

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

In the matter of the failure of Mark L. Haas ) Docket No. 25-CONS-3087-CPEN  
(Operator) to comply with K.A.R. 82-3-120. )  
) CONSERVATION DIVISION  
)  
\_\_\_\_\_ ) License No. 5935

**PRE-FILED SUPPLEMENTAL TESTIMONY OF**

**RYAN A. HOFFMAN**

**ON BEHALF OF COMMISSION STAFF**

**MARCH 7, 2025**

1 **Q. What is your name and business address?**

2 A. Ryan A. Hoffman, 266 N. Main St., Ste. 220, Wichita, Kansas 67202.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Kansas Corporation Commission (KCC) as Director of the  
5 Conservation Division.

6 **Q. Would you please briefly describe your background and work experience.**

7 A. I received my Bachelor of Arts degree in Political Science from the University of Kansas in  
8 2004 and my Juris Doctorate from Washburn University School of Law in December of 2007  
9 where I also achieved a Certificate in Natural Resources Law. I was a Legislative Fellow for  
10 the Kansas Legislative Research Department during the 2008 legislative session where I  
11 helped staff various legislative committees. I began as a Litigation Counsel with the KCC  
12 Conservation Division in August of 2008. As Litigation Counsel, my duties included drafting  
13 and reviewing Penalty Orders and various Applications, attending Oil and Gas Advisory  
14 Committee meetings and legislative hearings, and providing advice on regulatory matters to  
15 Conservation Division staff.

16 I was later promoted to Director in June of 2013. As Director, I chair the Oil and Gas  
17 Advisory Committee established by K.S.A. 55-153. I also represent the KCC as a member  
18 of the Executive Committee on the Board of Directors for the Groundwater Protection  
19 Council, and I was appointed as the Associate Representative for Kansas on the Interstate  
20 Oil and Gas Compact Commission (IOGCC) by Governor Brownback in 2014. I have served  
21 as the Chair of the Legal and Regulatory Affairs Committee and as the Chair of the Council  
22 of Oil and Gas Attorneys for the IOGCC. Further, I'm currently serving my second term as  
23 President of the Oil, Gas, and Mineral Law Section of the Kansas Bar Association.

1 **Q. What duties does your position with the KCC Conservation Division involve?**

2 A. Generally speaking, I oversee the daily operations of the Division. I directly supervise the  
3 four Professional Geologist Supervisors who oversee District Office operations, as well as  
4 three Central Office Supervisors who are responsible for the Environmental Remediation  
5 Department, Underground Injection Control and Production Departments, and the  
6 Administrative Department. I also share oversight of the two Litigation Counsels housed  
7 within the Conservation Division. When necessary, I brief the Commissioners on emerging  
8 issues and provide testimony to the Legislature on matters related to the regulation of the oil  
9 and gas industry in Kansas.

10 **Q. Have you previously testified before this Commission?**

11 A. Yes.

12 **Q. On February 4, 2025, the Commission issued an Order which expanded the scope of this**  
13 **proceeding to include: (1) whether Operator is legally responsible for the proper care**  
14 **and control of the wells pursuant to K.S.A. 55-179, and (2) what Operator's obligation**  
15 **should be if Operator is responsible under that statute. Are you familiar with the**  
16 **Commission's Order?**

17 A. Yes.

18 **Q. What is the purpose of K.S.A. 55-179?**

19 A. K.S.A. 55-179 specifically outlines the persons who are legally responsible for the proper care  
20 and control of an abandoned well. Specifically, K.S.A. 55-179(b) limits the person legally  
21 responsible for the care and control of an abandoned well to one or more of the following: (1)  
22 Any person causing pollution or loss of usable water through the well, including any operator  
23 of an injection well, disposal well or pressure maintenance program; (2) the most recent

1 operator to produce from or inject or dispose into the well, but if no production or injection  
2 has occurred, the person that caused the well to be drilled. A person shall not be legally  
3 responsible for a well pursuant to this paragraph if: (A) Such person can demonstrate that the  
4 well was physically operating or was in compliance with temporary abandonment regulations  
5 immediately before such person transferred or assigned the well to an operator with an active  
6 operator's license; and (B) a completed report of transfer was filed pursuant to commission  
7 regulations if transferred or assigned after August 28, 1997; (3) the person that most recently  
8 accepted responsibility for the well by accepting an assignment or by signing an agreement  
9 or other written document, between private parties, in which the person accepted  
10 responsibility. Accepting an assignment of a lease, obtaining a new lease or signing an  
11 agreement or any other written document between private parties shall not in and of itself  
12 create responsibility for a well located upon the land covered thereby unless such instrument  
13 adequately identifies the well and expressly transfers responsibility for such well; (4) the  
14 operator that most recently filed a completed report of transfer with the commission in which  
15 such operator accepted responsibility for the well or, if no completed report of transfer has  
16 been filed, the operator that most recently filed a well inventory with the commission in which  
17 such operator accepted responsibility for the well. Any modification made by commission  
18 staff of any such documents shall not alter legal responsibility unless the operator was  
19 informed of such modification and approved of the modification in writing; (5) the operator  
20 that most recently plugged the well, if no commission funds were used; and (6) any person  
21 that does any of the following to an abandoned well without authorization from the  
22 commission: (A) Tampers with or removes surface or downhole equipment that was  
23 physically attached to the well or inside the well bore; (B) intentionally destroys, buries or

