

FEB 23 2018

CONSERVATION DIVISION
WICHITA, KS

THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Pat Apple

In the matter of the Application of Edison Operating)
Company, LLC for an exception to the 10-year time)
limitation of K.A.R. 82-3-111 for its Seevers LKC Unit)
#8-3 well located in the Center of the Southwest Quarter)
of the Southeast Quarter)
of Section 1, Township 25 South, Range 14 West)
Stafford County, Kansas.)

Docket No. 18-CONS-³³³⁵__-CEXC
Conservation Division
License No.: 34434

APPLICATION

COMES NOW Edison Operating Company, LLC ("Applicant") in support of its Application in the captioned matter and states as follows:

1. Applicant is a Limited Liability Company authorized to do business in the State of Kansas. Applicant's address is 8100 E. 22nd N. Building 1900, Wichita, Kansas 67226.

2. Applicant has been issued by the Kansas Corporation Commission Operator's License number 34434, which expires on August 30th, 2018.

3. Applicant is the owner and operator of the Seevers LKC Unit #8-3 well (originally known as the Goodman #3), API # 15-185-33915-0001 ("the subject well"), which is located in the Center of the Southwest Quarter of the Southeast Quarter of Section 1, Township 25 South, Range 14 West, Stafford County, Kansas. The subject well is located on an active oil lease comprising the following lands:

North Half of the Northeast Quarter (N/2 NE/4) in Section 6, Township 25 South, Range 13 West
West Half of the Southwest Quarter of the Northeast Quarter (W/2 SW/4 NE/4) in Section 6, Township 25 South, Range 13 West
North Half of the Northwest Quarter (N/2 NW/4) in Section 6, Township 25 South, Range 13 West
South Half of the Northwest Quarter (S/2 NW/4) in Section 6, Township 25 South, Range 13 West
Northwest Quarter of the Southwest Quarter (NW/4 SW/4) in Section 6, Township 25 South, Range 13 West
South Half of the Northeast Quarter (S/2 NE/4) in Section 1, Township 25 South, Range 14 West
Northeast Quarter of the Northeast Quarter (NE/4 NE/4) in Section 1, Township 25 South, Range 14 West
North Half of the Southeast Quarter (N/2 SE/4) in Section 1, Township 25 South, Range 14 West
South Half of the Southeast Quarter (S/2 SE/4) in Section 1, Township 25 South, Range 14 West
Southeast Quarter of the Southwest Quarter (SE/4 SW/4) in Section 1, Township 25 South, Range 14 West
North Half of the Northeast Quarter (N/2 NE/4) in Section 12, Township 25 South, Range 14 West
Northwest Quarter (NW/4) in Section 12, Township 25 South, Range 14 West

4. Pursuant to K.A.R. 82-3-111, the well was shut in, or Applicant obtained temporary abandonment status, for the subject well on June 1, 2007. The subject well has maintained such status from June 1, 2007 to the present date.

5. Applicant acknowledges that the Seevers LKC Unit #8-3 well will reach its 10-year limitation on March 7, 2018. Applicant also acknowledges that temporary abandonment status for the subject well will be denied from and after March 7, 2018 because said well will have been temporarily abandoned for more than ten (10) years.

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

7. On February 15, 2018, the subject well passed a mechanical integrity test of the casing between the surface and a point within 59 feet above the uppermost perforation in the well. Said test was witnessed by Scott Alberg with the Kansas Corporation Commission, District #1.

8. Applicant wishes to continue temporary abandonment status for the subject well because Edison Operating Company, LLC intends to re-complete the wellbore in the Viola formation. The Seevers LKC Unit #8-3 is currently open in the Lansing-Kansas City. A DST was run across the Viola and recovered commercial quantities of oil and gas, but was never completed. The Viola formation is productive in this area of Stafford County, and we estimate recoverable reserves of 40,000 BOE.

9. Applicant submits the following information regarding the well in support of the Application.

See Exhibit A

10. Applicant has included a plat map showing the locations of all producing, injection, temporarily abandoned, abandoned, and plugged wells located on the same leased premises as the subject well. See enclosed.

11. Based on the foregoing, Applicant requests the Commission grant an exception to the 10-year limitation, specifically to allow the subject well to remain eligible for temporary abandonment status for three (3) years following the expiration of the 10-year limitation.

Applicant understands that the exception would be valid for three (3) years, but Applicant would still need to apply annually to the Conservation Division District Office for approval of an application for temporary abandonment status.

12. Listed in the attached Exhibit "B" are the names and addresses of the following persons:

A. Each operator of each oil and gas lease covering lands within one-half (1/2) mile radius of the subject well; and

B. Each person who owns any mineral interest of record in and under any lands located within one-half (1/2) mile radius of subject well

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

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

Respectfully Submitted,

Edison Operating Company, LLC
8100 E. 22nd N. Bldg 1900
316.201.1744 (phone)
316.201.1687 (fax)

By


Brian J. McCoy

CERTIFICATE OF SERVICE

I hereby certify on this 23 day of FEB, 2018, true and correct copies of the above and foregoing Application and the Notice of Application were served by depositing copies of the same in the United States Mail, postage prepaid, and properly addressed to the landowner/s set forth in paragraph 12 of said Application and each party set forth in Exhibit "B" attached to said Application filed by Applicant, and the original and seven (7) copies were hand delivered to the Kansas Corporation Commission.


