

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

Before Commissioners: Andrew J. French, Chairperson
 Dwight D. Keen
 Annie Kuether

In the matter of the failure of JBG Oil & Gas) Docket No.: 25-CONS-3392-CPEN
Company, LLC (Operator) to comply with)
K.A.R. 82-3-111 at the Tuttle #1-16, Tuttle) CONSERVATION DIVISION
#2-8, Tuttle "A" #1, and Tuttle A #1-9 in)
Clark County, Kansas.) License No.: 34842

PENALTY ORDER

The Commission finds Operator has violated K.A.R. 82-3-111 regarding the captioned wells, assesses a \$400 penalty, directs Operator to come into compliance, and further rules as more fully described below.

I. JURISDICTION

1. K.S.A. 74-623 provides the Commission exclusive jurisdiction and authority to regulate oil and gas activities in Kansas. K.S.A. 55-152 provides the Commission with jurisdiction to regulate the construction, operation, and abandonment of any well, and also the protection of the usable water of this state from any actual or potential pollution from any well. The Commission has licensing authority under K.S.A. 55-155.

2. K.S.A. 55-162 and K.S.A. 55-164 provide the Commission authority to issue penalty orders for violations of Chapter 55 of the Kansas Statutes Annotated, or of any rule, regulation, or order of the Commission. Under K.S.A. 55-164, a penalty order may include a monetary penalty of up to \$10,000, the penalty must constitute a substantial and actual economic deterrent to the violation, and each day of a continuing violation constitutes a separate violation.

3. K.A.R. 82-3-111 provides that within 90 days after operations cease on any well, the operator of that well shall plug the well, return the well to service, or file an application with

the Conservation Division requesting temporary abandonment (TA) status. If not plugged or returned to service, the operator must obtain TA approval; TA status may be denied by the Conservation Division if necessary to prevent pollution. A well shut-in for 10 years or more cannot be granted TA status without the operator filing an application for an exception pursuant to K.A.R. 82-3-100 and approval from the Commission. K.A.R. 82-3-111(e) provides a TA exemption for certain wells fully equipped and capable of production.

II. FINDINGS OF FACT

4. Operator is licensed to conduct oil and gas activities in Kansas and is responsible for the following wells (Subject Wells) in Clark County, Kansas:

- a. Tuttle #1-16, API #15-025-21128-00-00, located in Section 16, Township 35 South, Range 21 West;
- b. Tuttle #2-8, API #15-025-21067-00-00, located in Section 8, Township 35 South, Range 21 West;
- c. Tuttle “A” #1, API #15-025-21460, located in Section 8, Township 35 South, Range 21 West; and
- d. Tuttle A #1-9, API #15-025-21088, located in Section 9, Township 35 South, Range 21 West.

5. On April 10, 2025, Commission records indicated the Subject Wells had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111, that the wells were not exempt pursuant to K.A.R. 82-3-111(e), and that the wells were not approved for TA status. Thus, Commission Staff sent letters to Operator, requiring Operator to bring the Subject Wells into compliance with K.A.R. 82-3-111 by April 24, 2025.¹

¹ Exhibit A.

6. On May 06, 2025, Commission Staff inspected the Subject Wells, because the deadline in the letters had passed and the violations had not been resolved, verifying that the wells continued to be inactive and unplugged.²

III. CONCLUSIONS OF LAW

7. The Commission has jurisdiction over Operator and this matter under K.S.A. 74-623 and K.S.A. 55-152.

8. Operator has committed four violations of K.A.R. 82-3-111 because the Subject Wells have been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.³

THEREFORE, THE COMMISSION ORDERS:

- A. Operator shall pay a \$400 penalty.
- B. Operator shall plug the Subject Wells, or return the wells to service, or obtain TA status for the wells if eligible.
- C. Commission Staff may require Staff-witnessed static fluid level measurements before a Subject Well is returned to service. A Subject Well may not be returned to service if (1) any measurement has shown fluid in the wellbore at or above the appropriate minimum surface casing requirement described in Table I of the Commission's August 1, 1991, Order in Docket 34,780, (2) any measurement has shown fluid in the wellbore at or above any salt formation or other corrosive formation, or (3) in the opinion of Staff, variation in measurements indicates the possibility of a casing leak. Provided, however, a Subject Well may be returned to service upon (a) passing a casing integrity test after issuance of this Penalty Order to the satisfaction of Staff, or (b) Staff providing written, well-specific authorization after issuance of this Penalty Order.

