

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

In the matter of the failure of Prairie Gas)	Docket No. 19-CONS-3396-CPEN
Operating, LLC (“Operator”) to comply with)	
K.A.R. 82-3-104 at the Boltz #1 well in)	CONSERVATION DIVISION
Hamilton County, Kansas.)	
)	License No. 35442

In the matter of the failure of Prairie Gas)	Docket No. 20-CONS-3007-CPEN
Operating, LLC (“Operator”) to comply with)	
K.A.R. 82-3-603 at the Bounds lease in Greeley)	CONSERVATION DIVISION
County, Kansas.)	
)	License No. 35442

In the matter of the failure of Prairie Gas)	Docket No. 20-CONS-3018-CPEN
Operating, LLC (“Operator”) to comply with)	
K.A.R. 82-3-104 at the Beard #1 well in)	CONSERVATION DIVISION
Greeley County, Kansas.)	
)	License No. 35442

PRE-FILED TESTIMONY

OF

ERIC MACLAREN

On Behalf of Commission Staff

October 7, 2019

1 **Q. What is your name and business address?**

2 A. Eric MacLaren, 210 E. Frontview, Suite A, Dodge City, Kansas 67801.

3 **Q. By whom are you employed and in what capacity?**

4 A. I am employed by the Conservation Division of the Kansas Corporation Commission, District
5 #1 Office, as a Compliance Officer.

6 **Q. Would you please briefly describe your educational background and work experience?**

7 A. I am a high school graduate. My oilfield work experience started as a rotary drilling rig
8 roughneck in early 1982. After 2 years as a derrick hand, I became morning tour driller for
9 the next 2 years, until I got laid off. I was then hired on as a pumper/roustabout for an oil
10 company, and worked there for 17 ½ years. My job with the KCC started in October 2005 as
11 a regulatory field technician. I was promoted to KCC District 1 Compliance Officer in
12 February 2019.

13 **Q. Have you previously testified before this Commission?**

14 A. Yes.

15 **Q. What duties does your position with the Conservation Division involve?**

16 A. I coordinate the District #1 compliance program. This entails reviewing violation letters and
17 determining if the violation should be sent to legal for a penalty recommendation. I coordinate
18 with staff for tracking and actions related to operator regulatory violations, and submit penalty
19 recommendations for those violations. I witness well pluggings, mechanical integrity tests,
20 perform inspections, and compliance follow-ups.

1 **Q. Are you familiar with Docket 19-CONS-3396-CPEN?**

2 A. Yes, I have reviewed all filings in this docket. Operator was penalized for one violation of
3 K.A.R. 82-3-104.

4 **Q. Would you please explain the requirements of K.A.R. 82-3-104?**

5 A. K.A.R. 82-3-104 requires that an operator shall case or seal off formations to effectively
6 prevent migration of oil, gas, or water from or into strata that would be damaged by such
7 migration.

8 **Q. What is the recommended penalty for failure to comply with K.A.R. 82-3-104 in this**
9 **docket?**

10 A. There is no monetary penalty contained in K.A.R. 82-3-104. I recommended a penalty of
11 \$1,000 based on the provisions of K.S.A. 55-164 which allow for a penalty of up to \$10,000
12 per day for a violation of Commission statute, regulation, rule or order.

13 **Q. Why did you choose to pursue this matter under K.A.R. 82-3-104?**

14 A. It was determined that the well was a pollution threat through our enforcement of K.A.R. 82-
15 3-111 at the Boltz #1 well.

16 **Q. Would you please explain the requirements of K.A.R. 82-3-111?**

17 A. K.A.R. 82-3-111 requires that within 90 days after operations cease on a well, operator shall
18 plug the well, produce it, or obtain temporary abandonment (TA) status.

19 **Q. Did the Operator file a TA application on the Boltz #1 well?**

20 A. Yes. The Operator filed a TA application and it was approved by Michael Maier on June 5,
21 2018. E.M. Exhibit 1.

1 **Q. What happened after District Staff approved TA status for the Boltz #1?**

2 A. Scott Alberg, District 1 Professional Geologist Supervisor, sent Operator a letter on January
3 23, 2019 requesting them to reshoot the fluid level by February 23, 2019. Scott reviewed the
4 tape and found that the fluid level was at 640', rather than the 1400' on the Operators
5 application. E.M. Exhibit 2.

