

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

In the matter of Staff's enforcement of the ) Docket No. 25-CONS-3283-CMSC  
Commission's rules and regulations. )  
) CONSERVATION DIVISION  
)  
) License No. N/A

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**JOINT MOTION FOR THE DESIGNATION OF A PRESIDING OFFICER AND THE  
SCHEDULING OF A PREHEARING CONFERENCE**

Comes Now Staff of the Kansas Corporation Commission (Staff and Commission, respectively), Somerset Energy, Inc. (Somerset) and the Eastern Kansas Oil and Gas Association (EKOGA), requesting the Commission designate a presiding officer and schedule a prehearing conference in this matter. In support of its joint motion, the parties state the following:

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. Staff has been informed that Somerset and EKOGA have taken issue with the Conservation Division's implementation and enforcement of the Commission's regulations under K.A.R. 82-3-100 *et seq.* and K.A.R. 82-3-400 *et seq.* Specifically, EKOGA alleges a widespread practice by Staff of leveraging injection authority, and other approvals or authorizations, such as approval of T-1 forms in order to compel operators to accept responsibility for abandoned wells they are not legally responsible for under K.S.A. 55-179.

3. Somerset contends it has been individually affected by the issues described in paragraph 2 above and EKOGA is willing and able to generally represent its members with respect to the issues before the Commission in this matter.

WHEREFORE, for the reasons described above, the parties respectfully request the Commission designate a presiding officer and schedule a prehearing conference this matter in anticipation of a hearing regarding the issues noted above, and for any other relief the Commission determines to be just and equitable.

Respectfully Submitted,

/s/ Kelcey Marsh

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**CERTIFICATE OF SERVICE**

25-CONS-3283-CMSC

I, the undersigned, certify that a true and correct copy of the attached Motion has been served to the following by means of first class mail and electronic service on March 4, 2025.

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