



KANSAS CORPORATION COMMISSION 1322488
OIL & GAS CONSERVATION DIVISION

Form CP-1
March 2010

This Form must be Typed
Form must be Signed
All blanks must be Filled

WELL PLUGGING APPLICATION

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

OPERATOR: License #: 31769
Name: Atmos Energy Corporation
Address 1: 1200 11TH AVE
Address 2: _____
City: GREELEY State: CO Zip: 80631 + _____
Contact Person: Steve Mitchell
Phone: (970) 304-2066

API No. 15 - 15-091-19232-00-01
If pre 1967, supply original completion date: 09/05/1935
Spot Description: _____
SE_NW_NESE Sec. 17 Twp. 13 S. R. 23 East West
2209 Feet from North / South Line of Section
711 Feet from East / West Line of Section
Footages Calculated from Nearest Outside Section Corner:
 NE NW SE SW
County: Johnson
Lease Name: METROPOLITAN L. I. CO. Well #: 4

Check One: Oil Well Gas Well OG D&A Cathodic Water Supply Well Other: _____
 SWD Permit #: _____ ENHR Permit #: _____ Gas Storage Permit #: _____

Conductor Casing Size: _____ Set at: _____ Cemented with: _____ Sacks
Surface Casing Size: 0 Set at: 0 Cemented with: 0 Sacks
Production Casing Size: 0 Set at: 0 Cemented with: 0 Sacks

List (ALL) Perforations and Bridge Plug Sets:

Elevation: 966 (G.L. / K.B.) T.D.: 351 PBTD: _____ Anhydrite Depth: _____
(Stone Corral Formation)

Condition of Well: Good Poor Junk in Hole Casing Leak at: _____
(Interval)

Proposed Method of Plugging (attach a separate page if additional space is needed):

At this time production casing and surface casing sizes are unknown and will be identified during plugging activities. Determine status of well, if necessary pump mud to kill mud. Trip in 1 or 2 inch tubing to total depth. Flush well with fresh water to clean hole. Circulate cement to surface. Top off with cement after tripping out.

Is Well Log attached to this application? Yes No Is ACO-1 filed? Yes No

If ACO-1 not filed, explain why:

It is unknown if an ACO-1 has been filed for this well. The KCC research has determined Atmos Energy Corporation has acquired this well through acquisition of former Union Gas System, Inc. The information provided by the KCC is attached.

Plugging of this Well will be done in accordance with K.S.A. 55-101 et. seq. and the Rules and Regulations of the State Corporation Commission

Company Representative authorized to supervise plugging operations: Jerry Shaffer

Address: 1509 West Maple City: Independence State: Kansas Zip: 67301 + _____

Phone: (620) 494-6784

Plugging Contractor License #: 5491 Name: W & W Production Company, General Partnership

Address 1: 1150 HWY 39 Address 2: _____

City: CHANUTE State: KS Zip: 66720 + 5215

Phone: (620) 431-4137

Proposed Date of Plugging (if known): _____

Payment of the Plugging Fee (K.A.R. 82-3-118) will be guaranteed by Operator or Agent

Submitted Electronically

**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 # 31769
Name: Atmos Energy Corporation
Address 1: 1200 11TH AVE
Address 2: _____
City: GREELEY State: CO Zip: 80631 + _____
Contact Person: Jerry Shaffer
Phone: (620) 496-6784 Fax: (_____) _____
Email Address: Jerry.Shaffer@atmosenergy.com

Well Location:
SE NW NE SE Sec. 17 Twp. 13 S. R. 23 East West
County: Johnson
Lease Name: METROPOLITAN L. I. CO. Well #: 4

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

Surface Owner Information:
Name: Cedar Creek Development Company, Inc.
Address 1: 11040 Oakmont St.
Address 2: _____
City: Overland Park State: Kansas Zip: 66210 + _____

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 (House Bill 2032), 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 Submitted Electronically

Conservation Division
Finney State Office Building
130 S. Market, Rm. 2078
Wichita, KS 67202-3802



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

Shari Feist Albrecht, Chair
Thomas E. Wright, Commissioner
Jay Scott Emler, Commissioner

