

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

In the matter of the failure of Quito, Inc. ) Docket No. 19-CONS-3271-CPEN  
(“Operator”) to comply with K.A.R. 82-3-111 at )  
the Solomon #3, Solomon #5 in Chautauqua ) CONSERVATION DIVISION  
County, Kansas. )  
) License No. 33594

In the matter of the failure of Quito, Inc. ) Docket No. 19-CONS-3272-CPEN  
(“Operator”) to comply with K.A.R. 82-3-111 at )  
the Doty #3 in Chautauqua County, Kansas. ) CONSERVATION DIVISION  
)  
) License No. 33594

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**PRE-FILED TESTIMONY**

**OF**

**DUANE SIMS**

**May 13, 2019**

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

2   A.   Duane Sims, 137 West 21<sup>st</sup> Street, Chanute, Kansas 66720.

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       District #3 Office, as an Environmental Compliance and Regulatory Specialist (ECRS).

6   **Q.   How long have you worked for the Corporation Commission's Conservation Division?**

7   A.   I have worked for the Conservation Division since December 31, 2007.

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

9   A.   Yes.

10  **Q.   What duties does your position with the Conservation Division involve?**

11  A.   As an ECRS, I am responsible for the witnessing and monitoring of oil and gas related  
12       activities in Chautauqua, Elk, and the west half of Montgomery County, Kansas. My job  
13       involves inspections, documentation, investigation, and consultation with lease operators,  
14       landowners and Commission Staff on compliance issues related to oil and gas production in  
15       Kansas. I witness and monitor the drilling and completion of oil, gas, injection, and disposal  
16       wells. I also investigate spills and complaints, witness mechanical integrity tests, witness  
17       the plugging of wells, and witness the completion of wells. In addition, I conduct GPS  
18       surveys on new and abandoned wells to verify the exact location and the status of wells. I  
19       work with District Staff and Central Office Staff when required to complete various projects  
20       and requests.

1   **Q.   Are you familiar with Docket 19-CONS-3271-CPEN?**

2   A.   Yes, I have reviewed all filings in this Docket. The Operator was penalized for two violations  
3       of K.A.R. 82-3-111 for failure to produce, plug or obtain approved Temporary Abandonment  
4       (TA) status for the following two abandoned wells (Solomon subject wells):

5               Solomon #3, API #15-019-24303-00-00; and

6               Solomon #5, API #15-019-24301-00-00.

7   **Q.   Would you please explain the requirements of K.A.R. 82-3-111?**

8   A.   Yes. K.A.R. 82-3-111 states that within 90 days after operations cease on any well the  
9       operator of that well shall: (1) plug the well, (2) return the well to service, or (3) file an  
10       application with the Conservation Division requesting TA authority, on a form prescribed by  
11       the Conservation Division. K.A.R. 82-3-111 also states that no well shall be temporarily  
12       abandoned unless first approved by the Conservation Division and a well shall not be eligible  
13       for TA status if the well has been shut in for 10 years or more without an application and  
14       approval by the Commission of an exception pursuant to K.A.R. 82-3-100.

15   **Q.   What is the penalty for failure to comply with K.A.R. 82-3-111?**

16   A.   The failure to comply with K.A.R. 82-3-111 is punishable by a \$100 penalty, and the failure  
17       to obtain approval of temporary abandonment status shall subject the Operator to additional  
18       administrative action pursuant to K.S.A. 55-164 according to the Penalty Order in this  
19       docket.

20   **Q.   Did the Operator file TA applications on the Solomon subject wells?**

21   A.   Yes. The Operator filed TA applications on the Solomon subject wells in September 2018.  
22       The TA applications are attached as D.S. Exhibit 1. Staff denied the two TA applications on

1 September 11, 2018, because the Operator failed to provide current fluid levels for the  
2 Solomon subject wells.

3 **Q. What happened after District Staff denied TA status for the two Solomon subject wells?**

4 A. The Operator received letters denying its TA applications via email through KOLAR, on  
5 September 11, 2018. This letter also served as a Notice of Violation (NOV) to the Operator,  
6 with a deadline of 30 days to bring the Solomon subject wells into compliance. The NOV  
7 letters are attached as D.S. Exhibit 2. The NOV letters gave the Operator until October 09,  
8 2018, to correct the violations by plugging the Solomon subject wells or returning them to  
9 service. The NOV letter also stated that the reason for the denial was that the Operator needed  
10 to provide a current fluid level.

