

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

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the matter of an Order to Show Cause issued) Docket No.: 17-CONS-3476-CSHO
to The Raven Company, LLC (“Operator”))
regarding responsibility under K.S.A. 55-179 for) CONSERVATION DIVISION
unplugged wells on East and West Luckybeck)
leases in Sections 35 & 36, Township 33 South,) License No.: 34526
Range 14 East. Montgomery County, Kansas.)

**MOTION FOR AN ORDER TO SHOW CAUSE, THE DESIGNATION OF A
PREHEARING OFFICER, AND THE SCHEDULING OF A PREHEARING
CONFERENCE**

For the following reasons, Commission Staff moves for an Order to Show Cause, the designation of a prehearing officer, and the scheduling of a prehearing conference in this matter:

I. JURISDICTION & LEGAL STANDARD

1. The Commission has jurisdiction to regulate oil and gas production in Kansas under Chapter 55 of the Kansas Statutes Annotated and the General Rules and Regulations for the Conservation of Crude Oil and Natural Gas, K.A.R. 82-3-100 *et seq.*
2. K.S.A. 55-162 provides the Commission with jurisdiction to institute proceedings to enforce the laws of Kansas and Commission rules, regulations, and orders.
3. K.S.A. 55-179 provides the Commission with jurisdiction to determine the persons legally responsible for the proper care and control of oil and gas wells, including the responsibility to plug the wells.

4. K.S.A. 55-179(b) provides that a person who is legally responsible for the proper care and control of an abandoned well shall include one or more of the following:

- a. Any operator of a waterflood or other pressure maintenance program deemed to be causing pollution or loss of usable water;
- b. the current or last operator of the lease upon which such well is located, irrespective of whether such operator plugged or abandoned such well;
- c. the original operator who plugged or abandoned such well; and
- d. any person who without authorization tampers with or removes surface equipment or downhole equipment from an abandoned well.

5. K.S.A. 55-180 gives the Commission a cause of action against responsible parties for the reasonable plugging costs of abandoned wells.

II. STAFF'S ALLEGATION OF FACTS

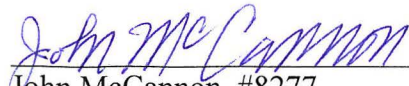
6. The wells listed on the attached Exhibit A are unplugged. The wells listed on Exhibit A are included on Operator's well inventory, which was certified as correct by Operator. Operator no longer holds a lease on the property containing the wells. Therefore the wells can no longer be temporarily abandoned under K.A.R. 82-3-111 and the wells must be plugged. Operator appears to be responsible for plugging the wells.

7. Operator should be required to plug the wells on Exhibit A within a reasonable time. If Operator fails to plug the wells Staff should be directed to plug the wells with Commission plugging funds and the plugging costs assessed to Operator.

III. CONCLUSION

8. Based on the above, Staff requests that an Order to Show Cause be issued, designating a prehearing officer and scheduling a prehearing conference.

Respectfully submitted,



John McCannon, #8277

Litigation Counsel

Kansas Corporation Commission

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CERTIFICATE OF SERVICE

I certify that on 2/2/2017, I caused a complete and accurate copy of this Motion to be served via United States mail, postage prepaid and properly addressed to:

