

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

Before Commissioners: Jay Scott Emler, Chairman
Shari Feist Albrecht
Pat Apple

In the matter of an Order to Show Cause) Docket No.: 17-CONS-3075-CSHO
issued to Randall K. Matlock ("Operator"))
regarding responsibility under K.S.A. 55-179) CONSERVATION DIVISION
for unplugged wells on an expired license.)
_____) License No.: 4676

**MOTION FOR AN ORDER TO SHOW CAUSE, THE DESIGNATION OF A
PREHEARING OFFICER, AND THE SCHEDULING OF A PREHEARING
CONFERENCE**

For the following reasons, Commission Staff moves for an Order to Show Cause, the designation of a prehearing officer, and the scheduling of a prehearing conference in this matter:

I. JURISDICTION & LEGAL STANDARD

1. The Commission has jurisdiction to regulate oil and gas production in Kansas under Chapter 55 of the Kansas Statutes Annotated and the General Rules and Regulations for the Conservation of Crude Oil and Natural Gas, K.A.R. 82-3-100 *et seq.*
2. K.S.A. 55-162 provides the Commission with jurisdiction to institute proceedings to enforce the laws of Kansas and Commission rules, regulations, and orders.
3. K.S.A. 55-179 provides the Commission with jurisdiction to determine the persons legally responsible for the proper care and control of oil and gas wells, including the responsibility to plug the wells.
4. K.S.A. 55-179(b) provides that a person who is legally responsible for the proper care and control of an abandoned well shall include one or more of the following:
 - a. Any operator of a waterflood or other pressure maintenance program deemed to be causing pollution or loss of usable water;

- b. the current or last operator of the lease upon which such well is located, irrespective of whether such operator plugged or abandoned such well;
- c. the original operator who plugged or abandoned such well; and
- d. any person who without authorization tampers with or removes surface equipment or downhole equipment from an abandoned well.

5. K.S.A. 55-180 gives the Commission a cause of action against responsible parties for the reasonable plugging costs of abandoned wells.

6. K.A.R. 82-3-120 provides that no Operator shall conduct activities at a well without a current license.

II. STAFF'S ALLEGATION OF FACTS

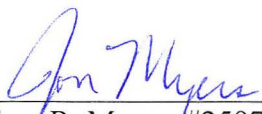
7. The wells listed on the attached Exhibit A are unplugged. As the wells are listed on Operator's license, which is expired, the wells appear to be abandoned. Pursuant to Kansas statutes and Commission regulations, Operator appears to be responsible for plugging the wells.

8. If Operator does not bring these wells into compliance with Commission regulations, then Operator's license should be suspended and any injection authority associated with the unplugged wells should be revoked.

III. CONCLUSION

9. Based on the above, Staff requests that an Order to Show Cause be issued, designating a prehearing officer and scheduling a prehearing conference.

Respectfully submitted,


Jonathan R. Myers, #25975
Litigation Counsel
Kansas Corporation Commission

266 N. Main, Suite 220
Wichita, Kansas 67202-1513
Phone: 316-337-6200; Fax: 316-337-6211

Exhibit A

Matlock, Randall K. License: 4676

Unplugged Wells on Operator's License

API Well #	Lease Name / Well #	Well Location	County
15-133-01782-00-01	O'BRYAN 83	22-29S-21E, E2SENW	NEOSHO
15-133-24261-00-00	O'BRYAN 4	22-29S-21E, NWNWNNW	NEOSHO
15-133-24263-00-00	O'BRYAN 5	22-29S-21E, NENNNWNW	NEOSHO
15-133-24271-00-00	O'BRYAN 6	22-29S-21E, NWNNNWNW	NEOSHO
15-133-24273-00-00	O'BRYAN 7	22-29S-21E, NNNWNNW	NEOSHO
15-133-24274-00-00	O'BRYAN 8	22-29S-21E, NWNWNNW	NEOSHO
15-133-24275-00-00	O'BRYAN 1	22-29S-21E, NNNNNNW	NEOSHO
15-133-24276-00-00	O'BRYAN 2	22-29S-21E, NWNNNNW	NEOSHO
15-133-24277-00-00	O'BRYAN 3	22-29S-21E, NNNWNNW	NEOSHO
15-133-24278-00-01	O'BRYAN 9	22-29S-21E, NNNNW	NEOSHO
15-133-24279-00-02	O'BRYAN 10	22-29S-21E, N2NNW	NEOSHO
15-133-24280-00-01	O'BRYAN 11	22-29S-21E, NWNNNW	NEOSHO
15-133-24281-00-00	O'BRYAN 12	22-29S-21E, N2N2NW	NEOSHO
15-133-24282-00-00	O'BRYAN 13	22-29S-21E, NNNWNNW	NEOSHO
15-133-24283-00-00	O'BRYAN 14	22-29S-21E, N2NWNW	NEOSHO
15-133-24284-00-00	O'BRYAN 15	22-29S-21E, NWNWNNW	NEOSHO
15-133-24371-00-00	O'BRYAN 16	22-29S-21E, SENNNNW	NEOSHO
15-133-24372-00-00	O'BRYAN 17	22-29S-21E, SWNNNNW	NEOSHO
15-133-24373-00-00	O'BRYAN 18	22-29S-21E, SENWNNW	NEOSHO
15-133-24374-00-00	O'BRYAN 19	22-29S-21E, SWNNNNW	NEOSHO
15-133-24375-00-01	O'BRYAN 20	22-29S-21E, SENWNNW	NEOSHO
15-133-24376-00-00	O'BRYAN 21	22-29S-21E, SWNNWNNW	NEOSHO
15-133-24376-00-02	O'BRYAN 21	22-29S-21E, SWNNWNNW	NEOSHO
15-133-24377-00-01	O'BRYAN 22	22-29S-21E, NWNWNNW	NEOSHO
15-133-24388-00-00	O'BRYAN 23	22-29S-21E, SWNNWNNW	NEOSHO
15-133-24389-00-00	O'BRYAN 24	22-29S-21E, E2NNW	NEOSHO
15-133-24390-00-00	O'BRYAN 25	22-29S-21E, NNNW	NEOSHO

