

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

In the matter of an order to show cause issued )	Docket No.: 23-CONS-3176-CSHO
To Great Plains Petroleum, Inc. (Operator) for )	
A plugging order at the Stumps #4 well in )	CONSERVATION DIVISION
Barton County, Kansas. )	
_____ )	License No.: 30163

**PETITION FOR RECONSIDERATION**  
**PURSUANT TO K.S.A. §§ 55-606 and 77-529**

COMES NOW Great Plains Petroleum, Inc. (“Petitioner”) and petitions the State Corporation Commission of the State of Kansas (“Commission”) to reconsider an Order dated November 7, 2023 concerning the denial of Petitioner’s application for a time extension and to return the well to service as an injection well. In support hereof, Petitioner states as follows:

1. The Kansas Judicial Review Act (“KJRA”) mandates relief from any agency action when the following deficiencies exist:

- [4] The agency has erroneously interpreted or applied the law;
- [6] The agency action is based on a determination of fact, made or implied by the agency, that is not supported to the appropriate standard of proof by evidence that is substantial when viewed in light of the record as a whole, which includes the agency record for judicial review, supplemented by any additional evidence received by the court under this act; or
- [8] The agency action is otherwise unreasonable arbitrary or capricious.<sup>1</sup>

2. The Commission based its decision on concerns that the well posits a threat to fresh water and correlative rights.<sup>2</sup> The Stumps #4 well is not currently causing any damage to fresh water. The Stumps #4 has passed—and continues to pass—the technical requirements for an MIT as required by K.A.R. 82-3-407. The casing holds pressure. Moreover, the gamma ray neutron logs

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<sup>1</sup> K.S.A. § 77-621(c).

<sup>2</sup> Final Order § 7.

show that this area of the Arbuckle is in active communication so there is no great risk of contaminating a producing formation with saltwater injections.

3. In Section 7 of the Final Order, the Commission says that, “For example, no party disputes the captioned well’s surface casing is less than presently required by regulation.” This is not strictly true. For this proposition, Staff relied on the maps of the area to establish its current position surface casing. Note that the Staff also concedes that the well was constructed as required by the regulations at the time it was drilled. Operator did not contest that based on the maps. However, the regulation for minimum surface casing requirements in Barton County is “20 feet into the Kiowa where present. Set 20 feet into the Permian where Kiowa is not present. In all cases, set through all unconsolidated material plus 20 feet into the underlying formation.”<sup>3</sup>

4. In this instance, the log for the Stumps #3 shows that the top of the Permian is at 1612 feet above sea level. Making the reasonable assumption that the Permian is at the same depth a half mile away at the Stumps #4 then to the top of the Permian is at 257 feet below the Kelly Bushing. Surface casing is set at 277 feet below the Kelly Bushing. This is 20 feet into the Permian which meets the current regulation. It is important to note that the well has repeatedly passed an MIT by Shane’s Tank Service after the hearing in early September. This well meets the mechanical requirements to protect safe and usable water. [Exhibits A and B]

5. The referenced partitioned action is now well underway and the operator has committed significant resources to seeing it through.

6. Nevertheless, partition actions take time to go through the judicial system. No mineral owner is opposing the action, but two pro se parties filed answers—meaning that rather

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<sup>3</sup> *Order on the matter of the general rules and regulations for the conservation of crude oil and natural gas*, Dock. No 34,780-C (Apr. 1, 1994).

than an agreed order circulated amongst counsel, the parties have to schedule and hold a hearing for every step of the process.

7. In addition, the shut down of all electronic filing throughout the state has slowed the process substantially. The Operator should not be penalized for factors beyond its control.

8. If Operator is forced to plug the well, the likelihood of anyone drilling in this area again is low. Requiring them to plug it before the partition action reaches the sale stage would constitute waste.

9. The Order of the Commission constitutes a determination that is not supported by evidence.

WHEREFORE, the Petitioner requests the State Corporation Commission of the State of Kansas to grant this petition to reconsider an Order dated November 7, 2023 concerning the denial of Petitioner's application for a time extension.