11 **Q. Did the Operator comply with the deadline in the NOV letters?**

12 A. No.

13 **Q. What did you do after the 30-day deadline?**

14 A. I met with a representative for the Operator at the location of the Solomon #3 well and #5  
15 well on October 11, 2018, to witness measuring the fluid level. The fluid level for the  
16 Solomon #3 well was 140 feet from the surface. The fluid level for the Solomon #5 well was  
17 150 feet from the surface. The fluid level in both the Solomon subject wells were determined  
18 to be near or above the designated Table I depth.

19 **Q. Please explain what Table I depth means.**

20 A. Table I is a designation determined by the Commission and the advisory Committee made  
21 up of representatives from Kansas Petroleum Council, Kansas Independent Oil and Gas  
22 Association, Eastern Kansas Oil and Gas Association, Association of Groundwater  
23 Management Districts, the Kansas Department of Health and Environment, the Kansas

1 Geological Survey, the Kansas Water Office, Division of Water Resources, and the General  
2 Public to designate maximum depths for fresh and usable water within established  
3 geographic areas. For this area, Table I indicates the maximum depth from the surface at  
4 which fresh and usable water may possibly be found is 225 feet. The fluid levels in both the  
5 Solomon subject wells were determined to be above the designated Table I depth, which  
6 would indicate the possibility of a casing failure.

7 **Q. Why is the possibility of a casing failure a concern when reviewing a TA application?**

8 A. A casing failure would allow the comingling of produced fluids within the designated fresh  
9 and usable water zones identified in the Table I area. A fluid level above the Table I  
10 designated depth, well construction, and well history information are determining factors in  
11 requesting a casing integrity test (CIT). I requested the CIT to ensure the integrity of the  
12 casing that should be protecting the fresh and usable water zones. Therefore, the fluid levels  
13 for the Solomon subject wells were too high to approve TA status without confirmation of a  
14 successful CIT. The TA applications with the updated fluid levels are attached as D.S.  
15 Exhibit 3.

16 **Q. Did you request the Operator conduct further testing to verify casing integrity?**

17 A. Yes, while we were still on site, I requested the Operator to perform CITs on the Solomon  
18 subject wells. I requested that the Operator perform either a tubing and packer test or a fluid  
19 depression test within 50 feet of the top perforations in order to verify the casing was  
20 adequately protecting fresh and usable water. The Operator declined to conduct the CIT as  
21 requested.

1    **Q.    Why did you request the Operator test the Solomon subject wells in this manner?**

2    A.    A tubing and packer test with the packer set at 50 feet above the top perforation or a fluid  
3        depression test calculated from the interval of 50 feet above the top perforation to surface  
4        would adequately determine the status of the casing integrity within that interval. In the  
5        Solomon #3 well, the packer would be required to be placed at 1006 feet. In the Solomon #5  
6        well the packer would be required to be placed at 970 feet. The Operator refused to perform  
7        a CIT as I requested.

8    **Q.    What did you do after the Operator refused to perform further testing?**

9    A.    On January 10, 2019, District #3 Compliance Officer John Almond, District #3 Supervisor  
10        Troy Russell, and I had a conference call with the Operator. During this call, my supervisor,  
11        Troy Russell, gave the Operator a 25-day extension to bring the wells into compliance. The  
12        extension deadline was February 4, 2019.

13   **Q.    Did the Operator bring the Solomon subject wells into compliance by the extension**  
14        **deadline?**

15   A.    No. On February 4, 2019, I conducted an inspection of both of the Solomon subject wells  
16        finding that neither of the Solomon subject wells had been put back into production, nor had  
17        these wells been plugged, and the Operator still had not performed CITs for TA status  
18        approval. The Solomon subject wells remained out of compliance. At this time, I submitted  
19        my field reports and penalty recommendations to the District #3 Compliance Officer. The  
20        field reports are attached as D.S. Exhibit 4. On February 26, 2019, the Commission issued a  
21        Penalty Order finding the Operator violated K.A.R. 82-3-111 and assessing the Operator a  
22        \$200 penalty.

1   **Q.   Are you familiar with Docket 19-CONS-3272-CPEN?**

2   A.   Yes. I have reviewed all filings in this docket. The Operator was penalized for one violation  
3       of K.A.R. 82-3-111 for failure to produce, plug, or obtain approved TA status for the  
4       following well (Doty #3):

5               Doty #3, API #15-019-23901-00-00.

6   **Q.   Did the Operator file a TA application on the Doty #3 well?**

7   A.   Yes. The Operator filed a TA application on the Doty #3 well in January 2019. The TA  
8       application is attached as D.S. Exhibit 5. Staff denied the TA application on January 10,  
9       2019. Staff denied the TA application because the Operator failed to provide a current fluid  
10      level for the subject well.

