

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

Before Commissioners:                    Andrew J. French, Chairperson  
    Dwight D. Keen  
    Annie Kuether

In the matter of the failure of ANR Pipeline Company (Operator) to comply with K.A.R. 82-3-701 and K.A.R. 82-3-702 at two cathodic protection boreholes in Meade County, Kansas.	)	Docket No.: 25-CONS-3329-CPEN
	)	CONSERVATION DIVISION
	)	License No.: 32953

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**PENALTY ORDER**

The Commission finds Operator has violated K.A.R. 82-3-701 and K.A.R. 82-3-702 regarding the captioned cathodic protection boreholes, assesses a \$7,000 penalty, directs Operator to come into compliance, and further rules as more fully described below.

**I. JURISDICTION**

1. K.S.A. 74-623 provides the Commission exclusive jurisdiction and authority to regulate oil and gas activities in Kansas. K.S.A. 55-152 provides the Commission with jurisdiction to regulate the construction, operation, and abandonment of any well, and also the protection of the usable water of this state from any actual or potential pollution from any well. The Commission has licensing authority under K.S.A. 55-155.

2. K.S.A. 55-162 and K.S.A. 55-164 provide the Commission authority to issue penalty orders for violations of Chapter 55 of the Kansas Statutes Annotated, or of any rule, regulation, or order of the Commission. Under K.S.A. 55-164, a penalty order may include a monetary penalty of up to \$10,000, the penalty must constitute a substantial and actual economic deterrent to the violation, and each day of a continuing violation constitutes a separate violation.

3. K.A.R. 82-3-701(a) provides that except within Groundwater Management Districts #2 and #5, each owner, operator, or person responsible for drilling a cathodic protection

borehole shall submit written notice of the intention to drill to the Conservation Division for permit approval before the commencement of drilling operations. The applicant shall file the notice with the Conservation Division at least 60 days before commencing any drilling. Each notice shall be submitted on a form prescribed by the Commission. K.A.R. 82-3-701(b) states that before drilling a cathodic protection borehole, the operator shall notify the appropriate Conservation Division District Office. K.A.R. 82-3-701(c) provides that an applicant may submit a written request to the Director of the Conservation Division for an exception to the 60-day intention to drill filing period in emergency situations. Such a request, though, shall document why the emergency exists. K.A.R. 82-3-701(d) states that drilling any cathodic protection borehole without an approved notice of intent or without being granted an exception shall be punishable by a penalty of up to \$1,000.

4. K.A.R. 82-3-702(b) provides that except within Groundwater Management Districts #2 and #5, operators shall construct cathodic protection boreholes in aquifer completions such that cathodic surface casing shall extend from the surface to 20 feet below the top of the aquifer. In multiple aquifer completions, the cathodic surface casing shall extend from the land surface through the aquifers and 20 feet into shale or other impermeable bedrock. Exceptions to the surface casing depth requirements may be granted by the Director of the Conservation Division upon written request. Each operator requesting an exception shall be required to demonstrate that the exception provides adequate protection of fresh and usable waters. K.A.R. 82-3-702(f) states that each failure to construct a cathodic protection borehole in accordance with these regulations shall be punishable by a penalty of up to \$2,500.

## II. FINDINGS OF FACT

5. Operator is licensed to conduct oil and gas activities in Kansas, and is responsible for the following cathodic protection boreholes (Subject Boreholes) in Meade County, Kansas:

- a. Groundbed ANR Trunk MP74.80 #1, API #15-119-21495-00-00, located in Section 5, Township 34 South, Range 28 West; and
- b. Groundbed ANR Trunk 100 MP83.30 #1, API #15-119-21494-00-00, located in Section 16, Township 33 South, Range 27 West.

6. On February 8, 2025, Operator submitted Cathodic Protection Borehole Intents (CB-Is) for the Subject Boreholes.<sup>1</sup> Attached to the CB-Is, Operator included correspondence with Commission Staff indicating that the Subject Boreholes had already been drilled.<sup>2</sup>

7. The Subject Boreholes are located in Groundwater Management District #3; consequently, Operator was required to submit CB-Is for the Subject Boreholes to the Conservation Division for approval at least 60 days before the commencement of drilling operations. Operator did not submit a written request to the Director of the Conservation Division for an exception to the 60-day intention to drill filing period. As a result, Operator violated K.A.R. 82-3-701 by drilling the Subject Boreholes before receiving Conservation Division approval of the CB-Is.

8. The CB-Is submitted by Operator indicate the length of cathodic surface casing set in the Subject Boreholes. The length of cathodic surface casing for the Groundbed ANR Trunk MP74.80 #1 is 40 feet, and the length for the Groundbed ANR Trunk 100 MP83.30 #1 is 20 feet.<sup>3</sup> Both Subject Boreholes are multiple aquifer completions; thus, the cathodic surface casing for each borehole must extend from the land surface through the aquifers and 20 feet into

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<sup>1</sup> Exhibit A.

<sup>2</sup> *See id.*

<sup>3</sup> *Id.*

shale or other impermeable bedrock. The depth to the bottom of the freshwater aquifers where the Groundbed ANR Trunk MP74.80 #1 is located is approximately 40 feet, while the depth to the bottom of the freshwater aquifers where the Groundbed ANR Trunk 100 MP83.30 #1 is located is approximately 180 feet. Consequently, the cathodic surface casings for the Subject Boreholes do not extend from the land surface through the aquifers and 20 feet into shale or other impermeable bedrock. Operator did not request an exception from the Director of the Conservation Division for the surface casing depth requirements. As a result, Operator violated K.A.R. 82-3-702 by failing to construct the Subject Boreholes in accordance with the regulation.

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

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

10. Operator has committed two violations of K.A.R. 82-3-701 because Operator drilled the Subject Boreholes without approved CB-1s and without being granted an exception. Accordingly, the Commission concludes Operator should be assessed a \$2,000 penalty for these violations.

11. Operator has committed two violations of K.A.R. 82-3-702 because Operator failed to construct the Subject Boreholes in accordance with the regulation and without being granted an exception. Accordingly, the Commission concludes Operator should be assessed a \$5,000 penalty for these violations.

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

- A. Operator shall pay a \$7,000 penalty.
- B. Operator shall plug the Subject Boreholes, extend the cathodic surface casings from the land surface through the aquifers and 20 feet into shale or other impermeable bedrock,

or obtain an exception to the surface casing depth requirements from the Director of the Conservation Division. If Operator fails to comply within 30 days of the date of this order, then Operator shall pay an additional \$5,000 penalty, and Commission Staff is directed to plug the Subject Boreholes and assess the costs to Operator.

C. Operator 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 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. A request for hearing must comply with K.A.R. 82-1-219.

D. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing. If no party timely requests a hearing, then this Order shall become final. If Operator is not in compliance with this Order and the Order is final, then Operator's license shall be suspended without further notice and shall remain suspended until Operator complies. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding license suspension. A party may petition for reconsideration of a final order pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).

E. Credit card payments may be made by calling the Conservation Division at 316-337-6200. 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. Payments must reference the docket number of this proceeding.

