

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

Before Commissioners: Dwight D. Keen, Chair
 Susan K. Duffy
 Andrew J. French

In the matter of a Compliance Agreement) Docket No. 21-CONS-3017-CMSC
between Running Foxes Petroleum, Inc.)
(Operator) and Commission Staff regarding) CONSERVATION DIVISION
bringing 27 wells into compliance with K.A.R.)
82-3-111.) License No. 33397

**ORDER APPROVING ADDITION OF WELLS
AND EXTENSION OF FINAL DEADLINE**

For the reasons described below, the Commission adds the Chi-Chi #2-1D-1, Cromer #11-22, Dunlop #1-12, Emmerson Farms #16-15A-3, Hoppe #2, Hoppe #4, McClintick #7, McClintick #8, New Horizons #6-26, S. Hoppe #3, Snow #14-5A-1, and Snow #11-5D-3 wells (Subject Wells) to Operator's Compliance Agreement, resulting in the final deadline of the Compliance Agreement now extending to June 30, 2025.

On September 27, 2022, Commission Staff filed a Status Update in this docket. The Commission notes: (1) the Compliance Agreement presently addresses 48 wells, requiring Operator to obtain compliance with K.A.R. 82-3-111 at a rate of three wells per quarter (the first deadline was September 30, 2020); (2) Operator is presently in compliance with the Compliance Agreement, having brought 26 wells into compliance with K.A.R. 82-3-111; (3) Staff recommends adding the Subject Wells to the Compliance Agreement and extending the final deadline, and (4) the addition and extension are allowed under the terms of the Compliance Agreement.¹


¹ See Status Update (Sept. 27, 2022); K.A.R. 82-1-230(h) (the Commission may take administrative notice of its files and records); see also Attachment A (Compliance Agreement).

The Commission agrees with Staff's recommendation. The Subject Wells are added to the Compliance Agreement and the final deadline is extended to June 30, 2025. All other deadlines in this matter remain unchanged.

BY THE COMMISSION IT IS SO ORDERED.

Keen, Chair; Duffy, Commissioner; French, Commissioner

Dated: 10/04/2022



Lynn M. Retz
Executive Director

Mailed Date: 10/04/2022

KAM

COMPLIANCE AGREEMENT

This Agreement is between Running Foxes Petroleum, Inc. ("Operator") (License #33397) and the Kansas Corporation Commission Staff ("Staff"). If the Kansas Corporation Commission ("Commission") does not approve this Agreement as evidenced by a signed order of the Commission, this Agreement shall not be binding on either party.

A. Background

1. Operator is responsible for the 27 wells ("the subject wells") on the attached list. All of the subject wells are out of compliance with K.A.R. 82-3-111. Operator has asked for an agreement to avoid penalties while Operator works to plug the subject wells, return them to service, or repair and obtain TA status for such subject wells if eligible. Obtaining TA status shall include application for, and Commission approval of, an exception to the 10-year limit on TA status if applicable. Staff is supportive of an agreement to this effect with the Operator.

B. Terms of Compliance Agreement

2. By September 30, 2020, Operator shall plug, return to service, or repair and obtain temporary abandonment status for 3 of the subject wells. Operator shall plug, return to service, or repair and obtain temporary abandonment status for an additional 3 subject wells within each three calendar months thereafter, resulting in all subject wells being returned to compliance by September 30, 2022. Staff may prioritize the order in which the subject wells are addressed pursuant to this Agreement by indicating priority on the attached list and may adjust the prioritization at any time during this Agreement should a subject well or wells become known to Staff to be a pollution or public safety threat. Operator shall notify Staff in writing of all subject wells returned to service during each three calendar month period throughout the term of this Agreement.

3. Upon good cause shown, the Operator may receive an extension of the time to achieve compliance for up to 30 days from an applicable deadline pursuant to this Agreement so that the Operator may plug, return to service, or repair and TA the well or wells that was or were the subject of the applicable deadline. If the Operator seeks a time extension for any deadline under this Agreement, the Operator shall request such an extension at least seven days prior to the applicable deadline. Staff will file a status update in the docket created for this matter containing the District Supervisor's recommendation to approve or deny the extension and place an order requesting Commission approval of the terms of the status update on the next available Consent Agenda for Commission consideration and possible approval. If Operator is denied a requested

extension by the Commission or otherwise remains out of compliance with this Agreement for any other reason, Staff shall immediately send a Notice of Non-Compliance and License Suspension to Operator, which shall suspend the Operator's license and become effective 10 days from the date of the Notice of Non-Compliance and License Suspension. The Operator's license shall remain suspended until well plugging or repair is resumed in accordance with the compliance schedule contained in the Status Update. If Staff finds that the Operator is conducting oil and gas operations after 10 days from the date of a Notice of Non-Compliance and License Suspension, and Operator's license remains suspended, Staff is authorized to seal all of Operator's oil and gas operations.

4. This Agreement, in its entirety, may be transferable between operators only by an Order of the Commission approving the transfer. Staff will file a status update in the docket created for this matter containing a recommendation regarding any proposed transfer between operators and will place an order regarding the transfer on the next available Consent Agenda for Commission consideration and possible approval. If the Operator intends to transfer any of the subject wells to another Operator, but does not intend to transfer this Agreement in its entirety, such subject wells must be returned to compliance pursuant to Commission, rules, regulations, or orders before Staff will process the transfer.

5. Except as provided by and under this Agreement, Staff will not pursue Operator for any violation of K.A.R. 82-3-111 for the subject wells that occurred or occurs prior to September 30, 2022, except for wells brought into compliance after Commission approval of this Agreement that subsequently fall out of compliance and remain the Operator's responsibility under the Operator's license.

