

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

In the Matter of the Application of Richardson) Docket No.: 25-CONS-3379-CEXC
and Son, Inc. for an exception to the 10-year)
time limitation of K.A.R. § 82-3-111 for its) CONSERVATION DIVISION
Waldschmidt #1 well located in the NE SW)
SE NW Sec 20-34S-6E in Cowley County,) License No.: 32917
Kansas.)

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

Staff of the State Corporation Commission of the State of Kansas (Staff and Commission, respectively) hereby moves the Commission for the designation of a presiding officer and the scheduling of a prehearing conference in this matter. In support of its motion, Staff states as follows:

1. On May 15, 2025, Richardson and Son, Inc. (Operator) filed an application for an exception to the 10-year temporary abandonment (TA) limitation of K.A.R. 82-3-111 for its Waldschmidt #1 well, API #15-035-21126-00-00 (Subject Well).

2. In its application, Operator requests the Commission grant a one-year exception to the requirement that it obtain a mechanical integrity test (MIT) for the Subject Well as a prerequisite for obtaining an exception to the 10-year TA limitation.¹ Operator requests an exception to performing an MIT because of the cost of such an MIT, and because it desires time to evaluate the production viability of a nearby well.²

3. Before granting an application for an exception to the 10-year TA limitation for a given well, the Commission has historically required the operator filing the application to test the

¹ Operator's application at ¶ 10.

² *Id.* at ¶¶ 8, 10.

well for mechanical integrity.³ The test is necessary to help ensure that the well does not present a threat to fresh and usable waters.⁴

4. The Subject Well in this docket is an oil well that has been shut-in since May 1, 2015.⁵ Commission Staff believes the Subject Well should be successfully tested for mechanical integrity before the Commission grants an exception to the 10-year TA limitation for the well. Such a test would indicate that the Subject Well does not present a threat to fresh and usable waters. Consequently, Staff requests the Commission issue an order designating a presiding officer and scheduling a prehearing conference in this docket.

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/Tristan Kimbrell
Tristan Kimbrell, #27720
Litigation Counsel
Kansas Corporation Commission
266 N. Main St., Ste. 220
Wichita, KS 67202
Tristan.Kimbrell@ks.gov

³ See, e.g., Docket 25-CONS-3334-CEXC, *Order Granting Application*, ¶ 5 (May 20, 2025).

⁴ *Id.*

⁵ Staff requests the Commission take administrative notice of its records. See K.A.R. 82-1-230(h).

CERTIFICATE OF SERVICE

25-CONS-3379-CEXC

I, the undersigned, certify that a true and correct copy of the attached Motion has been served to the following by means of first class mail and electronic service on May 30, 2025.

TRISTAN KIMBRELL, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
tristan.kimbrell@ks.gov

JEFF KLOCK
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 2
3450 N. ROCK RD BLDG 600 STE 601
WICHITA, KS 67226
jeff.klock@ks.gov

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

BRYAN J. RICHARDSON
RICHARDSON AND SON, INC.
17295 151st RD
WINFIELD, KS 67156-7524
bryanr@powdervalleyinc.com

/s/ Paula J. Murray
Paula J. Murray