Sam Brownback, Governor

November 18, 2016

Cedar Creek Development Company, Inc.
11040 Oakmont St.
Overland Park, KS 66210

RE: Kansas Surface Owners Notification Act
Lease Name: Metropolitan I Co Well No.: 4
Location: 17-13S-23E Montgomery County
Current Operator: Atmos Energy Corporation
API: 15-091-19232-00-01

Dear Nature Conservatory:

The 2009 Legislature passed *House Bill 2032*, known as the *Kansas Surface Owners Notice Act*. This Act requires the KCC to provide copies of drilling intents, operator transfers and well plugging applications to the surface owner if they are not provided by the lease operator. The *Operator of Record* has advised us that they have not provided you with a copy of the attached Well Plugging Application (CP-1) and Certification of Compliance with the Kansas Surface Owner Notification Act (KSONA-1) forms. Therefore, this letter and the attached forms shall serve as notice of the operator's action(s) in relation to the above-referenced well.

You do not need to respond to the KCC. Please contact the operator listed on the enclosed forms if you have any questions.

Cordially,

Rene Stucky
Production Department Supervisor

Encls. (CP-1; KSONA-1 forms)

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



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

Jay Scott Emler, *Chairman*
Shari Feist Albrecht, *Commissioner*
Pat Apple, *Commissioner*

Sam Brownback, *Governor*

October 13, 2016

Atmos Energy Corporation
c/o The Prentice-Hall Corporation System, Kansas, Inc.
2900 SW Wanamaker Drive, Suite 204
Topeka, Kansas 66614
Registered Agent for Atmos Energy Corporation

Atmos Energy Corporation
P.O. Box 650205
Dallas, Texas 75265

Steve Mitchell
Atmos Energy Corporation (KCC License #31769)
1200 11th Avenue
Greeley, Colorado 80631

**Re: Metropolitan L.I. Co. wells #2, #4, & #5
API #15-091-19230, API #15-091-19232, & API #15-091-19236
Sec. 17-13s-23e, Johnson County, Kansas**

Operator:

Commission Staff have determined that the referenced wells appear to be abandoned. Pursuant to K.S.A. 55-179(b), you appear to be responsible for plugging the wells. I am hopeful we can resolve this matter without the Commission taking formal enforcement action.

Staff research indicates the wells were drilled in about 1935 by Sagamore Oil & Gas Company. That company appears to have been a subsidiary of, and/or was later merged into, Union Gas System, Inc.

In addition to drilling the wells, Sagamore Oil & Gas and/or Union Gas System appear to be the last entities to operate the wells and the last entities to file paperwork with the Commission regarding the wells. Eventually, Union Gas System merged into United Cities Gas Company, and then United Cities Gas Company merged into Atmos Energy Corporation. Under Commission statutes, that makes Atmos Energy Corporation responsible for the referenced wells.

I understand you may wish to conduct your own research regarding this matter, and I have attached Staff's field inspection to assist you. You are welcome to contact me with any questions. I may be reached at the telephone number listed at the top of this page.

In terms of deadlines, if the Commission has not received Well Plugging Applications ("CP-1s") for the referenced wells by November 18, 2016, and I have not stated otherwise to you, then Staff will file a Motion to Show Cause after that date, asking the Commission to require your attendance at a formal hearing. Once the Commission receives the CP-1s, you will have 30 days to plug the wells, unless we have agreed to more time. Otherwise, Staff will file a Motion to Show Cause.

Sincerely,

Jon Myers
Litigation Counsel, Conservation Division
Kansas Corporation Commission

cc: Patrick Shields & John Almond, KCC Conservation Division
James G. Flaherty, Anderson & Byrd LLP, 216 S. Hickory, P.O. Box 17, Ottawa, Kansas 66067

KCC OIL/GAS REGULATORY OFFICES

Inspection Date 02/22/2016 District: 3 Incident Number: 5374

- New Situation Lease Inspection
- Response to Request Complaint
- Follow-up Field Report

Operator License No: 3149 API: 1509119232 Q3 NW Q2: NE Q1: SE
 Operator Name: Trend Properties SEC 17 TWP 13 RGE 23 RGEDIR E
 Address: 1518 Lakestone Dr. FSL: 2209
 City: Olathe FEL: 711
 State Kansas Zip Code: 66061 Lease: MetLifeInsCompa Well No.: 4
 Phone contact: 913-782-3080 County: JO

Reason for Investigation:

Chad Hartman emailed me about an abandoned gas well he found next to his property.

