

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

In the Matter of non-compliance by Prairie Gas) Docket No. 22-CONS-3349-CMSC
Operating, LLC ("Operator") to comply with)
the Commission's Final Order in the four) CONSERVATION DIVISION
consolidated dockets, regarding the Earl # 1,)
Fecht D #1, and Watson #1 wells.) License No: 33640

MOTION TO CLOSE DOCKET

COMES NOW Prairie Gas Operating LLC ("Prairie Gas") by and through its attorney of record, Lee Thompson, and moves the Commission for entry of an order closing the subject docket for the following reasons:

1. The captioned docket relates to the three gas wells previously operated by Prairie Gas Operating, LLC ("Prairie Gas"): the Earl #1, Fecht D #1, and Watson #1 (hereafter the "Three Wells").
2. This docket results from a Report issued by Staff in the captioned Docket alleging that Prairie Gas had failed to comply with Ordering Clause A in the Final Order in previously consolidated dockets which provided that Prairie Gas should conduct a casing integrity test on the Three Wells.¹
3. Prairie Gas filed a Petition seeking reconsideration of the Final Order in the Consolidated Dockets seeking, inter alia, an extension of the 30 day deadline for conducting the casing integrity tests due to a variety of operational problems in obtaining and scheduling appropriate equipment.²

¹ Report of Operator Non-Compliance, April 11, 2022.

² Petition for Reconsideration, ¶ 3 (Mar. 2, 2022).

4. In its order on reconsideration in the underlying docket The Commission denied the request for reconsideration of a 30 day deadline to conduct casing integrity tests, inter alia, for a practical reason: “there is no penalty associated with Operator failing to comply with this provision of the Final Order.”³ The Commission also ordered that in the event Prairie Gas failed to meet the deadline it would “have full opportunity in the separate docket to state its case regarding why, and regarding what result should transpire.”⁴ This is the separate docket.
5. The ‘result which should transpire’ in this separate docket is that the docket should be closed for multiple reasons.
 - (a) Prairie Gas no longer operates the Three Wells having filed form T-1 Requests for Change of Operator on all of the Three Wells seeking transfer of the operator to American Star Energy Services, LLC (Operator) (License #35913)⁵.
 - (b) The Commission recognized the transfer of operator in its Order Approving Compliance Agreement between Staff and American Star.⁶ The incorporated Compliance Agreement requires, inter alia, casing integrity and assigns the subject Three Wells the highest level of compliance in Attachment A to the Compliance Agreement.⁷
 - (c) Prairie Gas has no right, power or authority to conduct casing integrity tests on the Three Wells, inasmuch as it is not a licensed operator on the Three Wells,

³ Order on Petition for Reconsideration, ¶ 3.

⁴ *Id.*, ¶5.

⁵ See Exhibits A (Earl # 1), B (Fecht D) and C Watson (1).

⁶ Docket No.: 22-CONS-3478-CMSC, Order Approving Compliance Agreement, June 30, 2022.

⁷ See *Id.*, Attachment A.

has no right to enter the premises; and is not empowered to subsume the authority of the Commission which has issued an Order approving the Compliance Agreement as to American Star.

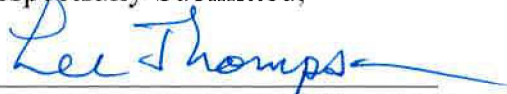
- (d) Pursuing the procedural schedule entered in this docket would be a needless and superfluous process inasmuch as no contested issues remain. Prairie Gas concedes that due to a variety of factors it was unable to comply with Ordering Clause A of the Final Order at issue.
- (e) Prairie Gas has offered to pay the penalty recommended in Staff's report -- \$1,000.⁸ That would be an additional penalty on top of the \$20,000 which Prairie Gas has previously paid in accordance with the Final Order.
- (f) If the docket were to proceed, Prairie Gas would be compelled to submit substantial evidence in mitigation of a penalty greater than \$1,000 given the lack of available equipment and resources due in no small measure to the fact that its income had been reduced during an extended period in which its license was previously suspended and which the Commission ordered was inappropriate.
- (g) Further proceedings would be wasteful and unnecessarily impinge on the time and resources of Prairie Gas and its attorney, on Staff and its attorney, and on the Commission.

