

**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 the application of Neal LaFon) Docket No: 22-CONS-3422-CUNI
Realty Inc. dba Meridian Energy Inc. (Operator))
for an order authorizing the unitization and unit) CONSERVATION DIVISION
operation of the Simon Says Unit to be located in)
Rawlins County, Kansas.) License No: 33937

ORDER REQUESTING ADDITIONAL INFORMATION

The Commission rules as follows:

1. On May 9, 2022, Operator filed an application for an order authorizing unitization and unit operation of the Simon Says Unit in Rawlins County, under K.S.A. 55-1301 *et seq.*¹ Operator intends to unitize certain lands from the top of the Topeka formation to the base of the Arbuckle, as expected to be encountered between 3,750 and 4,800 feet from surface, and “intends to conduct an exploratory and development drilling program within the pool anticipated to be encountered.”²
2. On June 14, 2022, Operator filed a Motion for Grant of Application by Summary Proceedings, requesting that the Commission utilize the summary proceedings available under the Kansas Administrative Procedure Act to grant Operator’s application.³
3. On June 21, 2022, Staff filed a Response, stating it had no objection to Operator’s motion and recommending approval of the application.⁴
4. Under K.S.A. 55-1304, the Commission may make an order providing for unitization of a pool or part thereof. And under K.S.A. 55-1302(b), “pool” means “an underground accumulation

¹ See Application (May 9, 2022).

² *Id.* at ¶ 5.

³ See Motion for Summary Proceedings (Jun. 14, 2022).

⁴ See Response to Operator’s Motion for Summary Proceedings, ¶ 5, Prayer (Jun. 21, 2022).

of oil and gas in one or more natural reservoirs in communication so as to constitute a single pressure system so that production from one part of the pool affects the pressure throughout its extent.”

5. The Commission would like further information demonstrating the formations Operator proposes to unitize upon the lands in question constitute natural reservoirs “in communication so as to constitute a single pressure system so that production from one part of the pool affects the pressure throughout its extent.” Accordingly:

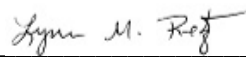
- A. Operator is directed to file such information at its convenience within the next two months, in the form of a pleading, to which written testimony and other data may be attached if desired, and explaining how such information demonstrates the formations proposed to be unitized constitute a pool as defined under K.S.A. 55-1302(b). To the extent Operator does not believe the formations are in communication, Operator is directed to explain how it believes the Commission has the legal basis to grant its application; and
- B. Staff is directed to respond to Operator’s pleading within two weeks of its submission, opining upon the matter, by providing both its legal analysis and technical advice regarding this issue.

6. Operator is reminded of the confidentiality provisions available under K.A.R. 82-1-221a; parties are directed to contact the Presiding Officer if a protective order would be appropriate.

BY THE COMMISSION IT IS SO ORDERED.

Keen, Chair; Duffy, Commissioner; French, Commissioner

Dated: 06/30/2022



Lynn M. Retz
Executive Director

Mailed Date: 06/30/2022

JRM

CERTIFICATE OF SERVICE

22-CONS-3422-CUNI

I, the undersigned, certify that a true copy of the attached Order has been served to the following by means of
electronic service on 06/30/2022.

JAKE EASTES, GEOLOGIST SPECIALIST
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
j.eastes@kcc.ks.gov

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

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
j.myers@kcc.ks.gov

JONATHAN A. SCHLATTER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
jschlatter@morrislaing.com

/S/ DeeAnn Shupe
DeeAnn Shupe