6 **Q. Why is a high fluid level a concern when reviewing a TA application?**

7 A. A high fluid level could indicate a possible casing leak.

8 **Q. Why is the possibility of a casing leak a concern when reviewing a TA application?**

9 A. Casing leaks might allow migration of gas and fluids into a usable water zone.

10 **Q. What is the depth of fresh water in the area of the Boltz #1?**

11 A. Approximately 800', determined by a plugging manual map of Permian depths, in accordance
12 with the location.

13 **Q. What happened after you confirmed the well had a high fluid level?**

14 A. Mr. Alberg revoked the TA status by letter on March 21, 2019 and provided the operator with
15 a deadline of April 22, 2019 to plug or produce the well. E.M. Exhibit 3.

16 **Q. Did the Operator bring the Boltz #1 into compliance by the deadline in Staff's letter?**

17 A. No. Ken Jehlik conducted a follow-up inspection on April 23, 2019 and found that nothing
18 had been done to plug, repair, or produce the Boltz #1 well. The follow-up report is attached
19 as E.M. Exhibit 4.

20 **Q. Are you familiar with Docket 20-CONS-3007-CPEN?**

21 A. Yes, I have reviewed all filings in this docket. Operator was penalized for one violation of
22 K.A.R. 82-3-603(e).

1 **Q. Would you please explain the requirements of K.A.R. 82-3-603(e)?**

2 A. Operators must clean-up spills within 10 days of discovery or knowledge of the spill, unless
3 otherwise provided in writing by the District. The clean-up must in a manner subject to
4 district approval.

5 **Q. What is the penalty for failure to comply with K.A.R. 82-3-603?**

6 A. \$1,000 for the first violation, \$2,500 for the second violation, and \$5,000 and an operator
7 license review for the third violation.

8 **Q. What action was taken in response to Ken Jehlik's inspection report about the two**
9 **unreported spills on the Bounds lease?**

10 A. A Notice of Violation (NOV) letter was sent on April 24, 2019 with a compliance deadline of
11 May 8, 2019. E.M. Exhibit 5.

12 **Q. Did Operator comply with the requirements in the NOV?**

13 A. No.

14 **Q. What happened after the May 8, 2019 deadline?**

15 A. Kenny Sullivan, Professional Geologist, sent Operator a remediation plan with a final deadline
16 of May 24, 2019 to finish cleanup. E.M. Exhibit 6.

17 **Q. Did Operator comply with the deadline in the remediation plan?**

18 A. No.

19 **Q. When did the Operator remediate the site?**

20 A. The remediation was finished by Lonestar Services, LLC on June 28, 2019.

1 **Q. Are you familiar with Docket 20-CONS-3018-CPEN?**

2 A. Yes, I have reviewed all filings in this docket. Operator was penalized for one violation of
3 K.A.R. 82-3-104.

4 **Q. Would you please explain the requirements of K.A.R. 82-3-104?**

5 A. You may refer to my testimony on Page 3, Lines 4 through 12 for an explanation of the
6 requirements and possible penalties of K.A.R. 82-3-104.

7 **Q. Would you please explain the requirements of K.A.R. 82-3-111?**

8 A. K.A.R. 82-3-111 requires that within 90 days after operations cease on a well, operator shall
9 plug the well, produce it, or obtain temporary abandonment status.

10 **Q. Did the Operator file a TA application for the Beard #1 well?**

11 A. Yes. Operator filed a TA application on October 5, 2018.

12 **Q. Did Staff approve the TA application for the Beard #1?**

13 A. No. It was denied due to a high fluid level by Michael Maier on October 9, 2018 with a
14 compliance deadline of November 6, 2018. E.M. Exhibit 7.

