

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

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

In the matter of the failure of Crown Well)	Docket No. 14-CONS-749-CPEN
Service Inc. (“Operator”) to comply with)	
K.A.R. 82-3-407 at the Baxa #12 in Rooks)	CONSERVATION DIVISION
County, Kansas.)	
<hr/>)	License No. 3722

PRE-FILED TESTIMONY

OF

DAVID WANN

1 Q. What is your name and business address?
2 A. David Wann, 2301 East 13th, Hays, Kansas.
3 Q. By whom are you employed and in what capacity?
4 A. The Kansas Corporation Commission Conservation Division, as Compliance Officer for
5 District Four.
6 Q. How long have you been employed by the KCC?
7 A. Since 1985.
8 Q. Have you previously testified before this Commission?
9 A. Yes, many times.
10 Q. What does your position with the Conservation Division involve?
11 A. My job involves inspection, documentation, investigation, and consultation with
12 operators and other Commission field staff on environmental compliance issues related to
13 oil and gas production in Kansas.
14 Q. Are you familiar with this KCC Docket, 14-CONS-749-CPEN?
15 A. Yes.
16 Q. Would you please summarize the circumstances which led to this docket?
17 A. Crown Well Service's ("Operator's") Baxa #12 well failed a mechanical integrity test
18 (MIT) on November 27, 2013 (Exhibit A). Basically, under K.A.R. 82-3-407(c), if a well
19 fails an MIT, the operator shall have no more than 90 days to either repair and
20 successfully re-test the well, or to plug it.
21 Q. What happened after the Baxa #12 failed the mechanical integrity test?
22 A. When a well fails an MIT, Staff typically sends a letter to the operator, giving a deadline
23 to repair and successfully re-test the well, or to plug the well. In this case, I sent a letter to
24 Operator on December 3, 2013, giving Operator until February 27, 2014, to repair and
25 successfully re-test the well, or to plug the well (Exhibit B).
26 Q. After you sent your December 3rd letter, did Operator contact you regarding this well?
27 A. No, Operator has never contacted me.
28 Q. Why did your December 3rd letter give Operator until February 27, 2014, to resolve the
29 compliance issue at the Baxa #12?
30 A. The maximum time our regulations allow to successfully re-test or plug a well that has
31 failed a mechanical integrity test is 90 days. The Baxa #12 failed its mechanical integrity

1 test on November 27, 2013. Since February 27, 2014, is actually 92 days after the well
2 failed the MIT, and Operator had not successfully re-tested or plugged the well by the
3 deadline, the Operator was in violation of K.A.R. 82-3-407(c). Consequently, I made the
4 penalty recommendation.

5 Q. Since February 27, 2014, has Operator repaired and successfully re-tested the well,
6 plugged the well, or otherwise brought the Baxa #12 into compliance with K.A.R. 82-3-
7 407(c)?

8 A. No. Operator is still out of compliance with K.A.R. 82-3-407(c).

9 Q. Does this conclude your testimony as of this date, July 21, 2014?

10 A. Yes.

CASING MECHANICAL INTEGRITY TEST

DOCKET # E-23,928

Disposal Well ☐ Enhanced Recovery:
 Repressuring ☒
 Flood ☐
 Tertiary ☐

E/2 SE NW, Sec 12, T 9, S, R 17 HW
3300' Feet from South Section Line
2970' Feet from East Section Line

Date injection started _____
 API #15-163-23081-00-01

Lease BAXA Well # 12
 County ROOTS

Operator: Crown Well Serv.
 Name & Address 650 EAST WISCONSIN
Russell KS 67665

Operator License # 3722
 Contact Person Steve Crawford **KCC**
 Phone 717-377-7514 435-8800 3/2013

Max. Auth. Injection Press. _____ Psi; Max Inj. Rate _____ bbl/d;
 If Dual Completion - Injection above production _____ Injection below production _____

Conductor	Surface	Production	Liner	Tubing
Size _____	<u>8 7/8</u>	<u>5 1/2</u>	_____	Size <u>2 7/8</u>
Set at _____	<u>210</u>	<u>3529</u>	_____	Set at <u>3100</u>
Cement Top _____	<u>Surf w/ 140 SXS</u>	<u>w/ 160 SXS</u>	_____	Type <u>DURALINE</u>
" Bottom _____	<u>210</u>	<u>3529</u>	_____	