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

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 04/01/2025



Celeste Chaney-Tucker  
Executive Director

Mailed Date: 04/01/2025

TSK



For KCC Use:

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

District # 1

SGA? ☒ Yes ☐ No

**KANSAS CORPORATION COMMISSION**  
**OIL & GAS CONSERVATION DIVISION**

Form CB-1

Oct 2016

Form must be Typed

Form must be Signed

All blanks must be Filled

**CATHODIC PROTECTION BOREHOLE INTENT**

*Must be approved by the KCC sixty (60) days prior to commencing well.*

**Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act, MUST be submitted with this form.**

Expected Spud Date: 2/11/2025  
month day year

OPERATOR: License# 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Amy Mills  
Phone: 832-320-5319

CONTRACTOR: License# 990  
Name: Associated Drilling, Inc. #990  
Type Drilling Equipment: ☒ Mud Rotary ☐ Cable  
☐ Air Rotary ☐ Other

**Construction Features**

Length of Cathodic Surface (Non-Metallic) Casing  
Planned to be set: 40 feet  
Length of Conductor pipe (if any): 0 feet  
Surface casing borehole size: 12 inches  
Cathodic surface casing size: 18 inches  
Cathodic surface casing centralizers set at depths of: 5; 20;  
\_\_\_\_; \_\_\_\_; \_\_\_\_; \_\_\_\_; \_\_\_\_; \_\_\_\_;  
Cathodic surface casing will terminate at:  
☐ Above surface ☐ Surface Vault ☒ Below Surface Vault  
Pitless casing adaptor will be used: ☐ Yes ☒ No Depth \_\_\_\_\_ feet  
Anode installation depths are: 345; 335; 325; 315; 305;  
295; 285; 275; 265; 255; 245; 235; 225;

**AFFIDAVIT**

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55-101 et. seq.

It is agreed that the following minimum requirements will be met:

1. Notify the appropriate District office prior to spudding and again before plugging the well. An agreement between the operator and the District Office on plugs and placement is necessary prior to plugging. In all cases, notify District Office prior to any grouting.
2. Notify appropriate District Office 48 hours prior to workover or re-entry.
3. A copy of the approved notice of intent to drill shall be posted on each drilling rig.
4. The minimum amount of cathodic surface casing as specified below shall be set by grouting to the top when the cathodic surface casing is set.
5. File all required forms: a. File Drill Pit Application (form CDP-1) with Intent to Drill (form CB-1). b. File Certification of Compliance with Kansas Surface Owner Notification Act (form KSONA-1) with Cathodic Protection Borehole Intent (CB-1) c. File Completion Form (ACO-1) within 60 days from spud date. d. Submit plugging report (CP-4) within 60 days after final plugging is completed.

I hereby certify that the statements made herein are true and to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_

**For KCC Use ONLY**

API # 15 - \_\_\_\_\_

Conductor pipe required 0 feet

Minimum Cathodic Surface Casing Required: 60 feet

Approved by: \_\_\_\_\_

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

Spud date: \_\_\_\_\_ Agent: \_\_\_\_\_

Spot Description: 37.120354, -100.387128  
SW - NE - SW - NE Sec. 5 Twp. 34 S. R. 28 ☐ E ☒ W  
(a/a/a/a) 1930 feet from ☒ N / ☐ S Line of Section  
1956 feet from ☒ E / ☐ W Line of Section

Is SECTION: ☒ Regular ☐ Irregular?

(Check directions from nearest outside corner boundaries)

County: Meade

Facility Name: Groundbed ANR Trunk 100 MP74.80

Borehole Number: 1

Ground Surface Elevation: 2327 Estimated \_\_\_\_\_ MSL

Cathodic Borehole Total Depth: 350 feet

Depth to Bedrock: 40 feet

**Water Information**

Aquifer Penetration: ☐ None ☐ Single ☒ Multiple

Depth to bottom of fresh water: 550

Depth to bottom of usable water: 550

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

Public water supply well within one mile: ☐ Yes ☒ No

Water Source for Drilling Operations:  
☐ Well ☐ Farm Pond ☐ Stream ☒ Other

Water Well Location: \_\_\_\_\_

DWR Permit # \_\_\_\_\_ apply if needed

Standard Dimension Ratio (SDR) is = 26

(Cathodic surface csg. O.D. in inches / MWT in inches = SDR)

Annular space between borehole and casing will be grouted with:

☐ Concrete ☐ Neat Cement ☐ Bentonite Cement ☒ Bentonite Clay

Anode vent pipe will be set at: 3 feet above surface

Anode conductor (backfill) material TYPE: Loresco SC-3 Coke Breeze

Depth of BASE of Backfill installation material: 350

Depth of TOP of Backfill installation material: 220

Borehole will be Pre-Plugged? ☒ Yes ☐ No

If this permit has expired or will not be drilled, check a box below, sign, date and return to the address below.

☐ Permit Expired ☐ Well Not Drilled

Date \_\_\_\_\_ Signature of Operator or Agent \_\_\_\_\_

For KCC Use ONLY

API # 15 - \_\_\_\_\_

Side Two  
**DRAFT**

**IN ALL CASES, PLEASE FULLY COMPLETE THIS SIDE OF THE FORM.**

In all cases, please fully complete this side of the form. Include items 1 through 3 at the bottom of this page.

Operator: ANR Pipeline Company  
Facility Name: Groundbed ANR Trunk 100 MP74.80  
Borehole Number: 1

Location of Well: County: Meade  
1,930 feet from ☒ N / ☐ S Line of Section  
1,956 feet from ☒ E / ☐ W Line of Section  
Sec. 5 Twp. 34 S. R. 28 ☐ E ☒ W

Is Section: ☒ Regular or ☐ Irregular

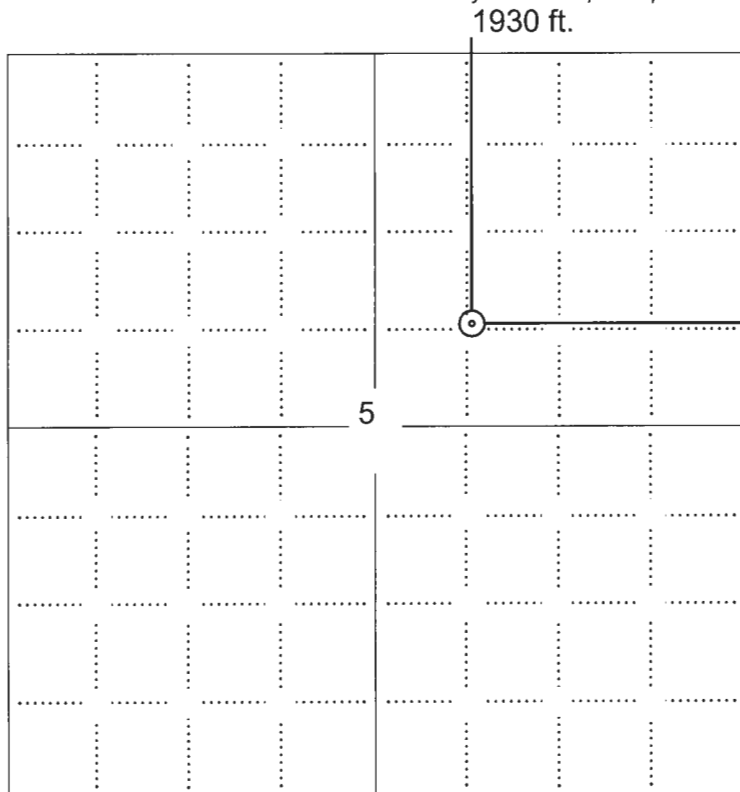
**If Section is Irregular, locate well from nearest corner boundary.**