15 **Q. Why is a high fluid level a concern when reviewing a TA application?**

16 A. A high fluid level could indicate a possible casing leak.

17 **Q. Why is the possibility of a casing leak a concern when reviewing a TA application?**

18 A. Casing leaks might allow migration of gas and fluids into a fresh and usable water zone.

19 **Q. Did the Operator remedy the high fluid level?**

20 A. No. Ken Jehlik conducted and/or witnessed three fluid level tests on June 10th, 12th, and 28th
21 of 2019 and found that the well still had a high fluid level. Mr. Jehlik searched all available

1 records and could not find proof that the Beard #1 was cemented through the usable water
2 section at approximately 1300'. The follow-up inspection report is attached as E.M. Exhibit 8.

3 **Q. What is the depth of usable water in the area of the Bounds #2?**

4 A. Usable water is around 1300', determined by a plugging manual map of Permian depths in
5 accordance with the location.

6 **Q. As of today, has Operator brought either the Beard #1 or the Boltz #1 into compliance?**

7 A. No. The Boltz #1 remains inactive without proper TA status. The Beard #1 remains inactive
8 without proper TA status.

9 **Q. Would you please summarize your recommendations?**

10 A. Operator has been penalized for two violations of K.A.R. 82-3-104 and one violation of
11 K.A.R. 82-3-603. I would recommend that Operator remedy any outstanding compliance
12 issues by repairing the casing leaks or plugging the wells. The Commission should also
13 require the payment of the \$3,000 in monetary penalties which have been assessed.

14 **Q. Does this conclude your testimony as of this date, October 7, 2019?**

15 A. Yes.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form CP-111

July 2017

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 35442
 Name: Prairie Gas Operating, LLC
 Address 1: 114 E. 5TH ST., SUITE 100
 Address 2: PO BOX 2170
 City: TULSA State: OK Zip: 74101 + 2170
 Contact Person: Jim Williams
 Phone: (918) 409-6711
 Contact Person Email: jimb.williams@hotmail.com
 Field Contact Person: Brett Cook
 Field Contact Person Phone: (620) 874-8267

API No. 15- 15-075-20031-00-00
 Spot Description: S2 SE NW Sec. 1 Twp. 24 S. R. 41 ☐ E ☒ W
3250 feet from ☐ N / ☒ S Line of Section
3300 feet from ☒ E / ☐ W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84
 County: Hamilton Elevation: _____ ☐ GL ☐ KB
 Lease Name: BOLTZ Well #: 1
 Well Type: (check one) ☐ Oil ☒ Gas ☐ OG ☐ WSW ☐ Other: _____
☐ SWD Permit #: _____ ☐ ENHR Permit #: _____
☐ Gas Storage Permit #: _____
 Spud Date: 12/31/1970 Date Shut-In: 07/14/2014

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	N/A	7	4.5	N/A	N/A	2.375
Setting Depth		461	2435			2418
Amount of Cement		250	100			0
Top of Cement		0	0			0
Bottom of Cement		461	2435			0

Casing Fluid Level from Surface: 1408 How Determined? Acoustic Fluid Level Test Date: 05/18/2018

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No

Depth and Type: ☐ Junk in Hole at _____ ☐ Tools in Hole at _____ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): _____

Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: _____ w / _____ sacks of cement ☐ Port Collar: _____ w / _____ sack of cement

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 2436 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name _____ Formation Top _____ Formation Base _____ Completion Information _____
 1. _____ At: _____ to _____ Feet Perforation Interval 2401 to 2409 Feet or Open Hole Interval _____ to _____ Feet
 2. _____ At: _____ to _____ Feet Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

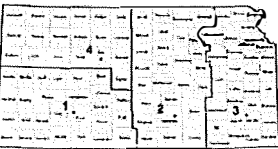
Do NOT Write in This
Space - KCC USE ONLY

Date Tested: _____ Results: _____ Date Plugged: _____ Date Repaired: _____ Date Put Back in Service: _____

Review Completed by: Michael Maier Comments: _____

TA Approved: ☒ Yes ☐ Denied Date: 06/05/2018

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

Conservation Division
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801



Phone: 620-682-7933
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Laura Kelly, Governor

January 23, 2019

Prairie Gas Operating, LLC
114 E. 5th ST, Ste 100
P.O. Box 2170
Tulsa, Oklahoma 74101-2170

Re: Prairie Gas Operating, LLC
Boltz #1
API # 15-075-20031-00-00
SE NW Section 1-T24-41W
Hamilton County, Kansas

Dear Mr. Jim Williams:

It has come to my attention that the latest fluid level you have taken on the above well was reported on the TA application to be at 1408', but when looking at the tape it is at 640', which is above the usable water. Staff requests that Prairie Gas Operating reshoot the fluid level on this well by **February 23, 2019**.