15-133-24391-00-00	O'BRYAN	26	22-29S-21E, W2NENW	NEOSHO
15-133-24392-00-00	O'BRYAN	27	22-29S-21E, N2NW	NEOSHO
15-133-24395-00-00	O'BRYAN	28	22-29S-21E, E2NWNW	NEOSHO
15-133-24396-00-00	O'BRYAN	30	22-29S-21E, W2NWNW	NEOSHO
15-133-24398-00-00	O'BRYAN	29	22-29S-21E, NWNW	NEOSHO
15-133-24420-00-00	O'BRYAN	35	22-29S-21E, NESENWNW	NEOSHO
15-133-24421-00-00	O'BRYAN	36	22-29S-21E, NWSENWNW	NEOSHO
15-133-24422-00-00	O'BRYAN	37	22-29S-21E, NESWNWNW	NEOSHO
15-133-24444-00-02	O'BRYAN	99	22-29S-21E, SWSWNW	NEOSHO
15-133-24463-00-00	O'BRYAN	92	22-29S-21E, NWSESENW	NEOSHO
15-133-24464-00-01	O'BRYAN	100	22-29S-21E, S2SENW	NEOSHO
15-133-24465-00-00	O'BRYAN	107	22-29S-21E, SWSESENW	NEOSHO
15-133-24466-00-02	O'BRYAN	84	22-29S-21E, W2SWNW	NEOSHO
15-133-24467-00-00	O'BRYAN	91	22-29S-21E, NESESENW	NEOSHO
15-133-24468-00-00	O'BRYAN	106	22-29S-21E, SESESENW	NEOSHO
15-133-24475-00-00	O'BRYAN	76	22-29S-21E, SWNWSWNW	NEOSHO
15-133-24476-00-00	O'BRYAN	77	22-29S-21E, SENWSWNW	NEOSHO
15-133-24477-00-00	O'BRYAN	85	22-29S-21E, SENW	NEOSHO
15-133-24478-00-00	O'BRYAN	93	22-29S-21E, NESWSENW	NEOSHO
15-133-24479-00-00	O'BRYAN	101	22-29S-21E, SWSENW	NEOSHO
15-133-24480-00-00	O'BRYAN	108	22-29S-21E, SESWSENW	NEOSHO
15-133-24528-00-00	O'BRYAN	95	22-29S-21E, NESESWNW	NEOSHO
15-133-24529-00-01	O'BRYAN	103	22-29S-21E, S2S2NW	NEOSHO
15-133-24530-00-00	O'BRYAN	110	22-29S-21E, SESESWNW	NEOSHO
15-133-24535-00-00	O'BRYAN	88	22-29S-21E, E2SWNW	NEOSHO
15-133-24536-00-02	O'BRYAN	89	22-29S-21E, SWNW	NEOSHO
15-133-24538-00-00	O'BRYAN	96	22-29S-21E, NWSESWNW	NEOSHO
15-133-24539-00-00	O'BRYAN	97	22-29S-21E, NWSWSWNW	NEOSHO
15-133-24660-00-00	O'BRYAN	104	22-29S-21E, S2SWNW	NEOSHO
15-133-24661-00-00	O'BRYAN	111	22-29S-21E, SWSESWNW	NEOSHO
15-133-25102-00-00	O'BRYAN	KESN-1	22-29S-21E, W2W2NW	NEOSHO

CERTIFICATE OF SERVICE

I certify that on August 30, 2016, I caused a complete and accurate copy of this Motion to be served via United States mail, with the postage prepaid and properly addressed to the following:

Linda Barker
Randall K. Matlock
1927 SE Ohio St
Topeka, KS 66607

/s/ Paula J. Murray
Paula J. Murray
Legal Assistant
Kansas Corporation Commission