THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Before Commissioners: Andrew J. French, Chairperson

Dwight D. Keen Annie Kuether

In the matter of the failure of SH Oil) Docket No.: 25-CONS-3373-CPEN Operations, LLC (Operator) to comply with)
K.A.R. 82-3-111 at eleven wells in Chase,) CONSERVATION DIVISION
Marion, and Morris Counties, Kansas.)
License No.: 35837

PENALTY ORDER

The Commission finds Operator has violated K.A.R. 82-3-111 regarding the captioned wells, assesses a \$1,100 penalty, directs Operator to come into compliance, and further rules as more fully described below.

I. JURISDICTION

- 1. K.S.A. 74-623 provides the Commission exclusive jurisdiction and authority to regulate oil and gas activities in Kansas. K.S.A. 55-152 provides the Commission with jurisdiction to regulate the construction, operation, and abandonment of any well, and also the protection of the usable water of this state from any actual or potential pollution from any well. The Commission has licensing authority under K.S.A. 55-155.
- 2. K.S.A. 55-162 and K.S.A. 55-164 provide the Commission authority to issue penalty orders for violations of Chapter 55 of the Kansas Statutes Annotated, or of any rule, regulation, or order of the Commission. Under K.S.A. 55-164, a penalty order may include a monetary penalty of up to \$10,000, the penalty must constitute a substantial and actual economic deterrent to the violation, and each day of a continuing violation constitutes a separate violation.
- 3. K.A.R. 82-3-111 provides that within 90 days after operations cease on any well, the operator of that well shall plug the well, return the well to service, or file an application with

the Conservation Division requesting temporary abandonment (TA) status. If not plugged or returned to service, the operator must obtain TA approval; TA status may be denied by the Conservation Division if necessary to prevent pollution. A well shut-in for 10 years or more cannot be granted TA status without the operator filing an application for an exception pursuant to K.A.R. 82-3-100 and approval from the Commission. K.A.R. 82-3-111(e) provides a TA exemption for certain wells fully equipped and capable of production.

II. FINDINGS OF FACT

- 4. Operator is licensed to conduct oil and gas activities in Kansas and is responsible for the following wells (Subject Wells):
 - a. Davis Giger B Gas Unit #1, API #15-017-20860-00-00, located in Section29, Township 19 South, Range 7 East, Chase County, Kansas;
 - b. Fankhauser #1-33, API #15-017-20091-00-01, located in Section 33,Township 19 South, Range 7 East, Chase County, Kansas;
 - c. Fankhauser Trust E #1, API #15-017-20843-00-00, located in Section 32, Township 19 South, Range 7 East, Chase County, Kansas;
 - d. Maxby Oil #1, API #15-115-01660-00-00, located in Section 34, Township18 South, Range 4 East, Marion County, Kansas;
 - e. McCallum Simmons Gas Unit #1, API #15-017-20858-00-00, located in Section 34, Township 19 South, Range 7 East, Chase County, Kansas;
 - f. Peterson C #1, API #15-127-20517-00-00, located in Section 23, Township16 South, Range 5 East, Morris County, Kansas;
 - g. Schimpf A #1, API #15-115-00679-00-01, located in Section 4, Township19 South, Range 4 East, Marion County, Kansas;

- h. Schimpf A #2, API #15-115-19290-00-00, located in Section 4, Township 19 South, Range 4 East, Marion County, Kansas;
- i. Schimpf A #3, API #15-115-19291-00-00, located in Section 4, Township19 South, Range 4 East, Marion County, Kansas;
- j. Schimpf B #2, API #15-115-19293-00-00, located in Section 4, Township19 South, Range 4 East, Marion County, Kansas; and
- k. Woods #A1, API #15-017-20828-00-00, located in Section 33, Township 19South, Range 7 East, Chase County, Kansas.
- 5. On March 13, 2025, Commission records indicated the Subject Wells had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111, that the wells were not exempt pursuant to K.A.R. 82-3-111(e), and that the wells were not approved for TA status. Thus, Commission Staff sent a letter to Operator, requiring Operator to bring the Subject Wells into compliance with K.A.R. 82-3-111 by April 12, 2025.
- 6. Between April 14, 2025, and April 16, 2025, Commission Staff inspected the Subject Wells, because the deadline in the letter had passed and the violations had not been resolved, verifying that the wells continued to be inactive and unplugged.²

III. CONCLUSIONS OF LAW

7. The Commission has jurisdiction over Operator and this matter under K.S.A. 74-623 and K.S.A. 55-152.

¹ Exhibit A.