Problem:

Multiple abandoned gas wells located in the NE 1/4 and SE 1/4 of this section.

Persons contacted:

Chad Hartman chad4ksu@gmail.com

Findings:

I inspected the property on 2-22-2016. I located the well that Mr. Hartman contacted me about at the back end of his property. I searched RBDMS, KGS, and the Eastern Kansas Database records and determined that this well was likely the Metropolitan Life Insurance Company #4 well. The records show that the well was spud on 9-2-1935 by Sagamore Oil and Gas Company. I also found records for four other wells drilled around this same date on the Metropolitan Life Insurance Company lease by the same operator and listed as #1, #2, #3, and #5. I found the #2 and #5 wells. The #2 well is located directly underneath a high voltage power line. I was not able to find the #3 or #1 wells. The #1 well may have plugged by Trend Properties in 1997 and called the Walton old 1 well. Based on the footages given on the plugging application on file, the #3 well may be located on the property of the Cedar Creek Elementary school. The Johnson county courthouse records show an assignment from Miller Bros. Production Co. to TAD Gas, Inc. (Tom Rendleman) effective 2-23-1987.

Actions / Recommendation

Follow-up Required

Deadline Date:

I will forward this field report to Steve Korf for a possible fee fund plugging for well #2, #4 and #5 and possibly search for the well #3 to determine if it needs to be plugged properly.

Photo's Taken:

3

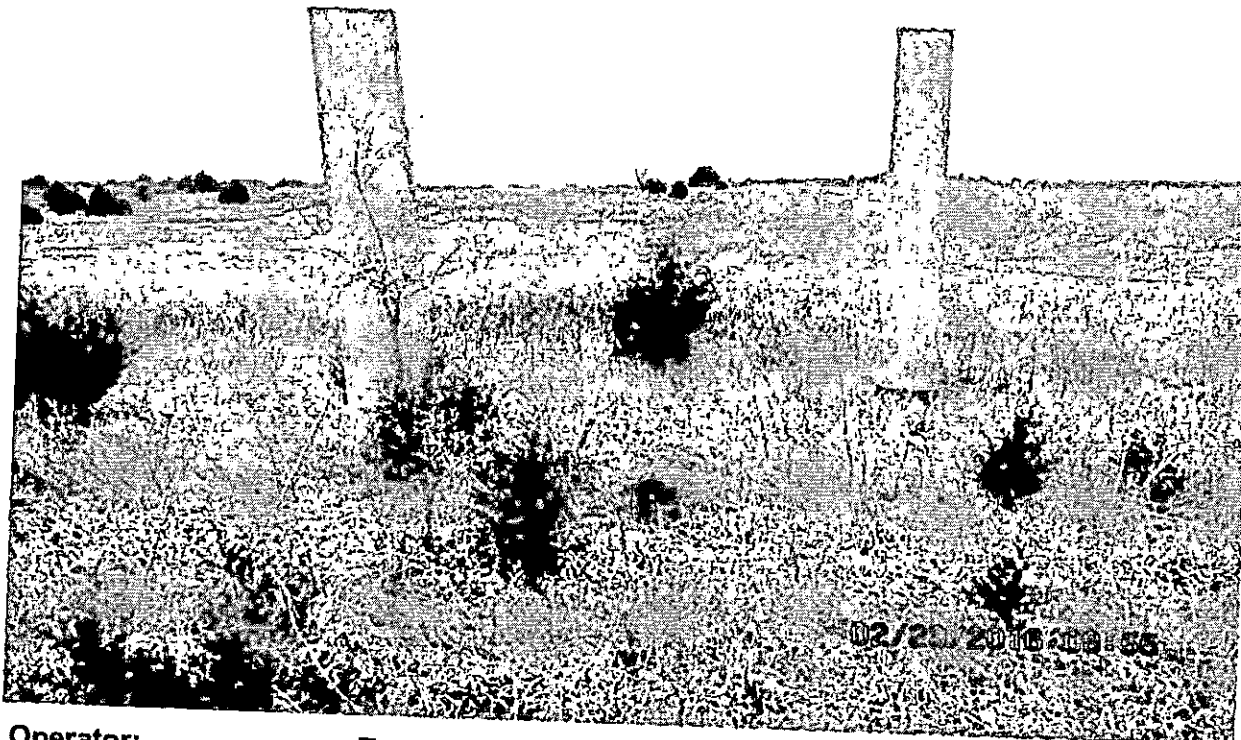
- RBDMS KGS TA DBF **Report Prepared By:** Taylor Herman
- T1 DBF District Files Courthouse **Position:** ECRS

