

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

In the matter of the application of Shakespeare Oil) Docket No.: 25-CONS-3411-CUIC
Company, Inc. for a permit to authorize injection)
into the Whitehorse and Cedar Hills formations at) CONSERVATION DIVISION
the Wells #2-27 well in Section 27, Township 16)
South, Range 35 West, Wichita County, Kansas.) License No.: 7311

**MOTION FOR THE DESIGNATION OF A PREHEARING OFFICER AND THE
SCHEDULING OF A PREHEARING CONFERENCE**

Staff of the Kansas Corporation Commission (Staff and Commission, respectively) files this motion requesting the designation of a presiding officer and scheduling of a prehearing conference. In support of its motion, Staff states as follows:

1. On January 10, 2025, Shakespeare Oil Company, Inc. (Operator) submitted an Application for Injection Well (U-1) form for the captioned well.¹ On March 17, 2025, Operator submitted an amended page 1 of the U-1 for the captioned well.² To date, Operator has not published notice of its application.

2. Upon reviewing Operator's U-1, Staff determined that the U-1 should be denied due to the threat the well presents to fresh and usable water. On May 7, 2025, Staff sent a letter to Operator formally denying its U-1 for the captioned well. The letter provided Operator until June 6, 2025 to provide Staff with a written request for hearing if it wished to pursue its application.³

3. On June 5, 2025, Staff received a letter from Operator's counsel requesting a hearing regarding its U-1 for the captioned well.⁴

¹ Exhibit A.

² Exhibit B.

³ Exhibit C.

⁴ Exhibit D.

4. Based upon the above, Staff does not recommend approval of Operator's U-1 for the captioned well and believes it would be appropriate for the Commission to designate a presiding officer and have a prehearing conference scheduled regarding this matter.

WHEREFORE, for the reasons described above, Staff respectfully moves the Commission to issue an order designating a prehearing officer and scheduling a prehearing conference that will allow further development of a procedural schedule in this matter.

Respectfully submitted,

/s/ Kelcey Marsh

Kelcey A. Marsh #28300
Litigation Counsel | Kansas Corporation Commission
266 N. Main, Suite 220 | Wichita, Kansas 67202
Phone: 316-337-6200 | Email: Kelcey.Marsh@ks.gov

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION
APPLICATION FOR INJECTION WELL

Form U-1
August 2020
Form must be Typed
Form must be Signed
All blanks must be Filled

Disposal ☒

Enhanced Recovery: ☐ Repressuring

☐ Waterflood

☐ Tertiary

Date: 01/08/2025

Operator License Number: 7311 Exp 06/30/25

Operator: Shakespeare Oil Company, Inc.

Address: 202 West Main St

Salem, IL 62881

Janessa Vandever

Contact Person: Don Williams (cc)

Phone: 618-548-1585

Email: don@shakespeare-oil.com

Permit Number: D-34,567

API Number: 15-203-20394-00-00

Well Location

Sec. 27 Twp. 16S S. R. 35W ☐ E ☐ W

1540 feet from ☒ S / ☐ N Line of Section

1360 feet from ☐ E / ☒ W Line of Section

GPS Location: Lat: 38.6315241, Long: -101.1785873
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☒ NAD27 ☐ NAD83 ☐ WGS84

Lease Description: S 135 acres of SW/4 27-16S-35W

Lease Name: Wells Well Number: 2-27

Field Name: Unnamed

County: Wichita

Deepest Usable Water

Formation: Ogallala Received by

Depth to Bottom of Formation: 200 Kansas Corporation Commission

JAN 10 2025

Check One: ☐ Old Well Being Converted ☒ Newly Drilled Well ☐ Well to be Drilled

Surface Elevation: 3197 feet Well Total Depth: 4898 feet Plug Back Depth: 2450 feet

Conservation Division, Wichita, KS

Datum of top of injection formation: +1754 feet (reference mean sea level)

Injection Formation Description:

Name	top / bottom	perf / open hole	depth
Whitehorse	1450 / 1608	perf	1452-76 to 1522-82 feet
Cedar Hills	1794 / 2078	perf	1800 to 2000 feet

List of Wells/Facilities Supplying Produced Saltwater or Other Fluids Approved by the Conservation Division:

(attach additional sheets if necessary)

Lease Operator	Lease/Facility Name	Lease/Facility Description	Well ID & Spot Location
1. Shakespeare Oil Co., Inc.	Jantz 1-22	SWc SW SE 22-16S-35W	730/FSL, 1835/FEL SE/4 22-17S-35W
2.			
3.			