Respectfully submitted,

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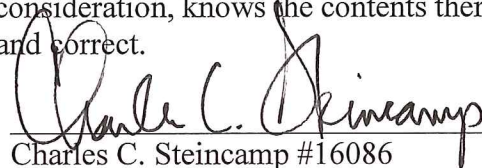
By /s/Charles C. Steincamp  
Charles C. Steincamp #16086  
*Attorney for Great Plains Petroleum, Inc.*

**VERIFICATION**

STATE OF KANSAS       )  
                                  )  
COUNTY OF SEDGWICK )

ss:

Charles C. Steincamp, of lawful age, being first duly sworn, upon oath states:  
That he is one of the attorneys for Great Plains Petroleum Inc., the petitioner herein, that he has read the above and foregoing Petition for Reconsideration, knows the contents thereof, and knows that all the statements made therein are true and correct.

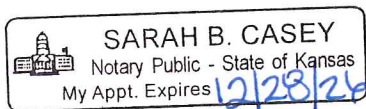
  
Charles C. Steincamp #16086

SUBSCRIBED and sworn to before me this 21<sup>st</sup> day of November, 2023.

  
Notary Public

My appointment expires:

Dec. 28<sup>th</sup>, 2026



## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 21<sup>st</sup> day of November, 2023, the foregoing *Petition for Reconsideration Pursuant To K.S.A. §§ 55-606 and 77-529* by Petitioner Great Plains Petroleum Inc., was served to the following by means of electronic service.

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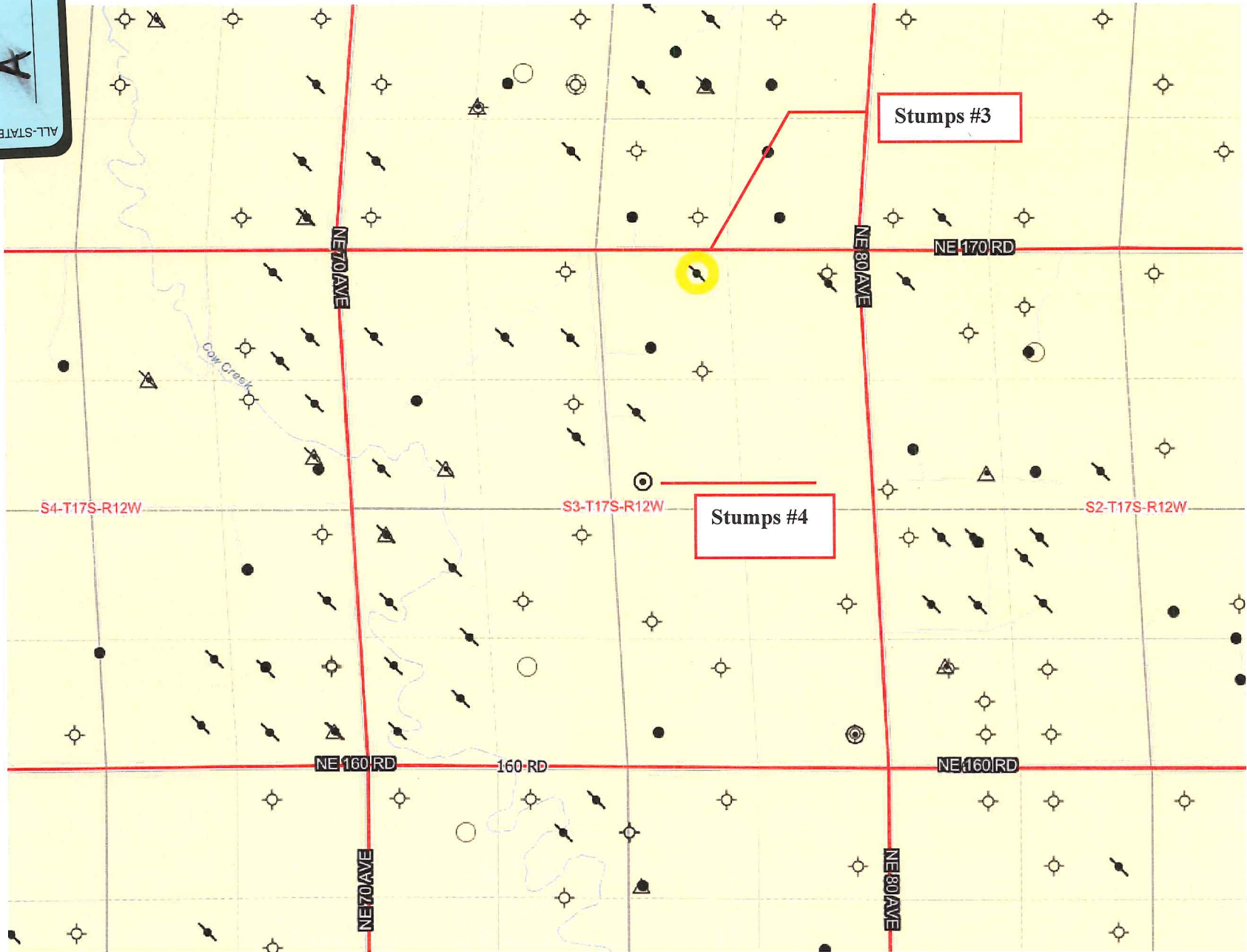
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/s/Charles C. Steincamp  
Charles C. Steincamp #16086