² Exhibit B.

³ K.S.A. 55-164; K.A.R. 82-3-111(b).

D. Operator may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, to the Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. A request for hearing must comply with K.A.R. 82-1-219.

E. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing. If no party timely requests a hearing, then this Order shall become final.

F. If Operator is not in compliance with this Order and the Order is final, then Operator's license shall be suspended without further notice and shall remain suspended until Operator complies. If a Subject Well has been inactive for more than 10 years and Operator applies for an exception to the 10-year limit on TA status for the Subject Well prior to this Order becoming final, and Operator would be in compliance with this Order if the application were approved, then suspension shall not be enforced unless: (1) the application is denied, and (2) 30 days have elapsed since the denial. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding license suspension.

G. A party may petition for reconsideration of a final order pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).⁴

H. Credit card payments may be made by calling the Conservation Division at 316-337-6200. Checks and money orders shall be payable to the Kansas Corporation Commission. Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. Payments must reference the docket number of this proceeding.

⁴ See K.S.A. 55-162; K.S.A. 55-164; K.S.A. 55-606; K.S.A. 55-707; K.S.A. 77-503(c); K.S.A. 77-531(b).

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 06/12/2025



Celeste Cheney-Tucker
Executive Director

Mailed Date: 06/12/2025

KAM



Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Corporation Commission

Laura Kelly, Governor

NOTICE OF VIOLATION

JBG OIL & GAS COMPANY LLC
2622 CR GG
ASHLAND KS 67831-3125

April 10, 2025
KCC Lic.-34842

RE: API Well No. 15-025-21128-00-00
TUTTLE 1-16
16-35S-21W, NWNWNE
CLARK County, Kansas

Dear Operator:

According to KCC records, the temporary abandonment (TA) status for this well expired on January 16, 2025, and you are in probable violation of K.A.R. 82-3-111. An operator may apply to the Conservation Division for a TA status extension prior to the expiration of its TA approval period.

If you file a TA application with the District Office by APRIL 24, 2025, we will process the application. If you do not file an application by this date, or advise the District Office in writing the date the well returned to service, I will refer the matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty and an order for you to plug the well.

You may contact me at the number below if you have any questions.

Sincerely,

MICHAEL MAIER
KCC District # 1



Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Corporation Commission

Laura Kelly, Governor

NOTICE OF VIOLATION

JBG OIL & GAS COMPANY LLC
2622 CR GG
ASHLAND KS 67831-3125

April 10, 2025
KCC Lic.-34842

RE: API Well No. 15-025-21067-00-00
TUTTLE 2-8
8-35S-21W, S2S2SE
CLARK County, Kansas

Dear Operator:

According to KCC records, the temporary abandonment (TA) status for this well expired on January 16, 2025, and you are in probable violation of K.A.R. 82-3-111. An operator may apply to the Conservation Division for a TA status extension prior to the expiration of its TA approval period.

If you file a TA application with the District Office by APRIL 24, 2025, we will process the application. If you do not file an application by this date, or advise the District Office in writing the date the well returned to service, I will refer the matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty and an order for you to plug the well.

You may contact me at the number below if you have any questions.

Sincerely,

MICHAEL MAIER
KCC District # 1



Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Corporation Commission

Laura Kelly, Governor

NOTICE OF VIOLATION

JBG OIL & GAS COMPANY LLC
2622 CR GG
ASHLAND KS 67831-3125

April 10, 2025
KCC Lic.-34842

RE: API Well No. 15-025-21460-00-00
TUTTLE "A" 1
8-35S-21W, NW
CLARK County, Kansas

Dear Operator:

According to KCC records, the temporary abandonment (TA) status for this well expired on January 16, 2025, and you are in probable violation of K.A.R. 82-3-111. An operator may apply to the Conservation Division for a TA status extension prior to the expiration of its TA approval period.

