20250620082019 Filed Date: 06/20/2025 State Corporation Commission of Kansas

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

WITHDRAWAL OF MOTION

Staff of the Kansas Corporation Commission (Staff and Commission, respectively) withdraws its motion requesting the designation of a presiding officer and scheduling a prehearing conference in anticipation of a hearing regarding the captioned matter. In support of its withdrawal, Staff states the following:

- 1. In November 2024, Staff received approximately 55 Request for Change of Operator (T-1) forms requesting to transfer 421 wells from Daylight Petroleum, LLC (Daylight) to Bluejacket Operating, LLC (Bluejacket). The T-1 forms did not include eleven wells located on the Johnson lease and the Olnhausen Farms #6 well located in Section 16, Township 30 South, Range 16 East, Wilson County, Kansas.
- 2. On January 21, 2025, Staff filed a motion requesting the designation of a presiding officer and the scheduling of a prehearing conference. Staff's motion was based upon its concern of the financial burden that could be left to the State if the T-1 forms were processed and Daylight was able to leave its plugging obligations behind.
- 3. While Staff's concerns are still present, Staff has determined to pursue an alternative course of action which resolves the captioned matter. Staff intends to process the T-1 forms between Daylight and Bluejacket once they are resubmitted, as long as they meet the requirements of K.A.R. 82-3-136. Further, Staff will not transfer injection authority for any currently permitted injection wells if Staff finds an abandoned well or any of the wells remaining under Daylight's license within a quarter mile area of review pursuant to K.A.R. 82-3-410.

WHEREFORE, Staff respectfully withdraws its motion in the above captioned matter and intends to process any T-1 forms that are resubmitted between Daylight and Bluejacket as described above.

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 electronic service on June 20, 2025.

KEITH A. BROCK, ATTORNEY ANDERSON & BYRD, L.L.P. 216 S HICKORY PO BOX 17 OTTAWA, KS 66067-0017 kbrock@andersonbyrd.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 CHRISTOPHER J MCGOWNE MCGOWNE LAW OFFICES, P.A. PO BOX 1659 HAYS, KS 67601-8659 cjmcgowne@mcgownelaw.com

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