

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

In the matter of the failure of Merit Energy) Docket No. 23-CONS-3273-CPEN
Company, LLC (Operator) to comply with K.A.R.)
82-3-603 at its WMSU lease in Morton County,) CONSERVATION DIVISION
Kansas.)
_____) License No. 32446

**PRE-FILED TESTIMONY OF
KENNY SULLIVAN
ON BEHALF OF COMMISSION STAFF
JANUARY 12, 2024**

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

2 A. Kenny Sullivan, 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
5 (Commission), District #1 Office, as the District #1 Professional Geologist Supervisor.

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

7 A. I received my Bachelor's Degree in Geology from Fort Hays State University in 2011.
8 Additionally, I received a professional geology license from the State of Kansas in 2021. I
9 have worked at the Commission for over twelve years. I was an Environmental Compliance
10 and Regulatory Specialist (ECRS) for three years, a Geology Specialist for six years, and
11 Supervisor for the past three years.

12 **Q. What duties does your position with the Conservation Division entail?**

13 A. I oversee the daily operations of the District #1 Office as they relate to oil and gas activities.
14 I currently supervise one Geology Specialist, eight ECRS's, and one Administrative
15 Specialist.

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

17 A. Yes.

18 **Q. What is the purpose of your testimony in this matter?**

19 A. The purpose of my testimony is to discuss the Penalty Order issued by the Commission against
20 Merit Energy Company, LLC (Operator) for a spill that occurred on Operator's WMSU lease
21 in Morton County, Kansas. My testimony will also discuss why Merit should be required to
22 transfer the brine impacted soil from the spill to a landfill.

1 **Q. When did this spill occur?**

2 A. Operator reported the spill to District #1 Staff on May 27, 2022. The spill report is attached
3 to the Penalty Order in Docket 23-3273 as Exhibit A. The cause of the spill was reported as a
4 valve failure on an injection flow line to the WMSU central tank battery. Operator reported
5 that a 168 by 129 foot area at the spill location was impacted. Operator also reported that fluid
6 ran east down the lease road towards its Webb A #3 well covering a 660 by 15 foot area, that
7 fluid ran north on the half section line over a 10 by 550 foot area, and that fluid went east
8 toward Operator's Webb A #1 well over a 10 by 210 foot area. Once fluid reached the location
9 of Operator's Webb A #1 well it impacted a 60 by 75 foot area around the well.

10 **Q. Did Operator take any initial steps to remediate the spill?**

11 A. Yes, the spill report indicates that Operator recovered 1,230 of an estimated 1,600 barrels of
12 free fluid and started scraping up the affected soil by May 31, 2022. An inspection conducted
13 by District #1 Staff on June 6, 2022, estimated that Operator scraped up 12-18 inches of
14 impacted soil, and hauled the refuse to an 80-acre parcel of land that Operator owns. However,
15 that was the extent of remediation conducted by Operator for an extended period of time.
16 Follow-up inspections conducted by Staff on June 14, 2022, September 20, 2022, February
17 13, 2023, and March 20, 2023, indicated that Operator still needed to completely remediate
18 the spill.

19 **Q. Why were the initial steps taken by Operator insufficient to remediate the spill?**

20 A. This is not the first spill that Operator has had on this particular lease. In previous spill
21 remediation attempts in this area, we have observed high chloride concentrations reach depths
22 greater than 15 feet below ground. This is due to the high permeability of the soil at this
23 location which allows fluid to pass through it to great depths and rather quickly. Past spill

1 remediation attempts in this area have also shown in-situ treatments to be ineffective. This is
2 due to the minimal annual precipitation in the area; the area also experiences surficial erosion
3 from persistent high winds and loose soil. In order to fully remediate the spill, Operator would
4 have needed to continue removing impacted soil to a depth that would have protected the root
5 zone of any plant that could be planted in that particular location now or in the future.