If you file a TA application with the District Office by APRIL 24, 2025, we will process the application. If you do not file an application by this date, or advise the District Office in writing the date the well returned to service, I will refer the matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty and an order for you to plug the well.

You may contact me at the number below if you have any questions.

Sincerely,

MICHAEL MAIER
KCC District # 1



Andrew J. French, Chairperson
Dwight D. Keen, Commissioner
Annie Kuether, Commissioner

Corporation Commission

Laura Kelly, Governor

NOTICE OF VIOLATION

JBG OIL & GAS COMPANY LLC
2622 CR GG
ASHLAND KS 67831-3125

April 10, 2025
KCC Lic.-34842

RE: API Well No. 15-025-21088-00-00
TUTTLE A 1-9
9-35S-21W, S2SW
CLARK County, Kansas

Dear Operator:

According to KCC records, the temporary abandonment (TA) status for this well expired on January 16, 2025 , and you are in probable violation of K.A.R. 82-3-111. An operator may apply to the Conservation Division for a TA status extension prior to the expiration of its TA approval period.

If you file a TA application with the District Office by APRIL 24, 2025 , we will process the application. If you do not file an application by this date, or advise the District Office in writing the date the well returned to service, I will refer the matter to our legal department with a recommendation that the Commission take formal enforcement action including a monetary penalty and an order for you to plug the well.

You may contact me at the number below if you have any questions.

Sincerely,

MICHAEL MAIER
KCC District # 1

KCC OIL/GAS REGULATORY OFFICES

Date: 05/06/25

District: 1

Case #: _____

☐ New Situation
☒ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 34842

Op Name: JBG Oil & Gas Company LLC

Address 1: 2622 CR GG

Address 2: _____

City: Ashland

State: KS Zip Code: 67831 -3125

Operator Phone #: (620) 635-4461

API Well Number: 15-025-21128-00-00

Spot: SE-SW-NW-SE Sec 16 Twp 35 S Rng 21 ☐ E / ☒ W

364 Feet from ☐ N / ☒ S Line of Section

2231 Feet from ☒ E / ☐ W Line of Section

GPS: Lat: 37.00092 Long: 99.60350 Date: 5/6/25

Lease Name: Tuttle Well #: 1-16

County: Clark

Reason for Investigation:

Expired TA

Problem:

Well is to be plugged, returned to service, or obtain TA.

Persons Contacted:

None

Findings:

10:00 AM

Tank Battery on location. TB consists of two 250 BBL steel stock tanks, and a 300 BBL steel stock tank.

Valves on well are open. Meter run shows no production. KGS shows last production was in 2018.

Action/Recommendations:

Follow Up Required ☒ Yes ☐ No ☐

Date: 5/6/25

Send to Legal

Verification Sources:

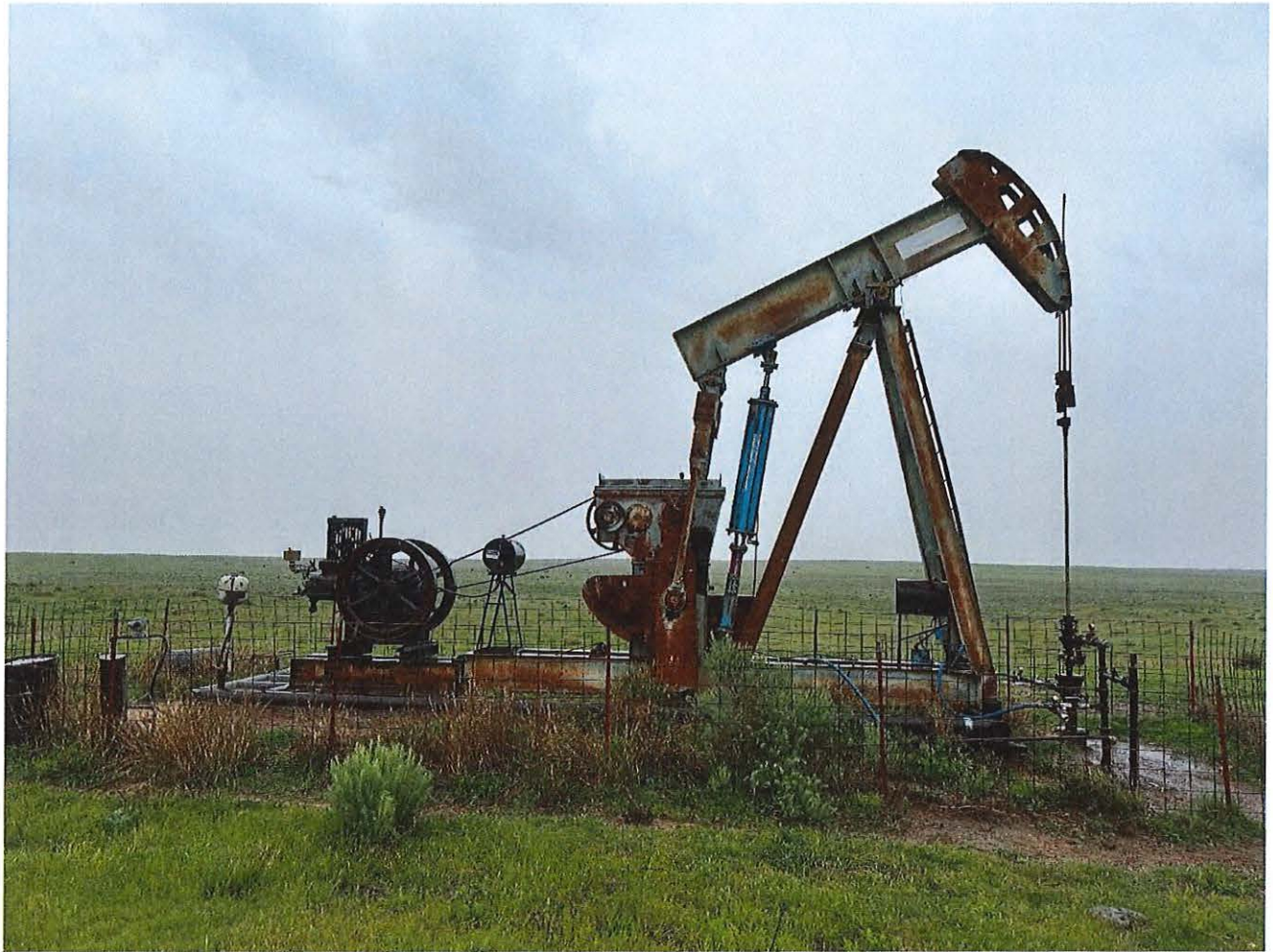
Photos Taken: _____

☒ RBDMS ☒ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☒ Other: On-Site Inspection

By: Nathan Feldkamp

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

Form: _____



5/6/25

JBL Oil & Gas Company LLC

Tuttle 1-16

SE 16-35S-21W, Clark County

Facing East

KCC OIL/GAS REGULATORY OFFICES

Date: 05/06/25

District: 1

Case #: _____

☐ New Situation
☒ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 34842

Op Name: JBG Oil & Gas Company LLC

Address 1: 2622 CR GG

Address 2: _____

City: Ashland

State: KS Zip Code: 67831 -3125

Operator Phone #: (620) 635-4461

API Well Number: 15-025-21067-00-00

Spot: SW-SW-SE-SE Sec 8 Twp 35 S Rng 21 ☐ E / ☒ W

330 Feet from ☐ N / ☒ S Line of Section

1341 Feet from ☒ E / ☐ W Line of Section

GPS: Lat: 37.00399 Long: 99.61831 Date: 5/6/25

Lease Name: Tuttle Well #: 2-8

County: Clark

Reason for Investigation:

Expired TA

Problem:

Well is to be plugged, returned to service, or obtain TA.

Persons Contacted:

None

Findings:

10:30 AM

Tank Battery on location. TB consists of a 200 BBL steel stock tank and a gas pack

Valves on well are open. Meter run shows no production. KGS shows last production was in 2022.