⁸ See Report, ¶5.

6. Prairie Gas hereby stipulates and agrees that it would consent to the Commission conditioning an order closing the docket on payment of the \$1,000 penalty recommended by Staff.
7. The underlying Final Order in the Consolidated Dockets has been appealed under the Kansas Judicial Review Act and is pending in Greely County Kansas. By closing this docket the Commission will likely moot the judicial appeal and further serve the purpose of judicial and administrative economy.

WHEREFORE: Prairie Gas respectfully moves the Commission to issue an Order closing the subject docket.

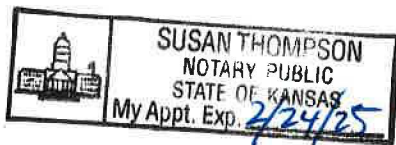
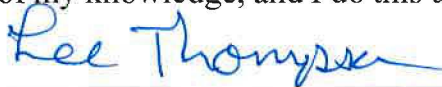
Respectfully Submitted,



LEE THOMPSON, KSCT # 08361
THOMPSON LAW FIRM, LLC
1919 N. Amidon, Suite 315
Wichita, Kansas 67203
Phone: (316) 267-3933
Facsimile: (316) 267-3901
lthompson@tslawfirm.com

VERIFICATION

I do solemnly, sincerely, and truly declare and affirm that the statements made in this motion are true and accurate to the best of my knowledge, and I do this under the pains and penalties of perjury.



Notary Public

CERTIFICATE OF SERVICE:

I hereby certify on this 29th day of July 2022 the original of the above and foregoing Motion to Close Docket was filed by means of the KCC e-filing Express and served on Kelcey Marsh, Litigation Counsel and Jonathan R. Myers, Assistant General Counsel as an attachment to an electronic mail.

Lee Thompson

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form T-1
April 2019
Form must be Typed
Form must be Signed
All blanks must be Filled

REQUEST FOR CHANGE OF OPERATOR
TRANSFER OF INJECTION OR SURFACE PIT PERMIT

Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act,
MUST be submitted with this form.

Check applicable boxes:

- Oil Lease: No. of Oil Wells _____ **
- Gas Lease: No. of Gas Wells 1 _____ **
- Gas Gathering System: _____
- Saltwater Disposal Well - Permit No.: _____
- Spot Location: _____ feet from N / S Line
_____ feet from E / W Line
- Enhanced Recovery Project Permit No.: _____
- Entire Project: Yes No
- Number of Injection Wells _____ **

Field Name: Bradshaw Gas Area

**** Side Two Must Be Completed.**

Effective Date of Transfer: 04/01/2022

KS Dept of Revenue Lease No.: 223463

Lease Name: EARL #1

_____ - _____ - SW - NW Sec. 23 Twp. 22 R. 40 E W

Legal Description of Lease:

E2 sSW NW Section 23 T22S, R40W

County: Hamilton

Production Zone(s): _____

Injection Zone(s): _____

Surface Pit Permit No.: _____
(API No. if Drill Pit, WO or Haul)

_____ feet from N / S Line of Section

_____ feet from E / W Line of Section

Type of Pit: Emergency Burn Settling Haul-Off Workover Drilling

Past Operator's License No. 35442

Contact Person: Ian Acrey

Past Operator's Name & Address: Prairie Gas Operating, LLC
114 E. 5TH ST., SUITE 100 PO BOX 2170 TULSA,OK 74101-2170

Phone: (817)681-7600

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: _____ Ian Acrey

New Operator's License No. 35913

Contact Person: Jeff Robinson

New Operator's Name & Address: American Star Energy Services, LLC
PO BOX 52464 TULSA,OK 74152-0464

Phone: (918)906-4300

Oil / Gas Purchaser: Tumbleweed Midstream

New Operator's Email: JEFFROB918@GMAIL.COM

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: _____ Jeffrey Robinson

Acknowledgment of Transfer: The above request for transfer of injection authorization, surface pit permit # _____ has been noted, approved and duly recorded in the records of the Kansas Corporation Commission. This acknowledgment of transfer pertains to Kansas Corporation Commission records only and does not convey any ownership interest in the above injection well(s) or pit permit.