Gary Dakil

The Raven Company, LLC

PO Box 6691

Grandbury, TX 76049



Cynthia K. Maine

Administrative Assistant

Kansas Corporation Commission

EXHIBIT A

LIC 34526 The Raven Company LLC
Expires 3/3/2017

Lease Name	Well #	API#	TVD	COUNTY	Sec	Twp	Rng	Dir	Q4Q3Q2Q1	Ft N/S	Ft. E/W	Well Type	Well Status	KDOR Gas/Oil
E LUCKYBECK	J-16	15125267770000	674	MONTGOMERY	36	33	14	E	NENWNWSW	2333 S	4637 E	OIL	IN	101382
E LUCKYBECK	N-14	15125270100000	687	MONTGOMERY	36	33	14	E	SWNWSWSW	990 S	5051 E	OIL	IN	101382
E LUCKYBECK	N-16	15125270110000	696	MONTGOMERY	36	33	14	E	NWNESWSW	994 S	4612 E	OIL	IN	101382
EAST LUCKYBECK	J-14	15125250290000	700	MONTGOMERY	36	33	14	E	S2NWNWSW	2305 S	5034 E	OIL	IN	101382
EAST LUCKYBECK	L-14	15125255110000	684	MONTGOMERY	36	33	14	E	NWSWNWSW	1719 S	5033 E	OIL	IN	101382
EAST LUCKYBECK	L-16	15125268650000	687	MONTGOMERY	36	33	14	E	SESWNWSW	1643 S	4623 E	OIL	IN	101382
EAST LUCKYBECK	L-23	15125210360000	775	MONTGOMERY	36	33	14	E	NESWNESW	1671 S	3305 E	OIL	IN	101382
LUCKYBECK	1	15125195780000	700	MONTGOMERY	35	33	14	E	SWNENESE	2163 S	563 E	OIL	IN	101382
LUCKYBECK	2	15125195790000	700	MONTGOMERY	35	33	14	E	SESWNESE	1539 S	932 E	OIL	IN	101382
LUCKYBECK	5	15125195810000	700	MONTGOMERY	36	33	14	E	NESENWSW	1857 S	4231 E	OIL	IN	101382
LUCKYBECK	N-18	15125195820000	700	MONTGOMERY	36	33	14	E	NENESWSW	1125 S	4136 E	OIL	IN	101382
LUCKYBECK	N-4	15125282560000	685	MONTGOMERY	35	33	14	E	SENWSWSE	978 S	2027 E	OIL	IN	101382
LUCKYBECK	P-105	15125278400000	686	MONTGOMERY	35	33	14	E	NWSESWSE	647 S	1753 E	EOR	IN	
LUCKYBECK	Q-10	15125285790000	674	MONTGOMERY	35	33	14	E	NESWSESE	337 S	701 E	OIL	IN	101382
LUCKYBECK	Q-4	15125282350000	755	MONTGOMERY	35	33	14	E	NESWSWSE	376 S	2012 E	OIL	IN	101382
LUCKYBECK	Q-6	15125282570000	670	MONTGOMERY	35	33	14	E	NESESWSE	349 S	1546 E	OIL	IN	101382
LUCKYBECK	Q-8	15125282580000	750	MONTGOMERY	35	33	14	E	NWSWSESE	348 S	1098 E	OIL	IN	101382
LUCKYBECK EA	I-115	15125252820000	700	MONTGOMERY	36	33	14	E	NENWNWSW	2633 S	4866 E	EOR	IN	
LUCKYBECK EA	J 119	15125210340001	700	MONTGOMERY	36	33	14	E	NENENWSW	2351 S	4158 E	EOR	IN	
LUCKYBECK EA	K 115	15125255100000	700	MONTGOMERY	36	33	14	E	SENWNWSW	1983 S	4817 E	EOR	IN	
LUCKYBECK EA	K 117	15125267350000	700	MONTGOMERY	36	33	14	E	NWSENWSW	1955 S	4484 E	EOR	IN	
LUCKYBECK EA	M-112A	15125267330000	700	MONTGOMERY	36	33	14	E	SWSWNWSW	1335 S	5245 E	EOR	IN	
LUCKYBECK EA	M-115	15125270080000	700	MONTGOMERY	36	33	14	E	SESWNWSW	1341 S	4844 E	EOR	IN	
LUCKYBECK EA	M-117	15125270090000	700	MONTGOMERY	36	33	14	E	SWSENWSW	1336 S	4396 E	EOR	IN	
LUCKYBECK W	J-10	15125284970000	670	MONTGOMERY	35	33	14	E	NWNENESE	2462 S	645 E	OIL	IN	101382
LUCKYBECK W	L-6	15125285350000	682	MONTGOMERY	35	33	14	E	NWSENWSE	1836 S	1654 E	OIL	IN	101382
LUCKYBECK WE	K 109	15125223380000	700	MONTGOMERY	35	33	14	E	NESWNESE	1935 S	987 E	EOR	IN	
LUCKYBECK WE	K-111A	15125289470000	660	MONTGOMERY	35	33	14	E	SWNENESE	2120 S	379 E	EOR	IN	101382
LUCKYBECK WE	M 105	15125016020000	700	MONTGOMERY	35	33	14	E	SWSENWSE	1404 S	1667 E	EOR	IN	101382
LUCKYBECK WE	M 107	15125284960000	680	MONTGOMERY	35	33	14	E	SESENWSE	1363 S	1342 E	EOR	IN	
LUCKYBECK WE	P 101	15125291150000	687	MONTGOMERY	35	33	14	E	SWNWSWSE	692 S	2648 E	EOR	IN	
LUCKYBECK WE	P 103	15125285780000	690	MONTGOMERY	35	33	14	E	SENWSWSE	696 S	2212 E	EOR	IN	
LUCKYBECK WE	P-107	15125262300000	675	MONTGOMERY	35	33	14	E	SWNWSSESE	691 S	1309 E	EOR	IN	
W LUCKY BECK	N-6	15125262310000	675	MONTGOMERY	35	33	14	E	NENESWSE	1014 S	1557 E	OIL	IN	101382
W LUCKYBECK	L-8	15125259430000	680	MONTGOMERY	35	33	14	E	NWSWNESE	1704 S	1258 E	OIL	IN	101382
W LUCKYBECK	N-10	15125267360000	680	MONTGOMERY	35	33	14	E	SENWSESE	906 S	720 E	OIL	IN	101382
W LUCKYBECK	N-12	15125267370000	693	MONTGOMERY	35	33	14	E	E2NESESE	988 S	216 E	OIL	IN	101382
WEST LUCKYBECK	J-8	15125249730000	672	MONTGOMERY	35	33	14	E	SWNWNENESE	2277 S	1142 E	OIL	IN	101382
WEST LUCKYBECK	L-12	15125256480000	683	MONTGOMERY	35	33	14	E	SESENESE	1624 S	210 E	OIL	IN	101382
WEST LUCKYBECK	N-8	15125210350000	775	MONTGOMERY	35	33	14	E	NWNWSESE	1015 S	1098 E	OIL	IN	101382
WEST LUCKYBECK	Q-2	15125294820000	695	MONTGOMERY	35	33	14	E	NWSWSWSE	358 S	2432 E	OIL	IN	101382