THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

Shari Feist Albrecht Pat Apple						
In the matter of an Order to Show Ca)	Docket No.:	17-CONS-3372-CSHO	ì	
to Rodger D. Wells dba Pioneer Reso)				
("Operator") for its failure to comply	with)	CONSERVA	TION DIVISION		
either K.A.R. 82-3-400 or K.A.R. 82	-3-409)				
regarding injection that took place du	aring the)	License No.:	32016		
2015 calendar year.						

MOTION FOR AN ORDER TO SHOW CAUSE, THE DESIGNATION OF A PREHEARING OFFICER, AND THE SCHEDULING OF A PREHEARING CONFERENCE

For the following reasons, Commission Staff moves for an Order to Show Cause, the designation of a prehearing officer, and the scheduling of a prehearing conference in this matter:

I. JURISDICTION & LEGAL STANDARD

- 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. K.S.A. 55-162 provides the Commission with jurisdiction to institute proceedings to enforce the laws of Kansas and Commission rules, regulations, and orders. K.S.A. 55-164 provides the Commission with authority to impose a penalty for a violation of such rules, regulations, and orders.
- 3. K.A.R. 82-3-400 provides that the penalty for unauthorized injection shall be \$1,000 for first-time violators, \$5,000 for second-time violators, and \$10,000 and operator license review for third-time violators.

4. K.A.R. 82-3-409(b) provides that each operator of an injection well shall submit a report to the conservation division, showing for the previous calendar year the following information, by March 1 of the following year: the monthly average wellhead pressure; the maximum wellhead pressure; the amount and kind of fluid injected into each well; and any other performance information required by the conservation division.

II. STAFF'S ALLEGATION OF FACTS

- 5. On July 23, 2015, Operator was penalized in Docket 16-CONS-094-CPEN for either conducting unauthorized injection in violation of K.A.R. 82-3-400, or misreporting injection in violation of K.A.R. 82-3-409, during the 2014 calendar year at the following wells:
 - a. Amrein A #1, API #15-051-24991,
 - b. Baird #1, API #15-137-20527,
 - c. Dayton-Axem-Credo #15-23, API #15-147-20454,
 - d. Groom #1, API #15-063-21161,
 - e. Hull #1, API #15-065-22944, and
 - f. Railroad #1, API #15-063-21690.
- 6. In February 2016, Operator reported unauthorized injection during the 2015 calendar year at the same wells. A July 29, 2016, Commission Staff inspection did not conclusively indicate whether Operator conducted unauthorized injection in violation of K.A.R. 82-3-400, or instead misreported its injection in violation of K.A.R. 82-3-409, for the 2015 calendar year.

III. CONCLUSION

7. Based on the above, Staff believes that the Commission should cause Operator to come before it at a hearing to show cause why a penalty constituting an actual and substantial

² See Exhibit B.

¹ See Exhibit A. The authorized injection pressures were accurately auto-filled by KOLAR in Section II of the Annual Fluid Report Forms, and Operator reported exceeding them in Section III.

economic deterrent should not be assessed against Operator for its violations of either K.A.R. 82-3-400 or K.A.R. 82-3-409 for the 2015 calendar year, which constitute second-time violations at the wells at issue.

Respectfully submitted,

Jonathan R. Myers, #25975

Litigation Counsel, Kansas Corporation Commission

266 N. Main, Suite 220

Wichita, Kansas 67202-1513

Phone: 316-337-6200; Fax: 316-337-6211

CERTIFICATE OF SERVICE

Rodger D. Wells dba Pioneer Resources 80 Windmill Drive Phillipsburg, Kansas 67661

