

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

In the matter of the request to transfer wells) Docket No.: 25-CONS-3235-CMSC
from Daylight Petroleum, LLC to Bluejacket)
Operating, LLC.) CONSERVATION DIVISION
)
) License No.: 35639
) 36169

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

Staff of the Kansas Corporation Commission (Staff and Commission, respectively) moves for the designation of a presiding officer and the scheduling of a prehearing conference in this matter. In support of its motion, Staff states the following:

1. On November 4, 2024, Bluejacket Operating, LLC (Bluejacket) obtained a license from the Commission. Between November 8 and November 20, 2024, Staff received Request for Change of Operator (T-1) Forms for approximately 55 leases, which would transfer the leases from Daylight Petroleum, LLC (Daylight) to Bluejacket. The submitted T-1 forms include 228 of Daylight's 240 wells. However, the T-1 forms do not include 11 wells on the Johnson lease or the Olnhausen Farms #6 well which are all located in Section 16, Township 30 South, Range 16 East, Wilson County, Kansas. The Johnson lease and Olnhausen Farms #6 well are currently referenced in Docket 25-CONS-3040-CMSC due to an unplugged abandoned well located beneath a building on the Johnson lease.

2. In December 2024, Staff inadvertently approved the T-1 forms. However, Staff is currently in the process of cancelling the T-1 forms and returning all wells to Daylight's license due to the concerns about the forms that have been filed. The request to transfer this magnitude of wells raises several red flags to Staff. First, Bluejacket is a new operator who only just formed in Kansas last October and only just obtained a KCC license last November. There has been no

indication that Bluejacket has the resources needed to maintain its regulatory obligations regarding the 228 wells it is currently seeking to add to its license. Second, it appears possible that if the T-1 forms are processed, then Daylight could leave behind its regulatory obligations at the Johnson lease and at the Olnhausen Farms #6 well. If Daylight is allowed to leave behind its regulatory obligations, then it will also leave behind a substantial economic burden on the State of Kansas.

WHEREFORE, for the reasons described above, Staff does not believe the T-1 forms between Daylight and Bluejacket should be processed until Daylight's statutory and regulatory obligations at the Johnson lease and the Olnhausen Farms #6 well have been addressed. Staff respectfully moves the Commission to issue an Order designating a presiding 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

CERTIFICATE OF SERVICE

25-CONS-3235-CMSC

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 January 21, 2025.

RICHARD DEAN
BLUEJACKET OPERATING, LLC
4582 S ULSTER ST STE 1210
DENVER, CO 80237-2633
rich@ranchoil.com

DEANNA GARRISON
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
deanna.garrison@ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kelcey.marsh@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

DONNAN STEELE
DAYLIGHT PETROLEUM, LLC
PO BOX 52070
HOUSTON, TX 77027-2952
regulatory@daylightpetroleum.com

KRAIG STOLL, EP&R SUPERVISOR
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kraig.stoll@ks.gov

/s/ Paula J. Murray
Paula J. Murray