1 damages the well; (C) intentionally alters the physical status of the well in a manner that will  
2 result in more than a de minimis increase in plugging costs; or (D) conducts any physical  
3 operations upon the well.

4 **Q. Does Operator appear to be responsible for the proper care and control of the wells at**  
5 **issue in this matter under K.S.A. 55-179?**

6 A. There is sufficient evidence that Operator appears to be responsible for each of the wells at  
7 issue that Staff has decided to pursue this docket.

8 **Q. Can you explain how Operator is responsible for the care and control of the Alexander**  
9 **#7 well, API #15-207-01379?**

10 A. Yes. As Mr. Kraig Stoll noted in his testimony, Staff was able to locate a Request for Change  
11 of Operator (T-1) form for the Alexander lease transferring the lease from L.C. Bodeman, Jr.  
12 to Operator in January 1996. The T-1 form for the Alexander lease was included in Exhibit  
13 KS-2. That T-1 form included the Alexander #7 well and listed the well as producing at the  
14 time of transfer. Additionally, KGS records indicate that Operator sold 45 barrels of oil from  
15 the Alexander lease in 1996. I have attached a copy of the KGS records for the Alexander  
16 Lease to my testimony as *Exhibit RH-1*. Staff's most recent findings for the Alexander #7  
17 well are included on pages 1 through 5 of Exhibit A to Staff's Motion to Add Wells to Penalty  
18 Order. Based on the information available, Operator is responsible for the care and control of  
19 the Alexander #7 under K.S.A. 55-179(b)(2) as the most recent operator to produce from the  
20 well and/or under K.S.A. 55-179(b)(4) as the operator that most recently filed a completed  
21 report of transfer with the Commission in which such operator accepted responsibility for the  
22 well.

1 **Q. Can you explain how Operator is responsible for the care and control of the Clarson #6**  
2 **well, API #15-207-24732?**

3 A. Yes. The Clarson #6 was listed as a permitted well to be drilled for oil on Operator's license.  
4 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Additionally, Staff's  
5 most recent findings for the Clarson #6 are included on pages 6 through 14 of Exhibit A to  
6 Staff's Motion to Add Wells to Penalty Order. Upon inspection of the permitted well location,  
7 Staff located gravel near the location representing an old pad around the wellsite and was able  
8 to use a metal detector to locate a spot where the casing would be below surface. Staff was  
9 also able to use historical arial photos that showed tracks and a turnaround spot near the  
10 location of where the Clarson #6 was permitted. Based on the information available, Operator  
11 appears to be responsible for the care and control of the Clarson #6 under K.S.A. 55-179(b)(2)  
12 as the most recent operator to produce from the well, but if no production has occurred, the  
13 person that caused the well to be drilled.

14 **Q. Can you explain how Operator is responsible for the care and control of the Estes #8,**  
15 **API #15-207-02841?**

16 A. Yes. The Estes #8 is listed under Operator's license in Commission databases as an enhanced  
17 oil recovery well with its injection authorization cancelled. Staff's most recent findings of the  
18 Estes #8 well are included on pages 15 through 18 of Exhibit A to Staff's Motion to Add  
19 Wells to Penalty Order. As Mr. Stoll noted in his testimony, there is documentation that  
20 indicates Staff identified Operator as being responsible for the Estes #8 well and requested  
21 Operator file transfer documents, file an annual report, and conduct a Mechanical Integrity  
22 Test (MIT) on the well. Included in Exhibit KS-3 is a UIC File Review for the Estes #8 well.  
23 Additionally, there is a letter from Staff to Operator regarding the Estes #8 and stating that it

1 had been brought to Staff's attention that Operator was now operating the A.J. Estes Lease.  
2 This also is an indication that the injection authority for the well was not cancelled until after  
3 Staff determined Operator was operating the A.J. Estes lease. Based on the information  
4 available, Operator appears to be responsible for the care and control of the Estes #8 under  
5 K.S.A. 55-179(b)(2) as the most recent operator to produce from or inject or dispose into the  
6 well.