Action/Recommendations:

Follow Up Required ☒ Yes ☐ No ☐

Date: 5/6/25

Send to Legal

Verification Sources:

☒ RBDMS ☒ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☒ Other: On-Site Inspection

Photos Taken: _____

By: Nathan Feldkamp

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

Form: _____



5/6/25

JBL Oil & Gas Company LLC

Tuttle 2-8

SE 8-35S-21W, Clark County

Facing Northwest

KCC OIL/GAS REGULATORY OFFICES

Date: 05/06/25

District: 1

Case #: _____

☐ New Situation
☒ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 34842

API Well Number: 15-025-21460-00-00

Op Name: JBG Oil & Gas Company LLC

Spot: NW-NW-SE-NW Sec 8 Twp 35 S Rng 21 ☐ E / ☒ W

Address 1: 2622 CR GG

3967 Feet from ☐ N / ☒ S Line of Section

Address 2: _____

4015 Feet from ☒ E / ☐ W Line of Section

City: Ashland

GPS: Lat: 37.01395 Long: 99.62748 Date: 5/6/25

State: KS Zip Code: 67831 -3125

Lease Name: Tuttle "A" Well #: 1

Operator Phone #: (620) 635-4461

County: Clark

Reason for Investigation:

Expired TA

Problem:

Well is to be plugged, returned to service, or obtain TA.

Persons Contacted:

None

Findings:

10:50

Tank Battery on location. TB consists of a 300 BBL steel stock tanks, and a 300 BBL fiberglass produced water tank.

Valves on well are open. Meter run has been disconnected. KGS shows last production was in 2018.

Action/Recommendations:

Follow Up Required ☒ Yes ☐ No ☐

Date: 5/6/25

Send to Legal

Verification Sources:

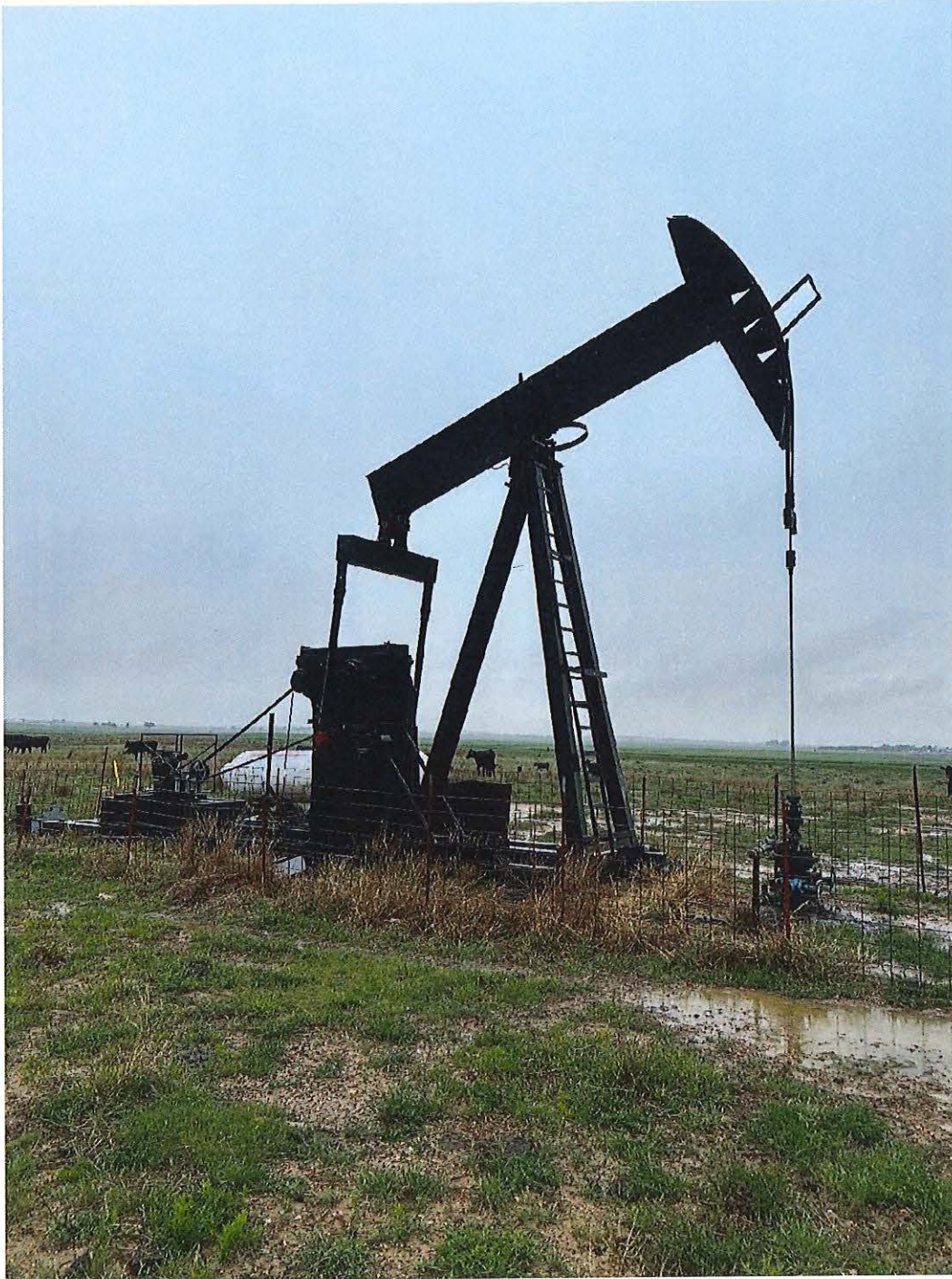
Photos Taken: _____

☒ RBDMS ☒ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☒ Other: On-Site Inspection

By: Nathan Feldkamp

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

Form: _____



5/6/25

JBL Oil & Gas Company LLC

Tuttle "A" 1

NW 8-35S-21W, Clark County

Facing Southwest

KCC OIL/GAS REGULATORY OFFICES

Date: 05/06/25

District: 1

Case #: _____

☐ New Situation
☒ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 34842

Op Name: JBG Oil & Gas Company LLC

Address 1: 2622 CR GG

Address 2: _____

City: Ashland

State: KS Zip Code: 67831 -3125

Operator Phone #: (620) 635-4461

API Well Number: 15-025-21088-00-00

Spot: SE-NE-SW-SW Sec 9 Twp 35 S Rng 21 ☐ E / ☒ W

778 Feet from ☐ N / ☒ S Line of Section

3982 Feet from ☒ E / ☐ W Line of Section

GPS: Lat: 37.00526 Long: 99.60928 Date: 5/6/25

Lease Name: Tuttle A Well #: 1-9

County: Clark

Reason for Investigation:

Expired TA

Problem:

Well is to be plugged, returned to service, or obtain TA.

Persons Contacted:

None

Findings:

10:20 AM

Tank Battery on location. TB consists of a 200 BBL steel stock tank and gas pack.

Valves on well are open. Meter run shows no production. KGS shows last production was in 2007.

Action/Recommendations:

Follow Up Required ☒ Yes ☐ No ☐

Date: 5/6/25

Send to Legal

Verification Sources:

Photos Taken: _____

☒ RBDMS ☒ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☒ Other: On-Site Inspection

By: Nathan Feldkamp

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

Form: _____



5/6/25

JBL Oil & Gas Company LLC

Tuttle A 1-9

SW 9-35S-21W, Clark County

Facing South

CERTIFICATE OF SERVICE

25-CONS-3392-CPEN

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of first class mail and electronic service on 06/12/2025.

MARK LUCKIE
JBG OIL & GAS COMPANY LLC
2622 CR GG
ASHLAND, KS 67831-3125

FRED MACLAREN
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
frederic.maclaren@ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
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kelcey.marsh@ks.gov

ROBYN STALKFLEET, ADMINISTRATIVE SPECIALIST
KANSAS CORPORATION COMMISSION
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210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
robyn.stalkfleet@ks.gov

KENNY SULLIVAN, DISTRICT #1 SUPERVISOR
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
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kenny.sullivan@ks.gov

/S/ KCC Docket Room

KCC Docket Room