Section corner used: ☐ NE ☐ NW ☐ SE ☐ SW

**PLAT**

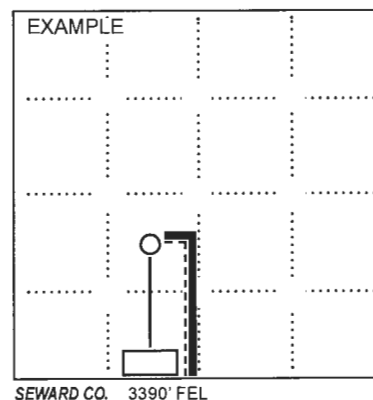
Show location of the Cathodic Borehole. Show footage to the nearest lease or unit boundary line. Show the predicted locations of lease roads, tank batteries, pipelines and electrical lines, as required by the Kansas Surface Owner Notice Act (House Bill 2032).

You may attach a separate plat if desired.



**LEGEND**

- ☐ Well Location
- ☐ Tank Battery Location
- ☐ Pipeline Location
- ☐ Electric Line Location
- ☐ Lease Road Location



**NOTE: In all cases locate the spot of the proposed drilling location.**

**In plotting the proposed location of the well, you must show:**

1. The manner in which you are using the depicted plat by identifying section lines, i.e. 1 section, 1 section with 8 surrounding sections, 4 sections, etc.;
2. The distance of the proposed drilling location from the section's south / north and east / west; line.
3. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

# DRAFT

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CDP-1  
July 2014  
Form must be Typed

## APPLICATION FOR SURFACE PIT

*Submit in Duplicate*

Operator Name: <b>ANR Pipeline Company</b>		License Number: <b>32953</b>	
Operator Address: <b>700 LOUISIANA ST SUITE 1300</b> <span style="float: right;"><b>HOUSTON TX 77002</b></span>			
Contact Person: <b>Amy Mills</b>		Phone Number: <b>832-320-5319</b>	
Lease Name & Well No.: <b>Groundbed ANR Trunk 100 MP74.80 1</b>		Pit Location (QQQQ): <b>SW - NE - SW - NE</b> Sec. <b>5</b> Twp. <b>34</b> R. <b>28</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>1930</b> Feet from <input type="checkbox"/> North / <input type="checkbox"/> South Line of Section <b>1956</b> Feet from <input type="checkbox"/> East / <input type="checkbox"/> West Line of Section <b>Meade</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit <small>(If WP Supply API No. or Year Drilled)</small>	Pit is: <input type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: _____ (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input type="checkbox"/> Yes <input type="checkbox"/> No		Chloride concentration: _____ mg/l <small>(For Emergency Pits and Settling Pits only)</small>	
Is the bottom below ground level? <input type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used? <b>Not Applicable</b>	
Pit dimensions (all but working pits): _____ Length (feet) _____ Width (feet) Depth from ground level to deepest point: _____ (feet)		<input checked="" type="checkbox"/> N/A: Steel Pits <input type="checkbox"/> No Pit	
If the pit is lined give a brief description of the liner material, thickness and installation procedure.  <b>Not Applicable</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring.  <b>Not Applicable</b>	
Distance to nearest water well within one-mile of pit: _____ feet    Depth of water well _____ feet		Depth to shallowest fresh water _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input type="checkbox"/> KDWR	
<b>Emergency, Settling and Burn Pits ONLY:</b>  Producing Formation: _____ Number of producing wells on lease: _____ Barrels of fluid produced daily: _____ Does the slope from the tank battery allow all spilled fluids to flow into the pit? <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Drilling, Workover and Haul-Off Pits ONLY:</b>  Type of material utilized in drilling/workover: _____ Number of working pits to be utilized: _____ Abandonment procedure: _____ Drill pits must be closed within 365 days of spud date.	
I hereby certify that the above statements are true and correct to the best of my knowledge and belief.  <div style="display: flex; justify-content: space-between;"> <div style="width: 45%; text-align: center;">           _____ Date         </div> <div style="width: 45%; text-align: center;">           _____ Signature of Applicant or Agent         </div> </div>			

<b>KCC OFFICE USE ONLY</b>	
<input type="checkbox"/> Liner <input checked="" type="checkbox"/> Steel Pit <input checked="" type="checkbox"/> RFAC <input type="checkbox"/> RFAS	Date Received: _____ Permit Number: _____ Permit Date: _____ Lease Inspection: <input type="checkbox"/> Yes <input type="checkbox"/> No



**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form KSONA-1

July 2021

**Form Must Be Typed**

**Form must be Signed**

**All blanks must be Filled**

**CERTIFICATION OF COMPLIANCE WITH THE  
KANSAS SURFACE OWNER NOTIFICATION ACT**

*This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.*

Select the corresponding form being filed: ☐ C-1 (Intent) ☒ CB-1 (Cathodic Protection Borehole Intent) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Amy Mills  
Phone: ( 304 ) 357-2561 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: \_\_\_\_\_

Well Location:  
SW NE SW NE Sec. 5 Twp. 34 S. R. 28 ☐ East ☒ West  
County: Meade  
Lease Name: Groundbed ANR Trunk 100 MP74.80 Well #: 1

*If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:*

**Surface Owner Information:**

Name: Michael Lawrence Amerin  
Address 1: 23463 V Road  
Address 2: \_\_\_\_\_  
City: Plains State: KS Zip: 67869 + \_\_\_\_\_

*When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.*

*If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.*

**Select one of the following:**

- ☒ I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.
- ☐ I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