KCC OIL/GAS REGULATORY OFFICES

Additional Findings:

Tom Rendleman is also the name associated with the Trend Properties license #3149. In the early 1980's Miller Bros Production Co. drilled the Walton #1 through #4 wells on this property. In 1997 Trend Properties plugged these four wells and two additional old wells, with one likely being the Metropolitan Life Ins. #1. After speaking with the Wichita legal staff, it appears that there is no responsible party for the three abandoned gas wells due to the fact that all companies are dissolved in the state of Kansas. The property is currently being developed for a housing development. The current landowner is Cedar Creek Development Co. Inc. 11040 Oakmont St. Overland Park, KS 66210 with a contact named Ronald A. Mather.

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator:	Trend Properties EXPIRED	KLN:	3149
Lease:	Metropolitan Life Insurance Co.	Legal:	17-13-23
County	Johnson	PIC ID #:	IMG-0564
Subject:	MetLifeInsCo #2 gas well	Pic Orientation:	Facing West
FEL:	652	LATITUDE	-94.873761
FSL:	3345	LONGITUDE	38.921819
API#:	15-091-19230	TIME:	8:55 AM
Date:	2/22/2016		
Staff:	Taylor Herman		

Additional Information:

This well is located directly underneath a hight voltage powerline.

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator:	Trend Properties EXPIRED	KLN:	3149
Lease:	Metropolitan Life Insurance Co.	Legal:	17-13-23
County	Johnson	PIC ID #:	IMG-0555
Subject:	MetLifeInsCo #4 gas well	Pic Orientation:	Facing West
FEL:	711	LATITUDE	-94.873976
FSL:	2209	LONGITUDE	38.918699
API#:	15-091-19232		
Date:	2/22/2016	TIME:	9:18 AM
Staff:	Taylor Herman		

Additional Information:

KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator:	Trend Properties EXPIRED	KLN:	3149
Lease:	Metropolitan Life Insurance Co.	Legal:	17-13-23
County	Johnson	PIC ID #:	IMG-0566
Subject:	MetLifeInsCo #5 gas well	Pic Orientation:	Facing West
FEL:	2004	LATITUDE	-94.878515
FSL:	3346	LONGITUDE	38.921848
API#:	15-091-19236		
Date:	2/22/2016	TIME:	9:16 AM
Staff:	Taylor Herman		

Additional Information:

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



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

Jay Scott Emler, Chairman
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

Sam Brownback, Governor

November 18, 2016

Steve Mitchell
Atmos Energy Corporation
1200 11TH AVE
GREELEY, CO 80631

Re: Plugging Application
API 15-091-19232-00-01
METROPOLITAN L. I. CO. 4
SE/4 Sec.17-13S-23E
Johnson County, Kansas

Dear Steve Mitchell:

The purpose of this letter is twofold. First, this letter is to notify you that the Conservation Division has received your plugging proposal, form CP-1, for the above well and has reviewed the proposal for completeness. The central office will now forward your CP-1 to the district office listed below for review of the proposed plugging method. **Please contact the district office for approval of your proposed plugging method at least five (5) days before plugging the well, pursuant to K.A.R. 82-3-113(b). If a workover pit will be used during the plugging of the well it must be permitted. A CDP-1 form must be filed and approved prior to the use of the pit in accordance with K.A.R. 82-3-600.**

This letter is also to notify you that during the central office's review of your CP-1 for license number verification, staff has discovered that you are not the current operator of record of the above well on file with the Conservation Division. **Central office staff is therefore requesting that you verify that you are the operator of record of the above well. The proper procedure for verifying operator authority is by filing a Conservation Division form T-1 (Request for Change of Operator; Transfer of Injection or Surface Pit Permit).** If a T-1 has already been filed with the Conservation Division reflecting the transfer of operator authority, please disregard this paragraph. If a T-1 has not been filed reflecting the transfer, please see the attached letter, which explains the T-1 filing process.