7 **Q. Can you explain how Operator is responsible for the care and control of the Knox #12,**  
8 **API #15-207-23492?**

9 A. Yes. The Knox #12 well was previously listed as plugged, but was updated to inactive  
10 enhanced oil recovery well after staff performed its lease inspection and learned that the well  
11 had been mistaken by Haas Petroleum for the Knox M-4. I have attached a field report  
12 regarding this update to my testimony as *Exhibit RH-2*. Staff's most recent findings are  
13 included on pages 19 through 24 of Exhibit A to Staff's Motion to Add Wells to Penalty  
14 Order. As Mr. Stoll noted in his testimony, Staff was able to locate a Request for Change of  
15 Operator (T-1) form from October 1985 for the Knox well transferring it from R. E. French  
16 Oil Company to Operator. The T-1 form for the Knox well was included in Exhibit KS-2.  
17 Based on the information available, Operator appears to be responsible for the care and control  
18 of the Knox #12 under K.S.A. 55-179(b)(2) as the most recent operator to inject or dispose  
19 into the well and/or under K.S.A. 55-179(b)(4) as the operator that most recently filed a  
20 completed report of transfer with the Commission in which such operator accepted  
21 responsibility for the well. Additionally, Staff listed Haas Petroleum, LLC as a working  
22 operator for the well. This is an indication that Haas Petroleum is also potentially responsible  
23 for the Knox #12 well.

1 **Q. Can you explain how Operator is responsible for the care and control of the Lauber #44,**  
2 **API #15-207-26091?**

3 A. Yes. The Lauber #44 was listed as a permitted well to be drilled for oil on Operator's license.  
4 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon inspection of  
5 the permitted well location, Staff located an inactive well. Staff's most recent findings are  
6 included on pages 25 through 27 of Exhibit A to Staff's Motion to Add Wells to Penalty  
7 Order. Based on the information available, Operator appears to be responsible for the care and  
8 control of the Lauber #44 under K.S.A. 55-179(b)(2) as the most recent operator to produce  
9 the well, but if no production has occurred, the person that caused the well to be  
10 drilled. Additionally, Staff's report found cement present at the surface of this well, so  
11 Operator may also be responsible for the care and control of the well under K.S.A.  
12 55-179(b)(5) as the operator that most recently plugged the well.

13 **Q. Can you explain how Operator is responsible for the care and control of the Ott A #A**  
14 **21, API #15-073-01562?**

15 A. Yes. The Ott A #A 21 well was listed under Operator's license as an authorized injection well.  
16 Staff's most recent findings are included on pages 29 through 32 of Exhibit A to Staff's  
17 Motion to Add Wells to Penalty Order. As Mr. Stoll notes in his testimony, there is an internal  
18 memo from August 1995 regarding the need for a T-1 form from Operator regarding the  
19 Lamont Ott "A" lease. Operator conducted a Mechanical Integrity Test (MIT) on the Ott A  
20 #A 21 well in August 1995 and September 2000. Based on the information available, Operator  
21 appears to be responsible for the care and control of the Ott A #A 21 under K.S.A.  
22 55-179(b)(2) well as the most recent operator to inject or dispose into the well.



1           Additionally, in February 2007, a company named Petrol Oil & Gas, License No. 33247,  
2 attempted to conduct a MIT on the well; however, the MIT failed. There is no documentation  
3 which indicates the Ott A #A 21 well was transferred to or operated by Petrol Oil & Gas,  
4 whose license expired in May 2010. Since the well remains under Operator's license as an  
5 unplugged authorized injection well and does not have a current MIT, Operator is also likely  
6 responsible for the well pursuant to K.S.A. 55-179(b)(1) as a person causing pollution or loss  
7 of usable water through the well. However, Petrol Oil & Gas could also be a potentially  
8 responsible party for the Ott A #A 21 well in addition to Operator.

9 **Q. Can you explain how Operator is responsible for the care and control of the Ott A #28,**  
10 **API #15-073-01747?**

11 A. Yes. The Ott A #28 well was listed under Operator's license as an authorized injection well.  
12 Staff was unable to locate this well during its most recent inspection, but noted additional  
13 areas still need to be investigated. As Mr. Stoll notes in his testimony, there is an internal  
14 memo from August 1995 regarding the need for a T-1 form from Operator regarding the  
15 Lamont Ott "A" lease. Operator conducted a MIT on the Ott A #28 well in August 1995 and  
16 September 2000. Based on the information available, Operator appears to be responsible for  
17 the care and control of the Ott A #28 well under K.S.A. 55-179(b)(2) as the most recent  
18 operator to inject or dispose into the well.

19           Additionally, in February 2007, a company named Petrol Oil & Gas, License No. 33247,  
20 attempted to conduct a MIT on the well; however, the MIT failed. There is no documentation  
21 which indicates the Ott A #28 well was transferred to or operated by Petrol Oil & Gas whose  
22 license expired in May 2010. Since the well remains under Operator's license as an unplugged  
23 injection well and does not have a current MIT, Operator is also likely responsible for the well

1 pursuant to K.S.A. 55-179(b)(1) as a person causing pollution or loss of usable water through  
2 the well. However, Petrol Oil & Gas could also be a potentially responsible party for the Ott  
3 A #28 well in addition to Operator.