 DV/Perf. A 1250' w/ 300 SXS TD (and plug back) 3527 PDWT-3300 ft. depth
 Packer type TENSION Size 5 1/2 Set at 3100
 Zone of injection 3189 ft. to ft. 3374 Perf. or open hole PERFORATIONS

HAYS, KS

Type MIT: Pressure: 07 02 Radioactive Tracer Survey: ☐ Temperature Survey: ☐

F Time: Start _____ Min. _____ Min. _____ Min.

I
 E Pressures: 320 0 Set up 1 System Pres. during test SHUT IN
 L Set up 2 Annular Pres. during test _____
 D Set up 3 Fluid loss during test _____ bbls.

A Tested: Casing ☐ or Casing - Tubing Annulus ☒

KCC WICHITA

DEC 05 2013

The bottom of the tested zone in shut in with A PACKER

RECEIVED

Test Date 11-27-13 Using Kirk's Tank Seal Company's Equipment

The operator hereby certifies that the zone between 0 feet and 3100 feet

was the zone tested Steve Crawford Pumper
 Signature Title

The results were Satisfactory _____, Marginal _____, Not Satisfactory X

FAILED

State Agent: Jim Cully Title: Perit II Witness: YES X NO _____

REMARKS: 10 BBL'S TO Load

☒ Origin. Conservation Div.: ☐ KDHE/T: ☐ Dist. Office

☒ Computer Update Is there Chemical Sealant or a Mechanical Casing patch in the annular space? (Y/N) N

GPS Lat 39.286 N GPS Long 099.16886

(If YES please describe in REMARKS)

KCC Form U-7
 Exhibit A

Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shari Feist Albrecht, Commissioner

Sam Brownback, Governor

December 3, 2013

Crown Well Service, Inc. #3722
650 East Wisconsin
Russell, Kansas 67665

(435)890-4367

RE: Baxa Lease
Well #12
E2 SE NW/4/4
Sec. 12-09-17W
Rooks County
Docket # E-23,928

Attention Operator:

On **November 27, 2013**, the above-mentioned well failed a Mechanical Integrity Test. K. A. R. 82-3-407 states in part ... "each well must be operated and maintained in a manner that will prevent pollution of fresh and usable water, damage to sources of oil and gas, and that will confine fluids to the interval or intervals approved for injection or disposal."

Any well failing to demonstrate mechanical integrity shall have no more than ninety days from the date of the initial failure to:

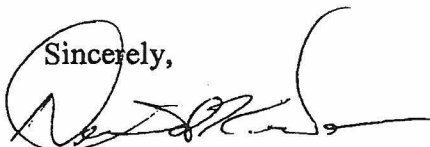
1. Repair and retest the well to demonstrate mechanical integrity or;
2. Plug the well or;
3. Isolate the leak or leaks to demonstrate that the well will not pose a threat to fresh or usable water resources or endanger correlative rights.

This letter is notification that you have until **February 27, 2014**, in which to complete the above. The well is to be immediately shut-in and disconnected. It is to remain so until it has been brought into compliance. Please contact the Hays District Office at (785)625-0550 regarding your intentions for this well. *This deadline is not to be construed as to supersede any previous deadline given by Commission Order or other regulatory requirements.*

If this lease is no longer owned or operated by you, please provide documentation showing when the new owner/operator took possession of said lease. Failure to comply with this request will result in this matter being referred to our legal staff for further action.

Thank you for your cooperation in this matter.

Sincerely,



David K. Wann
Compliance Officer

cc: File

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CERTIFICATE OF SERVICE

I, Paula Murray, certify that on July 21, 2014, I did cause a true and correct copy of the Pre-Filed Testimony of David Wann to be served by United States mail, first class, postage prepaid to the following:

Justice B. King
Fisher, Patterson, Sayler & Smith, L.L.P.
3550 S.W. 5th Street
P.O. Box 949
Topeka, Kansas 66601
Attorney for Crown Well Service Inc.



Paula Murray
Legal Assistant
Kansas Corporation Commission