6 **Q. Did Staff attempt to work with Operator to make sure the spill was fully remediated?**

7 A. Yes. Staff had multiple meetings with Operator about remediating the spill. During these
8 meetings Operator proposed different ways to remediate the spill. However, none of
9 Operator's proposals were acceptable to Staff. For example, Operator proposed various forms
10 of land farming/spreading the brine-impacted soil on a nearby 80-acre parcel of property that
11 it owns. Land farming is basically taking the contaminated soils and mixing it with fresh soil
12 or treating it with gypsum, and spreading it over a piece of ground. It doesn't get rid of the
13 chlorides that are in the soil, but merely spreads them across a larger area. Staff was opposed
14 to this method of remediation.

15 Further, Operator's proposal of land farming brine impacted soils is not allowed by the
16 Commission's regulations or KDHE's regulations (see K.A.R. 28-29-1600 through 28-29-
17 1608). There is an application available to operators to land spread water based drilling mud
18 generated by drilling oil and gas wells. However, land spreading brine impacted soils from a
19 spill on a lease would not be allowed in such an application. We also directed Operator to take
20 its proposal to the Kansas Department of Health and Environment (KDHE), since KDHE
21 generally oversees the disposal of hazardous waste. I did receive a land-spreading application
22 filled out by Tony Mellini on behalf of Operator. He wanted to know my thoughts on the

1 application and to send KDHE my support of the proposal; however, I refused. Tony later told
2 me the application had been denied by KDHE.

3 **Q. Has the landowner complained about Operator's remediation regarding this spill?**

4 A. Yes, the landowner has made many complaints to me about this spill and Operator's actions
5 on the lease.

6 **Q. Did Staff send any Notice of Violation (NOV) letters to Operator regarding the spill?**

7 A. Yes, Staff sent multiple NOV letters to Operator regarding this spill. The first NOV was sent
8 to Operator on September 21, 2022. This letter is attached to the Docket 23-3273 Penalty
9 Order as Exhibit B. The letter provided Operator with an October 21, 2022 deadline to clean
10 up the spill or contact District #1 Staff about timely cleaning up the spill. I then gave Operator
11 multiple verbal extensions of the October 21, 2022 deadline. However, Operator did not take
12 any additional action. As mentioned above, Staff conducted a follow-up lease inspection on
13 February 13, 2023. Based upon Operator's inaction to fully clean-up and remediate the spill
14 Staff sent a second NOV letter to cure the violation at the WMSU lease (attached to the Docket
15 23-3273 Penalty Order as Exhibit D). However, Operator failed to meet this deadline as well,
16 which led to us sending a penalty recommendation to Legal Staff.

17 **Q. Does District Staff have the authority to determine the appropriate cleanup methods?**

18 A. Yes. Under K.A.R. 82-3-603(e)(1), each operator shall clean up any spill that requires
19 notification under this regulation in accordance with the cleanup method approved by the
20 appropriate district office. The cleanup techniques can be physical removal, dilution,
21 treatment, and bioremediation. The regulation also requires operators to cleanup spills within
22 10 days after discovery or knowledge, or by the deadline prescribed in writing by the district
23 office. District Staff attempted to work with Operator in good faith to find a viable solution

1 to remediate the spill without taking formal action. However, Operator has failed to fully
2 remediate the spill within the timeframe outlined in the Commission's regulations and after
3 being given multiple written and verbal deadlines.

4 **Q. Have Staff and Operator agreed on how to remediate the spill at Operator's WMSU**
5 **lease?**

6 A. After the Docket 23-3273 Penalty Order was issued, further communication with Operator
7 led to an agreement on how the spill at Operator's WMSU was to be remediated, which I
8 believe complies with K.A.R. 82-3-603. Staff and Operator agreed that Operator would
9 excavate soils to the lesser of 10 feet or to a depth where the soils contained 500 ppm or less
10 of chlorides around the well sites. Operator would also excavate to the lesser of 4 feet or to a
11 depth that shows an electric conductivity level of 4mS/cm or less along the lease roads. Once
12 Operator reached the ultimate depth at these locations it would incorporate gypsum at a
13 sufficient rate to remediate the spill and protect the crop root zone and backfill the excavated
14 area with fresh soil once the remedial work is completed. Lastly, all brine impacted soils were
15 to be taken to a landfill.

