596-00-00  
GPS: 37.13507, -98.75388    4347'FSL, 1188' FEL    NW SW NE NE      BA Sec. 32-T33S-R13W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Closed Gas Line Valve





2/4/21      Facing South.      Clark Ranch #1      15-007-22596-00-00  
GPS: 37.13507, - 98.75388    4347'FSL, 1188' FEL    NW SW NE NE      BA Sec. 32-T33S-R13W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
No Gas Flow Meter



# KCC OIL/GAS REGULATORY OFFICES

Date: 2/4/21

District: 1

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

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

- ☒ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 9026

API Well Number: 15-007-22771-00-00

Op Name: Clark, Curtis dba Clark Exploration Co.

Spot: SW NE NE NE Sec 32 Twp 33 S Rng 13 ☐ E / ☒ W

Address 1: 120 S Clermont St.

4942 Feet from ☐ N / ☒ S Line of Section

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

.386 Feet from ☒ E / ☐ W Line of Section

City: Denver

GPS: Lat: 37.13670 Long: 98.75111 Date: 2/4/21

State: Colorado Zip Code: 80246 -1037

Lease Name: Clark Ranch Well #: 2

Operator Phone #: (303) 470-9043

County: Barber

## Reason for Investigation:

Routine Lease Inspection and production check for no response to NOV CP-111 letter dated December 11, 2020.

## Problem:

None

## Persons Contacted:

None

## Findings:

Well #2 located east of the tank battery. 1 200 bbl fiberglass tank next to well. No dike.  
Gas flow line valves closed.  
1 300 bbl tank.  
1 horizontal heater treater tank.  
1' dike around tank. Fenced.  
Last approved CP-111 TA dated 11/26/19.  
Last gas production record listed on KGS; June 2011.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

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

Forward to Legal for no response to NOV letter dated December 11, 2020. -LMS

## Verification Sources:

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

- |   |  |                                     |
|---|--|-------------------------------------|
| <input checked="" type="checkbox"/> RBDMS               | <input checked="" type="checkbox"/> KGS            | <input type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database                   | <input checked="" type="checkbox"/> District Files | <input type="checkbox"/> Courthouse |
| <input checked="" type="checkbox"/> Other: <u>Leo 7</u> |  |                                     |

By: David Ring, ECRS

Retain 1 Copy District Office  
Send 1 Copy to Conservation Division

Form: 02/04/2021





2/4/21      Facing North.      Clark Ranch #2      15-007-22771-00-00  
GPS: 37.13670, - 98.75111    4942'FSL, 386' FEL    SW NE NE NE      BA Sec. 32-T33S-R13W  
Clark, Curtis dba Clark Exploration Company      KLN# 9026  
Inactive.    Gas flow line to operate motor disconnected.

## **CERTIFICATE OF SERVICE**

21-CONS-3179-CPEN

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of first class mail and electronic service on 03/02/2021.

CURTIS CLARK  
CLARK, CURTIS  
D/B/A CLARK EXPLORATION CO.  
120 S CLERMONT ST  
DENVER, CO 80246-1037  
curtisfclark@comcast.net

KELCEY MARSH, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST, STE 220  
WICHITA, KS 67202-1513  
Fax: 785-271-3354  
k.marsh@kcc.ks.gov

FRED MACLAREN  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 1  
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DODGE CITY, KS 67801  
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e.maclaren@kcc.ks.gov

MICHELE PENNINGTON  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 1  
210 E. FRONTVIEW SUITE A  
DODGE CITY, KS 67801  
Fax: 785-271-3354  
m.pennington@kcc.ks.gov

/S/ DeeAnn Shupe  
\_\_\_\_\_  
DeeAnn Shupe