Producing Formation	Strata Depth	Total Dissolved Solids (if available)
1. LKC	4106 to 4257 feet	49,800 mg/l
2.	to feet	mg/l
3.	to feet	mg/l

Maximum Requested Liquid Injection Rate: 500 bbls / day; or

Maximum Requested Gas Injection Rate: scf / day. Type of Gas:

Maximum Requested Injection Pressure: 0 psig

Mail to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67202-1513

1/14/25 Recd in UIC Dept.

Shakespeare Oil Company, Inc.

WELLS #2-27 SWD

Wildcat

1054' FSL 1360' FWL SW/4

Sec. 27-16S-35W

Wichita County, Kansas

API# 15-203-20394

KB: 3206' GL: 3197'

Permit #:

Status: Salt Water Disposal

Set Production Casing: 11/19/24

Started Disposing: NA

12 1/4" Hole

237'

8 5/8" new MPW 23# LS @ 237' w/ 170 sx Class A 2% Gel, 3% CaCl. Circ.

2 3/8" Seal-Tite

Tbg/Rods/Pump

44 jts (1428.2') used Seal-tite lined 2 3/8" tbg

2 3/8" x 5 1/2" x 2.90' Seal-tite lined AD-1 pkr set @ 1434' KB

2 3/8" EUE 8rd Seal-tite lined tail pipe (2.30') set @ 1436.40' w/ 3' KB adj

AD-1 Pkr @ 1434'

Whitehorse Sand 1452'-1476' (24') w/ 2 jspf 4" HSC

Whitehorse Sand 1522'-1582' (60') w/ 1 spf Strip Jets

Cedar Hills 1800'-1900' (100') w/ 1 spf Strip Jets

Cedar Hills 1850'-1860' (10') w/ 1 jspf 4" HSC

Cedar Hills 1900'-2000' (100') w/ 1 spf Strip Jets

COTD 2350'
PBSD 2450'
2500'

5 1/2" new MWP 15.5# R3 LTC w/ 170 sx SMD @ 11.2 ppg, 200 sx SMD 12 ppg
& 50 sx SMD @ 13 ppg. Circ 60 sx to pit.

History

- 12/16/24 Perf Cedar Hills 1900'-2000' (100') w/ 3 1/2" strip jets, 1 spf. RU AA Fishing Tools air foam unit. Circ 3 hrs, last 2 hrs no returns.
- 12/17/24 Tiger Ac Cedar Hills w/ 500 G 15% DWA w/ extra surfactants. Started feeding 0.3 bpm @ 1000#, final 1/2 bpm @ 900#. ISIP 900#. 10 min 850#. Foam 2 hrs, 1st hr - good returns, 2nd clean.
- 12/18/24 Perf Cedar Hills 1800'-1900' (100') w/ 3 1/2" strip jets, 1 spf & 1850'-60' (10') w/ 4" HSC, 1 jspf. Swab down, 30 min test, no fillup.
- 12/30/24 Perf Whitehorse 1522'-82' (60') w/ 3 1/2" strip jets 1 spf & 1452'-76' (24') w/ 4" HSC, 2 jspf. Swab down to 1250', 30 min fl 850'.
- 12/31/24 Foamed 2 hrs, cleaned up quick. TOH w/ tbg. Csg swab 6 runs, rec foam & sand.
- 01/02/25 FL 750' from surface. Swab steady dropped to 1000'. Rec 3" of red & white sand in bucket per pull, decreased to 1/2". HU csg to swab tank, took 168 bbl water in 40 min on strong vac. SI csg.

RTD 4897'

LTD 4898'

7 7/8" Hole

Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, KS

Shakespeare Oil Company	
Field	Wildcat
Well Name	WELLS #2-27 SWD
Date	January 8, 2024
File Name	WELLS #2-27 SWD.dwg
Drawn By	Jeff Scarbrough

Offset Operators, Unleased Mineral Owners and Landowners acreage

(Attach additional sheets if necessary)

Name:

Shakespeare Oil Company, Inc.

Landmark Resources, Inc.

