

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

In the matter of the failure of Viva International,) Docket No. 20-CONS-3182-CPEN
Inc. (“Operator”) to comply with K.A.R. 82-3-)
603 at the Wright Lease in Linn County,) CONSERVATION DIVISION
Kansas.)
) License No. 5556
)

In the matter of the failure of Viva International,) Docket No. 20-CONS-3255-CPEN
Inc. (“Operator”) to comply with K.S.A. 55-164)
and K.A.R. 82-3-120 at the Campbell Carlson,) CONSERVATION DIVISION
and Gillian Simpson Leases in Wilson and)
Sedgwick County, Kansas.) License No. 5556

PRE-FILED DIRECT TESTIMONY

OF

RICHARD MCCONNELL

ON BEHALF OF VIVA INTERNATIONAL, INC.

AUGUST 10, 2020

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

2 A: Richard McConnell, 1031 N. Beau Jardin Street, Derby, Kansas, 67037

3 **Q: By whom are you employed and in what capacity?**

4 A: I am employed as a contract pumper for Viva International, Inc. and for other operators.

5 **Q: Would you please describe your educational background and work experience?**

6 A: In 1990 I graduated from Wellington High School, Wellington, Kansas. In 1994 I
7 graduated with a degree in Psychology from Wichita State University.

8 **Q: Would you please briefly describe your work experience?**

9 A: Yes. From 1994 through 2002 I worked for Oxford Docking Development, Oxford,
10 Kansas, a small oil producer. I also during this time period was a contract pumper for
11 John. O. Farmer, Hartman, Raymond Oil and other operators. From 2002 through 2008,
12 I was a police officer for the City of Wichita, Kansas. Since 2008, I have continued to
13 work as a contract pumper for various operators, including Viva International, Inc. in
14 Sedgwick County, Kansas.

15 **Q: Have you previously testified before this Commission?**

16 A: No.

17 **Q: Are you familiar with the Gillian Simpson lease operated by Viva International, Inc.,**
18 **located in 34-29-1, Sedgwick County, Kansas?**

19 A: Yes. I am the contract pumper on that lease.

20 **Q: What do you recall about production on that lease during the month of December**
21 **2019?**

1 A: I recall that two wells on this lease, the #7 and #11, were producing from December 1
2 through December 20. A third well, the #6, had experienced a casing leak and was not
3 producing. On December 20, I received a call from Robert Bukaty, President of Viva
4 International, Inc., advising that he had just recently been informed that the Operator's
5 License for Viva International, Inc. had been suspended. He advised me to turn off the
6 production on the Gillian Simpson lease right away, which I did. On December 23, 2019,
7 I received a text message from Robert Bukaty advising that the KCC had reinstated the
8 Operator's License for Viva International, Inc. A copy of the text message is attached as
9 **Exhibit P**. I then restarted the #7 and #11 wells.

10 **Q: Have you reviewed the production history on the Gillian Simpson lease?**

11 A: Yes. Attached as **Exhibit Q** is the production sales information maintained by the KGS
12 website. As shown by the production history, there was a sale of 160.66 barrels of oil in
13 December 2019. This most likely included production during the month of November
14 2019 and production from December 1 through December 20 and from December 23
15 through December 31.

16 **Q: Were you aware that the KCC claims that it mailed a letter dated June 19, 2019**
17 **advising that the Operator's License for Viva International, Inc. had been suspended**
18 **in Docket No. 19-CONS-3369-CPEN for failure to have MIT tests performed on two**
19 **wells?**

20 A: No. Based on Mr. Bukaty's telephone call to me on December 20, 2019, he did not appear
21 to have been aware of any letter dated June 19, 2019 advising that his license had been
22 suspended because he told me that he "had just been recently informed" that Viva
23 International, Inc.'s Operator's License had been suspended.

1 Q: **Does this conclude your testimony?**

2 A: Yes.