Should Prairie Gas not report the new fluid level to staff by the above date, the current TA on file will be revoked and Prairie Gas deemed to be in violation. An assessment of monitory penalties will be recommended to legal staff. Should you have any questions, please do not hesitate to contact me.

Respectfully,

Scott Alberg

Professional Geologist Supervisor



District #1
Conservation Division
Kansas Corporation Commission
210 E. Frontview, Suite A | Dodge City, KS | 67801
Phone (620) 682-7933

Conservation Division
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801



Phone: 620-682-7933
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Laura Kelly, Governor

March 21, 2019

Prairie Gas Operating, LLC
114 E. 5th ST, Ste 100
P.O. Box 2170
Tulsa, Oklahoma 74101-2170

Re: Prairie Gas Operating, LLC
Boltz #1
API # 15-075-20031-00-00
SE NW Section 1-T24W-R41W
Hamilton County, Kansas

Dear Mr. Jim Williams:

I have been notified that the fluid level recently shot on the above mentioned well is at approximately 496'. This level is in the usable water in that area. As part of a valid CP-111 regulation, a well is required to have an acceptable fluid level. The fluid level that staff witnessed shows the fluid level to be too high. After review of the well and the recent data, the Temporary Abandonment (TA) for the above listed well is revoked for the following reason:

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by April 22, 2019.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions regarding this matter.

Respectfully,

Scott Alberg
Professional Geologist Supervisor

District #1
Conservation Division
Kansas Corporation Commission
210 E. Frontview, Suite A | Dodge City, KS | 67801
Phone (620) 682-7933

KCC OIL/GAS REGULATORY OFFICES

Date: 04/23/19

District: 01

Case #: _____

☒ New Situation
☐ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 35442
 Op Name: Prairie Gas Operating, LLC
 Address 1: 114 E. 5th ST, Ste 100
 Address 2: P.O. Box 2170
 City: Tulsa
 State: Okla Zip Code: 74101 -2170
 Operator Phone #: (817) 681-7600

API Well Number: 15-075-20031-00-00
 Spot: SE NW Sec 1 Twp 24 S Rng 41 ☐ E / ☒ W
3250 (3330) Feet from ☐ N / ☒ S Line of Section
3300 (3331) Feet from ☒ E / ☐ W Line of Section
 GPS: Lat: 37.99567 Long: 101.77337 Date: 2/28/19
 Lease Name: Boltz Well #: 1
 County: Hamilton

Reason for Investigation:

8-18-18 Re shoot fluid level using the KCC echometer
 2-28-19 Witness the fluid level re shot by Prairie Gas
 4-23-19 Re check well status

Problem:

The pumper shot the fluid level for a TA application on 5-11-18. He mistakenly reported the repeat "kick" on the echometer tape rather than the actual fluid level. The actual fluid level was 22 joints down on his tape rather than 44 joints down like he reported.
 4-23-19 No reply to letter dated 3-21-19 to Prairie Gas revoking TA status due to a high fluid level. Deadline for a response was 4-22-19

Persons Contacted:

Brent Cook---Prairie Gas

Findings:

8-18-18 Ken Jehlik with the KCC reshot the fluid level using the KCC echometer and found fluid 20 joints down from surface (approx 840'). Well has an apparent Glorietta csg leak. Usable water is at approximately 800'.
 On 9-24-18 I met with Brett Cook with Prairie Gas and showed him the two echometer tapes and he admitted he missed the first "kick" and made a mistake and called the 2nd "kick" the fluid level.
 The well is located on the edge of the western city limits of Syracuse, Kansas.
 2-28-19 Scott Alberg sent Jim Williams with Prairie Gas a letter dated 1-23-19 to have the fluid level reshot by 2-23-19. I met Brett Cook with Prairie Gas and witnessed the fluid level shot on 2-28-19. Fluid level was 16 joints down which is approximately 496' to fluid. Confirming that well has an apparent Glorietta csg leak and the TA status should be revoked.
 3-21-19 Scott Alberg sent a letter to Prairie Gas revoking the TA status on this well due to a high fluid. Deadline for a response to plug or produce was 4-22-19.
 4-23-19 Re check well status. Well is still shutdown. Sales line valve closed. Brake set on pumping unit. Motor sheaves rusty. Nothing has been done to the well to repair, plug or produce.