11   **Q.   What happened after District Staff denied TA status for the Doty #3 well?**

12   A.   The Operator received a letter denying its TA application via email through KOLAR, on  
13      January 10, 2019. This letter also served as a NOV to the Operator, with a deadline of 30  
14      days to bring the Doty #3 well into compliance. The NOV letter is attached as D.S. Exhibit  
15      6. The NOV letter gave the Operator until February 7, 2019, to correct the violation by  
16      plugging the Doty #3 or returning it to service. The NOV letter also stated that the reason for  
17      the denial was that the Operator needed to provide a current fluid level.

18   **Q.   What did you do after sending the Operator the NOV letter?**

19   A.   I met with the representative for the Operator at the location of the Doty #3 well on January  
20      17, 2019, to witness the measuring of the fluid level. The fluid level for the Doty #3 well was  
21      215 feet from surface. For this area Table I is 300 feet, which indicates the maximum depth  
22      from the surface at which fresh and usable water may be expected to be found. The fluid  
23      level in the Doty #3 subject well was determined to be near or above the designated Table I

1 depth, which would indicate the possibility of a casing failure. The fluid level in the Doty #3  
2 was too high to approve TA status without confirmation of a successful CIT.

3 **Q. Did you request the Operator perform further tests to verify casing integrity?**

4 A. Yes, while we were still on site I requested the Operator perform a CIT on the Doty #3 well.  
5 I requested the Operator perform the CIT in order to verify the casing was adequately  
6 protecting fresh and usable water. To comply with the test the Operator would have to  
7 complete a tubing and packer test with the packer set at 50 feet above the top perforation or  
8 a fluid depression test calculated from the interval of 50 feet above the top perforation to  
9 surface would adequately determine the status of the casing integrity within that interval. The  
10 Operator refused to conduct the CIT as required. Without the CIT, I was unable to approve  
11 the Operator's TA application. The Operator was still required to either plug the well or  
12 return the well to service by the NOV letter deadline.

13 **Q. Did the Operator comply with the deadline in the NOV letter?**

14 A. No.

15 **Q. What did you do after the 30-day deadline?**

16 A. On February 7, 2019, I conducted an inspection of the Doty #3 well finding that the well had  
17 not been put back into production, nor had the well been plugged, and the Operator still had  
18 not performed a CIT for TA status approval. The Doty #3 remained out of compliance. At  
19 this time, I submitted my field report and penalty recommendation to the District #3  
20 Compliance Officer. The field report is attached as D.S. Exhibit 7. On February 26, 2019,  
21 the Commission issued a Penalty Order finding the Operator violated K.A.R. 82-3-111 and  
22 assessing the Operator a \$100 penalty.



1   **Q.   As of today, has the Operator brought any of the three subject wells into compliance?**

2   A.   No.

3   **Q.   Do you have a recommendation regarding the Penalty Orders in these two dockets?**

4   A.   Yes. The Penalty Orders should be affirmed. The Operator failed to plug, produce, or obtain  
5       TA status for the three subject wells and remains in violation of K.A.R. 82-3-111 as of this  
6       date. These wells remain a potential source of pollution to fresh and usable waters identified  
7       under Table I for this area. The assessment of the \$100.00 penalty for each of the three subject  
8       wells in the Commission's Penalty Orders is reasonable and should be upheld.

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

10  A.   Yes.

**KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION**

KOLAR Document ID: 1420856

Form CP-111

July 2017

Form must be Typed

Form must be signed

All blanks must be complete

**TEMPORARY ABANDONMENT WELL APPLICATION**

OPERATOR: License# 33594  
Name: Quito, Inc.  
Address 1: 1613 W 6TH ST  
Address 2: \_\_\_\_\_  
City: BARTLESVILLE State: OK Zip: 74003 + 3712  
Contact Person: Mark W. McCann  
Phone: (918) 331-6433  
Contact Person Email: mccanncompanies@yahoo.com  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: (\_\_\_\_) \_\_\_\_\_

API No. 15- 15-019-24303-00-00  
Spot Description: NE NW SE SE Sec. 18 Twp. 35 S. R. 12 ☒ E ☐ W  
990 feet from ☐ N / ☒ S Line of Section  
990 feet from ☒ E / ☐ W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84  
County: Chautauqua Elevation: \_\_\_\_\_ ☐ GL ☐ KB  
Lease Name: SOLOMON Well #: 3  
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_  
☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_  
☐ Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 08/23/1983 Date Shut-In: 10/22/2010

