

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

In the matter of the failure of Abercrombie) Docket No. 24-CONS-3382-CPEN
Energy, LLC (Operator) to comply with)
K.A.R. 82-3-111 at the Strickland #1 well in) CONSERVATION DIVISION
Hamilton County, Kansas.)
_____) License No. 32457

REQUEST FOR HEARING

Abercrombie Energy, LLC (“Operator”) respectfully requests a hearing in the referenced docket. In support of its request, Operator alleges and states:

1. On June 20, 2024, the Commission entered its Penalty Order in the referenced docket alleging one violation of K.A.R. 82-3-111 at Operator’s Strickland #1 well (“Subject Well”), API No. 15-075-20013, located in Section 27-T26S-R40W, Hamilton County, Kansas.¹

2. Per the Penalty Order, Operator was ordered to “plug the Subject Well, or return the well to service, or obtain TA status for the well.”² Failing to take such action within 30 days from the date of the Penalty Order would result in Operator’s license being suspended and require Operator to shut-in more than 100 oil and/or gas wells it operates³, which would result in significant waste of natural and economic resources.

3. Operator desired to rework the Subject Well to return it to production, however, when Operator went to workover the well it discovered the tubing was stuck in the hole. As a result, Operator now intends to plug and abandon the Subject Well. Upon its plugging and abandonment, the Subject Well will become compliant with Commission regulations.

¹ Penalty Order, ¶ 3.

² *Id.* Ordering Clause at ¶ B and F.

³ *Id.* Ordering Clause at ¶ F.

4. On July 16, 2024, Operator submitted its Form CP-1, Well Plugging Application, for the Subject Well. Operator learned on July 19, 2024, that District 1 staff will not approve the Plugging Application until Operator rigs up over the Subject Well and again attempts to pull the tubing. Until that happens, District 1 will not issue orders to plug and abandon the Subject Well. Operator has hired a rig to attempt to pull the Subject Well, and to plug the well once Operator receives plugging instructions. Operator anticipates, weather permitting, that the rig will be over the Subject Well within a week.

5. Operator's contractual notice and consent obligations to the non-operator working interest owners of the Subject Well previously restricted its ability to take immediate action on the Subject Well. Further, inclement weather and limited rig availability also delayed Operator's ability to take immediate action with the Subject Well.

6. Operator requests a hearing in this matter to request additional time beyond that prescribed by the Penalty Order to bring the Subject Well into compliance. As indicated above, granting this request will prevent waste.

WHEREFORE, for the foregoing reasons Operator requests that a hearing be set in this docket, that the requested extension of time to bring the Subject Well into compliance be granted, and for such further relief as the Commission deems necessary and proper.

Respectfully submitted,

MORRIS LAING LAW FIRM

By: 

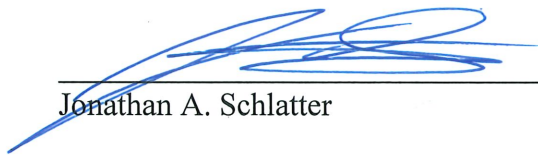
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VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Jonathan A. Schlatter, being of lawful age and being first duly sworn upon his oath, deposes and says:

That he is the attorney for Abercombie Energy, LLC; he has read the above and forgoing Request for Hearing and is familiar with its contents, and that the statements made therein are true and correct to the best of his knowledge and belief.



Jonathan A. Schlatter

SIGNED AND SWORN to before me this 19th day of July, 2024.



Notary Public

My Appointment expires: 11/05/2024



CERTIFICATE OF SERVICE

I, Jonathan A. Schlatter, hereby certify that on this 19th day of July, 2024, I caused the original of the foregoing **Request for Hearing** to be electronically filed with the Conservation Division of the State Corporation Commission of the State of Kansas, and emailed true and correct copies of the same to the following individuals:

Tristan Kimbrell, Litigation Counsel
Kansas Corporation Commission
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266 N. Main St, Ste 220
Wichita, KS 67202-1513
t.kimbrell@kcc.ks.gov



Jonathan A. Schlatter