Earl & Deborah Smith Trust

Gwen S. Wells Rev. Trust

Legal Description of Leasehold:

All sec 27-16S-35W, NE/4 & SE/4 28-16S-35W, NW/4 34-16S-35W

All 33-16S-35W

NW/4 34-16S-235W

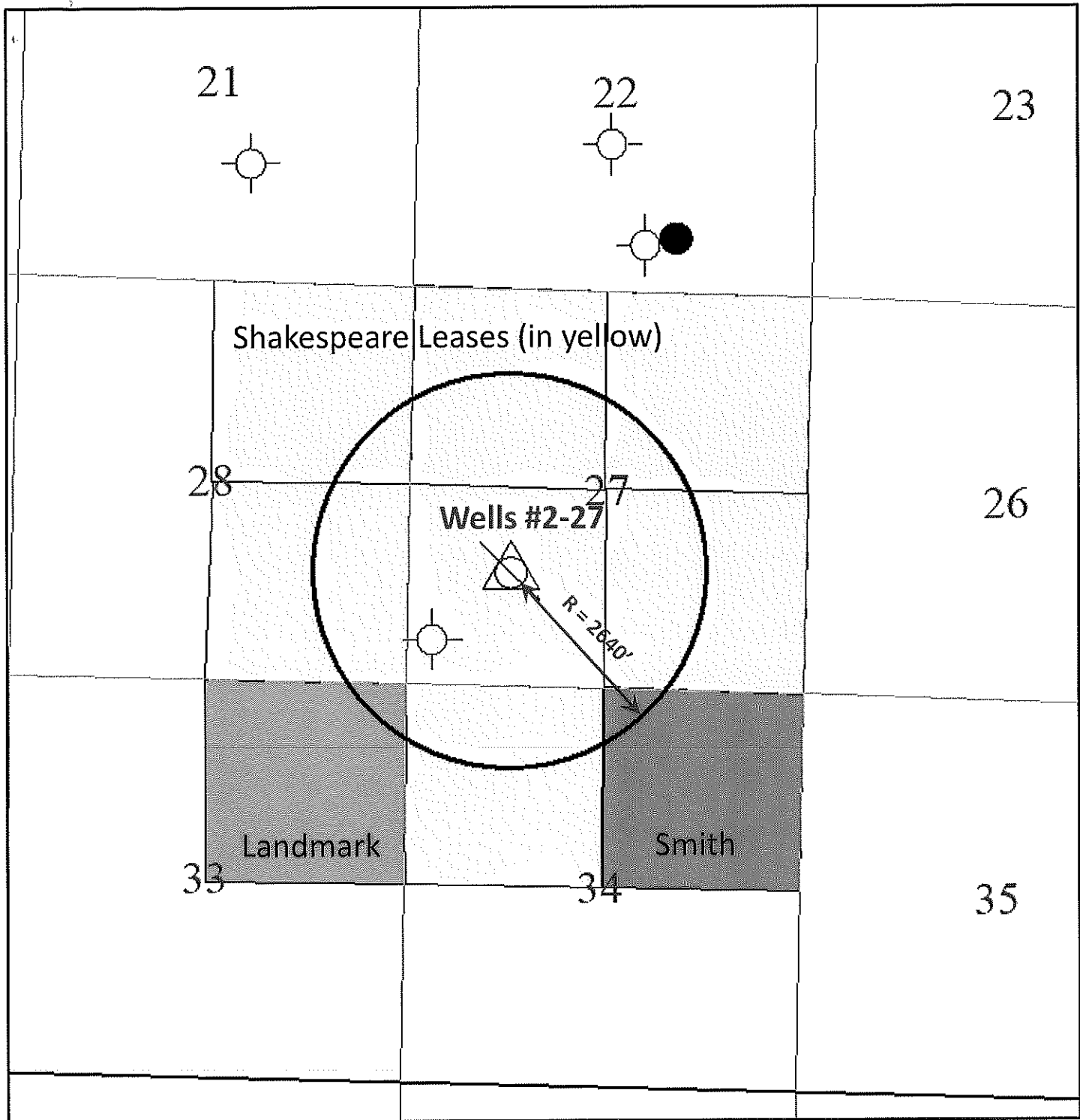
S 135 ac SW/4 27-16S-35W

Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, ^{KS}**Instructions:**

1. Fully complete application, including page 4 (plat map) showing subject well and all known oil, gas and input wells, including wells being drilled, inactive wells, or dry holes, within one-half mile. Show lease names and operators or unleased mineral rights owners of all lands within one-half mile. Show well numbers and elevations of producing formation tops.
2. Attach some type of log (drillers log, electric log, etc.).
3. Attach some type of verification of cementing for surface casing, longstring, D.V. tool, perforations, etc. (Cement ticket and job log, bond log, etc.).
4. Fill in schematic drawing of subsurface facilities including: size, setting depth, amount of cement, measured or calculated tops of cement for each of surface, intermediate (if any) and production casing; size and setting depth of tubing and packer; geological zone of injection showing top and bottom of injection interval.
5. The original and one copy of the application and all attachments shall be mailed to the Conservation Division.
6. Deliver or mail one (1) copy of the application to the landowner on whose land the injection well is located and to each operator or lessee of record and each unleased mineral rights owner within one-half mile of the applicant well before or when you file this application.
7. Approval of this application, if granted, is valid only as long as there are no substantial changes in operation set forth in the application. A substantial change requires the approval of a new application. **No injection well may be used without prior written authorization.**
8. All application fees must accompany the application.
9. After confirming the Conservation Division's receipt of this application, publish notice of the application in the official county newspaper of record where the well(s) is located. Mail a copy of the affidavit to the Conservation Division upon receipt from the newspaper.



Shakespeare Oil Company, Inc.

**Wells #2-27
27-16S-35W
Wichita County, KS**

Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, KS

1 mile

Affidavit of Notice Served

Re: Application for: Shakespeare Oil Company, Inc.Well Name: Wells 2-27 Legal Location: 1540'FSL, 1360'FWL SW/4 27-16S-35W, Wichita Co., KS

Note: A copy of this affidavit must be served as a part of the application.

Name:

Address: (Attach additional sheets if necessary)

Shakespeare Oil Company, Inc.202 W Main St., Salem, IL 62881Landmark Resources Inc.4900 Woodway Dr, Ste 880, Houston, TX 77056-1881Earl & Deborah Smith Trust1303 E County Rd M, Marienthal, KS 67863Gwen S. Wells Rev. Trust1149 N County Rd 22, Marienthal, KS 67863Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, KS