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	10	4.5	NA	NA	2.3
Setting Depth		41	1118			1054
Amount of Cement		25	130			NA
Top of Cement		NA	NA			NA
Bottom of Cement		NA	NA			NA

Casing Fluid Level from Surface: 820 How Determined? Line Measurement Date: 10/22/2010  
Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)  
Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No  
Depth and Type: ☐ Junk in Hole at \_\_\_\_\_ ☐ Tools in Hole at \_\_\_\_\_ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): \_\_\_\_\_  
(depth) (depth)  
Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement ☐ Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)  
Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet  
Total Depth: 1118 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

**Geological Data:**


Formation Name	Formation Top	Formation Base	Completion Information
1. <u>Wayside</u>	At: <u>1068</u>	to <u>1044</u> Feet	Perforation Interval <u>1056</u> to <u>1060</u> Feet or Open Hole Interval _____ to _____ Feet
2. <u>Wayside</u>	At: <u>1060</u>	to <u>1044</u> Feet	Perforation Interval <u>1070</u> to <u>1082</u> Feet or Open Hole Interval _____ to _____ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

**Submitted Electronically**

<b>Do NOT Write in This Space - KCC USE ONLY</b>	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Duane Sims</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>09/11/2018</u>					

**Mail to the Appropriate KCC Conservation Office:**

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

D.S. Exhibit 1

Page 1 of 2

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

KOLAR Document ID: 1420858

Form CP-111

July 2017

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TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 33594  
Name: Quito, Inc.  
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Address 2: \_\_\_\_\_  
City: BARTLESVILLE State: OK Zip: 74003 + 3712  
Contact Person: Mark W. McCann  
Phone: ( 918 ) 331-6433  
Contact Person Email: mccanncompanies@yahoo.com  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-019-24307-00-00  
Spot Description: SW SE NE SE Sec. 18 Twp. 35 S. R. 12 ☒ E ☐ W  
990 feet from ☐ N / ☒ S Line of Section  
330 feet from ☒ E / ☐ W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)  
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84  
County: Chautauqua Elevation: \_\_\_\_\_ ☐ GL ☐ KB  
Lease Name: SOLOMON Well #: 5  
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_  
☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_  
☐ Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 08/27/1983 Date Shut-In: 10/22/2010

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	10	6.5	NA	NA	2.375
Setting Depth		49	1076			1020
Amount of Cement		20	120			NA
Top of Cement		NA	NA			NA
Bottom of Cement		NA	NA			NA

Casing Fluid Level from Surface: 800 How Determined? Line Measurement Date: 10/22/2010  
Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)  
Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No  
Depth and Type: ☐ Junk in Hole at \_\_\_\_\_ ☐ Tools in Hole at \_\_\_\_\_ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): \_\_\_\_\_  
(depth) (depth)  
Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement ☐ Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)  
Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet  
Total Depth: 1093 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

Geological Data:


Formation Name Formation Top Formation Base Completion Information  
1. Wayside At: 1046 to 1020 Feet Perforation Interval 1020 to 1040 Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet  
2. \_\_\_\_\_ At: \_\_\_\_\_ to \_\_\_\_\_ Feet Perforation Interval \_\_\_\_\_ to \_\_\_\_\_ Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: <u>Duane Sims</u> Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied Date: <u>09/11/2018</u>					

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

D.S. Exhibit 1

# STATE OF KANSAS

CORPORATION COMMISSION  
CONSERVATION DIVISION  
DISTRICT OFFICE No. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720



PHONE: 620-902-6450  
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

September 11, 2018

Mark W. McCann  
Quito, Inc.  
1613 W 6TH ST  
BARTLESVILLE, OK 74003-3712

Re: Temporary Abandonment  
API 15-019-24303-00-00  
SOLOMON 3  
SE/4 Sec.18-35S-12E  
Chautauqua County, Kansas

Dear Mark W. McCann:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**need current Fluid level**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by October 09, 2018.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Duane Sims  
KCC DISTRICT 3

# STATE OF KANSAS

CORPORATION COMMISSION  
CONSERVATION DIVISION  
DISTRICT OFFICE No. 3  
137 E. 21st STREET  
CHANUTE, KS 66720



PHONE: 620-902-6450  
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

September 11, 2018

Mark W. McCann  
Quito, Inc.  
1613 W 6TH ST  
BARTLESVILLE, OK 74003-3712

Re: Temporary Abandonment  
API 15-019-24307-00-00  
SOLOMON 5  
SE/4 Sec.18-35S-12E  
Chautauqua County, Kansas