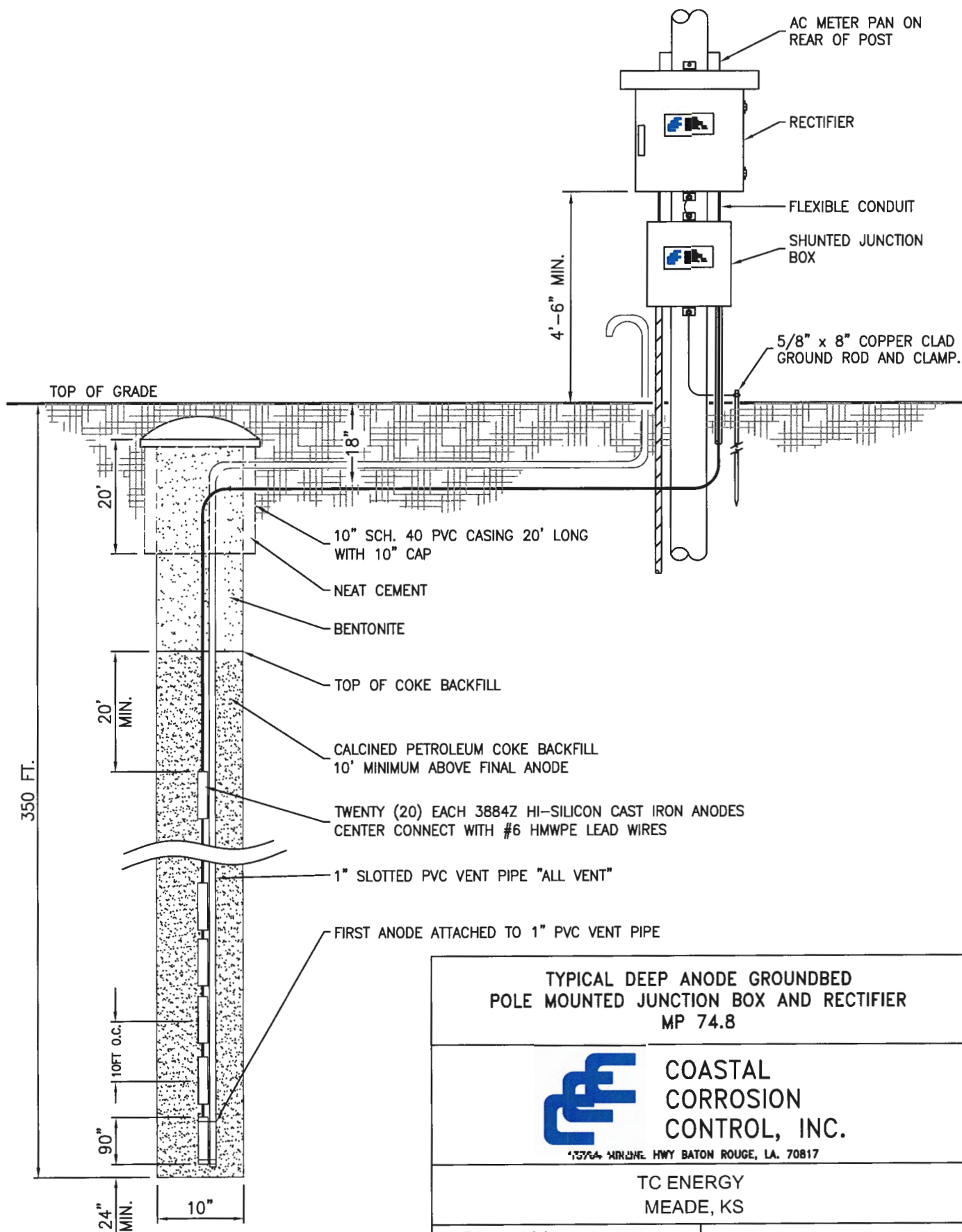
*If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.*

I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_







TYPICAL DEEP ANODE GROUND BED  
POLE MOUNTED JUNCTION BOX AND RECTIFIER  
MP 74.8



COASTAL  
CORROSION  
CONTROL, INC.

15744 AIRLINE HWY BATON ROUGE, LA. 70817

TC ENERGY  
MEADE, KS

DATE: 2024

SCALE: N.T.S.

DWG#: 11089C

## Nielsen, Abby

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**From:** CeLena Peterson [KCC] <CeLena.Peterson@ks.gov>  
**Sent:** Tuesday, January 28, 2025 11:10 AM  
**To:** Nielsen, Abby  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Abby,  
I'll need you to resubmit the intent to drill for both cathodic boreholes since they are no longer available on Kolar.

Thanks,

**CeLena Peterson, P.G.**  
Geologist - Production



Conservation Division  
Kansas Corporation Commission  
266 N. Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6035 | <http://kcc.ks.gov/>

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**From:** Nielsen, Abby <Abby.Nielsen@arcadis.com>  
**Sent:** Tuesday, January 21, 2025 11:55 AM  
**To:** CeLena Peterson [KCC] <CeLena.Peterson@ks.gov>  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

**EXTERNAL:** This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi CeLena,

Following up on my email below to confirm if the borehole diagram provided will suffice? Is there any additional information you need in order to provide final approval?

Thanks,  
Abby

**Abby Nielsen** | Project Environmental Scientist  
Arcadis of Michigan, LLC  
T +1 810 512 7775 | M +1 812 677 0064

**From:** Nielsen, Abby  
**Sent:** Thursday, December 5, 2024 3:06 PM  
**To:** CeLena Peterson [KCC] <[CeLena.Peterson@ks.gov](mailto:CeLena.Peterson@ks.gov)>  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

Hi CeLena,

I'm following up on the Cathodic Protection Borehole Intent (CB1CDP1) Form that was submitted for ANR's Groundbed ANR Trunk 100 MP 74.80 – Rectifier/Deep Bed Replacement Project (referenced below). Similar to ANR's MP83.30 Project, work at this Project has already been completed. I have attached a diagram for this Project as well for review.

Thanks,  
Abby

**Abby Nielsen** | Project Environmental Scientist  
Arcadis of Michigan, LLC  
T +1 810 512 7775 | M +1 812 677 0064

**From:** [kgs\\_exadata\\_prd\\_sa@ku.edu](mailto:kgs_exadata_prd_sa@ku.edu) <[kgs\\_exadata\\_prd\\_sa@ku.edu](mailto:kgs_exadata_prd_sa@ku.edu)>  
**Sent:** Thursday, November 7, 2024 10:56 AM  
**To:** Nielsen, Abby <[Abby.Nielsen@arcadis.com](mailto:Abby.Nielsen@arcadis.com)>  
**Subject:** +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

You don't often get email from [kgs\\_exadata\\_prd\\_sa@ku.edu](mailto:kgs_exadata_prd_sa@ku.edu). [Learn why this is important](#)

**Arcadis Warning:** Exercise caution with email messages from external sources such as this message. Always verify the sender and avoid clicking on links or scanning QR codes unless certain of their authenticity.

The KCC has returned the **Cathodic Protection Borehole Intent** (CB1CDP1) for the well named "Groundbed ANR Trunk 100 MP74.80 1". Corrections are needed or additional information is required.

Be sure to make the necessary changes and resubmit the CB1CDP1 within 35 days. Specific information from the KCC about what needs to be done is available on KOLAR.

After 35 days, if the CB1CDP1 has not been resubmitted to the KCC, the form will be deleted from KOLAR and you will not be able to retrieve it, but you have the option to file a new CB1CDP1.

**NOTE: If you are requesting confidentiality on an ACO-1, then you must resubmit the ACO-1 before the original 120 day confidentiality period expires in order for confidentiality to be granted.**



This is [KOLAR](#) email request #107178276222 [11/07/2024 09:51:30] [document #1796820].