Paula Murray Legal Assistant

Kansas Corporation Commission



1289318

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License #			API No.: 15-051-24991-00-02			
Name: Wells, Rodger D. dba Pioneer Resources		Permit No: D27864.0				
Address 1: _80 WINDMILL DR.			Reporting Year: 2015			
Address 2:			3	(January 1 to Decembe	r31)	
		S State: KS Zip: 676		NW SE NW	Sec. 32 Twp. 12 S.	B 19 F 7 W
	ct Person: Rodge		*	(0:0:0:0)	feet from N /	Service Control Control
	: (785) 54	2 5556			feet from 🗸 E /	Vietzgradund
	,	NA			Teel non ()	
				County.		The second secon
VV611 141	urricer.					
I. Inie	ction Fluid:					
	ype (Pick one):	Fresh Waler	Treated Brine	Untreated Brine	✓ Water/Brine	
	Source:	✓ Produced Water	Other (Attach list)	Samuera	No. 9, and	
C	Quality: Tota	1 Dissolved Solids:	mg/l Specific Grav	vity: Additives:		
(/	Attach water analys	is, if available)				
N	Maximum Authorized	d Injection Pressure: 0 d Injection Rate: 1500 anced Recovery Injection Wells	barrels per d	ay	Arbuckle	
10.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	130	300	0		31
	February	140	300			28
	March	160	300	0		31
	April	160	300	0		30
	May	170	300	0		31
	June	150	300	0		30
	July	140	300	0	Arran man and a second a second and a second a second and	31
	August	130	300	0		31
	September	150	300	0		30
	October	160	300	0	Management of the second secon	31
	November	150	300	0		30
	December	140	300	0		31
	TOTAL	1780		0		



KANSAS CORPORATION COMMISSION OIL & GAS CONSERVATION DIVISION 1289321

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License # _32016			API No.: 15-137-20527-00-00			
Name: Wells, Rodger D. dba Pioneer Resources		Permit No:D30766.0				
Address 1: _80 WINDMILL DR.			Reporting Year: 2015			
				3	(January 1 to Decembe	
		G State: KS Zip: 670		NE NW SW SW	Sec 24 Twn 5 S	B 21 □F ✓ W
	ct Person: Rodge		***************************************	(0.0/0/0)	feet from N /	
	: (785) 54			i e	feet from E /	
	15-41 year of the second		The Water and the text of the second second	County: Norton	leet non L /	V Line of Section
				County.	- that also the of half fellowed the state of the policy of the state of the state of the state of the state of	
vveniv	umber					
1 Inic	ection Fluid:					
•	Type (Pick one):	Fresh Water	Treated Brine	Untreated Brine	√ Water/Brine	
	Source:	-	Other (Attach list)	Security	(V) Water/Brille	
		Second 2		vity: Additives:		
	Attach water analys		mg. Oposiio ara		The state of the s	
N	Maximum Authorized	d Injection Pressure: 0 d Injection Rate: 150 anced Recovery Injection Wells	barrels per d		Cedar Hills	
Ш.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	3750	300	0		31
	February	3800	300	0		28
	March	4000	300	0		31
	April	3800	300	0		30
	May	3900	300	0		31
	June	3700	300	0		30
	July	4000	300	0		31
	August	3900	300	0		31
	September	3850	300	0		30
	October	3750	300	0		31
	November	3900	300	0		30
	December	3850	300	0		31
	TOTAL	46200		0		

Kansas Corporation Commission Oil & Gas Conservation Division 1289328

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License # 32016			API No.: 15-147-20454-00-00			
Name: Wells, Rodger D. dba Pioneer Resources		Permit No: D23630.0				
Address 1: _80 WINDMILL DR.			Reporting Year: 2015			
Addres	ss 2:			,	(January 1 to Decembe	r 31)
		G Stale: KS Zip: 670		NE_SW_SE	Sec. 23 Twp. 2 S.	B 19 ☐ E 🗸 W
	ct Person: Rodge			(Q/Q:Q:Q)	feet from N /	
	: (785) 54				feet from 🗸 E /	
		ON-AXEM-CREDO		County: Phillips	ieet non [v] L /	W Line of Section
	umber: 15-23			County.	The second secon	
Well IV	uniber.					
Linio	ection Fluid:		And the second s			
	ype (Pick one):	Fresh Water	Treated Brine	Untreated Brine	√ Water/Brine	
	Source:	✓ Produced Water	Other (Attach list)		(Valendine	
		The same of the sa		vity: Additives:		
	Attach water analys					
II. We	Il Data:					
		d Injection Pressure; 0		psi Injection Zone:	CEDAR HILLS	
		d Injection Rate: 160				The state of the s
		anced Recovery Injection Wells				
		Tables 1			Was transfer and t	
ш.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	310	300	0		31
	February	290	300	0		28
	March	330	300	0	Market and the second s	31
	April	340	300	0		30
	May	320	300	0		31
	June	340	300	0		30
	July	350	300	0		31
	August	330	300	0		31
	September	290	300	0		30
	October	300	300	0		31
	November	310	300	0		30
	December	320	300	0		31
	TOTAL	3830		0		