_____ is acknowledged as
the new operator and may continue to inject fluids as authorized by

Permit No.: _____ . Recommended action: _____

Date: _____
Authorized Signature

_____ is acknowledged as
the new operator of the above named lease containing the surface pit

permitted by No.: _____.

Date: _____
Authorized Signature

DISTRICT _____ EPR 07/07/2022 PRODUCTION _____ UIC _____

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form KSONA-1

July 2021

Form Must Be Typed

Form must be Signed

All blanks must be Filled

**CERTIFICATION OF COMPLIANCE WITH THE
KANSAS SURFACE OWNER NOTIFICATION ACT**

This form must be submitted with all Forms C-1 (Notice of Intent to Drill); CB-1 (Cathodic Protection Borehole Intent); T-1 (Request for Change of Operator Transfer of Injection or Surface Pit Permit); and CP-1 (Well Plugging Application). Any such form submitted without an accompanying Form KSONA-1 will be returned.

Select the corresponding form being filed: C-1 (Intent) CB-1 (Cathodic Protection Borehole Intent) T-1 (Transfer) CP-1 (Plugging Application)

OPERATOR: License # 35913
Name: American Star Energy Services, LLC
Address 1: PO BOX 52464
Address 2: _____
City: TULSA State: OK Zip: 74152 + 0464
Contact Person: Jeff Robinson
Phone: (918) 906-4300 Fax: (_____) _____
Email Address: JEFFROB918@GMAIL.COM

Well Location:
_____ - _____ - SW NW Sec. 23 Twp. 22 S. R. 40 East West
County: Hamilton
Lease Name: EARL #1 Well #: See T1 Side Two

If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

E2 sSW NW Section 23 T22S, R40W

Surface Owner Information:

Name: Earl J and Donna Simon Living Trust
Address 1: 13505 SW Daimond Rd
Address 2: _____
City: Augusta State: KS Zip: 67010 + _____

When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.

If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.

Select one of the following:

I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.

I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.

I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: 05/03/2022 Signature of Operator or Agent: Jeffrey Robinson Title: Authorized KOLAR Agent

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form T-1
April 2019
Form must be Typed
Form must be Signed
All blanks must be Filled

REQUEST FOR CHANGE OF OPERATOR
TRANSFER OF INJECTION OR SURFACE PIT PERMIT

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- Gas Lease: No. of Gas Wells 1 _____ **
- Gas Gathering System: _____
- Saltwater Disposal Well - Permit No.: _____
- Spot Location: _____ feet from N / S Line
_____ feet from E / W Line
- Enhanced Recovery Project Permit No.: _____
- Entire Project: Yes No
- Number of Injection Wells _____ **

Field Name: Bradshaw Gas Area

**** Side Two Must Be Completed.**

Effective Date of Transfer: 04/01/2022

KS Dept of Revenue Lease No.: 209018

Lease Name: FECHT D

_____ - _____ - C - SE Sec. 28 Twp. 18 R. 40 E W

Legal Description of Lease:

C SE SECTION 28 T18S R40W

County: Greeley

Production Zone(s): CHASE GROUP

Injection Zone(s): _____

Surface Pit Permit No.: _____
(API No. if Drill Pit, WO or Haul)