I certify that the statements and information contained in this application are true and correct to the best of my knowledge, and that a true and correct copy of this application was delivered or mailed to all required persons, and that such persons are identified on Page 5 of this application.



Donald R. Will, VICE PRESIDENT
Applicant or Duly Authorized Agent

Subscribed and sworn before me on: January 8, 2025

Beth Ann Mensen
Notary Public

My Commission Expires: 4-26-28

Protests may be filed by any party having a valid interest in the application. Petitions for protests shall be in writing and shall clearly identify the name and address of the protester and the title of the application. The petition shall include a clear and concise statement of the direct and substantial interest of the protester in the proceeding, including specific allegations as to the manner in which the grant of the application will cause waste, violate correlative rights, or pollute the water resources of the state of Kansas. Protesters shall serve the protest upon the applicant by mail or personal service at the same time or before the protester files the protest with the Conservation Division. Protests must be filed within 30 days of the publication notice of the application.

Mail to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67202-1513

Shakespeare Oil Company

INCORPORATED
202 WEST MAIN STREET
SALEM, ILLINOIS
62881
WWW.SHAKESPEARE-OIL.COM

January 8, 2025

Gwen S. Wells Rev Trust
1149 N County Rd 22
Marienthal, KS 67863

Re: Notice of Filing Application
Wells 2-27
1540' FSL, 1360' FWL SW/4, Sec. 27-16S-35W
Wichita County, KS

To Mr. & Mrs. Wells:

This letter is to inform you that Shakespeare Oil Company, Inc., in accordance with the rules of the KCC Conservation Division, has applied for a permit to convert the Wells 2-27 to a Salt Water Disposal Well to inject produced saltwater into the Whitehorse and Cedar Hills formations for the purpose of salt water disposal.

A copy of the application is attached for your reference.

If you have any further questions regarding this matter, please feel free to contact me by letter at this office, or by phone at (618) 548-1585. I can also be reached via e-mail at don@shakespeare-oil.com.

Very truly yours,
Shakespeare Oil Company, Inc.



Donald R. Williams
Vice President

cc: Well File

Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, KS

Shakespeare Oil Company

INCORPORATED
202 WEST MAIN STREET
SALEM, ILLINOIS
62881
WWW.SHAKESPEARE-OIL.COM

January 8, 2025

Earl & Deborah Smith Trust
1303 E County Rd M
Marienthal, KS 67863

Re: Notice of Filing Application
Wells 2-27
1540' FSL, 1360' FWL SW/4, Sec. 27-16S-35W
Wichita County, KS

To Mr. & Mrs. Smith:

This letter is to inform you that Shakespeare Oil Company, Inc., in accordance with the rules of the KCC Conservation Division, has applied for a permit to convert the Wells 2-27 to a Salt Water Disposal Well to inject produced saltwater into the Whitehorse and Cedar Hills formations for the purpose of salt water disposal.