1289313

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License # 32016 API No.: 15-063-21161-00-01							
Name: Wells, Rodger D. dba Pioneer Resources			Permil No: D31812.0				
Addres	ss 1: _80 WINDM	ILL DR.		Reporting Year: 2015			
Addres	ss 2:				(January 1 to Decembe	r 31)	
City: PHILLIPSBURG State: KS Zip: 67661 +		661 +	W2 NE NE NW	Sec. 25 Two 14 S.	R. 30 ☐ F 🗸 W		
	ct Person: Rodge			(0/0/0/0)	feet from N /	Section of Section 2	
	. (785) 543	2 EEE6			feet from 🗸 E /	10.22	
	,			Cauc			
						enter (All with the sense of transport graph, All the set is an artistic real Acade and a continued by a set o	
I. Inje	ection Fluid:						
Т	Type (Pick one):	Fresh Water	Treated Brine	Untreated Brine	✓ Water/Brine		
S	Source:	Produced Water	Other (Attach list)				
C	Quality: Total	Dissolved Solids:	mg/I Specific Grav	vily: Additives:			
('Attach water analysi	s, if available)					
			В брани в помности установ достуг обращения передо учет стой г				
		Injection Rate: 500 anced Recovery Injection Wells					
III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection	
	January	4800	150	0		31	
	February	4400	150	0		28	
	March	4200	150	0		31	
	April	4500	150	0		30	
	May	4600	150	0		31	
	June	4400	150	0		30	
	July	4900	150	0		31	
	August	4850	150	0		31	
	September	4750	150	0		30	
	October	4600	150	0		31	
	November	4250	150	0		30	
	December	4300	150	0		31	
	TOTAL	54550		0			



1289324

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License # 32016 API No.: 15-065-22944-00-01						
Name: Wells, Rodger D. dba Pioneer Resources			Permit No:D28473.0			
Address 1: _80 WINDMILL DR.						
Address 2:				, ,	(January 1 to Decembe	er 31)
		S State: KS Zip: 67		NE .SE _SE	Sec 9 Twn 8 S	B 23 F 7 W
	act Person: Rodge			(0.0.0/0)	feet from N	towns to the same of
	e: (785) 54	3-5556			feet from 🗸 E	
	,			Cuaham		
				County		
vveir	Number:					
)	ection Fluid: Type (Pick one): Source: Quality: Tota		Treated Brine Other (Attach list) mg/l Specific Gra	Untreated Brine		
	(Attach water analys		mg/r opposite did	7.00.0700		
	ell Data:					
	Maximum Authorized	I Injection Pressure: _0 I Injection Rate: _750 anced Recovery Injection Well	barrels per c		Cedar Hills	
m.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	790	300	0		31
	February	720	300	0		28
	March	790	300	0		31
	April	760	300	0		30
	May	850	300	0		31
	June	840	300	0		30
	July	810	300	0		31
	August	820	300	0		31
	September	850	300	0		30
	October	810	300	0		31
	November	790	300	0		30
	December	830	300	0		31
	TOTAL	9660		0		