16 **Q. Is there any documentation of the agreement between Staff and Operator?**

17 Yes. Attached to my testimony as *Exhibit KS-1* is an August 4, 2023, email of this plan from
18 Mr. Schlatter and an August 10, 2023, response from Staff. Staff's response email stated that
19 Operator's plan of remediation was sufficient and that all impacted soils will need to be
20 transported to a landfill. Additionally, Operator would need to file an Exploration &
21 Production Waste Transfer (CDP-5) Form for the refuse that is transported. Operator's
22 counsel, Mr. Jonathan Schlatter, appeared to agree to these requirements via email. Attached
23 to my testimony as *Exhibit KS-2* is an email that was sent from Mr. Schlatter to Staff's

1 Counsel and the presiding officer, Jon Myers, that Staff and Operator had agreed upon a
2 remediation plan. Staff believed this included the removal of brine impacted soils to a landfill
3 based on the email communication.

4 **Q. Has Operator complied with these requirements?**

5 A. No. District #1 Staff inspected the WMSU lease on November 2, 2023, and noted that
6 Operator has filled in areas around the spill location with dirt, but that some additional back-
7 filling was needed. Staff also documented that impacted soils removed from the spill had not
8 been taken to a landfill as agreed upon. I have attached a copy of photos from Staff's
9 inspection to my testimony as *Exhibit KS-3*. On November 9, 2023, Mr. Schlatter sent an
10 email to Staff stating that the remediation had been completed. I have attached a copy of that
11 email to my testimony as *Exhibit KS-4*. However, Staff was not able to witness the amount
12 of refuse removed as part of the remediation, particularly along the lease roads. I am also
13 unaware of any confirmation samples that indicate the electric conductivity level in the
14 locations around the lease road were below 4 ms/cm. Additionally, Operator has not taken
15 any of the brine impacted soils to a landfill. Thus, there has not been any verification up to
16 this point that the refuse removal has been completed as agreed upon. Operator has piled much
17 of these soils on the side of one of the roads on its 80 acre property without any treatment at
18 all. Attached to my testimony as *Exhibit KS-5* are photos showing stockpiles of brine
19 impacted soils from this spill at issue in Docket 23-3273, along with soil excavated from
20 previous spills, stockpiled on Operator's 80-acre property.

21 **Q. What is your recommendation in this docket?**

22 A. My recommendation would be that Operator needs to take soil samples around the lease road
23 to a depth of 4 feet to ensure that the spill in that area was properly remediated as agreed upon.

1 Additionally, Operator should be required to transport all brine impacted soils physically
2 removed from the spill to the nearest available landfill as agreed upon and as required by
3 District Staff.

4 **Q. Does this conclude your testimony?**

5 A. Yes.

Kelcey Marsh [KCC]

From: Kelcey Marsh
Sent: Thursday, August 10, 2023 9:43 AM
To: 'Jonathan Schlatter'
Cc: Carol Hannon
Subject: RE: WMSU Spill 23-3273 - Merit Energy (#32446) - Remediation Plan

Jon,

I can confirm that the below plan is sufficient to Staff as remediation for the WMSU spill at issue in Docket 23-3273. Just as a reminder, Staff does not consent to the refuse soil excavated as part of the remediation efforts being transported to Merit's property as described in paragraph 2.1 of Terracon's Soil Excavation Plan Proposal. As previously stated, all impacted soils that are removed will need to be transported to a landfill and Merit will need to file an Exploration & Production Waste Transfer (CDP-5) Form for the refuse that is transported.

Sincerely,

Kelcey Marsh
Litigation Counsel



Conservation Division
Kansas Corporation Commission
266 N. Main, Suite 220 | Wichita, KS | 67202-1513
Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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From: Jonathan Schlatter <jschlatter@morrislaing.com>
Sent: Wednesday, August 9, 2023 8:46 AM
To: Kelcey Marsh <k.marsh@kcc.ks.gov>
Cc: Carol Hannon <channon@morrislaing.com>
Subject: RE: WMSU Spill 23-3273 - Merit Energy (#32446) - Remediation Plan

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

Kelcey,

Can you confirm this email is the "plan"?

