

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

Before Commissioners: Pat Apple, Chairman
Shari Feist Albrecht
Jay Scott Emler

In the matter of the application of Quail Oil)	Docket No: 17-CONS-3484-CUIC
& Gas, LC to authorize injection of saltwater)	
into the Arbuckle formation at the Sly 2-6)	CONSERVATION DIVISION
SWD well, located in the NE NE SE of)	
Section 6, Township 17S, Range 6E in)	License No. 33185
<u>Morris County, Kansas.</u>)	

PRE-FILED REBUTTAL TESTIMONY OF WRAY VALENTINE
ON BEHALF OF QUAIL OIL & GAS, LC

1 Q. Please state your name, position, employer and office address.

2 A. My name is Wray Valentine. I am the Manager of Quail Oil & Gas, LC with a business
3 address of P.O. Box K, Garden City, Kansas 67846.

4 Q. Do you have any response to the Testimony of Cindy Hoedel?

5 A. Yes.

6 Q. What are the potential effects of the disposal well on tourism in the Flint Hills?

7 A. The use of a disposal well would reduce the amount of truck traffic, noise and dust as
8 compared to having to use trucks to haul salt water from the wells that produce oil and gas
9 to another disposal site.

10 Q. Are there other benefits from using a disposal well?

11 A. The use of a disposal well also would serve to prevent waste of oil and gas resources by
12 allowing for more economic production than hauling salt water by truck. In turn, more
13 economic production would extend the life of the oil and gas wells served by the disposal
14 well and thereby provide more royalty income to mineral owners in the Flint Hills, which

1 income would have a positive impact on the local community.

2 Q. Do you have a response to Cindy Hoedel's comments on earthquake insurance?

3 A. As a petroleum engineer and oil man, Ms. Hoedel's comments on insurance are not
4 relevant to a determination of whether the Commission should grant the permit to inject
5 salt water under K.A.R. 82-3-200 (prevent waste and protect correlative rights) and K.A.R.
6 82-3-400 (permitting factors).

7 Q. Does this conclude your rebuttal testimony?

8 A. Yes.

VERIFICATION


STATE OF KANSAS)
) ss:
COUNTY OF FINNEY)

I, Wray Valentine, being duly sworn, upon my oath, state that I have read the foregoing Pre-Filed Rebuttal Testimony to which this verification is attached, that I am aware of its contents, and the statements are true and correct.



Wray Valentine

SUBSCRIBED AND SWORN to before me on this 5 day of June 2017.



Notary Public

My commission expires:

