

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the matter of the failure of White)	Docket No. 25-CONS-3347-CPEN
Exploration, Inc. (Operator) to comply with)	
K.A.R. 82-3-111 at the Cullers #1 and Milton)	CONSERVATION DIVISION
#1 wells and K.A.R. 82-3-126 at the Cullers)	
lease in Stanton County, Kansas.)	License No. 33856
)	

**MOTION TO SUBMIT REQUEST FOR HEARING OUT OF TIME &
MOTION TO STAY ENFORCEMENT OF PENALTY ORDER**

White Exploration, Inc. ("White Exploration") moves for an order allowing it to file an untimely request for hearing in response to the Penalty Order issued in this docket. The Penalty Order was issued on May 1, 2025, and involved two wells operated by White Exploration, the Milton #1 well and the Cullers #1 well. Both wells had been inactive in excess of the time allowed by regulation without being either returned to service or approved for TA status, and the lease identification sign for the Cullers #1 was missing. The Penalty order required White Exploration to pay a \$300 fine, post an identification sign on the Cullers #1, and either return both wells to production or take the actions necessary to obtain an approved TA status for those wells.

White Exploration has paid the \$300 fine and filed a KCC Form CP-111 for the Milton #1 well seeking to extend the TA status for that well which was approved on June 23, 2025. White Exploration had also intended to file an application pursuant to K.A.R. § 82-3-111(b) and K.A.R. § 82-3-100 seeking to extend the TA status of the Cullers #1 well beyond the 10-year limit. Due to inadvertence and oversight, White Exploration failed to file that motion for the Cullers #1 well, or plug that well, prior to the expiration of the 30-day time limit to request a hearing on the Penalty

Order. Because it had intended to file that application, White Exploration also neglected to timely request a hearing in response to the Penalty Order.

As a result of White Exploration's failure to either seek a hearing on the Penalty Order, file its application to extend the TA status of the Cullers #1 well, or plug the Cullers #1 well, on June 13, 2025, the Commission issued a Notice of License Suspension stating that White Exploration was in violation of the Penalty Order and that, as a result, that the Staff would recommend a Shut-In Order be issued on or about June 23, 2025. White Exploration requests that any suspension of its license be stayed pending outcome of its current motion to request a hearing out of time on the Penalty Order, and otherwise to give it sufficient time to plug the Cullers #1 well bring that well into compliance with the regulations.

WHEREFORE, White Exploration, Inc. requests that the Commission enter an order granting these motions, and for such other and further relief as is just and proper.

Dated: June 24, 2025

/s/ David E. Bengtson

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CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June, 2025, the foregoing Motion to Submit Request for Hearing out of Time and Motion to Stay Enforcement of Penalty Order was electronically filed with the Kansas Corporation Commission and served by electronic mail to:

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s/ David E. Bengtson _____

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