1289331

Form U3C June 2015 Form must be Typed Form must be completed on a per well basis

ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

OPERATOR: License # 32016 API No.: 15-063-21690-00-01						
Name: Wells, Rodger D. dba Pioneer Resources			Permit No: D30125.0			
Addre	ess 1: _80 WINDM	IILL DR.		Reporting Year: 2015		
Address 2:				(January 1 to Decembe	er 31)	
City: PHILLIPSBURG State: KS Zip: 67661 +		61 +	<u>SW</u> . NW _SW	Sec. 7 Twp. 14 S.	R. 31 ☐ E ✓ W	
	act Person: Rodge			(0/0/0/0)	feet from N	
	e: (785) 54				feet from 🗸 E /	Noneman of
	Name: RAILR			County: Gove		
						ALL MANAGES OF SECURITION AND ADMINISTRATION OF PROPERTY OF STORAGE, ASSAULT, ASSAUL
,,,,,	101110017					
-	ection Fluid:	C Cook Make	Translat Diag	□ Maturated Briss	71.West 10.	
	Type <i>(Pick one):</i> Source:	☐ Fresh Water ✓ Produced Water	Treated Brine Other (Attach list)	Untreated Brine	√ Water/Brine	
		I Dissolved Solids:		vilv: Additives:		
	(Attach water analys		riigh opcome cha	, 10011100		
-						
II W	ell Data:					
		d Injection Pressure: 0		nei Injection Zone:	Cedar Hills	
			barrels per d			and the state of t
		anced Recovery Injection Wells				
			•			
111.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	9680	500	0		31
	February	8700	50	0		28
	March	9650	500	0	No. of Commence of the Commenc	31
	April	9800	500	0		30
	May	9820	500	0		31
	June	9660	500	0		30
	July	9750	500	0		31
	August	9870	500	0		31
	September	9300	500	0		30
	October	9100	500	0		31
	November	8900	500	0		30
	December	9650	500	0		31
	TOTAL	113880		0		

Case#		X		Situation onse to request		
Date:	07-29-2016					
Operator:	Pioneer Resources	Licen	ise:	32016		
Address:	80 Windmill Dr.	Locat	tion:	NW SE NW Sec. 32-12-19w		
City/St:	Phillipsburg KS. 67661	Lease	e:	Amrein-A		
Phone:	785-543-5556	Coun	ty:	Ellis		
Reason for	investigation: Request from Rich Williams compl	iance off	icer.			
Problem:	Pressure check					
Findings: A lease inspection was conducted on the above said lease on July 28, 2016 and found the following: The Amrein -A well # 1 SWD DKT-D-27,864 well located in the NW SE NW was found to be in operation. No pressure was found on the vacuum gage on the well head. Very little water was flowing into the well at the time of inspection. GPS location was 38.96786 099.45958. 3655'FSL & 3627'FEL API # 15-051-24991-00-02.						
Photos:	Yes					
Action /recommendations: The above said well will be turned over to compliance for any issues on the well.						
Pat Staab, July 29, 201	(Agent)	1	arm	(Signature)		

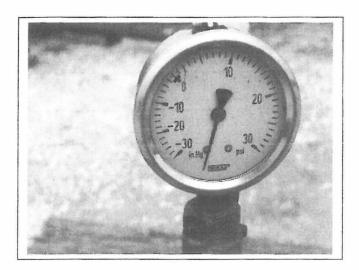
cc: file, Williams

Date: 07-29-2016

Company: Pioneer Resources #32016

Lease: Amrein-A SWD # 1 DKT- D-27,867

Legal: NW/4 Sec 32-12-19w





The Amrein SWD well# 1 had no pressure on gauge at the well head on 7-28-2016 lease inspection.

The Amrein SWD well Docket D-27,864. Located in the NW SE NW has a current MIT dated 1-20-2016. **API # 15-051-24991-00-02**.

X Responsible Follow Date of			Com	plaint
Operator:	July 29, 2016 Pioneer Resources		License:	32016
Address:	80 Windmill Dr		Location:	
		22		SW/4 24-5S-21W
City/St:	Phillipsburg, Ks. 67661-962	<u>LL</u>	Lease:	Baird
Phone:	(785)-543-5556 nvestigation: Compliance I	0	County:	Norton
21W North & 342' F.I Well has Operato Photos: Y Action /reco	E.L.). a vacuum guage and is gravity for is in violation of (K.A.R.	SWD. (GPS LOC: LAT. 39 fed.	.59986, LONC	S. 099.64545 Footages 1289' F.S.L.
Pat Bedore	E.C.R.S. (agent)			(signature)