4 **Q. Can you explain how Operator is responsible for the care and control of the Rhea #21,**  
5 **API #15-207-02842?**

6 A. The Rhea #21 is listed under Operator's license in Commission databases as having its  
7 injection authorization cancelled. It appears that the injection authorization for the well was  
8 cancelled by Houston-Oklahoma Oil Company in September 1983 in order to be converted to  
9 a producing well. I have attached a copy of the documentation cancelling the injection  
10 authority to my testimony as *Exhibit RH-3*. Staff's most recent findings for the Rhea #21 are  
11 included on pages 33 through 36 of Exhibit A to Staff's Motion to Add Wells to Penalty  
12 Order. As Mr. Stoll noted in his testimony, there is documentation that indicates Operator had  
13 an oil and gas lease for the property where the Rhea #21 well is located. It appears that the  
14 Rhea leases date back to as early as 1916. Staff was unable to locate any T-1 forms transferring  
15 wells to Operator. Additionally, when Operator transferred the wells on this lease to Haas  
16 Petroleum, the Rhea #21 was not included. This documentation is included in Exhibit KS-3.  
17 KGS records indicate that up to 12 Rhea wells were being operated in this area prior to that  
18 transfer. I have attached the KGS records for the Rhea lease to my testimony as *Exhibit RH-*  
19 *4*. Based on the information available at this time, Staff believes the Rhea #21 was operated  
20 by Operator which makes Operator responsible for the care and control of the well under  
21 K.S.A. 55-179(b)(2) as the most recent operator to produce from the well.

1 **Q. Can you explain how Operator is responsible for the care and control of the Sowder #2,**  
2 **API #15-207-25001?**

3 A. Yes. The Sowder #2 was listed as a permitted well to be drilled for oil on Operator's license.  
4 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon inspection of  
5 the permitted well location, Staff located an inactive well. Staff's findings are included on  
6 pages 37 through 42 of Exhibit A to Staff's Motion to Add Wells to Penalty Order. Based on  
7 the information available, Operator appears to be responsible for the care and control of the  
8 Sowder #2 under K.S.A. 55-179(b)(2) as the most recent operator to produce from the well,  
9 but if no production has occurred, the person that caused the well to be drilled.

10 **Q. Can you explain how Operator is responsible for the care and control of the Stockebrand**  
11 **#7, API #15-207-25247?**

12 A. Yes. The Stockebrand #7 was listed as a permitted well to be drilled for oil on Operator's  
13 license. A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon  
14 inspection of the permitted well location, Staff located an inactive well. Staff's most recent  
15 findings are included on pages 44 through 48 of Exhibit A to Staff's Motion to Add Wells to  
16 Penalty Order. Based on the information available, Operator appears to be responsible for the  
17 care and control of the Stockebrand #7 under K.S.A. 55-179(b)(2) as the most recent operator  
18 to produce from the well, but if no production has occurred, the person that caused the well  
19 to be drilled.

20 **Q. Can you explain how Operator is responsible for the care and control of the Stockebrand**  
21 **II #2-M, API #15-207-22216?**

22 A. Yes. The Stockebrand II #2-M was listed as a permitted well to be drilled for oil on Operator's  
23 license. A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon

1 inspection of the permitted well location, Staff located an inactive well. Staff's most recent  
2 findings are included on pages 44 through 48 of Exhibit A to Staff's Motion to Add Wells to  
3 Penalty Order. Based on the information available, Operator appears to be responsible for the  
4 care and control of the Stockebrand II #2-M under K.S.A. 55-179(b)(2) as the most recent  
5 operator to produce from the well, but if no production has occurred, the person that caused  
6 the well to be drilled.

7 **Q. Can you explain how Operator is responsible for the care and control of the Switzer**  
8 **#2-H, API #15-207-25089?**

9 A. Yes. The Switzer #2-H was listed as a permitted well to be drilled for oil on Operator's license.  
10 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon inspection of  
11 the permitted well location, Staff located an inactive well. Staff's most recent findings are  
12 included on pages 49 through 50 of Exhibit A to Staff's Motion to Add Wells to Penalty  
13 Order. Based on the information available, Operator appears to be responsible for the care and  
14 control of the Switzer #2-H under K.S.A. 55-179(b)(2) as the most recent operator to produce  
15 from the well, but if no production has occurred, the person that caused the well to be drilled.