² Exhibit B.

8. Operator has committed eleven violations of K.A.R. 82-3-111 because the Subject Wells have been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.³

THEREFORE, THE COMMISSION ORDERS:

- A. Operator shall pay a \$1,100 penalty.
- B. Operator shall plug the Subject Wells, or return the wells to service, or obtain TA status for the wells if eligible.
- C. Commission Staff may require Staff-witnessed static fluid level measurements before a Subject Well is returned to service. A Subject Well may not be returned to service if (1) any measurement has shown fluid in the wellbore at or above the appropriate minimum surface casing requirement described in Table I of the Commission's August 1, 1991, Order in Docket 34,780, (2) any measurement has shown fluid in the wellbore at or above any salt formation or other corrosive formation, or (3) in the opinion of Staff, variation in measurements indicates the possibility of a casing leak. Provided, however, a Subject Well may be returned to service upon (a) passing a casing integrity test after issuance of this Penalty Order to the satisfaction of Staff, or (b) Staff providing written, well-specific authorization after issuance of this Penalty Order.
- D. Operator may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, to the Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. <u>A request for hearing must comply with K.A.R. 82-1-219.</u>
- E. <u>Failure to timely request a hearing will result in a waiver of Operator's right to a hearing.</u> If no party timely requests a hearing, then this Order shall become final.

4

³ K.S.A. 55-164; K.A.R. 82-3-111(b).

F. If Operator is not in compliance with this Order and the Order is final, then Operator's license shall be suspended without further notice and shall remain suspended until Operator complies. If a Subject Well has been inactive for more than 10 years and Operator applies for an exception to the 10-year limit on TA status for the Subject Well prior to this Order becoming final, and Operator would be in compliance with this Order if the application were approved, then suspension shall not be enforced unless: (1) the application is denied, and (2) 30 days have elapsed since the denial. The notice and opportunity for a hearing on this Order shall constitute the notice required by K.S.A. 77-512 regarding license suspension.

G. A party may petition for reconsideration of a final order pursuant to the requirements and time limits established by K.S.A. 77-529(a)(1).⁴

H. Credit card payments may be made by calling the Conservation Division at 316-337-6200. Checks and money orders shall be payable to the Kansas Corporation Commission.

Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. Payments must reference the docket number of this proceeding.

BY THE COMMISSION IT IS SO ORDERED.

French, Chairperson; Keen, Commissioner; Kuether, Commissioner

Dated: 05/13/2025	(ulsted)			
	Celeste Chaney-Tucker			
	Executive Director			
Mailed Date: 05/13/2025				

⁴ See K.S.A. 55-162; K.S.A. 55-164; K.S.A. 55-606; K.S.A. 55-707; K.S.A. 77-503(c); K.S.A. 77-531(b).

Conservation Division District Office No. 2 3450 N. Rock Road Building 600, Suite 601 Wichita, KS 67226



Phone: 316-337-7400 http://kcc.ks.gov/

Laura Kelly, Governor

Andrew J. French, Chairperson Dwight D. Keen, Commissioner Annie Kuether, Commissioner

March 13, 2025

SH Oil Operations, LLC PO Box 771188 Wichita, KS 67277 Attn: Brian R. Klaassen KCC #35837

Re: Wells out of Compliance with K.A.R. 82-3-111 in Chase, Harvey, Kingman, Marion and Morris counties.

Dear Mr. Klaassen,

It has come to my attention that the well inventory for SH Oil Operations, LLC shows that there are currently 48 wells out of compliance with K.A.R. 82-3-111 located in the above mentioned counties. This regulation for Temporarily Abandoned wells states the following in part.

Temporary abandonment approval or plugging required. Within 90 days after operations cease on any well drilled for the purpose of exploration, discovery, service, or production of oil, gas or other minerals, the operator of that well shall perform either of the following:

- (1) Plug the well; or
- (2) File an application with the conservation division requesting temporary abandonment authority, on a form prescribed by the conservation division.