**LOCATION** SEC. 3-17-12W

NE NW NE

COMPANY FLOYD W. SMITH & MAYFIELD  
& SMITH

WELL STUMPS NO. 3

FIELD ODIN

COUNTY      BARTON

STATE KANSAS

DISTRIBUTED BY  
KANSAS GEOLOGICAL SOCIETY  
WICHITA, KANSAS

# WELLEX

RADIATION-GUARD  
LOG

COMPANY FLOYD SMITH & MAYFIELD & SMITH  
WELL STUMPS # 3  
FIELD ODIN  
County BARTON State KANSAS

COMPANY FLOYD M. SMITH AND MAYFIELD AND SMITH  
WELL STUMPS # 3  
FIELD ODIN  
COUNTY BARTON STATE KANSAS  
Sec. 3 Twp. 17S Rge. 12W

Other Sections  
NONE

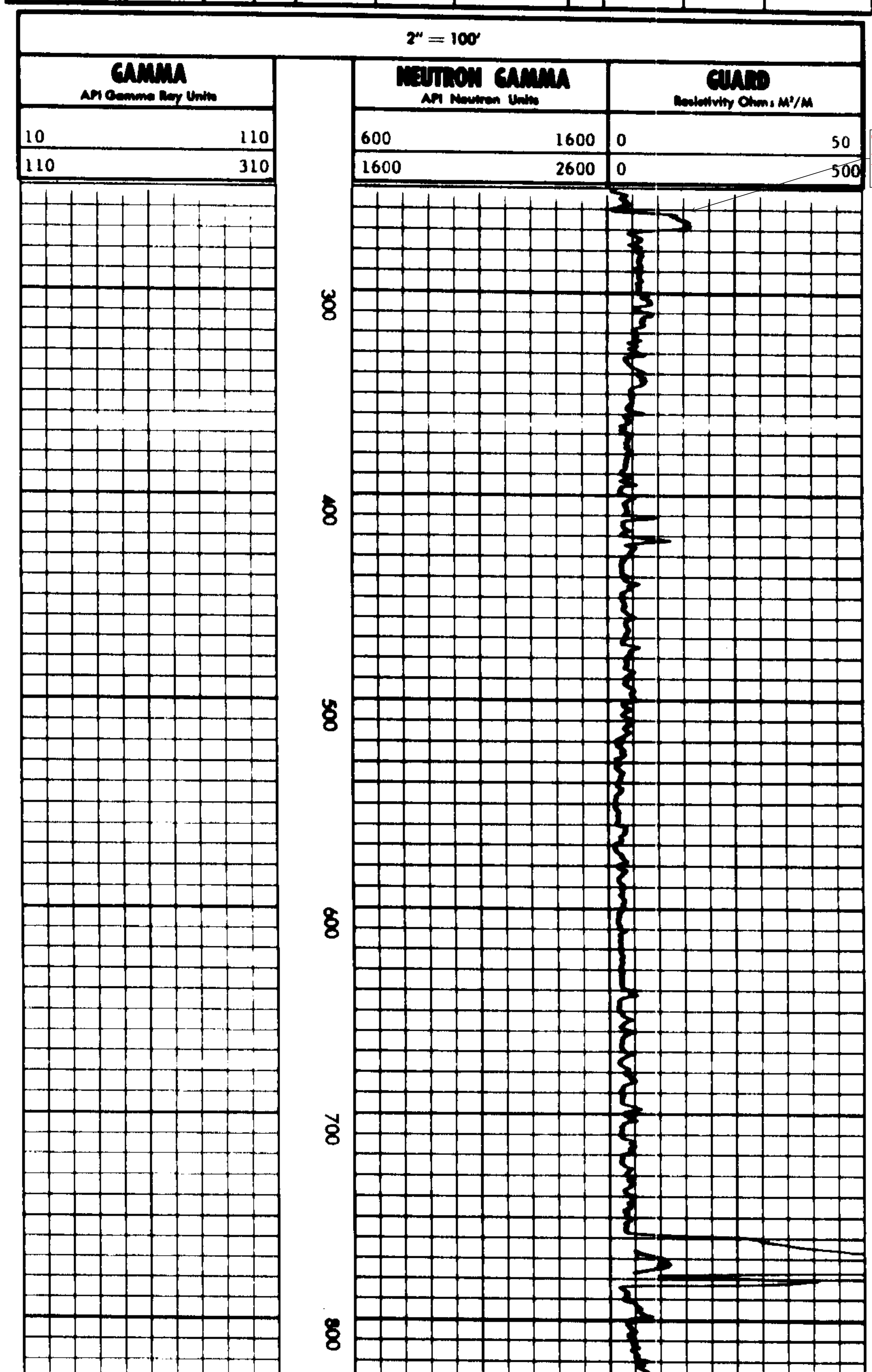
Permanent Datum GROUND LEVEL Elev. 1877'  
Log Measured From KELLY BUSHING 5 ft. Above Perm. Datum  
Drilling Measured From KELLY BUSHING