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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

According to the drilling pit application, no earthen pits will be used at this location. Steel pits will be used. Please inform the Commission in writing as to which disposal well you utilized to dispose of the contents in the steel pits and the amount of fluid that was disposed. Please file form CDP-5, Exploration and Production Waste Transfer, within 30 days of fluid removal.

Should a haul-off pit be necessary please file form CDP-1, Application for Surface Pit, This location will have to be inspected prior to approval of the haul-off pit application.

**A copy of this letter should be posted in the doghouse along with the approved Intent to Drill.**

For KCC Use:

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

District # 1

SGA? ☒ Yes ☐ No

**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CB-1

Oct 2016

Form must be Typed

Form must be Signed

All blanks must be Filled

**CATHODIC PROTECTION BOREHOLE INTENT**

*Must be approved by the KCC sixty (60) days prior to commencing well.*

**Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act, MUST be submitted with this form.**

Expected Spud Date: 2/11/2025  
month day year

OPERATOR: License# 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Amy Mills  
Phone: 832-320-5319

CONTRACTOR: License# 990  
Name: Associated Drilling, Inc. #990  
Type Drilling Equipment: ☒ Mud Rotary ☐ Cable  
☐ Air Rotary ☐ Other

**Construction Features**

Length of Cathodic Surface (Non-Metallic) Casing  
Planned to be set: 40 feet  
Length of Conductor pipe (if any): 0 feet  
Surface casing borehole size: 12 inches  
Cathodic surface casing size: 18 inches  
Cathodic surface casing centralizers set at depths of: 5; 20;  
\_\_\_\_; \_\_\_\_; \_\_\_\_; \_\_\_\_; \_\_\_\_;  
Cathodic surface casing will terminate at:  
☐ Above surface ☐ Surface Vault ☒ Below Surface Vault  
Pitless casing adaptor will be used: ☐ Yes ☒ No Depth \_\_\_\_\_ feet  
Anode installation depths are: 345; 335; 325; 315; 305;  
295; 285; 275; 265; 255; 245; 235; 225;

**AFFIDAVIT**

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55-101 et. seq.

It is agreed that the following minimum requirements will be met:

1. Notify the appropriate District office prior to spudding and again before plugging the well. An agreement between the operator and the District Office on plugs and placement is necessary prior to plugging. In all cases, notify District Office prior to any grouting.
2. Notify appropriate District Office 48 hours prior to workover or re-entry.
3. A copy of the approved notice of intent to drill shall be posted on each drilling rig.
4. The minimum amount of cathodic surface casing as specified below shall be set by grouting to the top when the cathodic surface casing is set.
5. File all required forms: a. File Drill Pit Application (form CDP-1) with Intent to Drill (form CB-1). b. File Certification of Compliance with Kansas Surface Owner Notification Act (form KSONA-1) with Cathodic Protection Borehole Intent (CB-1) c. File Completion Form (ACO-1) within 60 days from spud date. d. Submit plugging report (CP-4) within 60 days after final plugging is completed.

I hereby certify that the statements made herein are true and to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_

**For KCC Use ONLY**

API # 15 - \_\_\_\_\_  
Conductor pipe required 0 feet  
Minimum Cathodic Surface Casing Required: 60 feet  
Approved by: \_\_\_\_\_  
This authorization expires: \_\_\_\_\_  
(This authorization void if drilling not started within 12 months of approval date.)  
Spud date: \_\_\_\_\_ Agent: \_\_\_\_\_

Spot Description: 37.120354, -100.387128  
SW - NE - SW - NE Sec. 5 Twp. 34 S. R. 28 ☐ E ☒ W  
(Q/Q/Q/Q) 1,930 feet from ☒ N / ☐ S Line of Section  
1,956 feet from ☒ E / ☐ W Line of Section  
Is SECTION: ☒ Regular ☐ Irregular?  
(Check directions from nearest outside corner boundaries)  
County: Meade  
Facility Name: Groundbed ANR Trunk 100 MP74.80  
Borehole Number: 1  
Ground Surface Elevation: 2327 Estimated \_\_\_\_\_ MSL  
Cathodic Borehole Total Depth: 350 feet  
Depth to Bedrock: 40 feet  
**Water Information**  
Aquifer Penetration: ☐ None ☐ Single ☒ Multiple  
Depth to bottom of fresh water: 550  
Depth to bottom of usable water: 550  
Water well within one-quarter mile: ☐ Yes ☒ No  
Public water supply well within one mile: ☐ Yes ☒ No  
Water Source for Drilling Operations:  
☐ Well ☐ Farm Pond ☐ Stream ☒ Other  
Water Well Location: \_\_\_\_\_  
DWR Permit # \_\_\_\_\_ apply if needed  
Standard Dimension Ratio (SDR) is = 26  
(Cathodic surface csg. O.D. in inches / MWT in inches = SDR)  
Annular space between borehole and casing will be grouted with:  
☐ Concrete ☐ Neat Cement ☐ Bentonite Cement ☒ Bentonite Clay  
Anode vent pipe will be set at: 3 feet above surface  
Anode conductor (backfill) material TYPE: Loresco SC-3 Coke Breeze  
Depth of BASE of Backfill installation material: 350  
Depth of TOP of Backfill installation material: 220  
Borehole will be Pre-Plugged? ☒ Yes ☐ No

If this permit has expired or will not be drilled, check a box below, sign, date and return to the address below.

☐ Permit Expired ☐ Well Not Drilled

Date \_\_\_\_\_ Signature of Operator or Agent \_\_\_\_\_

For KCC Use ONLY

API # 15 - \_\_\_\_\_

Side Two  
**DRAFT**

**IN ALL CASES, PLEASE FULLY COMPLETE THIS SIDE OF THE FORM.**

In all cases, please fully complete this side of the form. Include items 1 through 3 at the bottom of this page.