From: Jonathan Schlatter
Sent: Friday, August 4, 2023 4:36 PM
To: Kelcey Marsh <k.marsh@kcc.ks.gov>

Cc: Carol Hannon <channon@morrislaing.com>

Subject: WMSU Spill 23-3273 - Merit Energy (#32446) - Remediation Plan

Kelcey,

Per the various email correspondence and phone call regarding the spill at the WMSU in Morton County, Staff and Merit have agreed on the following plan of remediation consistent with the requirements of KAR 82-3-603(e).

Merit will remediate the spill around the well sites according to the recommendations contained in the "Excavation Report Well Pads" dated June 8, 2023, and will remediate the spill on the lease road according to the recommendations contained in the "Excavation Plan Access Roads" dated June 12, 2023, each prepared by Terracon and attached to this email, subject to the following modifications:

- As to spill impacted areas around well sites, Merit will excavate to the depth that is the lesser of: (i) 10' or (ii) until the soil is shown to be contaminated less than 500ppm chlorides. Merit shall incorporate gypsum at the total excavated depth at a rate sufficient to properly remediate the spill.
- As to spill impacted areas on the lease road, Merit will excavate to the depth that is the lesser of: (i) 4', or (ii) the depth where the electric conductivity of the soil is shown to be 4 mS/cm or less. Merit will incorporate gypsum at the total excavated depth at a rate sufficient to properly remediate the spill and protect the crop root zone. Merit will not be required to excavate to depths below where the electric conductivity of the soil was shown to be less than 4 mS/cm.
- Gypsum rates will be applied based on the analysis obtained by Terracon from soil samples and probing taken immediately after the spill, which are shown in the referenced reports.
- Merit will backfill excavated areas with fresh soil after the above remedial work is completed.

Please respond to this email confirming the above represents the agreed upon plan of remediation for the WMSU spill, and that once completed the penalty order in the referenced docket will be resolved subject to resolution of the monetary fine.

Thank you,

Jon Schlatter | Attorney, Shareholder

MORRIS LAING LAW FIRM

300 N. Mead, Suite 200 | Wichita, KS 67202

P: 316.262.2671 | F: 316.383.

Email: jschlatter@morrislaing.com

www.morrislaing.com

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Kelcey Marsh [KCC]

From: Jonathan Schlatter <jschlatter@morrисlaing.com>
Sent: Monday, August 21, 2023 2:27 PM
To: Jon Myers; Kelcey Marsh
Subject: RE: KCC Dkt. 23-3273 (Merit), Status Update

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

Staff and Operator have agreed upon a plan of remediation. Operator will finish implementation of this plan as weather permits. When that is complete, the only outstanding issue will be how to handle the monetary fine.

Thank you,

Jon Schlatter | Attorney, Shareholder
MORRIS LAING LAW FIRM
P: 316.262.2671
Wichita | Topeka | West Palm Beach



From: Jon Myers <j.myers@kcc.ks.gov>
Sent: Monday, August 21, 2023 12:13 PM
To: Jonathan Schlatter <jschlatter@morrисlaing.com>; Kelcey Marsh <k.marsh@kcc.ks.gov>
Subject: RE: KCC Dkt. 23-3273 (Merit), Status Update

Gentlemen,

Just checking in. What is the status of this matter?

Sincerely,
Jon Myers
Assistant General Counsel
Office of General Counsel
Kansas Corporation Commission
266 N. Main, Suite 220 | Wichita, KS | 67202-1513
Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

From: Jon Myers
Sent: Monday, July 24, 2023 11:13 AM
To: 'Jonathan Schlatter' <jschlatter@morrисlaing.com>
Cc: Kelcey Marsh <k.marsh@kcc.ks.gov>
Subject: RE: KCC Dkt. 23-3273 (Merit), Status Update

Mr. Schlatter,

Thanks for the update. Absent a desire to the contrary from either party, I'll set this matter aside for a few more weeks.

Sincerely,

Jon Myers

Assistant General Counsel

Office of General Counsel

Kansas Corporation Commission

266 N. Main, Suite 220 | Wichita, KS | 67202-1513

Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

From: Jonathan Schlatter <jschlatter@morrislaing.com>

Sent: Monday, July 24, 2023 8:29 AM

To: Jon Myers <j.myers@kcc.ks.gov>

Cc: Kelcey Marsh <k.marsh@kcc.ks.gov>

Subject: RE: KCC Dkt. 23-3273 (Merit), Status Update

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

I think we are pretty close to having a plan of remediation worked out. Merit had proposed it follow the plan prescribed by Terracon, and staff had a few adjustments to that. Last Wednesday I sent an email seeking clarification as to requested remedial work in a couple areas with low contamination levels, and am waiting on staff's response.

From: Jon Myers <j.myers@kcc.ks.gov>

Sent: Monday, July 24, 2023 4:46 AM

To: Jonathan Schlatter <jschlatter@morrislaing.com>; Kelcey Marsh <k.marsh@kcc.ks.gov>

Subject: KCC Dkt. 23-3273 (Merit), Status Update

Parties,

What is the status of this matter?

Sincerely,

Jon Myers

Assistant General Counsel

Office of General Counsel

Kansas Corporation Commission

266 N. Main, Suite 220 | Wichita, KS | 67202-1513

Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Mid-Section road going north to south. Old dirt has been dug out. Section is approx. 200' long. Still needs to be filled back in with fresh dirt.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Dirt pad west of WMSU Central Tank Battery.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Dirt Pad west of WMSU Central Tank Battery



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-1 location. Filled back in with fresh dirt.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-1 location. Filled back in with fresh dirt. Still needs more dirt.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-1 Location. Filled back in with fresh dirt

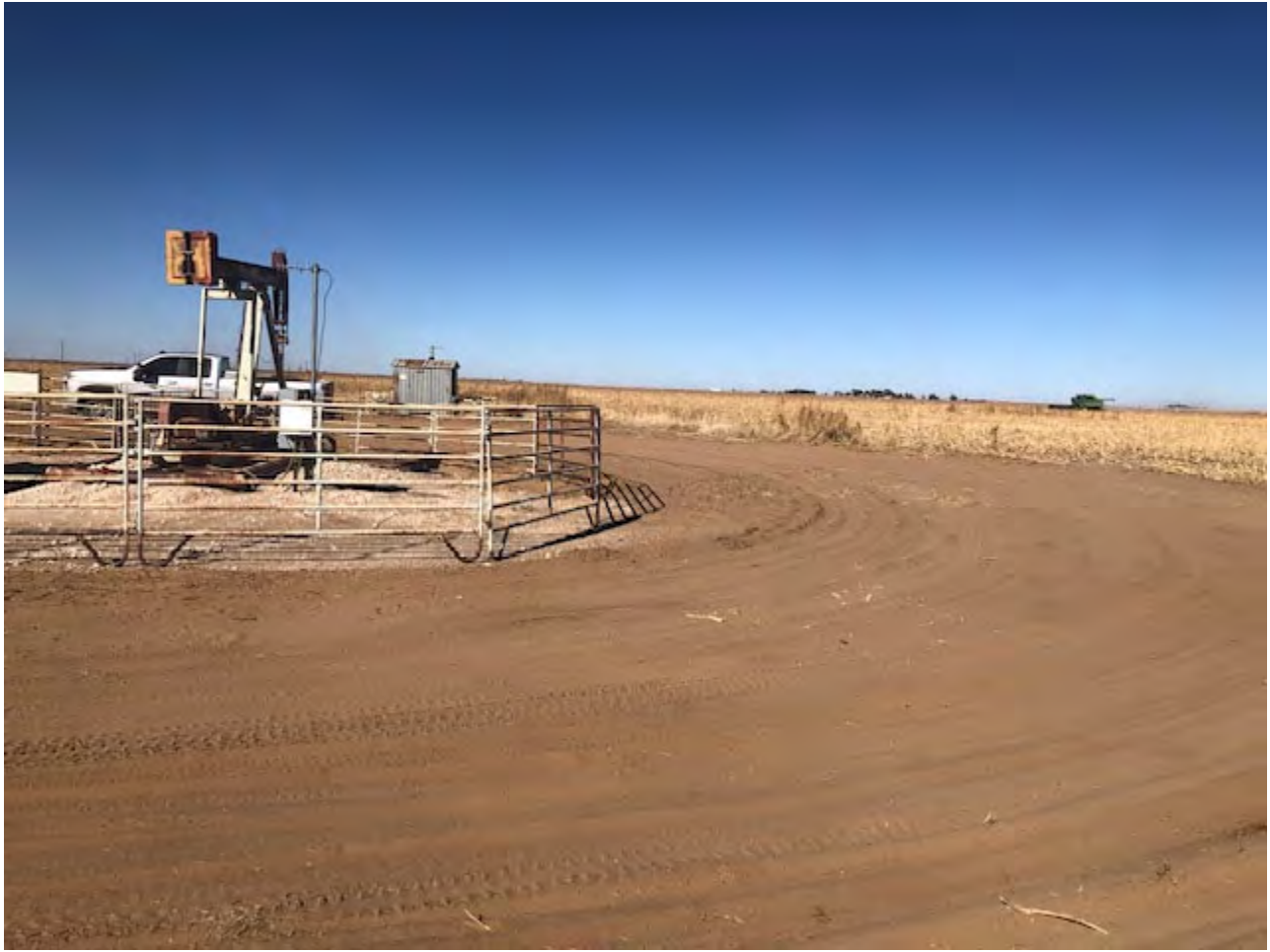


11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-3 Location. Filled back in with fresh dirt.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-3 location. Filled back in with fresh dirt.



11-2-2023 3:00 PM

Merit Energy Company LLC

WSMU

Webb A-3 location. Filled back in with fresh dirt.

Kelcey Marsh [KCC]

From: Jonathan Schlatter <jschlatter@morrисlaing.com>
Sent: Thursday, November 9, 2023 6:14 PM
To: Kelcey Marsh [KCC]
Cc: Carol Hannon
Subject: RE: Docket 23-3273 WMSU Spill - Merit Energy

This is an EXTERNAL EMAIL. Think before clicking a link or opening attachments.

Kelsey,

I was advised that dirt work was completed on Monday, November 6, 2023, so staff would need to reinspect to confirm all removed dirt has been replaced with fresh dirt.