Production records show that most of these wells have not produced in many years, and some have been inactive for longer than 10 years, and no longer qualify for TA status. I have enclosed a list of the 48 inactive wells shown on the SH Oil Operations, LLC well inventory. Failure to remedy these violations by April 12, 2025 shall be punishable by a \$100 penalty per well.

Jeff Klock District 2 Supervisor

Cc: Jerry Sparling – ECRS

Neal Rupp – ECRS

BJ Hope - ECRS

Tristan Kimbrell – Litigation Counsel

Dan Fox – Compliance Officer

				17 (1.0.	allono				
Detail	API Number	Lease and Well Name	Location	County	Requirement	Received	Required by		
Detail	15-115-20721-00-00	CANNON 1	08-19S-04E	Marion	CP111		03/01/2025		
Detail	15-017-20860-00-00	DAVIS GIGER B GAS UNIT 1	29-19S-07E	Chase	CP111		03/08/2025		
Detail	15-095-22080-00-00	DEVORE 1-14	14-28S-05W	Kingman	CP111		03/07/2025		
Detail	15-017-20091-00-01	FANKHAUSER 1-33	33-19S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20843-00-00	FANKHAUSER TRUST E 1	32-19S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20823-00-00	GIGER A-1	28-19S-07E	Chase	CP111		03/08/2025		
Detail	15-095-22070-00-00	HIRT B 1-14	14-28S-06W	Kingman	CP111		07/06/2024		
Detail	15-017-20081-00-01	KISSEL 1-29	29-19S-07E	Chase	CP111		03/08/2025		
Detail	15-115-01660-00-00	MAXBY OIL 1	34-18S-04E	Marion	CP111		03/01/2025		
Detail	15-017-20858-00-00	MCCALLUM SIMMONS GAS UNIT 1	34-19S-07E	Chase	CP111		03/08/2025		
Detail	15-127-20006-00-00	MILLER 1	23-16S-05E	Morris	CP111		03/01/2025		
Detail	15-127-20422-00-00	MILLER 1	23-16S-05E	Morris	CP111		03/01/2025		
Detail	15-127-20511-00-00	MILLER 23-2	23-16S-05E	Morris	CP111		03/01/2025		
Detail	15-017-20497-00-01	MUSHRUSH 1-26	26-19S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20868-00-00	NOBLE GAS 1	27-19S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20845-00-00	PALMER GAS 1	09-20S-07E	Chase	CP111		03/08/2025		
Detail	15-127-20517-00-00	PETERSON C 1	23-16S-05E	Morris	CP111		03/17/2024		
Detail	15-017-20817-00-00	PRETZER A 1	28-19S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20826-00-00	REEHLING TRUST B3	01-20S-07E	Chase	CP111		03/08/2025		
Detail	15-017-20809-00-00	RHEELING TRUST B1	01-20S-07E	Chase	CP111		03/01/2025		
Detail	15-127-20453-00-00	RINDT 22-1	22-16S-05E	Morris	CP111		01/26/2025		
Detail	15-127-20493-00-00	RINDT 22-2	22-16S-05E	Morris	CP111		01/26/2025		
Detail	15-127-01000-00-00	RINDT 22-3	22-16S-05E	Morris	CP111		03/01/2025		
Detail	15-127-20539-00-00	RINDT 22-6	22-16S-05E	Morris	CP111		01/26/2025		
Detail	15-127-20460-00-00	RINDT 23-3	23-16S-05E	Morris	CP111		01/26/2025		