The Conservation Division's review of form CP-1, either in the central or district office, does not include an inquiry into well ownership or the filing operator's legal right to plug the well. Furthermore, this notice in no way constitutes authorization to plug the above well by persons not having legal rights of ownership or interest in the well.

This notice is void after May 17, 2017. The CP-1 filing does not bring the above well into compliance with K.A.R 82-3-111 with regard to the Commission's temporary

abandonment requirements.

Sincerely,
Production Department Supervisor

cc: District 3

(620) 432-2300

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



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

Jay Scott Emler, Chairman
Shari Feist Albrecht, Commissioner
Pat Apple, Commissioner

Sam Brownback, Governor

November 18, 2016

SEE ORIGINAL/LEGACY OPERATOR DATA
KCC OFFICES--
TOPEKA, KS 66612

Re: Plugging Application
API 15-091-19232-00-01
METROPOLITAN L. I. CO. 4
SE/4 Sec.17-13S-23E
Johnson County, Kansas

On November 17, 2016 a well plugging application (CP-1) was received, which indicated to Staff that Atmos Energy Corporation is the current operator of the METROPOLITAN L. I. CO. lease. However, Conservation Division records indicate you have not filed a Request for Change of Operator; Transfer of Injection or Surface Pit Permit (Conservation Division Form T-1) transferring operator responsibility to Atmos Energy Corporation for the METROPOLITAN L. I. CO. lease. SEE ORIGINAL/LEGACY OPERATOR DATA therefore remains the Commission's operator of record and party responsible for the proper care and control of the METROPOLITAN L. I. CO. lease.

K.A.R. 82-3-136(a) provides that if operator responsibility is transferred, the past operator shall report the transfer to the Conservation Division within 30 days of the change upon a form prescribed by the Commission (the T-1); and/or K.A.R. 82-3-410(a) provides that authority to operate an injection well shall not be transferred from one operator to another without the approval of the Conservation Division. Furthermore, the transferring operator shall in writing notify the Conservation Division of its intent to transfer the injection authority, on a form prescribed by the Commission, the T-1, and in compliance with K.A.R. 82-3-136.

Staff will provide you with 28 days from this letter's date to bring the METROPOLITAN L. I. CO. lease into compliance with K.A.R. 82-3-136 and/or K.A.R. 82-3-410(a). As such, you will have until December 16, 2016, to bring the METROPOLITAN L. I. CO. lease into compliance. To bring your operations into compliance, you need to file a T-1 with the Conservation Division for the METROPOLITAN L. I. CO. lease. A blank T-1 is enclosed with this letter. The T-1 is also available on the Conservation Division's website, at <http://www.kcc.state.ks.us/conservation/forms/index.htm>, or upon request in the Conservation Division's central office in Wichita or any of the Conservation Division's district offices. If SEE ORIGINAL/LEGACY OPERATOR DATA believes it is still the operator of the METROPOLITAN L. I. CO. lease, you need to contact Jonelle Rains, the Conservation Division's Supervisor of

Environmental Protection and Remediation, immediately to address the situation. Jonelle Rains may be reached at the Conservation Division's central office in Wichita, at the contact information listed on the bottom of this page.

If by December 16, 2016, the Conservation Division has not received the T-1 requested, or you have not contacted Jonelle Rains and resolved this situation, Staff may refer the matter to Conservation Division legal staff with a recommendation for an administrative penalty or penalties. Violations of K.A.R. 82-3-136(a) and K.A.R. 82-3-410(a) are punishable by up to a \$1,000 fine for the first violation, \$2,000 for a second violation, and \$3,000 and operator license review for a third violation. In addition, Staff may ask the Commission to shut in your current operations until compliance is achieved.

Please contact the Conservation Division immediately, or provide the requested information by December 16, 2016, to remedy the above possible violation(s) and avoid further compliance action by the Commission. Please include a copy of this letter with completed T-1 form upon filing with the Conservation Division.

Sincerely,
Production Department Supervisor

cc: Steve Mitchell
Atmos Energy Corporation
1200 11TH AVE
GREELEY CO 80631