

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

In the matter of the failure of Barracuda)	Docket No.: 25-CONS-3360-CPEN
Operating Company (Operator) to comply with)	
K.A.R. 82-3-120 and K.A.R. 82-3-133 by)	CONSERVATION DIVISION
operating under a suspended license.)	
_____)	License No.: 33593

PRE-FILED DIRECT TESTIMONY

OF

M. SHANE JONES

ON BEHALF OF COMMISSION STAFF

AUGUST 22, 2025

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

2 A. M. Shane Jones, 2301 E 13th Street, Hays, Kansas 67601.

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

4 A. I am employed by the Conservation Division of the Kansas Corporation Commission (KCC
5 or Commission), District #4 Office, as a Compliance Officer, Temporary Abandonment (TA)
6 Coordinator, and Environmental Compliance and Regulatory Specialist (ECRS).

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

8 A. I worked on Pulling Unit and Cable Tool workover and completion rigs from 1991 through
9 1998. I then worked for the Kansas Department of Transportation (KDOT) as Maintenance
10 Crew for about a year and a half before transferring to KDOT Construction Inspection as an
11 Engineering Technician. In 2009, I started working for the KCC Conservation Division in the
12 District #2 Office as a Petroleum Industry Regulatory Technician (PIRT). In 2012, I left the
13 KCC and worked for APAC as a Heavy Highway Paving Forman. In 2017, I returned to
14 KDOT Construction as an Engineering Technician. Finally, in 2019, I returned to the KCC
15 Conservation Division as an ECRS. I am currently the Compliance Officer and TA
16 Coordinator for the District #4 Office.

17 **Q. What are your duties with the Conservation Division?**

18 A. As Compliance Officer, I review operator data for compliance with Commission regulations
19 and prepare evidence necessary to recommend penalties for probable violations of those
20 regulations. Specifically, my job includes reviewing Staff field reports, coordinating day-to-
21 day operations of the District #4 Office, sending Notice of Violation (NOV) letters, and
22 generally trying to resolve compliance issues. I work to coordinate scheduling of Staff-
23 witnessed well completions, well pluggings, and mechanical integrity tests. I coordinate the

1 investigation of spills and complaints, verify proper construction of wells, help train District
2 Staff, and work with Commission Staff in Wichita. I conduct inspections and investigations
3 on special projects, or in the absence of assigned Staff, whenever necessary. I work with lease
4 operators, landowners, local, county, and state agencies and organizations to resolve oil and
5 gas related issues.

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

7 A. No.

8 **Q. What is the purpose of your testimony in this matter?**

9 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings
10 in regard to the Shut-In Order issued against Barracuda Operating Company (Operator) in
11 Docket 25-CONS-3360-CPEN (Docket 25-3360).

12 **Q. Please provide a brief overview of the facts in this docket.**

13 A. Operator was penalized for violating K.A.R. 82-3-120 and K.A.R. 82-3-133 for conducting
14 oil and gas operations while its license was suspended.

15 **Q. Why was Operator's license suspended?**

16 A. The Commission issued Penalty Orders against Operator in three Dockets: 25-CONS-3050-
17 CPEN (25-3050), 25-CONS-3223-CPEN (25-3223), and 25-CONS-3242-CPEN (25-3242).
18 Operator was not in compliance with the Commission's orders in all three dockets, therefore,
19 on March 11, 2025, Staff suspended Operator's license. Staff sent a letter to Operator on that
20 same date, informing Operator that its license had been suspended (the letter is attached to the
21 Shut-In Order in this docket as Exhibit A).

1 **Q. Please describe the contents of the license suspension letter Staff sent to Operator on**
2 **March 11, 2025.**

3 A. The letter informed Operator that its license was suspended and gave notice to Operator that
4 if Staff discovered Operator performing oil or gas operations after March 21, 2025, Staff
5 would recommend a shut-in order and a \$10,000 penalty.

6 **Q. Why did the license suspension letter indicate that Staff would recommend a shut-in**
7 **order if Operator was still performing oil or gas operations?**

8 A. K.A.R. 82-3-120(a) provides that no operator shall operate a well without a current license.
9 K.A.R. 82-3-133(a) provides that production of oil or gas in violation of a Commission
10 regulation or order is unlawful.

11 **Q. Did Staff inspect any of Operator's leases while Operator's license was suspended?**

12 A. Yes, on April 17, 2025 (after the March 21, 2025, deadline in the license suspension letter), I
13 inspected Operator's Chapman, Horchem, and Robertson leases.

14 **Q. What did you find when inspecting those leases?**

15 A. I found that Operator's Chapman A #2, Horchem #2-A, and Robertson #1-24 wells were all
16 actively operating. The Chapman A #2 well is an injection well, and during my inspection I
17 found all the valves to the well open and fresh fluids in the saltwater tank, suggesting the well
18 was actively injecting fluids. The Horchem #2-A and Robertson #1-24 wells are both oil wells.
19 During my inspection I found both wells to be actively operating. Pictures showing the pump
20 jacks for the wells in both the upstroke and downstroke positions are attached to the Shut-In
21 Order as Exhibit B.

1 **Q. Is Operator still out of compliance with Dockets 25-3050, 25-3223, and 25-3242?**

2 A. No, Operator came into compliance with Docket 25-3242 on April 22, 2025, with Docket 25-
3 3050 on April 28, 2025, and with Docket 25-3223 on May 23, 2025.

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

5 A. Yes.

CERTIFICATE OF SERVICE

25-CONS-3360-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 August 22, 2025.

SHANE JONES, ENVIRONMENTAL COMPLIANCE &
REGULATORY SPECIALIST
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 4
2301 E. 13TH STREET
HAYS, KS 67601-2654
shane.jones@ks.gov

TRISTAN KIMBRELL, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
tristan.kimbrell@ks.gov

CASE MORRIS
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 4
2301 E. 13TH STREET
HAYS, KS 67601-2654
case.morris@ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
jon.myers@ks.gov

TIMOTHY R KEENAN, ATTORNEY
KEENAN LAW FIRM, P.A.
2200 LAKIN
SUITE B
GREAT BEND, KS 67530
timkeen@keenanlawyers.com

/s/ Sara Graves

Sara Graves