Dear Mark W. McCann:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

**need current Fluid level**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by October 09, 2018.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Duane Sims  
KCC DISTRICT 3



KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CP-111

July 2017

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TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 33594  
Name: Quito, Inc.  
Address 1: 1613 W 6TH ST  
Address 2: \_\_\_\_\_  
City: BARTLESVILLE State: OK Zip: 74003 + 3712  
Contact Person: Mark W. McCann  
Phone: ( 918 ) 331-6433  
Contact Person Email: mccanncompanies@yahoo.com  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-019-24303-00-00  
Spot Description: NE NW SE SE Sec. 18 Twp. 35 S. R. 12 ☒ E ☐ W  
990 feet from ☐ N / ☒ S Line of Section  
990 feet from ☒ E / ☐ W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84  
County: Chautauqua Elevation: \_\_\_\_\_ ☐ GL ☐ KB  
Lease Name: SOLOMON Well #: 3  
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_  
☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_  
☐ Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 08/23/1983 Date Shut-In: 10/22/2010

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	10	4.5	NA	NA	2.3
Setting Depth		41	1118			1054
Amount of Cement		25	130			NA
Top of Cement		NA	NA			NA
Bottom of Cement		NA	NA			NA

Casing Fluid Level from Surface: 820 140' How Determined? \_\_\_\_\_ Line Measurement ( Witnessed by DMS ) Date: 12/22/2017  
Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: 10-11-18

Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No  
Depth and Type: ☐ Junk in Hole at \_\_\_\_\_ (depth) ☐ Tools in Hole at \_\_\_\_\_ (depth) Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): \_\_\_\_\_  
Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: \_\_\_\_\_ (depth) w / \_\_\_\_\_ sacks of cement ☐ Port Collar: \_\_\_\_\_ (depth) w / \_\_\_\_\_ sack of cement  
Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet  
Total Depth: 1118 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

Geological Data:

Formation Name Formation Top / Formation Base Completion Information  
1. Wayside At: 1068 to 1044 Feet Perforation Interval 1056 to 1060 Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet  
2. Wayside At: 1060 to 1044 Feet Perforation Interval 1070 to 1082 Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_ Title: \_\_\_\_\_


Do NOT Write in This  
Space - KCC USE ONLY

Date Tested: \_\_\_\_\_ Results: \_\_\_\_\_ Date Plugged: \_\_\_\_\_ Date Repaired: \_\_\_\_\_ Date Put Back in Service: \_\_\_\_\_

Review Completed by: \_\_\_\_\_ Comments: Originally Denied on 9-11-18

TA Approved: ☐ Yes ☐ Denied Date: \_\_\_\_\_

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

D.S. Exhibit 3

Page 1 of 2

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION

Form CP-111

July 2017

Form must be Typed

Form must be signed

All blanks must be complete

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 33594  
Name: Quito, Inc.  
Address 1: 1613 W 6TH ST  
Address 2: \_\_\_\_\_  
City: BARTLESVILLE State: OK Zip: 74003 + 3712  
Contact Person: Mark W. McCann  
Phone: ( 918 ) 331-6433  
Contact Person Email: mccanncompanies@yahoo.com  
Field Contact Person: \_\_\_\_\_  
Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- 15-019-24307-00-00  
Spot Description: SW SE NE SE Sec. 18 Twp. 35 S. R. 12 ☒ E ☐ W  
990 feet from ☐ N / ☒ S Line of Section  
330 feet from ☒ E / ☐ W Line of Section  
GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84  
County: Chautauqua Elevation: \_\_\_\_\_ ☐ GL ☐ KB  
Lease Name: SOLOMON Well #: 5  
Well Type: (check one) ☒ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_  
☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_  
☐ Gas Storage Permit #: \_\_\_\_\_  
Spud Date: 08/27/1983 Date Shut-In: 10/22/2010

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	NA	10	6.5	NA	NA	2.375
Setting Depth		49	1076			1020
Amount of Cement		20	120			NA
Top of Cement		NA	NA			NA
Bottom of Cement		NA	NA			NA