Operator: ANR Pipeline Company

Facility Name: Groundbed ANR Trunk 100 MP74.80

Borehole Number: 1

Location of Well: County: Meade

1,930 feet from ☒ N / ☐ S Line of Section

1,956 feet from ☒ E / ☐ W Line of Section

Sec. 5 Twp. 34 S. R. 28 ☐ E ☒ W

Is Section: ☒ Regular or ☐ Irregular

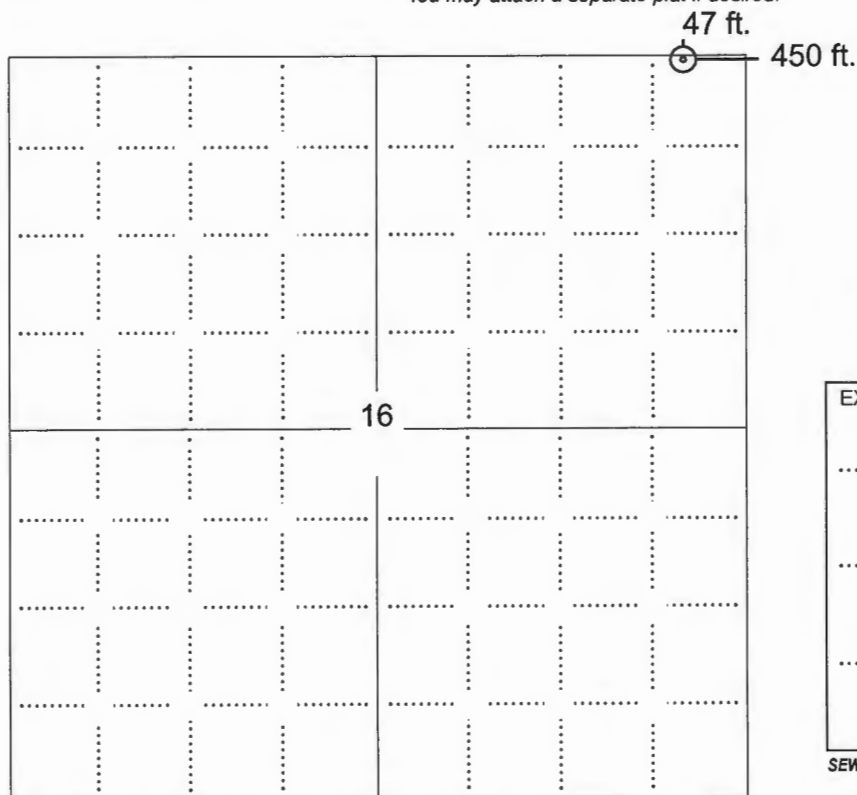
If Section is Irregular, locate well from nearest corner boundary.

Section corner used: ☐ NE ☐ NW ☐ SE ☐ SW

**PLAT**

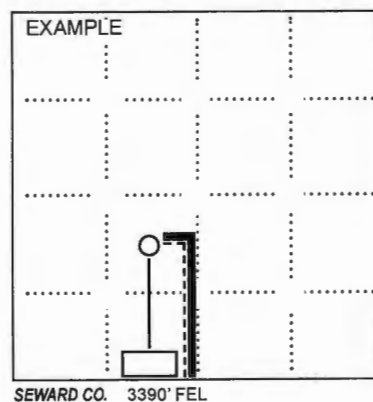
Show location of the Cathodic Borehole. Show footage to the nearest lease or unit boundary line. Show the predicted locations of lease roads, tank batteries, pipelines and electrical lines, as required by the Kansas Surface Owner Notice Act (House Bill 2032).

You may attach a separate plat if desired.



**LEGEND**

- ☐ Well Location
- ☐ Tank Battery Location
- ☐ Pipeline Location
- ☐ Electric Line Location
- ☐ Lease Road Location



**NOTE: In all cases locate the spot of the proposed drilling location.**

In plotting the proposed location of the well, you must show:

1. The manner in which you are using the depicted plat by identifying section lines, i.e. 1 section, 1 section with 8 surrounding sections, 4 sections, etc.;
2. The distance of the proposed drilling location from the section's south / north and east / west; line.
3. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.

**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CDP-1  
July 2014  
Form must be Typed

## APPLICATION FOR SURFACE PIT

*Submit in Duplicate*

Operator Name: <b>ANR Pipeline Company</b>		License Number: <b>32953</b>	
Operator Address: <b>700 LOUISIANA ST SUITE 1300</b>		<b>HOUSTON TX 77002</b>	
Contact Person: <b>Amy Mills</b>		Phone Number: <b>832-320-5319</b>	
Lease Name & Well No.: <b>Groundbed ANR Trunk 100 MP74.80 1</b>		Pit Location (QQQQ): <b>SW - NE - SW - NE</b> Sec. <b>5</b> Twp. <b>34</b> R. <b>28</b> <input type="checkbox"/> East <input checked="" type="checkbox"/> West <b>1,930</b> Feet from <input type="checkbox"/> North / <input type="checkbox"/> South Line of Section <b>1,956</b> Feet from <input type="checkbox"/> East / <input type="checkbox"/> West Line of Section <b>Meade</b> County	
Type of Pit: <input type="checkbox"/> Emergency Pit <input type="checkbox"/> Burn Pit <input type="checkbox"/> Settling Pit <input type="checkbox"/> Drilling Pit <input type="checkbox"/> Workover Pit <input type="checkbox"/> Haul-Off Pit <i>(If WP Supply API No. or Year Drilled)</i>	Pit is: <input type="checkbox"/> Proposed <input type="checkbox"/> Existing If Existing, date constructed: _____ Pit capacity: _____ (bbls)		
Is the pit located in a Sensitive Ground Water Area? <input type="checkbox"/> Yes <input type="checkbox"/> No		Chloride concentration: _____ mg/l <i>(For Emergency Pits and Settling Pits only)</i>	
Is the bottom below ground level? <input type="checkbox"/> Yes <input type="checkbox"/> No	Artificial Liner? <input type="checkbox"/> Yes <input type="checkbox"/> No	How is the pit lined if a plastic liner is not used? <b>Not Applicable</b>	
Pit dimensions (all but working pits): _____ Length (feet) _____ Width (feet) Depth from ground level to deepest point: _____ (feet)		<input checked="" type="checkbox"/> N/A: Steel Pits <input type="checkbox"/> No Pit	
If the pit is lined give a brief description of the liner material, thickness and installation procedure. <b>Not Applicable</b>		Describe procedures for periodic maintenance and determining liner integrity, including any special monitoring. <b>Not Applicable</b>	
Distance to nearest water well within one-mile of pit: _____ feet    Depth of water well _____ feet		Depth to shallowest fresh water _____ feet. Source of information: <input type="checkbox"/> measured <input type="checkbox"/> well owner <input type="checkbox"/> electric log <input type="checkbox"/> KDWR	
<b>Emergency, Settling and Burn Pits ONLY:</b> Producing Formation: _____ Number of producing wells on lease: _____ Barrels of fluid produced daily: _____ Does the slope from the tank battery allow all spilled fluids to flow into the pit? <input type="checkbox"/> Yes <input type="checkbox"/> No		<b>Drilling, Workover and Haul-Off Pits ONLY:</b> Type of material utilized in drilling/workover: _____ Number of working pits to be utilized: _____ Abandonment procedure: _____ Drill pits must be closed within 365 days of spud date.	
I hereby certify that the above statements are true and correct to the best of my knowledge and belief.			
_____ Date		_____ Signature of Applicant or Agent	

<b>KCC OFFICE USE ONLY</b>			
Date Received: _____		Permit Number: _____	
Permit Date: _____		Lease Inspection: <input type="checkbox"/> Yes <input type="checkbox"/> No	
<input type="checkbox"/> Liner		<input checked="" type="checkbox"/> Steel Pit <input checked="" type="checkbox"/> RFAC <input type="checkbox"/> RFAS	



**DRAFT**  
KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form KSONA-1

July 2021

Form Must Be Typed

Form must be Signed

All blanks must be Filled

**CERTIFICATION OF COMPLIANCE WITH THE  
KANSAS SURFACE OWNER NOTIFICATION ACT**

*This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.*

Select the corresponding form being filed: ☐ C-1 (Intent) ☒ CB-1 (Cathodic Protection Borehole Intent) ☐ T-1 (Transfer) ☐ CP-1 (Plugging Application)