A copy of the application is attached for your reference.

If you have any further questions regarding this matter, please feel free to contact me by letter at this office, or by phone at (618) 548-1585. I can also be reached via e-mail at don@shakespeare-oil.com.

Very truly yours,
Shakespeare Oil Company, Inc.



Donald R. Williams
Vice President

cc: Well File

Shakespeare Oil Company
INCORPORATED
202 WEST MAIN STREET
SALEM, ILLINOIS
62881
WWW.SHAKESPEARE-OIL.COM

January 8, 2025

Landmark Resources Inc.
4900 Woodway Dr., Ste 880
Houston, TX 77056-1881

Re: Notice of Filing Application
Wells 2-27
1540' FSL, 1360' FWL SW/4, Sec. 27-16S-35W
Wichita County, KS

To Whom It May Concern:

This letter is to inform you that Shakespeare Oil Company, Inc., in accordance with the rules of the KCC Conservation Division, has applied for a permit to convert the Wells 2-27 to a Salt Water Disposal Well to inject produced saltwater into the Whitehorse and Cedar Hills formations for the purpose of salt water disposal.

A copy of the application is attached for your reference.

If you have any further questions regarding this matter, please feel free to contact me by letter at this office, or by phone at (618) 548-1585. I can also be reached via e-mail at don@shakespeare-oil.com.

Very truly yours,
Shakespeare Oil Company, Inc.



Donald R. Williams
Vice President

cc: Well File

Received by
Kansas Corporation Commission

JAN 10 2025

Conservation Division, Wichita, KS

Shakespeare Oil Company

INCORPORATED
202 WEST MAIN STREET
SALEM, ILLINOIS
62881
WWW.SHAKESPEARE-OIL.COM

January 8, 2025

Received by
Kansas Corporation Commission

JAN 10 2025

Kansas Corporation Commission
Oil & Gas Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513

Conservation Division, Wichita, KS

Re: **Application for Salt Water Disposal Well**
Wells 2-27
1540' FSL & 1360' FWL SW/4, Sec. 27-16S-35W
Wichita County, KS

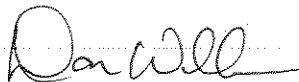
Dear Sir or Madam:

Enclosed please find a completed original Form U-1 Application For Injection Well, and one copy; together with supporting attachments, and a check for \$200.00, to complete the above referenced well as a Salt Water Disposal well.

The Affidavit of Publication from the Wichita County Native Sun and the MIT, as soon as it is completed, will be forwarded as soon as it is available.

If you have any questions, or need additional information regarding this application, please do not hesitate to contact me by phone at this office, or by email at don@shakespeare-oil.com.

Very truly yours,
Shakespeare Oil Company, Inc.



Donald R. Williams
Vice President

Encl.
cc: Well File

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION
APPLICATION FOR INJECTION WELL

Form U-1
August 2020
Form must be Typed
Form must be Signed
All blanks must be Filled

Disposal ☒

Enhanced Recovery: ☐ Repressuring

☐ Waterflood

☐ Tertiary

Date: 03/14/2025

Operator License Number: 7311 Exp. 06/30/25

Operator: Shakespeare Oil Company, Inc.

Address: 202 West Main St (Co.)
Salem, IL 62881

Tanessa Vandever

Contact Person: Don Williams (CC)

Phone: 618-548-1585

Email: don@shakespeare-oil.com

Permit Number: D-34,567

API Number: 15-203-20394-00-00

Well Location

Sec. 27 Twp. 16S S. R. 35W ☐ E ☐ W
1540 feet from ☒ S / ☐ N Line of Section

1360 feet from ☐ E / ☒ W Line of Section

GPS Location: Lat: 38.6315241, Long: -101.1785873
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☒ NAD27 ☐ NAD83 ☐ WGS84

Lease Description: S 135 acres of SW/4 27-16S-35W

Lease Name: Wells Well Number: 2-27

Field Name: Unnamed

County: Wichita

Deepest Usable Water

Formation: Ogallala

Depth to Bottom of Formation: 200

Received by
Kansas Corporation Commission

MAR 17 2025

Check One: ☐ Old Well Being Converted

☒ Newly Drilled Well

☐ Well to be Drilled

Surface Elevation: 3197 feet Well Total Depth: 4898 feet Plug Back Depth: 2450 feet

Datum of top of injection formation: +1754 feet (reference mean sea level)