Detail	API Number	Lease and Well Name	Location	County	Requirement	Received	Required by
Detail	15-127-20492-00-00	RINDT 23-4	23-16S-05E	Morris	CP111		01/26/2025
Detail	15-127-20526-00-00	RINDT 23-5	23-16S-05E	Morris	CP111		01/26/2025
Detail	15-127-20549-00-00	RINDT A 2	14-16S-05E	Morris	CP111		01/26/2025
Detail	15-127-20430-00-00	RINDT B-2	14-16S-05E	Morris	CP111		03/01/2025
Detail	15-127-20471-00-00	RINDT B-3	14-16S-05E	Morris	CP111		03/01/2025
Detail	15-127-20535-00-00	RINDT E A 22-5	22-16S-05E	Morris	CP111		03/01/2025
Detail	15-017-20827-00-00	ROBERTS A 1	13-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20833-00-00	ROBERTS A 2	13-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20838-00-00	ROBERTS A 3	13-19S-07E	Chase	CP111		03/08/2025
Detail	15-115-00679-00-01	SCHIMPF A 1	04-19S-04E	Marion	CP111		03/01/2025
Detail	15-115-19290-00-00	SCHIMPF A 2	04-19S-04E	Marion	CP111		03/01/2025
Detail	15-115-19291-00-00	SCHIMPF A 3	04-19S-04E	Marion	CP111		03/01/2025
Detail	15-115-19293-00-00	SCHIMPF B 2	04-19S-04E	Marion	CP111		03/01/2025
Detail	15-017-20800-00-00	STARKEY A1	34-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20089-00-00	STAUFFER 1-35	35-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20126-00-00	STAUFFER 3-35	35-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20789-00-00	STAUFFER 35-8	35-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20373-00-01	STAUFFER 5-35	35-19S-07E	Chase	CP111		03/08/2025
Detail	15-079-20679-00-00	TALBOT 1-23	23-23S-02W	Harvey	CP111		03/07/2025
Detail	15-025-20342-00-00	THEIS B UNIT 2	06-34S-25W	Clark	CP111		11/11/2024
Detail	15-017-20092-00-01	THURSTON 1-27	27-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20816-00-00	WARD RANCH A 1	21-19S-07E	Chase	CP111		03/08/2025
Detail	15-017-20828-00-00	WOODS A1	33-19S-07E	Chase	CP111		03/08/2025

Date: <u>04/16/25</u>	District: 02	Case #:
	New Situation	Lease Inspection
	Response to Request	Complaint
	Follow-Up	Field Report
	_	
Operator License No: <u>35837</u>	API Well Number: <u>15-01</u>	
Op Name: SH OIL OPERATIONS		Sec $\underline{29}$ Twp $\underline{19}$ S Rng $\underline{7}$ $\boxed{\checkmark}$ E / $$ W
Address 1: PO BOX 771188		Feet from N/V S Line of Section
Address 2:		Feet from F Line of Section
City: WICHITA	GPS: Lat: <u>38.36318</u>	Long: <u>96.67995</u> Date: <u>4/16/25</u>
State: KS Zip Code: <u>67277 - </u>		ER B GAS UNIT Well #: 1
Operator Phone #:	County: Chase	
Reason for Investigation:		
OUT OF COMPLANCE. TA EXPIRED MAR	CH 8, 2025.	
Problem:		
N/A		
Persons Contacted:		
N/A		
Findings:		
WELL IS EQUIPPED		
Action/Recommendations: Follo	w Up Required Yes No	Date:
TA NOV A SENT ON MARCH 13th,2025. DI		·
STAFF RECOMENDS PENALTY PER KAR	-82-3-111 OF THE KCC	RULES AND REGULATIONS.
Verification Sources:		Photos Taken: YES
	T. D	1 notos 1 aken; 1E3
	TA Program By: NF	AL RUPP
	Courtnouse	ronmental Compliance and Regulatory Specialist
Other:	EIIVI	oninonial Compilation and Negulatory Opecialist
Retain 1 Copy District Office Send 1 Copy to Conservation Division		

