

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

In the matter of whether Somerset Energy,) Docket No. 25-CONS-3193-CUIC
Inc.'s injection authority at eight wells subject)
to permit E-31,866 should be revoked.) CONSERVATION DIVISION
)
) License No. 6143

In the matter of the petition of Somerset Energy,) Docket No. 25-CONS-3195-CMSC
Inc. to open a docket pursuant to K.S.A. 55-)
605(a).) CONSERVATION DIVISION
)
) License No. 6143

RESPONSE TO PETITION FOR RECONSIDERATION
BY SOMERSET ENERGY, INC.

Comes Now Staff of the Kansas Corporation Commission (Staff and Commission, respectively), in response to the Petition for Reconsideration submitted on behalf of Somerset Energy, Inc. (Operator) on February 14, 2025. In support of its response, Staff states the following:

1. On December 31, 2024, the Commission issued an Order Consolidating Dockets and Designating Presiding Officer. In that Order the Commission stated that the purpose of these consolidated dockets shall be to determine what obligations Somerset may have as it pertains to the Nevius #OW-6 well, and how the status of the Nevius #OW-6 well should impact Somerset's use of the eight wells within a quarter mile of that well.¹

2. On February 14, 2025, Operator filed a Petition for Reconsideration requesting that the Commission broaden the purpose of the Dockets to (1) determine what obligations Operator may have as it pertains to the Nevius #OW-6 well, and how the status of the Nevius #OW-6 well should impact Operator's use of the eight wells within a quarter mile of that injection well, and (2) determine if Commission Staff is engaging in an enforcement practice against Operator and other

¹ Order Consolidating Dockets and Designating Presiding Officer, ¶6 (Dec. 31, 2024).

Kansas oil and gas operators of leveraging injection authority, and other approvals or authorizations, such as approval of T-1 transfers in order to compel operators to accept responsibility for abandoned wells that they are not legally responsible for under K.S.A. 55-179.²

3. Staff is opposed to the purpose of these dockets being broadened beyond what the Commission has already directed in its December 31, 2024 order. After Operator filed its Petition for Reconsideration, Staff and Operator had a discussion regarding the issues in this docket. The current plan of the parties is to file a joint motion to open a separate docket where the broader issues can be addressed by the Commission. Once the separate docket is opened Operator would plug the well at issue in these dockets which will allow the consolidated dockets to be closed and the judicial review case to be dismissed. Staff recommends that the Commission hold any orders regarding Operator's Petition for Reconsideration in abeyance until the parties have had the opportunity to submit their joint motion.

WHEREFORE, for the reasons described above, Staff respectfully requests the Commission hold Operator's Petition in abeyance, and for any other relief the Commission determines to be just and equitable.

Respectfully Submitted,

/s/ Kelcey Marsh
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² Petition for Reconsideration by Somerset Energy, Inc., ¶2 (Feb. 14, 2025).

CERTIFICATE OF SERVICE

25-CONS-3193-CUIC, 25-CONS-3195-CMSC

I, the undersigned, certify that a true and correct copy of the attached Response has been served to the following by means of first class mail and electronic service on February 17, 2025.

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