OPERATOR: License # 32953  
Name: ANR Pipeline Company  
Address 1: 700 LOUISIANA ST SUITE 1300  
Address 2: \_\_\_\_\_  
City: HOUSTON State: TX Zip: 77002 + 2700  
Contact Person: Amy Mills  
Phone: ( 304 ) 357-2561 Fax: ( \_\_\_\_\_ ) \_\_\_\_\_  
Email Address: \_\_\_\_\_

Well Location:  
SW NE SW NE Sec. 5 Twp. 34 S. R. 28 ☐ East ☒ West  
County: Meade  
Lease Name: Groundbed ANR Trunk 100 MP74.80 Well #: 1

*If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:*

**Surface Owner Information:**

Name: Michael Lawrence Amerin  
Address 1: 23463 V Road  
Address 2: \_\_\_\_\_  
City: Plains State: KS Zip: 67869 + \_\_\_\_\_

*When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.*

*If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.*

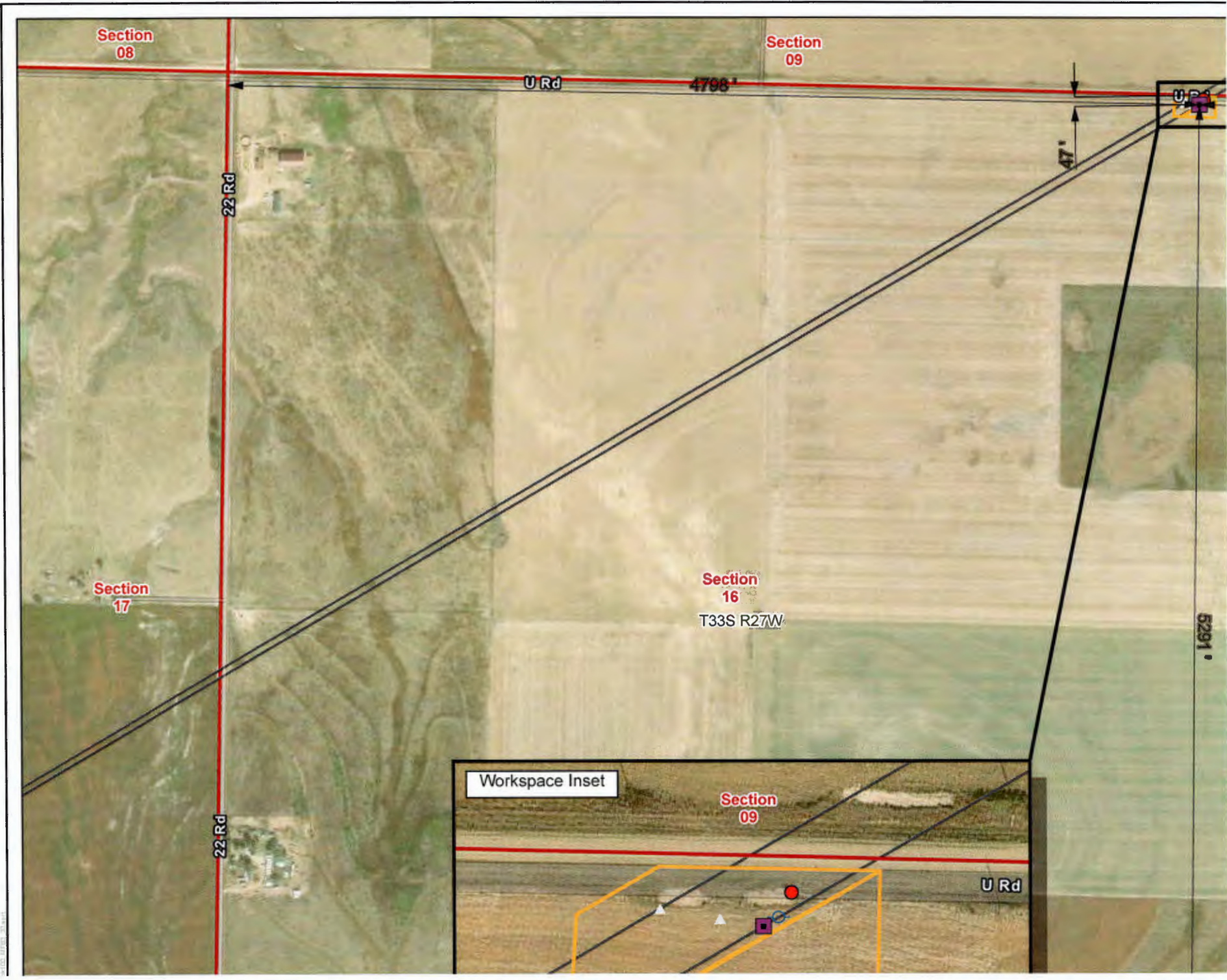
**Select one of the following:**

- ☒ I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.
- ☐ I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

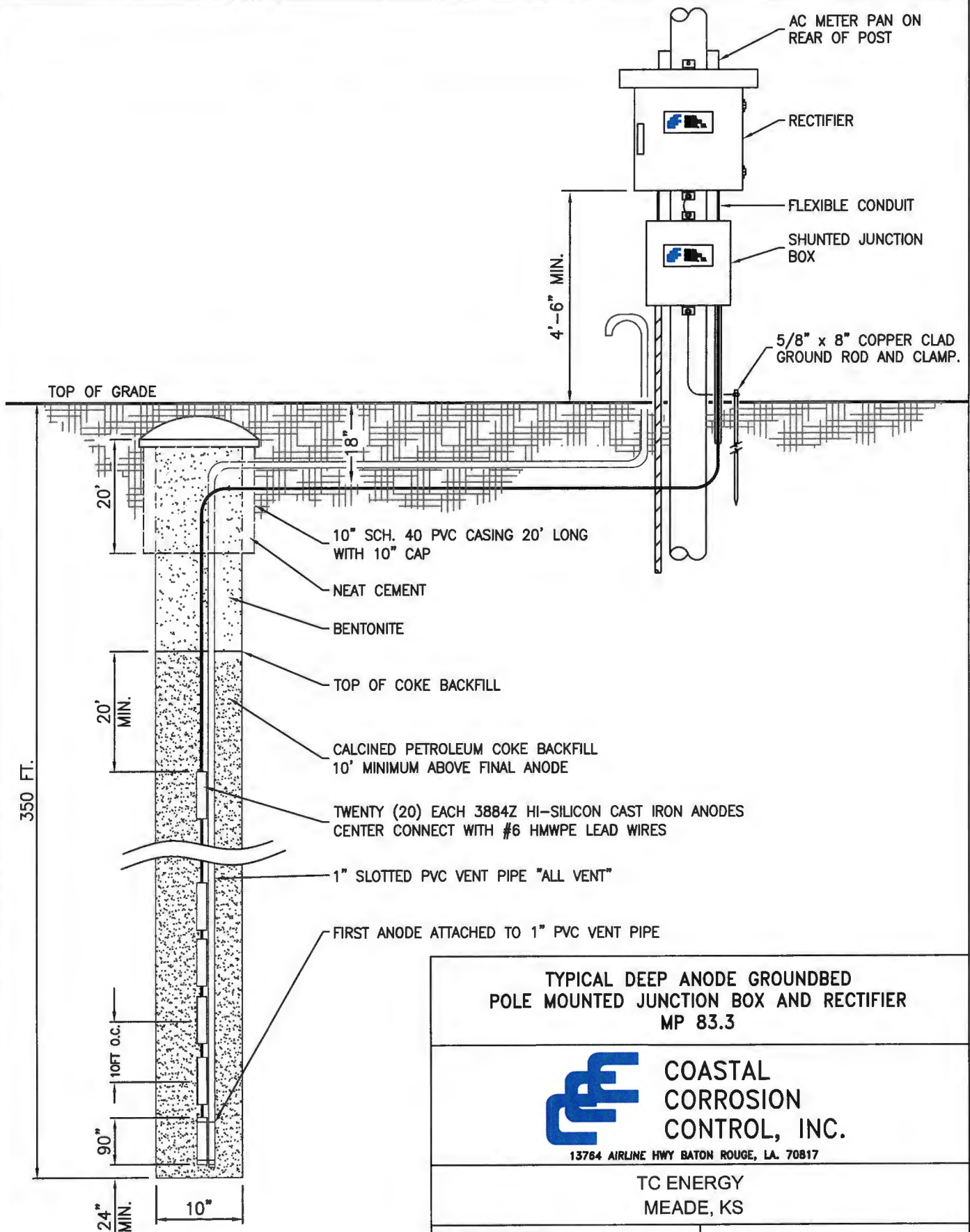
*If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.*