Exhibit B Page 1 of 15



SH OIL OPERATIONS, DAVIS GIGER GAS UNIT 1, 29-1-7E, API # 15-017-20660-00-00

CHASE COUNTY 38.36318.-96.67995 4-16-2025 NR

Date: <u>04/16/25</u>	District: 02	_	Case #:
	New Situation	· [✓ Lease Inspection
	Response to R	Request	Complaint
	Follow-Up	Ī	Field Report
Operator License No: <u>35837</u>	API Well Number:	15-017-20091-	00-01 & 15-017-20843-00-00
Op Name: SH OIL OPERATIONS			
Address 1: PO BOX 771188			Feet from \(\sqrt{N} \) \(\sqrt{S} \) Line of Section
Address 2:			Feet from \(\subseteq \ \mathbb{E} \setminus \ \mathbb{W} \) Line of Section
City: WICHITA	GPS: Lat: <u>38.383</u>	57Long: <u>96</u>	5.65587 Date: 4/16/25
State: KS Zip Code: <u>67277 – </u>			JST E Well #: 1-33, 1
Operator Phone #:	a	•	
Reason for Investigation:			_
OUT OF COMPLANCE 2 WELLS			
Problem:			
PRIOR TA'S EXPIRED MARCH 8, 2025.			
THOR THE EXTINED WINTON O, 2020.			
Persons Contacted:			1
N/A			
Findings:			
WELLS ARE EQUIPPED AND INACTIVE.			
FANKHOUSER 1-33, SE NE, SEC 33-19-7E.	LAST SALE 6/2	2021.	
FANKHAUSER TRUST E 1 NE NE SE, SEC.).
Action/Recommendations: Follow	Up Required Ye	s No	Date:
TA NOV A SENT ON MARCH 13th,2025. DE	ADLINE FOR CO	OMPLAINCE 4	APRII 12th 2025
STAFF RECOMMENDS A PENALTY PER KA			•
		1112 1100 110	
Verification Sources:			Photos Taken: YES
RBDMS KGS T	A Program		_
	ourthouse	By: NEAL RUP	P
Other:		<u>Environmental</u>	Compliance and Regulatory Specialist
Retain 1 Copy District Office	'		

Send 1 Copy to Conservation Division

Form: _____ Exhibit B Page 3 of 15



SH OIL OPERATIONS, FANKHOUSER 1-33, 33-19-7E, API # 15-017-20091-00-01

CHASE COUNTY 38.35719, -96.65587 4-16-2025 NR



SH OIL OPERATIONS, FANKHAUSER TRUST E 1, 33-19-7E, API # 15-017-20843-00-00

CHASE COUNTY 38.35451, -96.96.67319 4-16-2025 NR

Date: <u>04/14/25</u>	District: 02	2		Case	#:
	New S	Situation		Lease Ins	spection
	Respo	nse to Request		Complair	nt
	Follow	v-Up	√	Field Rep	oort
Operator License No: 35837	API Well N	umber: <u>15-11</u>	5-01660-00	000	
Op Name: S H Oil Operations		SW SW SE			S Rng 4VE /W
Address 1: P O Box 771188					N/ S Line of Section
Address 2:					E/W Line of Section
City: Wichita	GPS: Lat:	38.43581	_Long: <u>96.9</u>	7478	Date: <u>4/14/25</u>
State: Kansas Zip Code: 67277 -1188	Lease Name	: Maxby Oil			Well #: 1
Operator Phone #: (316) 206-3559	County: M	arion			
Reason for Investigation:					
Compliance Audit					
Problem:					
Well out of Compliance					
Persons Contacted:					
Findings:					
A Notice of Violation was sent to SH Oil Oper	rations II (on March	13 2025 w	ith a co	mpliance deadline of
April 12, 2025. SH Oil Operations have not be					
last sale from the well was in July 2022.					
Action/Recommendations: Follow	w Up Required	Yes No	0 🖄	Date: _	
Staff recommends a penalty under K.A.R. 82	2-3-111.				
,					
Verification Sources:					Photos Taken: Yes
	TA Program	D _{vv} lore	v Sparling		
	Courthouse		y Sparling		a and Daguilatam, On a stall to
Other:		<u>Envi</u>	ronmental C	ompiiance	e and Regulatory Specialist
Retain 1 Copy District Office					

Send 1 Copy to Conservation Division

Exhibit B Page 6 of 15



SH Oil Operations, LLC #35837 Maxby Oil #1, SE/4 Sec. 34-18-4E API 15-115-01660-0000 Last sale 7/2022