Soil samples from the spill indicating chloride levels and electric conductivity levels were included in the Terracon report previously provided. The levels could have only gotten lower as a result of time and subsequent rainfall since there have not been any additional spills. An electric conductivity test does not measure chloride levels. If you review Merit's agreement with staff, Merit was only obligated to excavate lease roads to the lesser of 4' or the depth where electric conductivity is shown to be 4 mS/cm or less. As to areas other than the lease roads, the excavation depths are based on chlorides and not electric conductivity. As such, there would be no point of staff testing electric conductivity at a depth of 4' because that is not a term of the agreement.

Be advised that Mr. Tucker, who I do not believe has any practical training, education or experience in these matters, was on the site throughout the dig antagonizing Merit's employees and contractors. At one point, he was using a device to measure electric conductivity and making baseless claims that it demonstrated elevated chloride levels. I just want staff to understand the source and veracity of his claims, before it wastes any resources indulging them.

I will check on the Waste Transfer Form, and was not aware that the impacted soils remained on site.

Thank you,

Jon Schlatter | Attorney, Shareholder

MORRIS LAING LAW FIRM

P: 316.262.2671

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From: Kelcey Marsh [KCC] <k.marsh@kcc.ks.gov>

Sent: Thursday, November 9, 2023 4:41 PM

To: Jonathan Schlatter <jschlatter@morrисlaing.com>; Jon Myers [KCC] <j.myers@kcc.ks.gov>

Subject: RE: Docket 23-3273 WMSU Spill - Merit Energy

Staff conducted a visual inspection of the lease on November 2, 2023. At that time, they noted that some of the areas needed fresh dirt to replace the dirt that was removed. That may be resolved if Merit completed the work after Staff performed its visual inspection. The landowner's counsel has notified us that there are still spill impacted areas which have elevated levels of chlorides. I am working to figure out what those specific areas are, but I think it would be helpful to have staff-witnessed Electric Conductivity Probing work done to a depth of at least 4 feet around the spill area to verify that is not the case. Additionally, Staff required all impacted soils to be removed to a landfill and my understanding is that has not been done yet. The impacted soils will need to be removed prior to Staff signing off on the spill remediation being complete.