_____ feet from N / S Line of Section

_____ feet from E / W Line of Section

Type of Pit: Emergency Burn Settling Haul-Off Workover Drilling

Past Operator's License No. 35442

Contact Person: Ian Acrey

Past Operator's Name & Address: Prairie Gas Operating, LLC

Phone: (817)681-7600

114 E. 5TH ST., SUITE 100 PO BOX 2170 TULSA,OK 74101-2170

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: _____ Ian Acrey

New Operator's License No. 35913

Contact Person: Jeff Robunson

New Operator's Name & Address: American Star Energy Services, LLC

Phone: (918)906-4300

PO BOX 52464 TULSA,OK 74152-0464

Oil / Gas Purchaser: TUMBLEWEED MIDSTREAM

New Operator's Email: JEFFROB918@GMAIL.COM

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: _____ Jeffrey Robunson

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_____ is acknowledged as
the new operator and may continue to inject fluids as authorized by

Permit No.: _____ . Recommended action: _____

Date: _____
Authorized Signature

_____ is acknowledged as
the new operator of the above named lease containing the surface pit
permitted by No.: _____.

Date: _____
Authorized Signature

DISTRICT _____ EPR 07/07/2022 PRODUCTION _____ UIC _____

CERTIFICATION OF COMPLIANCE WITH THE KANSAS SURFACE OWNER NOTIFICATION ACT

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OPERATOR: License # 35913
Name: American Star Energy Services, LLC
Address 1: PO BOX 52464
Address 2: _____
City: TULSA State: OK Zip: 74152 + 0464
Contact Person: Jeff Robunson
Phone: (918) 906-4300 Fax: (_____) _____
Email Address: JEFFROB918@GMAIL.COM

Well Location:
_____ C _____ SE Sec. 28 Twp. 18 S. R. 40 East West
County: Greeley
Lease Name: FECHT D Well #: See T1 Side Two

If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

C SE SECTION 28 T18S R40W

Surface Owner Information:

Name: SCOTT M SCHNEIDER
Address 1: 111 PROVATE LANE
Address 2: _____
City: TRIBUNE State: KS Zip: 67879 + _____

When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.

If this form is being submitted with a Form C-1 (Intent) or CB-1 (Cathodic Protection Borehole Intent), you must supply the surface owners and the KCC with a plat showing the predicted locations of lease roads, tank batteries, pipelines, and electrical lines. The locations shown on the plat are preliminary non-binding estimates. The locations may be entered on the Form C-1 plat, Form CB-1 plat, or a separate plat may be submitted.

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I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: 05/03/2022 Signature of Operator or Agent: Jeffrey Robinson Title: Authorized KOLAR Agent

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form T-1
April 2019
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REQUEST FOR CHANGE OF OPERATOR
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- Gas Lease: No. of Gas Wells 1 **
- Gas Gathering System: _____
- Saltwater Disposal Well - Permit No.: _____
- Spot Location: _____ feet from N / S Line
_____ feet from E / W Line
- Enhanced Recovery Project Permit No.: _____
- Entire Project: Yes No
- Number of Injection Wells _____ **

Field Name: Bradshaw Gas Area

**** Side Two Must Be Completed.**

Effective Date of Transfer: 04/01/2022

KS Dept of Revenue Lease No.: 221585

Lease Name: WATSON 1

C - SW - SW Sec. 17 Twp. 20 R. 39 E W

Legal Description of Lease:

C SW SW SECTION 17 T20S-39W

County: Greeley

Production Zone(s): CHASE GROUP

Injection Zone(s): _____

Surface Pit Permit No.: _____
(API No. if Drill Pit, WO or Haul)