Casing Fluid Level from Surface: 800 150 How Determined? Line Measurement (witnessed by DAS) Date: 12/22/2017  
Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: 10-11-18  
Do you have a valid Oil & Gas Lease? ☒ Yes ☐ No  
Depth and Type: ☐ Junk in Hole at \_\_\_\_\_ ☐ Tools in Hole at \_\_\_\_\_ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): \_\_\_\_\_  
Type Completion: ☐ ALT. I ☒ ALT. II Depth of: ☐ DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement ☐ Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement  
Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet  
Total Depth: 1093 Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

RECEIVED  
KCC DIST # 3  
SEP 26 2018  
CHANUTE, KS

Geological Date: \_\_\_\_\_  
Formation Name Wayside Formation Top 1046 Formation Base 1020 Completion Information  
1. \_\_\_\_\_ At: \_\_\_\_\_ to \_\_\_\_\_ Feet Perforation Interval 1020 to 1040 Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet  
2. \_\_\_\_\_ At: \_\_\_\_\_ to \_\_\_\_\_ Feet Perforation Interval \_\_\_\_\_ to \_\_\_\_\_ Feet or Open Hole Interval \_\_\_\_\_ to \_\_\_\_\_ Feet

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_ Title: \_\_\_\_\_

Do NOT Write in This Space - KCC USE ONLY	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: _____ Comments: <u>Originally derived on 9-11-18</u>				
TA Approved: <input type="checkbox"/> Yes <input type="checkbox"/> Denied Date: _____					

Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

## KCC OIL/GAS REGULATORY OFFICES

Inspection Date: 02/04/2019 District: 3 Incident Number: 6392

☐ New Situation ☒ Lease Inspection  
☐ Response to Request ☐ Complaint  
☒ Follow-up ☒ Field Report

Operator License No: 33594

API:

Q3:

Q2:

Q1:

Operator Name: Quito, Inc.

SEC 18 TWP 35 RGE 12 RGEDIR: E

Address: 1613 W. 6TH ST.

FSL:

City: Bartlesville

FEL:

State: OK Zip Code: 74003

Lease: Solomon

Well No.: 3

Phone contact: 918-331-6433

County: CQ

**Reason for Investigation:**

To check status of wells.

**Problem:**

CP-111 was denied on these wells on September 11, 2018.

**Persons contacted:**

District #3 Staff

**Findings:**

On February 4, 2019 I was on the Solomon lease for a follow up from the January 2, 2019 inspection. Quito, Inc. was granted a verbal extension from Troy Russell (District #3 Supervisor) of February 4, 2019 to have the Solomon #3 and the Solomon #5 wells put back into production. As of February 4, 2019 neither one of these wells have been put back into production. A casing integrity test has not been completed so CP-111's could be filed and approved, nor have these wells been plugged.

**Actions / Recommendation**

**Follow-up Required** ☐

**Deadline Date:**

Turn my finding in to John Almond (District #3 Compliance Officer) for review.

**Photo's Taken:**

☒ RBDMS ☒ KGS ☐ TA DB **Report Prepared By:** Duane A. Sims

☐ T1 DBF ☒ District Files ☐ Courthouse **Position:** E.C.R.S.



## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Quito, Inc.

Lease: Solomon

County: Chautauqua

Subject: Abandoned well (Solomon #3)

FSL: 1008

FEL: 974

API#: 15-019-24303-00-00

Date: February 4, 2019

Staff: Duane A. Sims

KLN: 33594

Legal: 18-35-12E

PIC ID#: IMG 0919

PIC Orientation: Facing East

Latitude: 37.002029

Longitude: -96.130592

Time: 5:06PM

Additional Information: This is a picture of the Solomon #3 well. I was on location on February 4, 2019, for a follow up from the January 2, 2019 inspection. The Operator was granted a verbal extension of February 4, 2019 to have the well put back into production. The well is not in production. A Casing Integritty Test has not been completed on this well, so a CP-111 can not be approved because of the 140' fluid level. The well has not been plugged. Table I for this 225'.

## KCC OIL/GAS REGULATORY OFFICES

Inspection Date: 02/04/2019 District: 3 Incident Number: 6392

☐ New Situation ☒ Lease Inspection  
☐ Response to Request ☐ Complaint  
☒ Follow-up ☒ Field Report

Operator License No: 33594

API:

Q3:

Q2:

Q1:

Operator Name: Quito, Inc.

SEC 18 TWP 35 RGE 12 RGEDIR: E

Address: 1613 W. 6TH ST.

FSL:

City: Bartlesville

FEL:

State: OK Zip Code: 74003

Lease: Solomon

Well No.: 5

Phone contact: 918-331-6433

County: CQ

### Reason for Investigation:

To check status of wells.

