

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

In THE MATTER OF THE APPLICATION	)	
OF ROBINETTE OIL COMPANY LLC	)	Docket No. 25-CONS- <u>3366</u> -CMSC
FOR A FINDING DETERMINING THE	)	
RESPONSIBILITY OF GREGORY NOLL	)	CONSERVATION DIVISION
TO PLUG THE NOLL 2-06 WELL IN	)	
<u>JEFFERSON COUNTY, KANSAS</u>	)	

**MOTION FOR THE DESIGNATION OF A PRESIDING OFFICER AND REQUEST  
FOR A HEARING**

Robinette Oil Company LLC, by and through its attorney Charles C. Steincamp of Depew Gillen Rathbun & McInteer, LC, moves for the designation of a presiding officer and the scheduling of a prehearing conference in this matter. In support of its motion, Robinette Oil Company LLC states as follows:

**I. Jurisdiction**

1. The Commission has jurisdiction to regulate oil and gas production in Kansas under Chapter 55 of the Kansas Statutes Annotated and the General Rules and Regulations for the Conservation of Crude Oil and Natural Gas, K.A.R. 82-3-100 et seq.
2. K.S.A. 55-179 provides the Commission with jurisdiction to determine the persons legally responsible for the proper care and control of abandoned oil and gas wells.
3. K.S.A. 55-179 provides that a person who is legally responsible for the proper care of an abandoned well shall include:
  - (6) any person that does any of the following to an abandoned well without authorization from the commission: (A) Tamper with or removes surface or downhole equipment that was physically attached to the well or inside the well bore; (B) intentionally destroys, buries or damages the well; (C) intentionally alters the physical status of the well in a manner that will result in more than a *de minimis* increase in plugging costs; or (D) conducts any physical operations upon the well.

4. K.S.A. 55-180(a) authorizes parties to ask the Commission to investigate an abandoned well.

## **II. Background**

5. Robinette Oil (“Robinette”) is a licensed Kansas operator.
6. Robinette operated the Noll lease in Jefferson County, Kansas.
7. The Noll lease had six wells on the property:
  - a. Joseph Noll #1-84, API #15-087-20097-00-00;
  - b. Joseph Noll #1-86, API #15-087-20227-00-00;
  - c. Joseph Noll #2-86, API #15-087-20258-00-00;
  - d. Noll Joe #5, API #15-087-20478-00-00;
  - e. Noll Joe #6, API #15-087-20485-00-00; and
  - f. Noll 2-06, API # 15-087-20646-00-00.
8. In March 2022, Operator submitted plugging applications for all six wells on the Noll lease.
9. Between April 1, 2022 and April 27, 2022, Operator plugged the first five wells.
10. While Operator was plugging the second to last well, they noticed the Nolls doing a large dirt work operation for a drainage system.
11. When Operator went to plug the Noll 2-06, they discovered that the well had been buried.
12. Noll’s dirt work contractor dug up the well so the extent of the damage could be determined, revealing it had been intentionally bent at a ninety-degree angle approximately twenty to twenty-five feet below the ground.
13. Five or six feet of casing at the top of the well separated from the rest when the contractor excavated the well.

14. This separation means that the top of the well looks like it might be able to be normally plugged, but plugging will actually require significant excavation.
15. It is estimated that the intentional damage to the well will increase the cost of plugging substantially.
16. Robinette received a Notice of Violation for the Noll 2-06 on February 17, 2025.
17. Before plugging the Noll 2-06, Operator seeks a determination from the Commission on the parties legally responsible for plugging costs.
18. This well is an abandoned well because the landowner buried it and planted row crops over the site.

WHEREFORE, Operator asks for the designation of a presiding officer and the scheduling of a prehearing conference in this matter that will allow further development of a procedural schedule in anticipation of a hearing regarding Gregory Noll's responsibility for the plugging of the Noll 2-06 well.

Respectfully Submitted,

DEPEW GILLEN RATHBUN & McINTEER, LC

By: 

Charles C. Steincamp

8301 E 21<sup>st</sup> St. N, Ste. 450

Wichita KS 67206

(316) 262-4000

*Attorney for Robinette Oil Company LLC*

**VERIFICATION**

STATE OF KANSAS            )

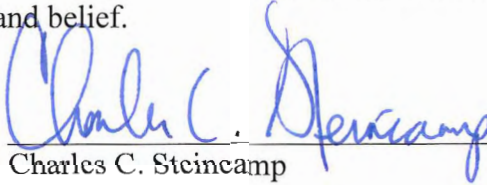
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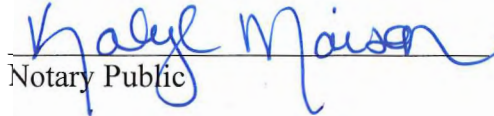
COUNTY OF SEDGWICK )

Charles C. Steincamp, of lawful age, being first duly sworn, upon oath states:

That he is the attorney for Robinette Oil Company LLC, applicant herein; that he has read the above and foregoing Motion for the Designation of a Presiding Officer and Request for a Hearing and is familiar with the contents thereof; and that the statements made therein are true and correct to the best of his knowledge and belief.

  
Charles C. Steincamp

SUBSCRIBED TO AND SWORN BEFORE ME ON THIS 5<sup>th</sup> DAY OF May, 2025.

  
Notary Public

My Appointment Expires:

6/16/2027



**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of May, 2025, a true and correct copy of the above and foregoing document were served by depositing copies of the same in the United States Mail, postage pre-paid, and properly addressed to each of the following:

CHARLES C. STEINCAMP  
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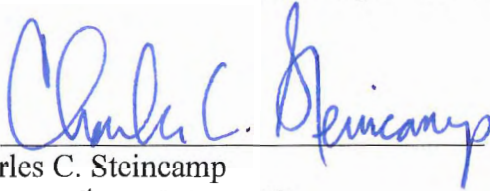
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KANSAS CORPORATION COMMISSION  
CONSERVATION DIVISION (OIL & GAS)  
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KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 3 - LEVI SHORT  
137 E. 21ST STREET  
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and that the same was filed electronically with the Kansas Corporation Commission via E-filing Express to a new Docket.

By:   
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