6. This Agreement may be amended to add additional wells with the written consent of the District Supervisor. If this Agreement is amended, then Staff shall file a status update in the Commission docket created for this matter, also indicating that Operator is not opposed to the addition of the wells. The addition of wells may not change the number of wells to be brought into compliance each calendar quarter, but may extend the final compliance deadline. Any changes to a previously approved timeline will be included in the status update. Staff will place an order approving the addition of wells and extending the final compliance deadline on the next available Consent Agenda for Commission consideration and possible approval.

7. Operator may bring more than 3 wells into compliance during any three calendar month term. The excess number of wells brought into compliance will be attributed to a future three-month compliance period.

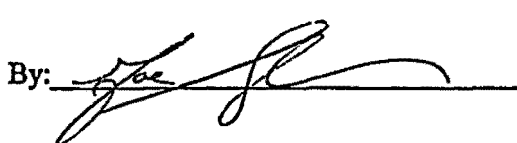
8. None of the subject wells to be brought into compliance hereunder are currently authorized for injection. Upon Commission approval of this Agreement, Staff shall revoke the Operator's injection authorization for such subject wells that are to be plugged. These subject wells are highlighted in yellow on the attached list, and have an "x" marked in the far right column.

9. After this Agreement has been in effect for two years, Staff may reopen negotiation with Operator about the terms of this Agreement at any time, upon giving Operator written notice of Staff's intent to do so. If Staff and Operator are unable to agree to new terms, and to submit those terms to the Commission for its consideration and possible approval within 90 days of Staff's written notice, then this Agreement shall be terminated upon Staff's filing a statement to that effect in the Commission docket for this matter.

Commission Staff

Running Foxes Petroleum, Inc. #33397

By: 

By: 

Printed Name: Troy A. Russell

Printed Name: JOE TAGLIERI

Title: District #3 Supervisor

Title: PRESIDENT

Date: 7/7/2020

Date: 4 JUNE 2020

List of wells to be plugged by Running Foxes Petroleum, Inc. #33397 Compliance Agreement:

1. Snyder #2-1A-1	API# 15-011-24000	Sec.1, Twp.24S, Rge. 23E
2. Snyder #2-1B-2	API# 15-011-24005	Sec.1, Twp.24S, Rge. 23E
3. Snyder #1-31	API# 15-011-23168	Sec.1, Twp.24S, Rge. 23E
4. Snyder #2-1B INJ	API# 15-011-24146	Sec.1, Twp.24S, Rge. 23E
5. Snyder #2-1B-3	API# 15-011-24006	Sec.1, Twp.24S, Rge. 23E
6. Snyder #2-1C INJ4	API# 15-011-24151	Sec.1, Twp.24S, Rge. 23E
7. Snyder #2-1C INJ	API# 15-011-23882	Sec.1, Twp.24S, Rge. 23E
8. Snyder #2-1C-3	API# 15-011-24212	Sec.1, Twp.24S, Rge. 23E
9. Snyder #2-1C INJ3	API# 15-011-24150	Sec.1, Twp.24S, Rge. 23E
10. Snyder #2-1A-2	API# 15-011-24001	Sec.1, Twp.24S, Rge. 23E
11. Snyder #2-1A INJ	API# 15-011-23881	Sec.1, Twp.24S, Rge. 23E
12. Snyder #1-24D INJ4	API# 15-011-24435	Sec.24, Twp.23S, Rge. 23E
13. Snyder #24-41	API# 15-011-23306	Sec.24, Twp.23S, Rge. 23E
14. Snyder #7-24	API# 15-011-24424	Sec.24, Twp.23S, Rge. 23E
15. Snyder #1-24A INJ	API# 15-011-24433	Sec.24, Twp.23S, Rge. 23E
16. Snyder #25-34	API# 15-011-23020	Sec.25, Twp.23S, Rge. 23E
17. Snyder #30-14	API# 15-011-23169	Sec.30, Twp.23S, Rge. 24E
18. Bower #2-21	API# 15-011-23047	Sec.21, Twp.26S, Rge. 23E
19. Bower #8-21	API# 15-011-23008	Sec.21, Twp.26S, Rge. 23E
20. Martin Trust #8-23	API# 15-011-23055	Sec.23, Twp.26S, Rge. 23E
21. Meier Trust #4-23	API# 15-011-23067	Sec.23, Twp.26S, Rge. 23E
22. Meier Trust #6-23	API# 15-011-23068	Sec.23, Twp.26S, Rge. 23E
23. Oberst #10-27	API# 15-011-23232	Sec.27, Twp.26S, Rge. 23E
24. Rhodes #4-24	API# 15-011-23062	Sec.24, Twp.26S, Rge. 23E
25. Rhodes #6-24	API# 15-011-23063	Sec.21, Twp.26S, Rge. 23E
26. Wunderly #3-26	API# 15-011-23243	Sec.26, Twp.24S, Rge. 23E
27. Gregg #10-33	API# 15-011-23618	Sec.22, Twp.22S, Rge. 22E

Compliance Agreement Schedule for Running Foxes Petroleum, Inc. 33397

Wells to be brought into compliance per Quarter, per year ending September 30, 2022.

	2020	2021	2022
Q1 Jan			
Feb			
Mar	0	3	3
Q2 Apr			
May			
Jun	0	3	3
Q3 Jul			
Aug			
Sep	3	3	3
Q4 Oct			
Nov			
Dec	3	3	0
Total	6	12	9

Totals Wells Brought Into Compliance ending September 30, 2022: 27

CERTIFICATE OF SERVICE

21-CONS-3017-CMSC

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 10/04/2022.

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/S/ KCC Docket Room
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