### Problem:

CP-111 was denied on these wells on September 11, 2018.

### Persons contacted:

District #3 Staff

### Findings:

On February 4, 2019 I was on the Solomon lease for a follow up from the January 2, 2019 inspection. Quito, Inc. was granted a verbal extension from Troy Russell (District #3 Supervisor) of February 4, 2019 to have the Solomon #3 and the Solomon #5 wells put back into production. As of February 4, 2019 neither one of these wells have been put back into production. A casing integrity test has not been completed so CP-111's could be filed and approved, nor have these wells been plugged.

### Actions / Recommendation

Follow-up Required ☐

Deadline Date:

Turn my finding in to John Almond (District #3 Compliance Officer) for review.

### Photo's Taken:

☒ RBDMS ☒ KGS ☐ TA DB **Report Prepared By:** Duane A. Sims  
☐ T1 DBF ☒ District Files ☐ Courthouse **Position:** E.C.R.S.



# KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Quito, Inc.	KLN: 33594
Lease: Solomon	Legal: 18-35-12E
County: Chautauqua	PIC ID#: IMG 0920
Subject: Abandoned well (Solomon #5)	PIC Orientation: Facing East
FSL: 1032	Latitude: 37-002100
FEL: 343	Longitude: -96.128433
API#: 15-019-24307-00-00	
Date: February 4, 2019	Time: 5:07PM
Staff: Duane A. Sims	

Additional Information: This is a picture of the Solomon #5 well. I was on location on February 4, 2019, for a follow up from the January 2, 2019 inspection. The Operator was granted a verbal extension of February 4, 2019 to have the well put back into production. The well is not in production. A Casing Integritty Test has not been completed on this well, so a CP-111 can not be approved because of the 150' fluid level. The well has not been plugged. Table I for this area is 225'.

# KANSAS CORPORATION COMMISSION OIL & GAS CONSERVATION DIVISION

## TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# \_\_\_\_\_

Name: \_\_\_\_\_

Address 1: \_\_\_\_\_

Address 2: \_\_\_\_\_

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_ + \_\_\_\_\_

Contact Person: \_\_\_\_\_

Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

Contact Person Email: \_\_\_\_\_

Field Contact Person: \_\_\_\_\_

Field Contact Person Phone: ( \_\_\_\_\_ ) \_\_\_\_\_

API No. 15- \_\_\_\_\_

Spot Description: \_\_\_\_\_

\_\_\_\_ - \_\_\_\_ - \_\_\_\_ - \_\_\_\_ Sec. \_\_\_\_\_ Twp. \_\_\_\_\_ S. R. \_\_\_\_\_ ☐ E ☐ W

\_\_\_\_\_ feet from ☐ N / ☐ S Line of Section

\_\_\_\_\_ feet from ☐ E / ☐ W Line of Section

GPS Location: Lat: \_\_\_\_\_, Long: \_\_\_\_\_  
(e.g. xx.xxxxx) (e.g. -xxx.xxxxx)

Datum: ☐ NAD27 ☐ NAD83 ☐ WGS84

County: \_\_\_\_\_ Elevation: \_\_\_\_\_ ☐ GL ☐ KB

Lease Name: \_\_\_\_\_ Well #: \_\_\_\_\_

Well Type: (check one) ☐ Oil ☐ Gas ☐ OG ☐ WSW ☐ Other: \_\_\_\_\_

☐ SWD Permit #: \_\_\_\_\_ ☐ ENHR Permit #: \_\_\_\_\_

☐ Gas Storage Permit #: \_\_\_\_\_

Spud Date: \_\_\_\_\_ Date Shut-In: \_\_\_\_\_

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size						
Setting Depth						
Amount of Cement						
Top of Cement						
Bottom of Cement						

Casing Fluid Level from Surface: \_\_\_\_\_ How Determined? \_\_\_\_\_ Date: \_\_\_\_\_

Casing Squeeze(s): \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement, \_\_\_\_\_ to \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement. Date: \_\_\_\_\_  
(top) (bottom) (top) (bottom)

Do you have a valid Oil & Gas Lease? ☐ Yes ☐ No

Depth and Type: ☐ Junk in Hole at \_\_\_\_\_ ☐ Tools in Hole at \_\_\_\_\_ Casing Leaks: ☐ Yes ☐ No Depth of casing leak(s): \_\_\_\_\_  
(depth) (depth)

