

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

In the matter of the application of Haas)	Docket No.: 22-CONS-3220-CEXC
Petroleum, LLC for an exception to the 10-year)	
time limitation of K.A.R. 82-3-111 for its)	CONSERVATION DIVISION
Saubers #2 and Saubers #6 wells located in the)	
SE/4 of Section 13, Township 26 South, Range)	License No.: 33640
14 East Woodson County, Kansas.)	

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

The Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) hereby files this Motion seeking 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 19, 2021, (Operator) filed an application seeking an exception to the 10-year time limitation of K.A.R. 82-3-111 for its Saubers #2, API #15-207-02647, and Saubers #6, API #15-207-23874 wells (Subject Wells).

2. On January 5, 2022, Operator filed an affidavit of publication from The Wichita Eagle.

3. Upon review of the application, Legal Staff noted that Operator had not conducted a satisfactory mechanical integrity test at the Subject Wells, that Operator had not published notice of its application as required under K.A.R. 82-3-135a(d), and that Operator's Application appeared to lack information about the number and types of wells on the lease, the estimated cost to plug the Subject Well and the remaining wells on the lease, the production rate for the lease, a basic estimation of remaining reserves and an explanation of the basis for the estimation, and an estimation of the cost to perform whatever actions are necessary using current prices.

4. On January 10, 2022, Staff sent a letter to Operator requiring Operator to conduct a mechanical integrity test at the Subject Wells, publish notice of its Application, and supplement its Application by February 10, 2022.¹

5. On January 12, 2022, Operator filed an affidavit of publication from The Yates Center News. Operator failed to file a supplement or conduct the mechanical integrity tests by the deadline provided.

WHEREFORE, for the reasons described above, 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
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Kansas Corporation Commission
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¹ Exhibit A.

January 10, 2022

Keith Brock
Anderson & Byrd, LLP
P.O. Box 17
Ottawa, Kansas 66067
Attorney for Haas Petroleum, LLC

RE: Dockets #22-CONS-3219-CEXC and #22-CONS-3220-CEXC

Mr. Brock:

Commission Legal Staff received the applications in the referenced dockets on November 19, 2021. However, Staff sees a few issues that need to be resolved.

First, the Operator needs to conduct a successful mechanical integrity test on the Steele #9-1, API #15-207-26782; Saubers #2, API #15-207-02647; and Saubers #6, API #15-207-23874. Staff will not recommend approval of the application without the Operator conducting a successful mechanical integrity test.

Second, the Operator needs to publish notice of its application as required under K.A.R. 82-3-135a(d). After notice has been published the Operator will need to submit affidavits of publication to the Kansas Corporation Commission to supplement its application in the referenced docket.

Third, the application needs to be supplemented with the following information:

- A breakdown of how many and what types of wells are on the lease;
- An estimated cost to plug this well and the remaining wells on the lease;
- A current production rate for the lease;
- A basic estimation of remaining reserves and an explanation of the basis for the estimation;
- An explanation of what has already been done and what will need to be done to use the well as stated in paragraph 8; and
- An estimation of the cost to perform whatever actions are necessary using current prices.

Please address the issues listed above and submit an affidavit of publication for the *Yates Center News* by February 10, 2022. Failure to do so will result in Staff filing a motion to dismiss the application for the reasons noted above.

You may contact me by phone or at k.marsh@kcc.ks.gov if you have any questions.

Sincerely,

/s/ Kelcey Marsh
Kelcey Marsh
Litigation Counsel
Kansas Corporation Commission

cc: Troy Russell, Ryan Duling, District #3

CERTIFICATE OF SERVICE

22-CONS-3220-CEXC

I, the undersigned, certify that a true and correct copy of the attached Motion for the Designation of a Presiding Officer and the Scheduling of a Prehearing Conference has been served to the following by means of first class mail and electronic service on March 21, 2022.

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/s/ Paula J. Murray

Paula J. Murray