Elev. R.S. 1882'  
D.F. 1879'  
O.I. 1877'

Date	Run No.	ONE	2-3-64	2-3-64	2-3-64	FILE NO.
Depth-Driver	3394'	3394'	NEUTRON	3394'	3394'	47507
Depth-Wireline	3394'	3394'	3394'	3394'	3394'	WELLS
Run Log Wire.	3386'	3394'	3394'	3386'	3386'	
Top Log Wire.	2900'	2900'	2900'	256'	256'	
Casing-Driver				8-5/8" 256'		
Casing-Wireline						
Bit Size				7-7/8"		
Type Fluid in Hole				SALT GEL		
Date	Well					
Run Log	al			9.9	4.5	
Series of Readings				6.5	1.3 ml	
Log Series Temp.	4°	4°	4°	1.3 @ 60 °	4°	4°
Log Series Temp.	4°	4°	4°	0.96 @ 60 °	4°	4°
Log Series Temp.	4°	4°	4°	24. @ 60 °	4°	4°
Series Log L.	4°	4°	4°	NEAS		
Log Series Cnc.	4°	4°	4°	0.79 @ 103°	4°	4°
Temp. Rec. Temp.	4°	4°	4°	1 HOUR		
Temp. Rec. Location				103° @ 3380'	4°	4°
Recorded by	U. HANBISON			6870 IGT RD		
Witnessed by	MR. OPEN & MR. SMITH					

**Fold Here**

REMARKS											
Change in Mud Type or Additional Samples						SCALE CHANGES					
Date	Sample No.					Type Log	Depth	Scale Up Hole	Scale Down Hole		
Depth-Driller						RAD. GUARD	3394'	NO CHANGE			
Type Fluid in Hole											
Dens.	Visc.										
ph	Fluid Loss		ml								
Source of Sample						EQUIPMENT DATA					
R <sub>sp</sub> @ Meas. Temp.	②	°F	②	°F		Run No.	Tool Type and No.	Prod Type	Tool Position	Other	
R <sub>sp</sub> @ Meas. Temp.	②	°F	②	°F		ONE	EXP. # 1		FREE		
R <sub>sp</sub> @ Meas. Temp.	②	°F	②	°F							
Source: R <sub>sp</sub>	R <sub>sp</sub>										
R <sub>sp</sub> @ BHT	079	②103°F	②	°F							
R <sub>sp</sub> BHT	016	②103°F	②	°F							
R <sub>sp</sub> BHT	14	②103°F	②	°F							
TICKET #W-39839						RW ARR. 27 @ 420° 12 @ 103°					
						JH					

[illegible]

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