Brian J. McCoy

EXHIBIT A

A.

| | | PROD | WELL | | | Yr. Assumed | | | | | |
|-----------------------|-----|-------|-------|-------------------|--------------|----------------|-------|----------|---|-----|-----|
| Lease | O/G | WELLS | COUNT | API # | Year Drilled | Responsibility | Depth | County | S | T | R |
| Seevers LKC Unit #6-2 | TA | 0 | 1 | 15-185-11923-0001 | 1959 | 2016 | 4292 | Stafford | 1 | 25S | 14W |
| Seevers LKC Unit #7-1 | TA | 0 | 1 | 15-185-13139-0001 | 1958 | 2016 | 4291 | Stafford | 1 | 25S | 14W |
| Seevers LKC Unit #7-2 | TA | 1 | 1 | 15-185-13234-0000 | 1958 | 2016 | 4307 | Stafford | 1 | 25S | 14W |
| Seevers LKC Unit #7-3 | O | 1 | 1 | 15-185-13233-0000 | 1959 | 2016 | 4297 | Stafford | 1 | 25S | 14W |
| Seevers LKC Unit #8-2 | O | 1 | 1 | 15-185-13138-0000 | 1958 | 2016 | 4317 | Stafford | 1 | 25S | 14W |
| Seevers LKC Unit #8-3 | TA | 0 | 1 | 15-185-33915-0001 | 1959 | 2016 | 4310 | Stafford | 1 | 25S | 14W |

B. BREAKDOWN OF PLUGGING EXPENSES TO PLUG SEEVERS LKC UNIT #8-3

| | |
|-------------------------|-------------|
| WORKOVER RIG | \$ 7,500.00 |
| WIRELINE | \$ 2,500.00 |
| TBG RENTAL | \$ 1,500.00 |
| PUMP TRUCK & CEMENT | \$ 8,500.00 |
| DIG PIT & WATER TO PLUG | \$ 2,000.00 |
| MISC. | \$ 1,500.00 |

| | |
|--------------|---------------------|
| TOTAL | \$ 23,500.00 |
|--------------|---------------------|

C. 2017 OIL PRODUCTION

| MONTH | #7-3 (BO) | #8-2 (BO) | LEASE TOTALS (BO) |
|-------------|-----------|-----------|-------------------|
| JANUARY | 274 | 216 | 490 |
| FEBRUARY | 301 | 214 | 515 |
| MARCH | 38 | 190 | 228 |
| APRIL | 298 | 221 | 519 |
| MAY | 320 | 256 | 576 |
| JUNE | 247 | 113 | 360 |
| JULY | 10 | 57 | 67 |
| AUGUST | 94 | 100 | 194 |
| SEPTEMBER | 275 | 67 | 342 |
| OCTOBER | 344 | 290 | 634 |
| NOVEMBER | 325 | 369 | 694 |
| DECEMBER | 326 | 406 | 732 |
| 2017 TOTALS | 2852 | 2499 | 5351 |

D. SEE ITEM 1.

REMAINING RESERVES 40,000 BOE

E. The subject well, in order to produce or inject at a future time will need the following:

1. RIH AND CEMENT/SQUEEZE INJECTION ZONE.
2. SCENARIO FOR PRODUCER - PERFORATE NEW ZONE, ACIDIZE, SWAB TEST, RUN PRODUCTION TBG, RIH W/ BHP AND ROD STRING, PUT WELL INTO PRODUCTION.
3. SCENARIO FOR INJECTOR - RIH WITH PACKER AND COATED TBG, MIT WELL, PUT INTO SERVICE.

F. THE SUBJECT WELL HAS PASSED MIT AS OF FEBRUARY 15, 2018. NO FURTHER ACTION IS NEEDED. PLUGGING COSTS ABOVE ARE CURRENT PRICE.

EXHIBIT B

A. HERMAN L. LOEB
P.O. BOX 524
LAWRENCEVILLE, IL 62439-0524

NW/4 NE/4 SECTION 1-25S-14W, STAFFORD COUNTY, KS

EC SERVICES, LLC
P.O. BOX 142
WHITEWATER, KS 67154

NW/4 SECTION 1-25S-14W, STAFFORD COUNTY, KS

REGINALD D. FISHER
110 N. EXCHANGE ST.
ST. JOHN, KS 67576

SE/4 SECTION 36-24S-14W, STAFFORD COUNTY, KS

EDISON OPERATING COMPANY, LLC
8100 E. 22ND ST. NORTH
BUILDING 1900
WICHITA, KS 67226

SW/4 SECTION 31-24S-13W, STAFFORD COUNTY, KS

B. NONE