16 **Q. Can you explain how Operator is responsible for the care and control of the Switzer**  
17 **#2-J, API #15-207-24793?**

18 A. Yes. The Switzer #2-J was listed as a permitted well to be drilled for oil on Operator's license.  
19 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon inspection of  
20 the permitted well location, Staff located an inactive well. Staff's most recent findings are  
21 included on pages 51 through 52 of Exhibit A to Staff's Motion to Add Wells to Penalty  
22 Order. Based on that information, Operator appears to be responsible for the care and control

1 of the Switzer #2-J under K.S.A. 55-179(b)(2) as the most recent operator to produce from  
2 the well, but if no production has occurred, the person that caused the well to be drilled.

3 **Q. Can you explain how Operator is responsible for the care and control of the Wallace**  
4 **#16, API #15-207-24885?**

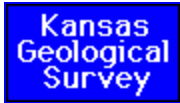
5 A. Yes. The Wallace #16 was listed as a permitted well to be drilled for oil on Operator's license.  
6 A copy of the permit is included in Exhibit KS-1 to Mr. Stoll's testimony. Upon inspection of  
7 the permitted well location, Staff located an inactive well. Staff's most recent findings are  
8 included on pages 53 through 57 of Exhibit A to Staff's Motion to Add Wells to Penalty  
9 Order. Based on that information, Operator appears to be responsible for the care and control  
10 of the Wallace #16 under K.S.A. 55-179(b)(2) as the most recent operator to produce from  
11 the well, but if no production has occurred, the person that caused the well to be drilled.

12 **Q. If the Commission finds Operator to be responsible for these wells pursuant to K.S.A.**  
13 **55-179, what should his responsibility for the wells be?**

14 A. If the Commission finds Operator to be responsible for these wells, then Operator should be  
15 required to obtain a licensed contractor to plug these wells. If Operator fails to plug these  
16 wells, then he should be responsible for reimbursing Staff's costs for plugging the wells.

17 **Q. Does this conclude your testimony?**

18 A. Yes.



## Yearly and monthly production

ALEXANDER Lease



**Lease:** ALEXANDER

**Operator:** Haas, Mark L.

**Location:** T24S, R16E, Sec. 18

**Cumulative Production:** 45.18 barrels (from 1996 to 1996)

**KS Dept. of Revenue Lease Code:** 133626

**KS Dept. of Revenue Lease Name:** ALEXANDER

**Field:** [Vernon](#)

**County:** Woodson

**Producing Zone:**

Data are received monthly from the Kansas Department of Revenue.

## Annual Oil Production, (bbls)

Year	Production	Wells
<a href="#">Production Plots</a>		
1996	45	-

Reported through 5-1996.

Note: bbls is barrels; mcf is 1000 cubic feet.

Pre-1987 cumulative data and monthly volume data is provided under license agreement to the KGS by IHS Energy. As such, it may be reviewed and used for public service and research purposes. It may not be downloaded or used for purposes of re-packaging, reselling or dissemination to third parties.

Kansas Geological Survey

Comments to [webadmin@kgs.ku.edu](mailto:webadmin@kgs.ku.edu)

URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014

Data from Kansas Dept. of Revenue files monthly.

## KCC OIL/GAS REGULATORY OFFICES

**Inspection Date:** 07/29/2022      **District:** 3      **Incident Number:** 8069

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

**Operator License No:** 33640      **API:** 15-207-01033-00-01 **Q3:** SW    **Q2:** NE    **Q1:** NE

**Operator Name:** Haas Petroleum, LLC.      **SEC** 24    **TWP** 24    **RGE** 13    **RGEDIR:** E

**Address:** PO Box 8396      **FSL:** 4600

**City:** Prairie Village      **FEL:** 1100

**State:** KS      **Zip Code:** 66208-1936      **Lease:** Knox M      **Well No.:** 4

**Phone contact:** 913-499-8373      **County:** WO

### Reason for Investigation:

To locate the Knox M #4 well so it could be retested or plugged.

### Problem:

Operator filed a pre test failure on the MIT of this well. Staff was unable to locate well with the footages listed above.

### Persons contacted:

District #3 Staff, Rhonda Epps (913-244-9591).

### Findings:

On July 20, 2022 Ryan Tromsness and I met with Rhonda Epps with Haas Petroleum, LLC., on the Knox Lease. She took us to a well that Haas Petroleum believed to be the Knox M #4. We gps'd the well and upon further inspection we found the Knox M #4 not to be at this location. This was the location of the Knox #12 (15-207-23492-00-01). This was confirmed by old lease maps in the UIC files of the Knox M #4 and the Knox #12.

On July 29, 2022 Ryan Tromsness and I went back to the Knox lease to try and locate the Knox M #4. We were unable to locate a well at the location of the Knox M #4. We checked with a metal detector and physically walked the area around the location footages supplied for the Knox M #4. We did find what could of been an old drill pit by this area but was unable to locate any pipe with the metal detector around this pit at or below surface. (See additional findings)

**Actions / Recommendations**      **Follow-up Required**       **Deadline Date:**

I changed the status of the Knox #12 (15-207-23492-00-01) from PA to IN. Haas Petroleum is going to file a Transfer (T-1) on this well and get it plugged. I will forward this field report to Wichita Production department so they can change the status of the Knox M #4 (15-207-01033-00-01) to PA per lease inspection and scan this field report to well record of the Knox M #4 supporting this status update.

