

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

In the matter of the petition of Somerset Energy,) Docket No. 25-CONS-3195-CMSC
Inc. to open a docket pursuant to K.S.A.)
55.605(a).) CONSERVATION DIVISION
)
) License No. 6143

RESPONSE TO PETITION OPENING DOCKET PURSUANT TO K.S.A. 55-605(a)
AND MOTION TO CLOSE DOCKET

Comes Now Staff of the Kansas Corporation Commission (Staff and Commission, respectively), in response to the petition opening docket pursuant to K.S.A. 55-605(a) (Petition) submitted on behalf of Somerset Energy, Inc. (Operator) on December 11, 2024. In support of its response, Staff states the following:

1. On December 2, 2024, Commission Staff sent a letter to Operator's counsel temporarily reducing the rate and pressure of eight injection wells that are within the area of review of an abandoned well found by Staff. That letter also stated that Staff intended to open a docket by filing a motion requesting a presiding officer be assigned and a prehearing conference set in anticipation of a formal hearing where the operator would be required to appear before the Commission to show why its injection authority for the injection wells at issue should not be revoked.

2. On December 9, 2024, Commission Staff filed a motion for the designation of a presiding officer and the scheduling of a prehearing conference in Docket 25-CONS-3193-CUIC regarding the exact same matter that is described in Operator's Petition. As a docket has already been created, Operator's Petition is moot.

WHEREFORE, for the reasons described above, Staff respectfully requests the Commission deny Operator's Petition, close the captioned docket, and for any other relief the Commission determines to be just and equitable.

Respectfully Submitted,

/s/ Kelcey Marsh

Kelcey A. Marsh, S. Ct. No. 28300
Litigation Counsel | Kansas Corporation Commission
266 N. Main, Suite 220 | Wichita, KS 67202
Phone: 316-337-6200 | Email: Kelcey.Marsh@ks.gov

CERTIFICATE OF SERVICE

25-CONS-3195-CMSC

I, the undersigned, certify that a true and correct copy of the attached Response has been served to the following by means of first class mail and electronic service on December 13, 2024.

KEITH A. BROCK, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
kbrock@andersonbyrd.com

TODD BRYANT, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
todd.bryant@ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
kelcey.marsh@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

TROY RUSSELL
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
troy.russell@ks.gov

DUANE SIMS
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
duane.sims@ks.gov

/s/ Paula J. Murray
Paula J. Murray
