

In the matter of an Order to Show Cause)	Docket No.: 17-CONS-3194-CSHO
issued to Cal Jones (“Operator”) regarding)	
responsibility under K.S.A. 55-179 for)	CONSERVATION DIVISION
unplugged wells on an expired license.)	
)	License No.: 5276

For the following reasons, Commission Staff moves for an Order to Show Cause, the designation of a prehearing officer, and the scheduling of a prehearing conference in this matter:

a. Any operator of a waterflood or other pressure maintenance program deemed to be causing pollution or loss of usable water;

- 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

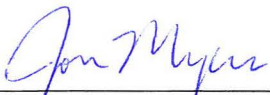
7. The wells listed on the attached Exhibit A are unplugged. As the wells are listed on Operator's license, which is expired, the wells appear to be abandoned. Pursuant to Kansas statutes and Commission regulations, Operator appears to be responsible for plugging the wells.

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,



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Kansas Corporation Commission

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Exhibit A

Jones, Cal License: 5276

<u>Unplugged Wells on Operator's License</u>			
API Well #	Lease Name / Well #	Well Location	County
15-113-00619-00-00	PETERSON 1	6-18S-3W, SWNESW	MCPHERSON
15-113-01112-00-00	LIVELY 3	21-19S-1W, SWNWNE	MCPHERSON
15-115-20194-00-00	UNRAU B 1	27-19S-1E, SWSENE	MARION
15-115-20418-00-00	G AND C FARMS B 3	30-18S-1E, NESWSE	MARION
15-115-20575-00-00	RUTH 1	30-18S-1E,	MARION
15-115-20597-00-00	ALICE JONES 1	30-18S-1E, SWSENE	MARION

CERTIFICATE OF SERVICE

I certify that on October 17, 2016, I caused a complete and accurate copy of this Motion to be served via United States mail, with the postage prepaid and properly addressed to the following:

Cal Jones
300 N 1st
Canton, KS 67428

/s/ Jonathan R. Myers
Jonathan R. Myers
Litigation Counsel
Kansas Corporation Commission