**Photo's Taken:** 0

RBDMS     KGS     KOLAR    **Report Prepared By:** Duane A. Sims

District Files     Courthouse    **Position:** UIC Coordinator/E.C.R.S.

## KCC OIL/GAS REGULATORY OFFICES

### **Additional Findings:**

I contacted Rhonda Epps and discussed this issue with her. I told her I was going to change the Knox #12 from plugged and abandoned (PA) to inactive (IN) and Haas Petroleum would need to file a Transfer on this well and get it plugged. Haas Petroleum was using this well as an injection well, they believed it to be the Knox M #4 instead of the Knox #12. They had also MIT'd this well as the Knox M #4. She agreed that they had been using the well and they would be the responsible party to plug this well. I also told her I was going to do a field report showing that we could not find the Knox M #4 and believed it was plugged in the past. I would turn in the field report and the KCC would change the status of the Knox M #4 to PA per lease inspection.



HOUSTON-OKLAHOMA OIL COMPANY

1717 ST. JAMES PLACE, SUITE 212

HOUSTON, TEXAS 77056

March 5, 1980

State Corporation Commission  
Conservation Division  
(Oil, Gas and Water)  
245 North Water  
Wichita, Kansas 67202

Dear Sirs:

We would appreciate your advising us what is necessary to abandon the water injection project on our leases in Greenwood and Woodson Counties, which are listed below:

C-7811	Greenwood ✓
C-8069	Greenwood ✓
C-13251	Greenwood ✓
C-9884	Greenwood ✓
C-13162	Woodson ✓
C-13109	Woodson ✓

The injection wells on these projects have been inactive for several years.

Thank you for your cooperation in this matter.

Sincerely,

HOUSTON OKLAHOMA OIL COMPANY

  
W. F. Randolph

WFR/dc

cc: Kansas Geological Survey  
Lawrence, Kansas

RECEIVED  
STATE CORPORATION COMMISSION

MAR - 7 1980

CONSERVATION DIVISION  
Wichita, Kansas



State Corporation Commission

CONSERVATION DIVISION

(Oil, Gas and Water)

245 North Water

WICHITA, KANSAS 67202

JOHN CARLIN Governor  
 R. C. LOUX Chairman  
 JANE T. ROY Commissioner  
 WILLIAM G. GRAY Commissioner  
 CAROL J. LARSON Executive Secretary

March 18, 1980

Re: Houston-Oklahoma Oil Co.

- C-7811 Greenwood
- C-8069 Greenwood
- C-13251 Greenwood
- C-9884 Greenwood
- C-13162 Woodson
- C-13109 Woodson

Mr. W. F. Randolph  
 Houston-Oklahoma Oil Company  
 1717 St. James Place, Suite 212  
 Houston, Texas 77056

Dear Mr. Randolph:

Thank you for your letter of March 5, 1980, regarding the above leases which are now inactive.

Before these leases are abandoned, it will be necessary for the wells to be plugged in accordance with KSA-55-128 of the General Rules and Regulations. As soon as this has been done, we can cancel the permits on the leases.

Very truly yours,

*Frank Broadfoot*  
 Frank Broadfoot  
 Kansas Corporation Commission

FB/ew

cc: Kansas Geological Survey  
Lawrence, Kansas

*TA Report*  
*Plan to put on production*  
*no repressuring wells*  
*Cancel*  
*Called 8-4-83*



JOHN CARLIN  
MICHAEL LENNEN  
R. C. (PETE) LOUX  
PHILLIP R. DICK  
JUDITH McCONNELL  
BRIAN J. MOLINE

GOVERNOR  
CHAIRMAN  
COMMISSIONER  
COMMISSIONER  
EXECUTIVE SECRETARY  
GENERAL COUNSEL

State Corporation Commission

CONSERVATION DIVISION

(Oil, Gas and Water)  
200 Colorado Derby Building  
202 West 1st Street  
WICHITA, KANSAS 67202-1286

September 8, 1983

RE: Rhea Lease  
Winterscheid Pool  
Well No. 21  
S/2 Sec. 13-24-13E  
Woodson County, Kansas  
Docket No. C-13,162 (80,419-C)

Houston-Oklahoma Oil Company  
1717 St. James Place, Suite 212  
Houston, Texas 77056

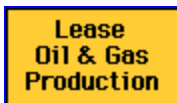
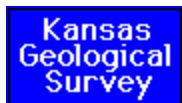
A C K N O W L E D G E M E N T

This is to notify you that authority to inject through the above referenced well has been cancelled as of this date.