I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: \_\_\_\_\_ Signature of Operator or Agent: \_\_\_\_\_ Title: \_\_\_\_\_







TYPICAL DEEP ANODE GROUND BED  
POLE MOUNTED JUNCTION BOX AND RECTIFIER  
MP 83.3



COASTAL  
CORROSION  
CONTROL, INC.

13764 AIRLINE HWY BATON ROUGE, LA. 70817

TC ENERGY  
MEADE, KS

DATE: 2024

SCALE: N.T.S.

DWG#: 11090C

## Nielsen, Abby

---

**From:** CeLena Peterson [KCC] <CeLena.Peterson@ks.gov>  
**Sent:** Tuesday, January 28, 2025 11:10 AM  
**To:** Nielsen, Abby  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

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Abby,  
I'll need you to resubmit the intent to drill for both cathodic boreholes since they are no longer available on Kolar.

Thanks,

**CeLena Peterson, P.G.**  
Geologist - Production



Conservation Division  
Kansas Corporation Commission  
266 N. Main, Suite 220 | Wichita, KS | 67202-1513  
Phone (316) 337-6035 | <http://kcc.ks.gov/>

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**From:** Nielsen, Abby <Abby.Nielsen@arcadis.com>  
**Sent:** Tuesday, January 21, 2025 11:55 AM  
**To:** CeLena Peterson [KCC] <CeLena.Peterson@ks.gov>  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

**EXTERNAL:** This email originated from outside of the organization. Do not click any links or open any attachments unless you trust the sender and know the content is safe.

Hi CeLena,

Following up on my email below to confirm if the borehole diagram provided will suffice? Is there any additional information you need in order to provide final approval?

Thanks,  
Abby

**Abby Nielsen** | Project Environmental Scientist  
Arcadis of Michigan, LLC  
T +1 810 512 7775 | M +1 812 677 0064

**From:** Nielsen, Abby  
**Sent:** Thursday, December 5, 2024 3:06 PM  
**To:** CeLena Peterson [KCC] <[CeLena.Peterson@ks.gov](mailto:CeLena.Peterson@ks.gov)>  
**Subject:** RE: +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

Hi CeLena,

I'm following up on the Cathodic Protection Borehole Intent (CB1CDP1) Form that was submitted for ANR's Groundbed ANR Trunk 100 MP 74.80 – Rectifier/Deep Bed Replacement Project (referenced below). Similar to ANR's MP83.30 Project, work at this Project has already been completed. I have attached a diagram for this Project as well for review.

Thanks,  
Abby

**Abby Nielsen** | Project Environmental Scientist  
Arcadis of Michigan, LLC  
T +1 810 512 7775 | M +1 812 677 0064

**From:** [kgs\\_exadata\\_prd\\_sa@ku.edu](mailto:kgs_exadata_prd_sa@ku.edu) <[kgs\\_exadata\\_prd\\_sa@ku.edu](mailto:kgs_exadata_prd_sa@ku.edu)>  
**Sent:** Thursday, November 7, 2024 10:56 AM  
**To:** Nielsen, Abby <[Abby.Nielsen@arcadis.com](mailto:Abby.Nielsen@arcadis.com)>  
**Subject:** +KOLAR: Cathodic Protection Borehole Intent (CB1CDP1) for "Groundbed ANR Trunk 100 MP74.80 1" returned

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The KCC has returned the **Cathodic Protection Borehole Intent** (CB1CDP1) for the well named "Groundbed ANR Trunk 100 MP74.80 1". Corrections are needed or additional information is required.

Be sure to make the necessary changes and resubmit the CB1CDP1 within 35 days. Specific information from the KCC about what needs to be done is available on KOLAR.

After 35 days, if the CB1CDP1 has not been resubmitted to the KCC, the form will be deleted from KOLAR and you will not be able to retrieve it, but you have the option to file a new CB1CDP1.

**NOTE:** If you are requesting confidentiality on an ACO-1, then you must resubmit the ACO-1 before the original 120 day confidentiality period expires in order for confidentiality to be granted.



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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

According to the drilling pit application, no earthen pits will be used at this location. Steel pits will be used. Please inform the Commission in writing as to which disposal well you utilized to dispose of the contents in the steel pits and the amount of fluid that was disposed. Please file form CDP-5, Exploration and Production Waste Transfer, within 30 days of fluid removal.

Should a haul-off pit be necessary please file form CDP-1, Application for Surface Pit, This location will have to be inspected prior to approval of the haul-off pit application.

**A copy of this letter should be posted in the doghouse along with the approved Intent to Drill.**

**CERTIFICATE OF SERVICE**

25-CONS-3329-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 04/01/2025.

TODD BRYANT, GEOLOGIST SPECIALIST  
KANSAS CORPORATION COMMISSION  
266 N. Main St., Ste. 220  
WICHITA, KS 67202-1513  
todd.bryant@ks.gov

TRISTAN KIMBRELL, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST, STE 220  
WICHITA, KS 67202-1513  
tristan.kimbrell@ks.gov

CELENA PETERSON, PRODUCTION DEPARTMENT  
KANSAS CORPORATION COMMISSION  
266 N. Main St., Ste. 220  
WICHITA, KS 67202-1513  
celena.peterson@ks.gov

ROBERT SOUTHERS  
ANR PIPELINE COMPANY  
700 LOUISIANA ST STE 1300  
HOUSTON, TX 77002-2700

/S/ KCC Docket Room  
KCC Docket Room