Date of photo: 4-14-2025

Date: <u>04/16/25</u>	District: 02		Case #:
	New Si	tuation	Lease Inspection
	Respoi	ise to Request	Complaint
	Follow		Field Report
	Ш	•	
Operator License No: 35837	API Well Nu	mber: <u>15-017-208</u>	58-00-00
Op Name: SH OIL OPERATIONS		IE NW Sec 3	34 Twp 19 S Rng 7 VE / W
Address 1: PO BOX 771188			Feet from N S Line of Section
Address 2:			Feet from E/W Line of Section
City: WICHITA			96.46412 Date: 4/16/25
State: KS Zip Code: <u>67277 – </u>			DNS GAS UNIT Well #: 1
Operator Phone #:			
Reason for Investigation:			
OUT OF COMPLANCE			
Problem:			
PRIOR TA EXPIRED MARCH 8, 2025.			
Persons Contacted:			
N/A			
Findings:			
WELL IS EQUIPPED. LAST SALE 6/2021.			
A C / 10 1 C	W.D. 1	Yes No 🗵	
Action/Recommendations: Follo	ow Up Required	Yes No	Date:
TA NOV A SENT ON MARCH 13, 2025. DE			,
STAFF RECOMMENDS PENALTY PER KA	AR-82-3-111	OF THE KCC RU	ILES AND REGULATIONS.
Verification Sources:			Photos Taken: YES
RBDMS KGS	TA Program	.	
T-I Database District Files	Courthouse	By: <u>NEAL RI</u>	JPP
Other:		<u>Environmer</u>	ntal Compliance and Regulatory Specialist
Retain 1 Copy District Office			
Send 1 Copy to Conservation Division			

Exhibit B Page 8 of 15



SH OIL OPERATIONS, McCallum SIMMONS GAS UNIT 1, 34-19-7E, API # 15-017-20858-00-00 CHASE COUNTY, 38.36172, -96.64612 4-16-2025 NR

Date: <u>04/14/25</u>	District: 02	2		Case	#:
	New S	Situation	Г	Lease In	spection
	Respo	onse to Request		Complai	nt
	√ Follow	v-Up	√	Field Re	port
Operator License No: 35837	API Well N	umber: <u>15-12</u>	7-20517		
Op Name: S H Oil Operations, LLC	Spot: <u>NW</u>	NE SE SW	Sec <u>23</u>	Twp <u>16</u>	S Rng _5VE /W
Address 1: P O Box 771188	990			Feet from	N/ S Line of Section
Address 2:	2990			Feet from	E/W Line of Section
City: Wichita	GPS: Lat:	38.64113	Long: <u>96.8</u>	34851	Date: <u>4/14/25</u>
State: Kansas Zip Code: 67277 -1188	Lease Nam	e: <u>Peterson</u>			Well #: <u>C -1</u>
Operator Phone #: (316) 206-3559	County: N	Iorris			
Reason for Investigation:					
Compliance Audit					
Problem:					
Well out of Compliance					
Persons Contacted:					
Findings:					
Well Out of Compliance API # 15-127-20517 No rods or pump jack Well has not operated in over 10 years A Notice of Violation letter was sent to SH Oi deadline of April 12, 2025. SH Oil have not b				2025 wit	h a compliance
Action/Recommendations: Follow	w Up Required	Yes No	KO.	Date: _	
Staff recommends a penalty per K.A.R. 82-3	-111.				
Verification Sources:					Photos Taken: Yes
✓ RBDMS ✓ KGS	TA Program				
	Courthouse	By: <u>Jerry</u>	/ Sparling		
Other:		<u>Envir</u>	onmental C	ompliance	e and Regulatory Specialist
Retain 1 Copy District Office		1			