Injection Formation Description:

Name	top / bottom	perf / open hole	depth
Whitehorse	1450 / 1514	perf	1452 to 1476 feet
Cedar Hills	1520 / 2078	perf	1522-82 to 1800-2000 feet

List of Wells/Facilities Supplying Produced Saltwater or Other Fluids Approved by the Conservation Division:
(attach additional sheets if necessary)

Lease Operator	Lease/Facility Name	Lease/Facility Description	Well ID & Spot Location
1. Shakespeare Oil Co., Inc.	Jantz 1-22	SWc SW SE 22-16S-35W	730'FSL, 1835'FEL SE/4 22-17S-35W
2.			
3.			

Producing Formation	Strata Depth	Total Dissolved Solids (if available)
1. LKC	4106 to 4257 feet	49,800 mg/l
2.	to feet	mg/l
3.	to feet	mg/l

Maximum Requested Liquid Injection Rate: 500 bbls / day; or

Maximum Requested Gas Injection Rate: scf / day. Type of Gas:

Maximum Requested Injection Pressure: 0 psig

Mail to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67202-1513

3/18/25 Prod in UIC Dept.

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

May 7, 2025

Don Williams
Shakespeare Oil Company, Inc.
202 West Main Street
Salem, IL 62881

RE: **Application for Injection Well**
D-34,567
Wells 2-27
Sec. 27-T16S-R35W

Dear Don Williams:

Commission staff reviewed your application for the Wells 2-27 requesting injection authority. The application (to the above referenced well) is **denied** based on the following factor:

- Injection as described in your application would endanger usable groundwater.

On this basis, staff is unable to recommend administrative approval of your application for injection authority. Should you wish to proceed with this application, you have the option of requesting a hearing in this matter. If you do not wish to proceed with this application, or if I do not receive a written request for a hearing by June 6, 2025, I will recommend dismissal of this injection well application.

Should you have any questions regarding this matter, please feel free to contact me. Thank you for your cooperation in this matter.

Sincerely,

Evan Darrah
Underground Injection Control

David E. Bengtson

DIRECT: 316.268.7943

OFFICE: 316.265.8800

david.bengtson@stinson.com

June 5, 2025

Via Fax - 316.337.6211

Evan Darrah
Underground Injection Control
Kansas Corporation Commission
Conservation Division
266 N. Main St., Suite 220
Wichita, KS 67202-1513

Via Electronic Mail

Kelcey Marsh
Litigation Counsel
Kansas Corporation Commission
Conservation Division
266 N. Main St., Suite 220
Wichita, KS 67202-1513

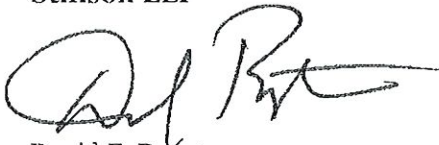
Re: Application for Injection Well
D-34,567
Wells #2-27 well
Section 27-16S-35W

Dear Evan and Kelcey,

In response to Mr. Darrah's letter to Shakespeare Oil Company, Inc. ("Shakespeare") dated May 7, 2025, Shakespeare (KCC License No. 7311) wishes to proceed with its Application for authority to inject into the Wells #2-27 well (D-34,567), and hereby requests a hearing on that Application. We ask that a prehearing conference and the hearing be scheduled in that matter at mutually agreeable future dates. We will be representing Shakespeare in this matter, and request that we receive copies of all notices and other correspondence and communications regarding this matter.

Sincerely,

Stinson LLP



David E. Bengtson

DEB

1625 North Waterfront Parkway, Suite 300, Wichita, KS 67206

CERTIFICATE OF SERVICE

25-CONS-3411-CUIC

I, the undersigned, certify that a true and correct copy of the attached Motion has been served to the following by means of first class mail and electronic service on June 12, 2025.

DAVID E. BENGTSON, ATTORNEY
STINSON LEONARD STREET LLP
1625 N WATERFRONT PKWY STE 300
WICHITA, KS 67206
david.bengtson@stinson.com

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KANSAS CORPORATION COMMISSION
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WICHITA, KS 67202-1513
todd.bryant@ks.gov

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WICHITA, KS 67202-1513
evan.darraha@ks.gov

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WICHITA, KS 67202-1513
jon.myers@ks.gov

JANESSA VANDEVEER
SHAKESPEARE OIL CO., INC.
202 W MAIN ST
SALEM, IL 62881-1519

/s/ Paula J. Murray
Paula J. Murray
