

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

In the Matter of the responsibility of	)	Docket No. 25-CONS-3324-CMSC
Running Foxes Petroleum, Inc. (Operator)	)	
for abandoned wells pursuant to K.S.A.	)	CONSERVATION DIVISION
55-179.	)	
_____	)	License No. 33397

**MOTION TO EXTEND PROCEDURAL SCHEDULE**

Running Foxes Petroleum, Inc. (“Operator”) moves the Commission for an order extending the procedural schedule entered in this docket to allow time for discovery to be completed. In support of this Motion, Operator states and alleges the following.

1. The Procedural Schedule entered in this docket has two remaining deadlines: (a) Operator Pre-Filed Direct & Rebuttal Testimony due September 5, 2025, and (b) Commission Staff Pre-Filed Rebuttal Testimony Due September 19, 2025. Thereafter, the Evidentiary Hearing is to be scheduled.

2. On August 15, 2025, Operator filed a Motion Requesting the Commission Issue a Business Records Subpoena to Cross Country Ventures, LLC (“CCV”). No party has responded or otherwise lodged an objection to the requested Business Records Subpoena, and the time to respond to the motion has passed. As such, the Business Records Subpoena should issue in the ordinary course of discovery.

3. The records to be produced in response to the Business Records Subpoena should provide the direct evidence necessary to resolve the factual claim that is the central issue of this case. Specifically, as to whether CCV operated the wells at issue in this docket (“Subject Wells”) after Operator transferred the Subject Wells to CCV. If CCV indeed operated these wells, Operator has a complete and total defense under K.S.A. 55-179 to the allegation it is responsible to plug the

Subject Wells. As such, the direct evidence that should be contained in these business records are indispensable to the disposition of this docket, and the just and fair administration of justice.

4. Notably, CCV was in exclusive possession of the Subject Wells at all times in question, and is the only party that can know the status of the Subject Wells during that time. Responses to written discovery furnished by Staff indicate that no inspections of the Subject Wells were conducted between the time after the Subject Wells were transferred from Operator to CCV effective February 10, 2022, and the time CCV's license expired on February 28, 2024. Accordingly, Staff is not in possession of any direct evidence demonstrating whether CCV operated the Subject Wells after they were transferred from Operator to CCV. Such evidence could also foster a non-judicial resolution of this docket.

5. For the foregoing reasons, Operator requests that the Procedural Schedule be amended to allow time for the Business Records Subpoena to be issued and responded to, and discovery to be completed.

6. Operator has consulted with Staff regarding an extension to the procedural deadlines, and Staff has no objection.<sup>1</sup>

WHEREFORE, Operator respectfully requests that the Commission enter an order extending the procedural schedule in this docket to allow time for discovery to be completed, and for such other and further relief as the Commission deems equitable or appropriate by law.

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<sup>1</sup> No specific extended deadline dates were discussed.

Respectfully submitted,

MORRIS LAING LAW FIRM

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*Attorneys for Running Foxes Petroleum, Inc.*

## **CERTIFICATE OF SERVICE**

The undersigned hereby certify that on this 4th day of September, 2025, I caused the original of the foregoing **Motion to Extend Procedural Schedule** to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and emailed true and correct copies of the same to the following individuals:

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