_____ feet from N / S Line of Section

_____ feet from E / W Line of Section

Type of Pit: Emergency Burn Settling Haul-Off Workover Drilling

Past Operator's License No. 35442

Contact Person: Ian Acrey

Past Operator's Name & Address: Prairie Gas Operating, LLC

Phone: (817)681-7600

114 E. 5TH ST., SUITE 100 PO BOX 2170 TULSA,OK 74101-2170

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: Ian Acrey

New Operator's License No. 35913

Contact Person: Jeff Robinson

New Operator's Name & Address: American Star Energy Services, LLC

Phone: (918)906-4300

PO BOX 52464 TULSA,OK 74152-0464

Oil / Gas Purchaser: TUMBLEWEED MIDSTREAM

New Operator's Email: JEFFROB918@GMAIL.COM

Date: 05/03/2022

Title: Authorized KOLAR Agent

Signature: Jeffrey Robinson

Acknowledgment of Transfer: The above request for transfer of injection authorization, surface pit permit # _____ has been noted, approved and duly recorded in the records of the Kansas Corporation Commission. This acknowledgment of transfer pertains to Kansas Corporation Commission records only and does not convey any ownership interest in the above injection well(s) or pit permit.

_____ is acknowledged as
the new operator and may continue to inject fluids as authorized by

_____ is acknowledged as
the new operator of the above named lease containing the surface pit

Permit No.: _____ . Recommended action: _____

permitted by No.: _____ .

Date: _____
Authorized Signature

Date: _____
Authorized Signature

DISTRICT _____ EPR 07/07/2022 PRODUCTION _____ UIC _____

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

KOLAR Document ID: 103701

Form KSONA-1

July 2021

Form Must Be Typed

Form must be Signed

All blanks must be Filled

**CERTIFICATION OF COMPLIANCE WITH THE
KANSAS SURFACE OWNER NOTIFICATION ACT**

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Select the corresponding form being filed: C-1 (Intent) CB-1 (Cathodic Protection Borehole Intent) T-1 (Transfer) CP-1 (Plugging Application)

OPERATOR: License # 35913
Name: American Star Energy Services, LLC
Address 1: PO BOX 52464
Address 2: _____
City: TULSA State: OK Zip: 74152 + 0464
Contact Person: Jeff Robinson
Phone: (918) 906-4300 Fax: (_____) _____
Email Address: JEFFROB918@GMAIL.COM

Well Location:
_ C _ SW _ SW Sec. 17 Twp. 20 S. R. 39 East West
County: Greeley
Lease Name: WATSON 1 Well #: See T1 Side Two

If filing a Form T-1 for multiple wells on a lease, enter the legal description of the lease below:

C SW SW SECTION 17 T20S-39W

Surface Owner Information:

Name: WATSON FARMS INC
Address 1: 2504 RD 21
Address 2: _____
City: TRIBUNE State: KS Zip: 67879 + _____

When filing a Form T-1 involving multiple surface owners, attach an additional sheet listing all of the information to the left for each surface owner. Surface owner information can be found in the records of the register of deeds for the county, and in the real estate property tax records of the county treasurer.

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Select one of the following:

I certify that, pursuant to the Kansas Surface Owner Notice Act (see Chapter 55 of the Kansas Statutes Annotated), I have provided the following to the surface owner(s) of the land upon which the subject well is or will be located: 1) a copy of the Form C-1, Form CB-1, Form T-1, or Form CP-1 that I am filing in connection with this form; 2) if the form being filed is a Form C-1 or Form CB-1, the plat(s) required by this form; and 3) my operator name, address, phone number, fax, and email address.

I have not provided this information to the surface owner(s). I acknowledge that, because I have not provided this information, the KCC will be required to send this information to the surface owner(s). To mitigate the additional cost of the KCC performing this task, I acknowledge that I must provide the name and address of the surface owner by filling out the top section of this form and that I am being charged a \$30.00 handling fee, payable to the KCC, which is enclosed with this form.

If choosing the second option, submit payment of the \$30.00 handling fee with this form. If the fee is not received with this form, the KSONA-1 form and the associated Form C-1, Form CB-1, Form T-1, or Form CP-1 will be returned.

I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Date: 05/03/2022 Signature of Operator or Agent: Jeffrey Robinson Title: Authorized KOLAR Agent

Exhibit C