cc: file

Case#		X Resp	plaint Situation onse to request ow-up
Inspection:	July 29, 2016		
Operator:	Pioneer Resources	License:	32016
Address:	80 Windmill Dr	Location:	SE/4 23-2S-19W
City/St:	Phillipsburg, Ks. 67661-9622	Lease:	Dayton-Axem
Phone:	(785)-543-5556	County:	Phillips
Reason for i	nvestigation: Compliance Request		
Problem:	Verfiy pressure on tubing from Operators Annual I	Report of Pres	ssure Monitoring.
SW SE/4 099.4276 Well has Photos: Y Action /reco	2016: Dayton-Axem Credo 15-23 API# 15-147-23-2-19W Phillips County Kansas is currently an active State of Footages 990' F.S.L. & 1650' F.E.L. no guage on tubing and is gravity fed. es mmendations: to Compliance Officer		
Pat Bedore	E.C.R.S. (agent)		(signature)

Case#		X Resp	plaint Situation onse to request w-up
Date of Inspection:	July 29, 2016		
Operator:	Pioneer Resources	License:	32016
Address:	80 Windmill Dr	Location:	SE/4 23-2S-19W
City/St:	Phillipsburg, Ks. 67661-9622	Lease:	Dayton-Axem
Phone:	(785)-543-5556	County:	Phillips
Reason for i	nvestigation: Compliance Request		
Problem:	Verfiy pressure on tubing from Operators Annual R	eport of Pres	sure Monitoring.
SW SE/4 099.4276 Well has Photos: Y Action /reco	2016: Dayton-Axem Credo 15-23 API# 15-147-2 23-2-19W Phillips County Kansas is currently an active S 0 Footages 990' F.S.L. & 1650' F.E.L. no guage on tubing and is gravity fed. es mmendations: to Compliance Officer		
Pat Bedore	E.C.R.S. (agent)		(signature)
(51	(agent)		(signature)
cc: file			

UPDATE REPORT

Date:

JULY 29 2016

Operator: PIONEER RESOURCES

License: 32016

Location: NE NE NW/4 25-14-30W

Lease:

GROOM #1

County:

GOVE

Findings:

July 29 2016 API: 15-063-21161-0001 Docket # D 31812.0 located NE NE NW/4 25-14-30W Gove County Ks. GPS: Lat 38.81480 Long 100.60587. Is on a vacuum not on any pressure it is a gravity well.

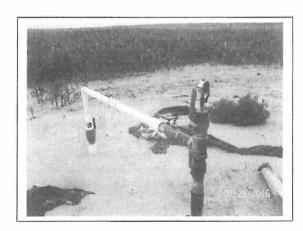
MARVIN MILLS E.C.R.S

(agent)

(signature)

Marin Miller

cc: file



X Respon	ituation nse to request -up		Comp	olaint
Date of Inspection:	July 29, 2016			
Operator:	Pioneer Resources		License:	32016
Address:	80 Windmill Dr		Location:	SE/4 9-8S-23W
City/St:	Phillipsburg, Ks. 67661-96	622	Lease:	Hull
Phone:	(785)-543-5556		County:	Graham
Reason for i	nvestigation: Compliance	e Request		
Problem:	Verify pressure on tubing	from Operators Annual R	Report of Pres	sure Monitoring.
Graham (350' F.E.I Well has Operato Photos: Y Action /reco Referred	county Kansas is an active SV	VD. (GPS LOC: LAT. 39.36 d is gravity fed.	740, LONG, 09	e tank.
Pat Bedore	E.C.R.S.			
	(agent)			(signature)

cc: file

UPDATE REPORT

Date:	JULY 29 2016	
Operator:	PIONEER RESOURCES	License: 32016
Location:	SW NW SW/4 7-14-31W	
Lease:	RAILROAD #1	
County:	GOVE	
Couredo feed	nty Ks. GPS: Lat 38.84813 Long 100.8	33-21690-0001 located SW NW SW/4 7-14-31W Gove 1522. There is no way to get to the well the county has two entrance to the well I can not drive to it. This is a gravity has no pumps all gravity.
cc: file		