

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

In the matter of an order to show cause issued) Docket No.: 23-CONS-3176-CSHO
to Great Plains Petroleum, Inc. (Operator) for)
a plugging order at the Stumps #4 well in) CONSERVATION DIVISION
Barton County, Kansas.)
_____) License No.: 30163

PRE-FILED REBUTTAL TESTIMONY

OF

RICHARD WILLIAMS

ON BEHALF OF COMMISSION STAFF

JULY 26, 2023

1 **Q. Are you the same Richard Williams who pre-filed direct testimony in this docket on**
2 **June 2, 2023?**

3 A. Yes.

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

5 A. The purpose of my testimony is to discuss the assertions contained in the pre-filed testimony
6 of Roderick Phares, given on behalf of Great Plains Petroleum, Inc. (Operator) in Docket
7 23-CONS-3176-CSHO.

8 **Q. Have you had an opportunity to review the Petition to Partition filed in Barton County**
9 **District Court and attached as a copy to Mr. Phares' testimony?**

10 A. Yes, I have.

11 **Q. When did Operator file the Petition to Partition in District Court?**

12 A. Operator filed the Petition on July 12, 2023—the same day Operator filed testimony in this
13 docket. It appears that Operator only took action to quiet title because the Commission opened
14 this docket.

15 **Q. On page 3, lines 16-23 of Mr. Phares' testimony, he argues that the Subject Well is not**
16 **a threat to the environment. Do you agree with Mr. Phares' analysis of the well?**

17 A. No, I do not. I agree with the testimony of Todd Bryant that the Subject Well continues to
18 present a potential threat to the environment, as well as a potential source of waste.

19 **Q. Has your recommendation regarding this docket changed based upon Mr. Phares'**
20 **testimony?**

21 A. No, it has not. Even if Operator's Petition to Partition succeeds, the Subject Well is still a
22 potential threat to the environment and a potential source of waste. Additionally, as I discussed
23 in my direct testimony, the Subject Well has been out of compliance with Commission orders

1 and regulations since at least 2018. The Commission should order Operator to plug the Subject

2 Well.

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

4 A. Yes.

CERTIFICATE OF SERVICE

23-CONS-3176-CSHO

I, the undersigned, certify that a true and correct copy of the attached Prefiled Rebuttal Testimony of Richard Williams has been served to the following by means of electronic service on July 26, 2023.

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