

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

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Dwight D. Keen

In the Matter of the Application of Urban Oil)	Docket No: 18-CONS-3375-CUIC
and Gas Group LLC (Operator) to Authorize)	
Injection of Saltwater into the Arbuckle)	CONSERVATION DIVISION
formation at the Lygrisse #82X, located in)	
Section 15, Township 26 South, Range 2 East,)	License No. 34381
Sedgwick County, Kansas.)	
_____)	

PRE-FILED DIRECT TESTIMONY

OF

CORALIN MODE

ON BEHALF OF

URBAN OIL & GAS GROUP, LLC

Hearing Date

December 20, 2018

1 Q. Please state your name and business address.

2 A. Coraline Mode, 1000 East 14th, Suite 300, Plano, Texas 75074.

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

4 A. Urban Oil & Gas Group, LLC as a landman.

5 Q. Have you ever testified before the Kansas Corporation?

6 A. Yes.

7 Q. Please summarize your educational background and work experience.

8 A. I graduated with a Bachelor of Administration with a concentration in Energy

9 Commerce Oil and Gas from Texas Tech University. From 2012 to 2014, I

10 worked as a landman for Southwestern Energy Company in Houston, Texas,

11 working primarily the Fayetteville shale play. My duties there included the land

12 work for proposing and drilling new wells. From there, I went to work for

13 Carrizo Oil and Gas in Houston. I was there for approximately for 1 year and

14 worked as a landman for their non-operated properties. I joined Urban Oil and

15 Gas Group in 2016 and have performed all duties standard and usual for a

16 landman, including maintaining relationships with mineral and surface owners,

17 obtaining right-of-ways and oil and gas leases, proposing projects and new drills,

18 and negotiating farmouts and assignments.

19 Q. Are you familiar with the Application filed by Urban Oil & Gas Group, LLC in

20 Docket No. 18-CONS-3375-CUIC?

21 A. Yes.

22 Q. In this Application, Urban Oil and Gas Group, LLC is requesting authority to

23 convert the Lygrisse #82X well, located in the NE/4 of Section 15, Township 26
24 South, Range 2 East, Sedgwick County, Kansas, into a saltwater disposal well for
25 disposal into the Arbuckle formation. Are you familiar with this request?

26 A. Yes.

27 Q. Does Urban Oil and Gas Group, LLC own the right to recomplete this well and
28 dispose of produced saltwater and other fluids approved by the Conservation
29 Division into the Lygrisse #82X well?

30 A. Yes, Urban Oil and Gas Group, LLC owns an oil and gas lease covering the NE/4
31 of Section 15. Attached to the Application is a plat that shows the tracts within
32 one-half mile of the Lygrisse #82X well and lists the leasehold owners or the
33 mineral owners of unleased tracts within that area.

34 Q. Does the Application also reflect the wellbores within that one-half mile?

35 A. Yes, attached to the Application is a separate plat that shows all of the known oil,
36 gas and input wells, including wells being drilled, inactive wells or dry
37 holes within one-half mile of the Lygrisse #82X well. Included is a list of the
38 operator, lease name, well number, field and status of the wells reflected on that
39 plat.

40 Q. Other than the publication of the Notice, to whom was a copy of
41 the Application mailed?

42 A. Samuel T. Luinstra Living Trust, the landowner of the NE/4 of Section 15, and
43 to Benjamin M. Giles, the operator of the Erdwien #1A well located in the SW/4
44 SW/4 of Section 11, Township 26 South, Range 2 East, and of the M&L Land
45 Stollie #1A well located in the SE/4 SW/4 of Section 11, Township 26 South,

46 Range 2 East.

47 Q. I note that on attachment to the Application that lists the wells within one-half
48 mile of this injection well, the Erdwien #1A well is listed as inactive. Upon what
49 information do you base that designation?

50 A. We have reviewed the production information from the Kansas Geological
51 Survey. That information reflects that well last sold oil in September of 2017 and
52 the last sale of oil prior to that date was in August of 2016. Based upon that
53 information, the well does not appear to be an active well.

54 Q. What about the M&L Land Stollie #1A well?

55 A. We have that as an active well as it appears to still be selling oil in 2018.

56 Q. Do you request that the Application filed by Urban Oil and Gas Group be
57 granted?

58 A. Yes.

59 Q. Does this complete your testimony?

60 A. Yes.

VERIFICATION

STATE OF TEXAS)
) ss:
COUNTY OF Collin)

Coralin Mode, of lawful age, being first duly sworn, disposes and states that she is the Coralin Mode referred to in the foregoing document entitled "Pre-filed Testimony of Coralin Mode" in Docket No. 18-CONS-3375-CUIC before the State Corporation Commission of the State of Kansas and the statements and attached exhibits therein were prepared by her or under her direction and control and are true and correct to the best of her information, knowledge, and belief.

Coralin Mode
CORALIN MODE

Subscribed and sworn for me this 12th day of November, 2018.

[Signature]
NOTARY PUBLIC