Very truly yours,

CAROL J. LARSON, ADMINISTRATOR

cc: KDHE: DO#3; KGS: PI:



## Yearly and monthly production



## RHEA A H-O Lease

**Lease:** RHEA A H-O

**Operator:** Laymon Oil II, LLC

**Location:** T24S, R13E, Sec. 13

**Cumulative Production:** 104102.84 barrels (from 1970 to 2024)

**KS Dept. of Revenue Lease Code:** 101133

**KS Dept. of Revenue Lease Name:** RHEA A

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

**Field:** [Winterschied](#)

**County:** Woodson

**Producing Zone:** Mississippian System

**Well Data (may be an incomplete list):**

<a href="#">T24S R13E, Sec. 13, SW NE SE</a> <b>Lease:</b> RHEA 24-SWD <b>Operator:</b> HOUSTON-OKLAHOMA OIL CO. <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-21923	<a href="#">T24S R13E, Sec. 13, SW SW SW SW</a> <b>Lease:</b> RHEA 1-A <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01064
<a href="#">T24S R13E, Sec. 13, NE SE SW SW</a> <b>Lease:</b> RHEA 12-A <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01065	<a href="#">T24S R13E, Sec. 13, NE NE SW SW</a> <b>Lease:</b> Rhea 'A' 17 <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01068
<a href="#">T24S R13E, Sec. 13, NE NW NE SW</a> <b>Lease:</b> Rhea 'A' 19 <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01069	<a href="#">T24S R13E, Sec. 13, SW SE NE SE</a> <b>Lease:</b> Rhea 'B' 27 <b>Operator:</b> Haas Petroleum, LLC <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-27344
<a href="#">T24S R13E, Sec. 13, SW SW NW SW</a> <b>Lease:</b> Rhea 'A' 26 <b>Operator:</b> Haas Petroleum, LLC <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-27343	<a href="#">T24S R13E, Sec. 13, SW SE SW SW</a> <b>Lease:</b> RHEA 13-A <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01066
<a href="#">T24S R13E, Sec. 13, NW SW SE SE</a> <b>Lease:</b> RHEA 15-A <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-01067	<a href="#">T24S R13E, Sec. 13, SW SW SW</a> <b>Lease:</b> E KIMBALL 7 <b>Operator:</b> <b>Current Operator:</b> Laymon Oil II, LLC <b>API Number:</b> 15-207-02717

Data are received monthly from the Kansas Department of Revenue.

Annual Oil Production,  
(bbls)

Recent Monthly Oil Production, (bbls)

(Complete production available in file saved  
using blue button at top of page.)

Year	Production	Wells
<a href="#">Production Plots</a>		
1970	4,027	-
1971	4,845	-
1972	3,081	1
1973	3,101	1
1974	2,797	1
1975	2,692	1
1976	2,387	1
1977	2,100	1
1978	2,183	1
1979	2,021	1
1980	2,058	1
1981	1,968	1
1982	1,866	1
1983	1,760	1
1984	1,874	1
1985	1,839	1
1986	1,583	1
1987	1,351	1
1988	1,154	1
1989	1,368	1
1990	1,033	1
1991	1,840	1
1992	1,756	1
1993	1,379	1
1994	1,686	1
1995	2,249	1
1996	2,185	6
1997	1,967	5
1998	1,444	5
1999	1,479	5
2000	1,696	5
2001	1,659	5
2002	1,823	5
2003	1,517	5
2004	2,009	5
2005	2,125	5
2006	2,197	6
2007	1,955	6

Year	Month	Production	Wells	Reporter or Purchaser/ Reporting Customer
2014	1	216.87	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	2	153.13	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	3	224.57	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	4	170.27	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	5	256.64	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	6	182.22	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	7	170.56	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	8	256.33	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	9	189.88	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	10	152.68	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	11	181.01	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2014	12	185.16	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	1	245.83	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	2	157.54	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	3	242.9	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	4	165.33	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	5	261.96	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	6	171.77	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	7	126.54	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	8	138.19	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	9	182.93	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	10	223.45	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>

2008	2,179	6
2009	2,297	6
2010	1,984	6
2011	2,261	6
2012	2,078	6
2013	2,002	6
2014	2,339	8
2015	2,150	8
2016	1,608	8
2017	889	8
2018	697	8
2019	1,298	8
2020	1,090	9
2021	1,112	9
2022	940	9
2023	679	9
2024	448	9

Reported through 10-2024.

Note: bbls is barrels; mcf is 1000 cubic feet.