Action/Recommendations:

Follow Up Required ☐ Yes ☐ No ☒

Date: _____

The CP-111 was submitted and approved with a fluid level of 1408' on 6-5-18.
 8-18-18 Suggest we deny this fluid level due to a high fluid level & its close proximity to Syracuse town site.
 2-28-19 Revoke the TA status due to a high fluid level.
 4-23-19 Send to legal with pics for failure to repair, produce or plug the well.

Verification Sources:

Photos Taken: 2 tapes & 3 pics

☒ RBDMS ☒ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☐ Other: _____

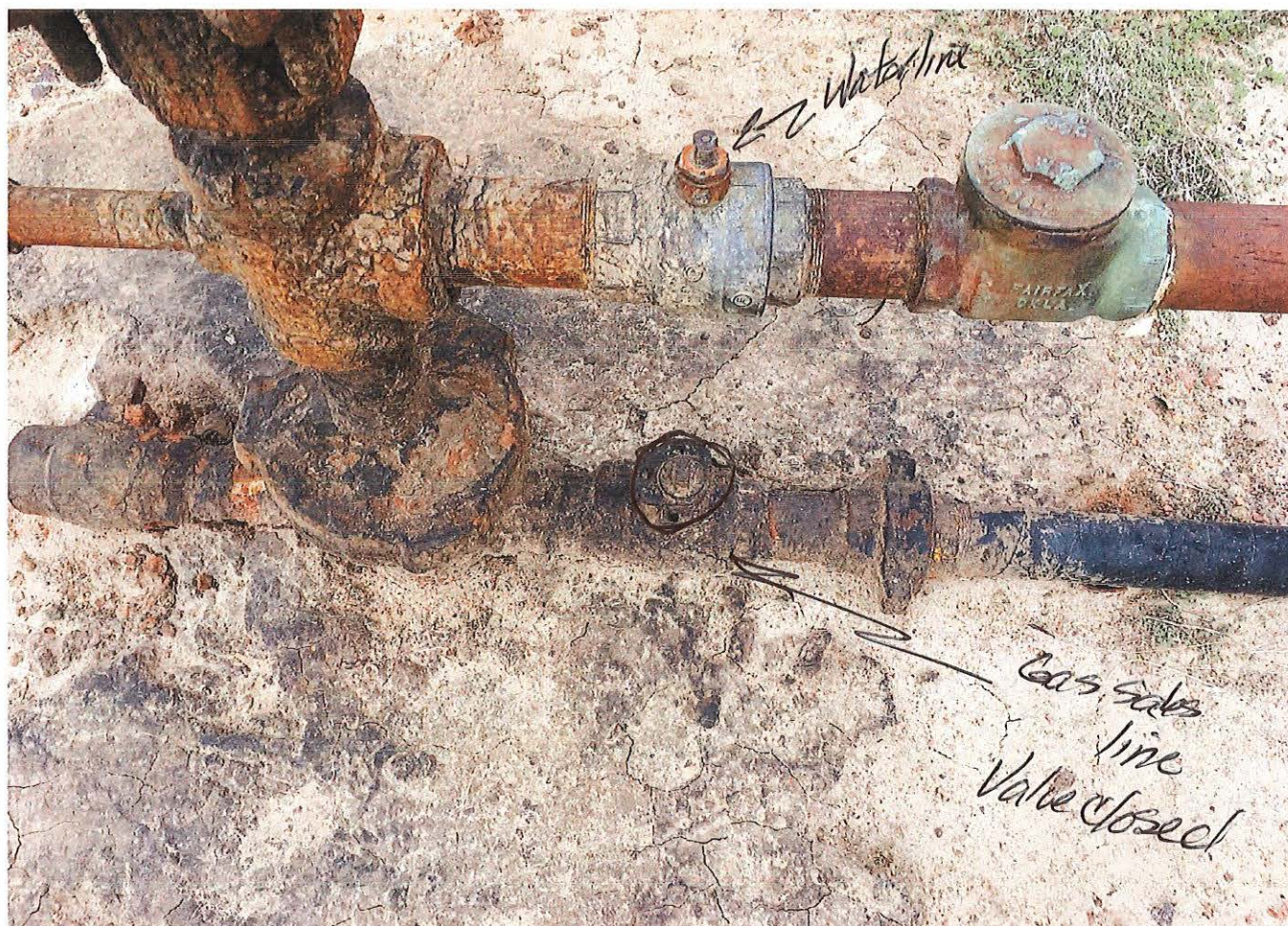
By: Ken Jehlik
ECRS

Retain 1 Copy District Office
 Send 1 Copy to Conservation Division

Form: 02/22/2008



Electric power switch off Prairie Gas Boltz #1
NW Sec 1-24-41W 4-23-19 KJ
Hamilton Co



Bottom solenoid line valve closed.	PrairieGas NW Sec 1-24-41W Hamilton Co	Bolt #1 4-23-19 KTS
---------------------------------------	--	------------------------



Brakeset
Shafts rusty
Unit has not ran

Prairie Gas Bell #1
NW Sec. 1, 24-41W 4-23-19LS
Hamilton Co

Conservation Division
District Office No. 1
210 E. Frontview, Suite A
Dodge City, KS 67801



Phone: 620-682-7933
<http://kcc.ks.gov/>

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner

Laura Kelly, Governor

NOTICE OF VIOLATION

April 24, 2019

IAN B. ACREY
PRAIRIE GAS OPERATING, LLC #35442
114 E 5TH ST., STE 100
PO BOX 2170
TULSA OK 74101-2170

**RE: BOUNDS #2 SWD
SWSWSW SEC. 13-20S-34W
GREELEY COUNTY, KANSAS**

Following a lease inspection conducted on April 09, 2019 & April 18, 2019, on the above captioned lease, it has been determined that you are currently in violation of the General Rules and Regulations of the Kansas Corporation Commission regarding the conservation of crude oil and natural gas. Specifically, you are in violation of K.A.R. 82-3-603. **The operator shall notify the appropriate district of any escape of saltwater, oil, or refuse that meets the definition of "spill" in K.A.R. 82-3-101. This notification shall meet the requirements K.A.R 82-3-603(c) and shall be made no later than the next business day following the date of discovery or knowledge of the spill.**

