BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Application of TDR)	DOCKET NO. 19-CONS-3168-CUIC
Construction, Inc. (Operator) to authorize)	
injection of saltwater into the Squirrel)	CONSERVATION DIVISION
formation at the Superior #I-1 well, located)	
in Section 10, Township 16 South,)	License No: 32218
Range 21 East, Franklin County, Kansas.)	

INFORMATION REQUEST

COME NOW Scott Yeargain and Polly Shteamer, Protestants in this docket, who respectfully request that Applicant, TDR Construction, Inc., provide responses to the following to them (Scott Yeargain and Polly Shteamer) by Monday, March 11, 2019:

1. Identify all persons who assisted in the preparation of the answers to this information request.

RESPONSE:

2. Please provide any all supporting documents used to provide information required by (K.A.R. 82-3-401) on the application for well # I-1 in the Superior lease in NE/4 of the Sec. 10 Twp. 16S R.21E.

RESPONSE:

3. Please provide a copy of Permit No. E-32,758 and any and all supporting documents used to support the information required by Permit Number E-32,758 (listed on page 1 of Form U-1 Application for well I-1 API. #15-059-27200).

RESPONSE:

4. What is the bottom of unconsolidated material at the well # 1? Please provide full and complete driller's log showing lithology reported during drilling and electrical logs for Superior well #1.

RESPONSE:

5. Is the EOR taking place on the Superior lease a project qualifying a type of tax reduction or relief under K.S.A. 79-4217(b)(6)(A)(4)(ii) or K.A.R. 82-3-902?

RESPONSE:

6. Please provide, for years 2014-2018, the information required by K.A.R. 82-3-409.(
Record retention; annual report; penalty. (a) Each operator of an injection well shall
perform the following: (1) Keep current, accurate records of the amount and kind of fluid
injected into the injection well; and (2) preserve the records required in paragraph (a)(1)
above for five years. (b) Each operator of an injection well shall submit a report to the
conservation division, on a form required by the commission, showing for the previous
calendar year the following information: (1) The monthly average wellhead pressure; (2)
the maximum wellhead pressure; (3) the amount and kind of fluid injected into each well;
and (4) any other performance information...) for well #1 API No. 15-059-27176 on the
Superior lease.

RESPONSE:

7. For the last 2 years, please provide income and expense reports and any and all other information that would be required for an economic viability test under a habendum clause for the Superior lease.

RESPONSE:

8. Regulations require mechanical integrity tests generally using "A fluid pressure of 300 psig shall be applied. If the operator requests a pressure in excess of 300 psig on the injection application, a test pressure up to the requested pressure may be required." The Enhanced Recovery Project Docket E-31,984 on the McCoy lease has been permitted for 650 psi injection. Please provide documentation that supports the safety (related to conservation of oil and gas and the integrity of the confining formations above and below the Squirrel formation) and necessity of the high injection pressure being permitted.

RESPONSE:

9. What do you know about the danger of "channeling" in a formation that can happen when an EOR injection pressure is too high? Is this a concern on the McCoy lease at an injection pressure of 650 psi and a rate of 500 bbls. per day? Please provide supporting documents?

RESPONSE:

10. Are you aware of seeps or other evidence of abandoned or leaking oil and/or gas wells on the Superior lease or within one mile of the Superior lease that do not appear on the

Kansas Geological Survey on-line interactive oil and gas map (the site you used on your application to provide a list of the oil and gas wells).

RESPONSE:

11. On the Superior lease about how often do you flare gas and for how long would a flare typically last? Have you or do you anticipate having to in the future flare gas from any of your wells on the Superior lease.

RESPONSE:

12. How will you determine the depth to fresh and usable water on the above-mentioned wells? Please provide supporting documents.

RESPONSE:

13. Please list any and all financial assurance or bonds have you had to provide to the KCC for your activity on the Superior lease?

RESPONSE:

14. Is the application in this docket an application for a permit to authorize the injection of saltwater for the enhanced recovery of oil from the Superior lease?

RESPONSE:

Pally Shteamer

Polly Shteamer 2263 Nevada Road Ottawa, Kansas 66067 913-649-7388

pshteamer@gmail.com

Scott Yeargain 2263 Nevada Road Ottawa, Kansas 66067 785-418-7615 syeargai2@gmail.com

CERTIFICATE OF SERVICE

We, the undersigned, certify that a true copy of the attached INFORMATIN REQUEST to TDR CONSTRUCTION, INC., for information related to this docket has been filed with the Kansas Corporation Commission and served to the following parties electronically on February 25th, 2019.

Jonathan R. Myers

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