



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 Conrad #30-1 well (Subject Well), API #15-025-21550-00-00, located in Section 30, Township 33 South, Range 21 West, Clark County, Kansas.

5. On April 12, 2021, Commission records indicated the Subject Well had been inactive and unplugged for longer than the 90 days allowed by K.A.R. 82-3-111 and that the well was not exempt pursuant to K.A.R. 82-3-111(e). The Subject Well had also not been approved for TA status. Thus, Commission Staff sent a letter to Operator, requiring Operator to bring the Subject Well into compliance with K.A.R. 82-3-111 by May 10, 2021.<sup>1</sup>

6. On June 4, 2021, Commission Staff inspected the Subject Well, because the deadline in the letter had passed and the violation had not been resolved, verifying that the well continued to be inactive and unplugged.<sup>2</sup>

## **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.

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<sup>1</sup> Exhibit A.

<sup>2</sup> Exhibit B.

8. Operator has committed one violation of K.A.R. 82-3-111 because the Subject Well has been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.<sup>3</sup>

**THEREFORE, THE COMMISSION ORDERS:**

- A. Operator shall pay a \$100 penalty.
- B. Operator shall plug the Subject Well, or return the well to service, or obtain TA status for the well 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. A request for hearing must comply with K.A.R. 82-1-219.
- E. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing. If no party timely requests a hearing, then this Order shall become final.

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<sup>3</sup> 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).<sup>4</sup>

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; Duffy, Commissioner

Dated: 08/24/2021



Lynn M. Retz  
Executive Director

Mailed Date: 08/24/2021

TSK

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<sup>4</sup> 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).



Andrew J. French, Chairperson  
Dwight D. Keen, Commissioner  
Susan K. Duffy, Commissioner

Corporation Commission

Laura Kelly, Governor

## **NOTICE OF VIOLATION**

REH OIL AND GAS LLC  
1501 E 1ST ST  
PRATT KS, 67124

April 12, 2021  
KCC Lic. 32556

RE: **TEMPORARY ABANDONMENT**  
API Well No. 15-025-21550-00-00  
CONRAD 30-1  
30-33S-21W, E2NE  
CLARK County, Kansas

Operator:

On April 12, 2021, a file review documented a probable violation of the following regulation at the referenced well:

- K.A.R. 82-3-111. Within 90 days after operations cease on a well, the operator must return the well to service, plug the well, or obtain approval for temporary abandonment status.

**Failure to remedy this violation  
by MAY 10, 2021  
shall be punishable by a \$100 penalty.**

You may contact me if you have any questions.

Sincerely,

  
MICHAEL MAIER  
KCC District # 1

# KCC OIL/GAS REGULATORY OFFICES

Date: 06/04/21

District: 1

Case #: \_\_\_\_\_

- ☒ New Situation  
☐ Response to Request  
☐ Follow-Up

- ☐ Lease Inspection  
☐ Complaint  
☒ Field Report

Operator License No: 32556

API Well Number: \_\_\_\_\_

Op Name: REH Oil & Gas LLC

Spot: \_\_\_\_\_ Sec 30 Twp 33 S Rng 21 ☐ E / ☒ W

Address 1: 1501 E 1st ST

Feet from ☐ N / ☒ S Line of Section

Address 2: \_\_\_\_\_

Feet from ☒ E / ☐ W Line of Section

City: Pratt

GPS: Lat: \_\_\_\_\_ Long: \_\_\_\_\_ Date: 6/4/21

State: KS Zip Code: 67124 -2069

Lease Name: Conrad Well #: Lease

Operator Phone #: (620) 672-8111

County: Clark

## Reason for Investigation:

Requested Inspection

## Problem:

Failure to TA, Plug, or return well to service after 90 days.  
 No lease sign.

## Persons Contacted:

None

## Findings:

9:53am

No tank battery present.

#1 E2 NE. Production casing is visible with swedge, valve, and bull plug attached. Well is shut in and not in use.

No current leaks or spills.

## Action/Recommendations:

Follow Up Required ☐ Yes ☒ No ☐

Date: \_\_\_\_\_

Send to Legal.

## Verification Sources:

Photos Taken: \_\_\_\_\_

- |  |  |                                     |
|--|--|-------------------------------------|
| <input checked="" type="checkbox"/> RBDMS                            | <input type="checkbox"/> KGS                       | <input type="checkbox"/> TA Program |
| <input type="checkbox"/> T-I Database                                | <input checked="" type="checkbox"/> District Files | <input type="checkbox"/> Courthouse |
| <input checked="" type="checkbox"/> Other: <u>On-site inspection</u> |  |                                     |

By: Isaac Baxa

Retain 1 Copy District Office  
 Send 1 Copy to Conservation Division

Form: \_\_\_\_\_



Conrad 30-1 Well (Facing Northeast)

30-33-21 CA Co

Photo was taken on 6/4/2021 at 9:50am



## **CERTIFICATE OF SERVICE**

22-CONS-3092-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 08/24/2021.

TRISTAN KIMBRELL, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
CENTRAL OFFICE  
266 N. MAIN ST, STE 220  
WICHITA, KS 67202-1513  
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DOUG REH  
REH OIL AND GAS LLC  
1501 E 1ST ST  
PRATT, KS 67124-2069

KENNY SULLIVAN, DISTRICT #1 SUPERVISOR  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 1  
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DODGE CITY, KS 67801  
k.sullivan@kcc.ks.gov

/S/ DeeAnn Shupe  
\_\_\_\_\_  
DeeAnn Shupe