The spill must be cleaned up by May 08, 2019 Prior to commencing clean-up operations, contact the District Office for approval of your cleanup plan. Failure to clean up this spill by the above date will result in this matter being referred to our Legal Staff with a recommendation for a penalty and other possible action.

Enclosed is an Unreported Spill Form to be completed by the operator and returned to the district office by May 08, 2019. *This form is for informational purposes only and not to be construed as to supersede regulatory requirements for reporting.* Your cooperation in this matter is appreciated. Should you have any questions, you may call the District Office at 620-682-7933.

Sincerely,

Ken Jehlik by M. Pennington
Ken Jehlik
District #1

cc:File
Enclosure

Dwight D. Keen, Chair
Shari Feist Albrecht, Commissioner
Susan K. Duffy, Commissioner

Laura Kelly, Governor

May 8, 2019

Ian B. Acrey
Prairie Gas Operating, LLC #35442
114 E. 5th St., STE 100
PO Box 2170
Tulsa, Oklahoma 74101-2170

Re: Unreported Spill Clean-up on Bounds Lease Greeley County, KS

To whom it may concern:

Pursuant to K.A.R. 82-3-603(e) (1), Commission District Office #1 hereby gives you a final deadline of **May 24, 2019**, to complete cleanup of the referenced spill.

District staff has measured the affected area of the spill to be approximately 12,000 square feet; which calculates to be a minimum of 150 barrels of brine spilled. District staff have developed a remediation plan to be completed by the May 24, 2019 deadline.

The remediation plan is as follows: Apply granulated gypsum at a rate of 130 pounds per 1000 square foot along with 250 pounds of hay per 1000 square foot of area, and till in to no less than 6" deep. The area will need to be watered to help activate the gypsum. The gypsum is used to restore the calcium ion, reduce surface crusting, and increase aggregation. The hay is beneficial in stimulating nutrient cycling, as well as improving soil structure by enhancing aggregate formation which in turn improves soil permeability.