Sincerely,

Kelcey Marsh
Litigation Counsel



Conservation Division
Kansas Corporation Commission
266 N. Main, Suite 220 | Wichita, KS | 67202-1513
Phone (316) 337-6200 | Fax (316) 337-6211 | <http://kcc.ks.gov/>

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From: Jonathan Schlatter <jschlatter@morrislaing.com>
Sent: Thursday, November 9, 2023 2:38 PM
To: Kelcey Marsh [KCC] <k.marsh@kcc.ks.gov>; Jon Myers [KCC] <j.myers@kcc.ks.gov>
Subject: RE: Docket 23-3273 WMSU Spill - Merit Energy

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Another update: Dirt work was completed on Monday. No timetable on spreading of manure, but I don't think staff needs to inspect that.

Kelsey, please let me know when District 1 completes its inspection and is satisfied remediation has been completed.

From: Jonathan Schlatter
Sent: Monday, November 6, 2023 2:13 PM
To: Kelcey Marsh [KCC] <k.marsh@kcc.ks.gov>; Jon Myers [KCC] <j.myers@kcc.ks.gov>
Subject: Docket 23-3273 WMSU Spill - Merit Energy

Here's the status of remediation:

Merit is still backfilling the remediation digs, and should be finished with that step today or tomorrow. Final step is to spread manure. I assume that will be done soon thereafter. I'll report back when everything is done. I assume Staff can conduct its inspection prior to manure being spread, since that wasn't part of Merit and Staff's agreement in the first instance.

Jon Schlatter | Attorney, Shareholder

MORRIS LAING LAW FIRM

300 N. Mead, Suite 200 | Wichita, KS 67202

P: 316.262.2671 | F: 316.383.

Email: jschlatter@morrisolaing.com

www.morrisolaing.com

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10-19-2023

Merit Energy Company LLC

WMSU Tank Battery

NE-SE-SW-NE 33-34-41

Morton Co.

Facing west. Piled of contaminated soil from spills.



10-19-2023

Merit Energy Company LLC

WMSU Tank Battery

NE-SE-SW-NE 33-34-41

Morton Co.

Facing east. Dirt containment on west side of Tank Battery Facility .



10-19-2023

Merit Energy Company LLC

WMSU Tank Battery

NE-SE-SW-NE 33-34-41

Morton Co.

Facing west. Dirt Containment on north side of Tank Battery Facility.



10-19-2023

Merit Energy Company LLC

WMSU Tank Battery

NE-SE-SW-NE 33-34-41

Morton Co.

Facing west. Dirt containment on south side of tank battery facility.



10-19-2023

Merit Energy Company LLC

WMSU Tank Battery

NE-SE-SW-NE 33-34-41

Morton Co.

Facing north. Dirt containment on west side of Tank Battery facility.



12-1-2023 11:00 am

Merit Energy Company LLC

WMSU Central Tank Battery

33-34-41

Morton Co.

Facing east. Piles of contaminated soil from multiple spills that have occurred in the past piled up west of WMSU Tank Battery.



12-1-2023 11:00 am

Merit Energy Company LLC

WMSU Central Tank Battery

33-34-41

Morton Co..

Facing south. Piles of contaminated soil from multiple spills that have occurred in the past piled up west of WMSU Tank Battery.

CERTIFICATE OF SERVICE

23-CONS-3273-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Kenny Sullivan has been served to the following by means of electronic service on January 12, 2024.

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

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
k.marsh@kcc.ks.gov

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL
KANSAS CORPORATION COMMISSION
266 N. Main St., Ste. 220
WICHITA, KS 67202-1513
j.myers@kcc.ks.gov

JONATHAN A. SCHLATTER, ATTORNEY
MORRIS LAING EVANS BROCK & KENNEDY CHTD
300 N MEAD STE 200
WICHITA, KS 67202-2745
jschlatter@morrislaing.com

ROBYN STALKFLEET, ADMINISTRATIVE SPECIALIST
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
r.stalkfleet@kcc.ks.gov

KRAIG STOLL, EP&R SUPERVISOR
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
k.stoll@kcc.ks.gov

KENNY SULLIVAN, DISTRICT #1 SUPERVISOR
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 1
210 E. FRONTVIEW SUITE A
DODGE CITY, KS 67801
k.sullivan@kcc.ks.gov

/s/ Paula J. Murray

Paula J. Murray