

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of whether Somerset Energy, Inc.'s)
injection authority at eight wells subject to permit E-)
31,866 should be revoked.) Docket No. 25-CONS-3193-CUIC
CONSERVATION DIVISION
License Nos. 6143

In the matter of the petition of Somerset Energy, Inc.)
to open a docket pursuant to K.S.A. 55-605(a).) Docket No: 25-CONS-3195-CMSC
CONSERVATION DIVISION
License Nos: 6143

PETITION TO INTERVENE

Keith A. Brock, Anderson & Byrd, LLP, petitions the Commission, pursuant to K.S.A. 77-521 and K.A.R. 82-1-225, for an order permitting the Eastern Kansas Oil & Gas Association ("EKOGA") to intervene in the captioned matter. In support of this petition, EKOGA states:

1. EKOGA is an organization that has been in existence since 1957 to promote the responsible development of oil and gas resources in Eastern Kansas.
2. EKOGA has approximately 300 members, EKOGA collects and disseminates information to its members regarding oil and gas development issues impacting operations in Eastern Kansas.
3. EKOGA is an active member of the Kansas Advisory Committee on Regulation of Oil and Gas Activities, which was formed pursuant to K.S.A. 55-153. As a statutorily designated member of such Committee, EKOGA has a duty to provide input and guidance to the Kansas Corporation Commission regarding its rules, regulations and prescribed processes in oil and gas conservation matters.
4. This Docket concerns the enforcement of K.S.A. 55-179 and a wide spread practice by Commission Staff of leveraging injection authority, and other approvals or authorizations, such as

approval of T-1 Transfers in order to compel operators to accept responsibility for abandoned wells that they are not legally responsible for under K.S.A. 55-179. The majority of the abandoned wells in the State of Kansas are located in Eastern Kansas, and the majority of the oil production in Eastern Kansas is conducted through waterflood operations. The majority of the crude oil resources in Eastern Kansas are unrecoverable without utilizing injection wells to enhance oil recovery. Thus, the Commission's actions in this proceeding will have a direct and profound impact on EKOGA's members.

5. Many of EKOGA's members have also been subjected to the widespread practice by the Commission Staff of leveraging injection authority, approval/withholding of approval of T-1 transfers and other practices by Commission Staff in order to compel operators to accept responsibility for abandoned wells they are not legally responsible for under K.S.A. 55-179. For this reason the Commission's determination of the issues in this Docket could have a substantial and adverse impact upon Eastern Kansas oil and gas operators, including EKOGA members. EKOGA is willing and able to generally represent its members with respect to the issues before the Commission in this proceeding. No other party in this proceeding is able and willing to represent the general interests of EKOGA members in this Docket.

6. Through its membership EKOGA has at its disposal considerable expertise in matters concerning standard oil and gas practices, the economic impact of the Commission's actions in this Docket and the impact of such actions upon the oil and gas industry and upon the environment. EKOGA is prepared to provide technical and scholarly input regarding the issues before the Commission which can assist the Commission in its pursuit of justice without impairing the orderly and prompt conduct of the proceedings.

7. Counsel for EKOGA has consulted with Commission Staff concerning this Petition to Intervene and Staff has indicated that it is opposed to granting EKOGA's Petition to Intervene.

WHEREFORE, EKOGA prays that this Petition to Intervene be granted and that EKOGA be allowed to participate fully in the captioned matter.



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STATE OF KANSAS, COUNTY OF FRANKLIN, ss:

Keith A. Brock, of lawful age, being first duly sworn on oath, states: That he is the attorney for Eastern Kansas Oil & Gas Association and is duly authorized to make this affidavit; that he has read the foregoing Petition to Intervene, knows the contents thereof; and that the facts set forth therein are true and correct to the best of his knowledge, information and belief.



Keith A. Brock

SUBSCRIBED AND SWORN to before me this 14th day of February, 2025.



Notary Public

Appointment/Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing was sent via electronic mail, this 14th day of February, 2025, addressed to:

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/s/ Keith A. Brock

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