Please contact the district office at (620) 682-7933 at least 24 hours prior to beginning remediation so staff can witness.

If the May 24, 2019 deadline is not met you will be considered non-compliant, which may result in Commission Staff recommending a penalty.

You are welcome to contact me with any questions.

Sincerely,



Kenny Sullivan
KCC District #1

STATE OF KANSAS

CORPORATION COMMISSION
CONSERVATION DIVISION
DISTRICT No. 1
210 E. FRONTVIEW, SUITE A
DODGE CITY, KS 67801



PHONE: 620-682-7933
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

October 09, 2018

Jim Williams
Prairie Gas Operating, LLC
114 E. 5TH ST.
SUITE 100
TULSA, OK 74103

Re: Temporary Abandonment
API 15-071-20040-00-01
BEARD 1
SE/4 Sec.36-20S-41W
Greeley County, Kansas

Dear Jim Williams:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

High Fluid Level

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by November 06, 2018.

This deadline does NOT override any compliance deadline given to you in any Commission Order.

You may contact me if you have any questions.

Sincerely,
Michael Maier
KCC DISTRICT 1

KCC OIL/GAS REGULATORY OFFICES

Date: 06/28/19

District: 01

Case #: _____

☒ New Situation
☐ Response to Request
☐ Follow-Up

☐ Lease Inspection
☐ Complaint
☒ Field Report

Operator License No: 35442

Op Name: Prairie Gas Operating, LLC

Address 1: 114 E. 5th ST, Ste 100

Address 2: P.O. Box 2170

City: Tulsa

State: Okla Zip Code: 74101 -2170

Operator Phone #: (817) 681-7600

API Well Number: 15-071-20040-00-01

Spot: SE NW SE Sec 36 Twp 20 S Rng 41 ☐ E / ☒ W

1508 Feet from ☐ N / ☒ S Line of Section

1544 Feet from ☒ E / ☐ W Line of Section

GPS: Lat: 38.26655 Long: 101.79388 Date: 12/18/18

Lease Name: Beard Well #: 1

County: Greeley

Reason for Investigation:

6-28-19 Witness a third fluid level shot

Problem:

TA application was initially denied on 10-9-18 due to a high fluid level of 640'

Persons Contacted:

Brett Cook--pumper

Findings:

6-10-19 Witness a second fluid level shot by Brett Cook. FL= 558' from surface. Started up the pumping unit w/ rental generator on the elec motor. Pumping a minimal stream of water up the tbg with no gas up the annulus.

6-12-19 Pumping unit broke down. Wrist pin twisted off. No gas up the annulus.

6-28-19 Witness a third fluid level shot by Brett Cook. FL= 558' from surface. Pumping unit is still broke down with no plans to repair it. No gas up the annulus.

The high fluid level in this well is indicative of a highly corrosive Glorietta sand casing leak. (wellbore schematic confirms the well has a csg leak). Since the well only has 347' of surface casing and the production casing is not cemented thru the usable water section starting at 1300', the high fluid level could be now or in the near future causing contamination and/or environmental issues.

Action/Recommendations:

Follow Up Required ☐ Yes ☐ No ☒

Date: _____

Send to legal for 82-3-104.

Verification Sources:

☐ RBDMS ☐ KGS ☐ TA Program
☐ T-I Database ☐ District Files ☐ Courthouse
☐ Other: _____

Retain 1 Copy District Office
Send 1 Copy to Conservation Division

Photos Taken: Yes 2

By: Ken Jehlik
ECRS

E.M. Exhibit 8
Page 1 of 1

Form: 02/22/2008

5/8

CERTIFICATE OF SERVICE

19-CONS-3396-CPEN, 20-CONS-3007-CPEN, 20-CONS-3018-CPEN

I, the undersigned, certify that a true copy of the attached Prefiled Testimony of Eric MacLaren has been served to the following by means of electronic service on October 7, 2019.

FRED MACLAREN
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
Fax: 785-271-3354
e.maclaren@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
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