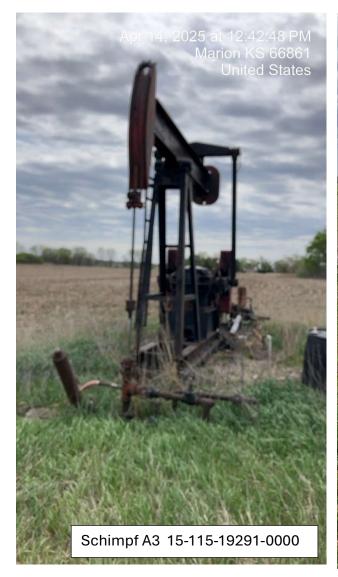
Send 1 Copy to Conservation Division

Exhibit B Page 10 of 15



Date: <u>04/14/25</u>	District: <u>02</u>	Case #:
	New Situation	Lease Inspection
	Response to Request	Complaint
	Follow-Up	Field Report
Operator License No. 35927	API Wall Number	
Operator License No: 35837 Op Name: SH Oil Operations LLC		c 4 Twp 19 S Rng 4 VE / W
Address 1: PO Box 771188		Feet from N/ S Line of Section
Address 2:		Feet from E/W Line of Section
City: Wichita		ng: Date:
State: KS Zip Code: 67277 –	**************************************	, A3, B2 Well #:
Operator Phone #: (316) 206-3559	•	
Reason for Investigation:		
Compliance Audit		
Problem:		
Wells out of Compliance		
Wells out of Compliance		
Persons Contacted:		
Findings:		
Wells out of compliance:		
Schimpf A1 15-115-00679-0001		
Schimpf A2 15-115-19290-0000 (No photo o	btained for the Schimpf A	2)
Schimpf A3 15-115-19291-0000		
Schimpf B2 15-115-19293-0000		
A Notice of Violation letter was sent to SH Oil	Operations LLC on March	13, 2025 with a compliance
deadline of April 12, 2025. The wells are inac		
records reflect the last sale was in July 2022.		,
Action/Recommendations: Follow	Up Required Yes No	Date:
		Date.
Staff recommends a \$100 penalty per well un	der K.A.R. 82-3-111	
Verification Sources:		Photos Taken: Yes
▼ RBDMS	'A Program	
T-I Database District Files C	Courthouse By: Jerry Sp	•
Other:	<u>Environn</u>	nental Compliance and Regulatory Specialist
Retain 1 Copy District Office Send 1 Copy to Conservation Division		

Exhibit B Page 12 of 15







A Photo was not taken of the Schimpf A2 15-115-19290-0000

SH Oil Operations, LLC #35837 Schimpf Lease, SE/4 Sec. 4-19-4E, Marion Co. Last sale 7/2022

Date of photos: 4-14-2025

Date: <u>04/16/25</u>	District: 02	_	Case #:
	New Situation	on [v	Lease Inspection
	Response to	Request	Complaint
	Follow-Up	<u> </u>	Field Report
Operator License No: <u>35837</u>	API Well Number	: <u>15-017-20828-</u> 0	 ∩∩∩∩
Op Name: SH OIL OPERATIONS, LLC			_ Twp <u>19 </u>
·			Feet from N/ S Line of Section
Address 1: PO BOX 771188 Address 2:			Feet from E/\sqrt{W} Line of Section
City: WICHITA			67187 Date: 4/16/25
State: KS Zip Code: 67277 –			Well #: A1
Operator Phone #:			weit#. A
	County: Chase		
Reason for Investigation:			
OUT OF COMPLANCE			
Problem:			
PRIOR TA EXPIRED ON MARCH 8, 2025			
Persons Contacted:			
N/A			
Findings:			
WELL IS EQUIPPED. LAST SALE WAS IN	5/2021		
WELL IS EQUIL ED. LAST SALE WAS IN	3/2021.		
Action/Recommendations: Follo	ow Up Required 📝 Y	es No	Date:
TA NOV A SENT ON MARCH 13, 2025. DE	EADLINE FOR CO	OMPLAINCE AP	RIL 12, 2025.
STAFF RECOMMENDS PENALTY PER KA			•
Verification Sources:			Photos Taken: YES
✓ RBDMS ✓ KGS	TA Program		_
T-I Database District Files	Courthouse	By: NEAL RUP	<u> </u>
Other:	-	Environmental (Compliance and Regulatory Specialist
Retain 1 Copy District Office Sand 1 Copy to Conservation Division			
Send 1 Copy to Conservation Division			

Exhibit B Page 14 of 15



SH OIL OPERATIONS, WOODS A1, 33-19-7E, API # 15-017-20828, CHASE COUNTY 38.6110, -96.67187 4-16-2025 NR

CERTIFICATE OF SERVICE

25-CONS-3373-CPEN

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 05/13/2025.

DANIEL FOX, COMPLIANCE OFFICER, KCC DISTRICT 2 KANSAS CORPORATION COMMISSION DISTRICT OFFICE NO. 2 3450 N. ROCK RD BLDG 600 STE 601 WICHITA, KS 67226 dan.fox@ks.gov

BRIAN R KLAASSEN SH OIL OPERATIONS LLC PO BOX 771188 WICHITA, KS 67277-1188 TRISTAN KIMBRELL, LITIGATION COUNSEL KANSAS CORPORATION COMMISSION CENTRAL OFFICE 266 N. MAIN ST, STE 220 WICHITA, KS 67202-1513 tristan.kimbrell@ks.gov

/S/ KCC Docket Room

KCC Docket Room