2015	11	164.66	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2015	12	68.63	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	1	300.35	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	2	119.06	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	3	145.37	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	4	76.52	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	5	214.22	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	6	58.48	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	7	102.27	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	8	107.74	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	9	150.75	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	10	149.36	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	11	145.75	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2016	12	37.96	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	1	158.51	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	2	112.26	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	3	116.17	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	4	90.67	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	5	129.06	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	6	72.65	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	7	77.55	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	8	36.75	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	9	39.14	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>

2017	10	36.32	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2017	12	19.75	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	1	41.05	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	2	91.65	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	3	71.94	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	4	42.66	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	5	71.69	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	7	68.12	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	8	28.93	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	9	54.89	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	10	130.49	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2018	11	95.18	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	1	153.57	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	2	62.51	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	3	158.65	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	4	93.38	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	5	84.86	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	6	191.26	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	7	80.59	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	8	128.73	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	9	80.19	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	10	90.01	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2019	11	84.16	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>

2019	12	89.65	8	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2020	1	86.06	9	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2020	2	143.96	9	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2020	4	165.8	9	<a href="#">Coffeyville Resources Refining &amp; Marketing (100%)</a>
2020	6	160.88	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	7	71.57	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	8	83.9	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	9	82.63	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	10	82.99	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	11	75.8	9	<a href="#">M V Purchasing LLC (100%)</a>
2020	12	136.18	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	1	78.89	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	2	93.21	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	3	93.2	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	4	99.83	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	5	126.63	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	6	69.57	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	7	105.13	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	8	126.5	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	9	87.02	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	10	86.81	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	11	63.16	9	<a href="#">M V Purchasing LLC (100%)</a>
2021	12	82.29	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	1	78.1	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	2	73.15	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	3	77.1	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	4	81.64	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	5	96.14	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	6	76.59	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	7	83.67	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	8	78.09	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	9	80.2	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	10	54.79	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	11	75.09	9	<a href="#">M V Purchasing LLC (100%)</a>
2022	12	85.3	9	<a href="#">M V Purchasing LLC (100%)</a>
2023	1	74.74	9	<a href="#">M V Purchasing LLC (100%)</a>
2023	3	148.06	9	<a href="#">M V Purchasing LLC (100%)</a>



2023	5	115.03	9	<a href="#">M V Purchasing LLC (100%)</a>
2023	8	133.59	9	<a href="#">M V Purchasing LLC (100%)</a>
2023	10	122.69	9	<a href="#">M V Purchasing LLC (100%)</a>
2023	12	84.47	9	<a href="#">M V Purchasing LLC (100%)</a>
2024	2	71.73	9	<a href="#">M V Purchasing LLC (100%)</a>
2024	5	132.35	9	<a href="#">M V Purchasing LLC (100%)</a>
2024	8	130.48	9	<a href="#">M V Purchasing LLC (100%)</a>
2024	10	113.29	9	<a href="#">M V Purchasing LLC (100%)</a>

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Pre-1987 cumulative data and monthly volume data is provided under license agreement to the KGS by IHS Energy. As such, it may be reviewed and used for public service and research purposes. It may not be downloaded or used for purposes of re-packaging, reselling or dissemination to third parties.

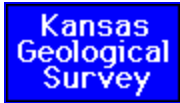
Kansas Geological Survey

Comments to [webadmin@kgs.ku.edu](mailto:webadmin@kgs.ku.edu)

URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014

Data from Kansas Dept. of Revenue files monthly.



## Yearly and monthly production



## RHEA (B) Lease

**Lease:** RHEA (B)

**Operator:** Haas, Mark L.

**Location:** T24S, R13E, Sec. 13

**Cumulative Production:** 21994.48 barrels (from 1970 to 1998)

**KS Dept. of Revenue Lease Code:** 101134

**KS Dept. of Revenue Lease Name:** RHEA B H-O

**Field:** [Winterschied](#)

**County:** Woodson

**Producing Zone:**

Data are received monthly from the Kansas Department of Revenue.

## Annual Oil Production, (bbls)

Year	Production	Wells
<a href="#">Production Plots</a>		
1970	451	-
1971	369	-
1972	372	10
1973	379	10
1974	374	10
1975	232	10
1976	303	10
1977	346	10
1978	300	10
1979	224	10
1980	604	10
1981	1,791	10
1982	1,519	11
1983	1,131	11
1984	1,078	11
1985	938	11
1986	952	11
1987	888	11
1988	847	11
1989	887	11
1990	875	11

1991	882	11
1992	910	11
1993	845	11
1994	1,075	11
1995	1,004	11
1996	853	3
1997	870	3
1998	696	3

Reported through 5-1998.

Note: bbls is barrels; mcf is 1000 cubic feet.

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Kansas Geological Survey

Comments to [webadmin@kgs.ku.edu](mailto:webadmin@kgs.ku.edu)

URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014

Data from Kansas Dept. of Revenue files monthly.

**CERTIFICATE OF SERVICE**

25-CONS-3087-CPEN

I, the undersigned, certify that a true and correct copy of the attached Testimony has been served to the following by means of electronic service on March 7, 2025.

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/s/ Paula J. Murray  
Paula J. Murray

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