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KANSAS CORPORATION COMMISSION

2016.04.25 09:09:24
Kansas Corporation Commission
/S/ Amy L. Green

APR 22 2016

LEGAL SECTION

RELATIVE ENERGY, INC
213 N 3rd ST
Lindsborg KS 67456
620-242-7766

April/22/2016

Amy L Green
KCC Conservation Division
266 N Main, Ste 220
Wichita KS 67202

16-cons-721-C540

Re: Holm Lease – Un-plugged well.
Motion to Vacate

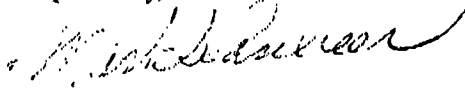
Dear Ms Green,

I did not get notification of the date of the hearing. Enclosed is a copy of the previous correspondence I received from the KCC concerning this matter. I am in no way disputing the plugging matter but I would like the default order to be vacated on the grounds that I did not receive proper notification.

I have been digging into old records trying to find receipts from the rig and the cement company showing that the well is plugged properly. So far I haven't been successful but I'm still looking. In the meantime, I have a backhoe and am willing to dig the well up and see what's there. My dad, Charles Casebeer, was actually overseeing the operation and Ralph Tittle was our KCC area supervisor at that time. I was involved but I don't remember any of the details of how the well was left. The field is planted in wheat, which looks real good. In behalf of the farmers I hope we can wait until after harvest.

I don't want to be an adversary of the KCC. Had I know about the hearing, I would have been there and would have said the same thing. I am willing to do whatever is necessary to resolve this situation. My cell phone number is 620-242-7766 and my email address is maap@cox.net. Thank you.

Respectfully,



Mark S Casebeer

- b. the current or last operator of the lease upon which such well is located, irrespective of whether such operator plugged or abandoned such well;
- c. the original operator who plugged or abandoned such well; and
- d. any person who without authorization tampers with or removes surface equipment or downhole equipment from an abandoned well.

5. K.S.A. 55-180 gives the Commission a cause of action against responsible parties for the reasonable plugging costs of abandoned wells.

6. K.A.R. 82-3-120 provides that no Operator shall conduct activities at a well without a current license.

II. STAFF'S ALLEGATION OF FACTS

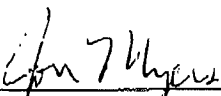
7. The wells listed on the attached Exhibit A are unplugged. As the wells are listed on Operator's license, which is expired, the wells appear to be abandoned. Pursuant to Kansas statutes and Commission regulations, Operator appears to be responsible for plugging the wells.

8. If Operator does not bring these wells into compliance with Commission regulations, then Operator's license should be suspended and any injection authority associated with the unplugged wells should be revoked.

III. CONCLUSION

9. Based on the above, Staff requests that an Order to Show Cause be issued, designating a prehearing officer and scheduling a prehearing conference.

Respectfully submitted,


Jonathan R. Myers, #25975
Litigation Counsel
Kansas Corporation Commission

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