Type Completion: ☐ ALT. I ☐ ALT. II Depth of: ☐ DV Tool: \_\_\_\_\_ w / \_\_\_\_\_ sacks of cement ☐ Port Collar: \_\_\_\_\_ w / \_\_\_\_\_ sack of cement  
(depth) (depth)

Packer Type: \_\_\_\_\_ Size: \_\_\_\_\_ Inch Set at: \_\_\_\_\_ Feet

Total Depth: \_\_\_\_\_ Plug Back Depth: \_\_\_\_\_ Plug Back Method: \_\_\_\_\_

### Geological Data:

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At: _____ to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet	
2. _____	At: _____ to _____ Feet	Perforation Interval _____ to _____ Feet or Open Hole Interval _____ to _____ Feet	

UNDER PENALTY OF PERJURY I HEREBY ATTEST THAT THE INFORMATION CONTAINED HEREIN IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE

Submitted Electronically

<b>Do NOT Write in This Space - KCC USE ONLY</b>	Date Tested: _____	Results: _____	Date Plugged: _____	Date Repaired: _____	Date Put Back in Service: _____
	Review Completed by: _____ Comments: _____				
TA Approved: <input type="checkbox"/> Yes <input type="checkbox"/> Denied Date: _____					

### Mail to the Appropriate KCC Conservation Office:

	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4 - 2301 E. 13th Street, Hays, KS 67601-2651	Phone 785.261.6250

D.S. Exhibit 5

# STATE OF KANSAS

CORPORATION COMMISSION  
CONSERVATION DIVISION  
DISTRICT OFFICE No. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720



PHONE: 620-902-6450  
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

January 10, 2019

Mark W. McCann  
Quito, Inc.  
1613 W. 6th Street  
Bartlesville, OK 74003-3712

Re: Temporary Abandonment  
API 15-019-23901-00-00  
DOTY 3  
SE/4 Sec.33-33S-11E  
Chautauqua County, Kansas

Dear Mark W. McCann:

Your application for Temporary Abandonment (TA) for the above-listed well is denied for the following reasons(s):

## **Needs current Fluid level**

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by February 07, 2019.

**This deadline does NOT override any compliance deadline given to you in any Commission Order.**

You may contact me if you have any questions.

Sincerely,  
Duane Sims  
KCC DISTRICT 3



## KCC OIL/GAS REGULATORY OFFICES

Inspection Date: 02/07/2019 District: 3 Incident Number: 6394

☒ New Situation ☒ Lease Inspection  
☐ Response to Request ☐ Complaint  
☐ Follow-up ☒ Field Report

Operator License No: 33594 API: 15-019-23901-00-00 Q3: SW Q2: SW Q1: SE  
Operator Name: Quito, Inc. SEC 33 TWP 33 RGE 11 RGEDIR: E  
Address: 1613 W. 6TH ST. FSL: 351  
City: Bartlesville FEL: 2198  
State: OK Zip Code: 74003 Lease: Doty Well No.: 3  
Phone contact: 918-331-6433 County: CQ

### Reason for Investigation:

To check status of well.

### Problem:

CP-111 was denied on this well on January 10, 2019.

### Persons contacted:

District #3 Staff, Coleen Servant 918-331-6433

### Findings:

On February 7, 2019 I was at the Doty #3 well location to check status of well. The well was still abandoned. I denied a CP-111 for this well on January 10, 2019 because a current fluid level was not provided. On January 17, 2019 I met with a representative (Darrell Hughes) for Quito, Inc. on lease to check the fluid level of the Doty #3. The fluid level was 215'. This fluid level is too high to approve the CP-111. Table One for this area is 300'. I talked to Coleen Servant on this day and explained to her that a CIT would have to be performed and pass before the deadline of February 7, 2019 because of the high fluid level so a CP-111 could be approved. As of February 7, 2019 a satisfactory CIT has not been conducted on the well so a CP-111 could be approved. This well has not been put back into production, nor has the well been plugged.

### Actions / Recommendation

Follow-up Required ☐

Deadline Date:

Turn my finding in to John Almond (District #3 Compliance Officer) for review and turn in for final recommendations.

Photo's Taken:

1

☒ RBDMS ☒ KGS ☐ TA DB Report Prepared By: Duane A. Sims  
☐ T1 DBF ☒ District Files ☐ Courthouse Position: E.C.R.S.

## KCC DISTRICT III OFFICE FIELD REPORT PHOTO ID FORM



Operator: Quito, Inc.

Lease: Doty

County: Chautauqua

Subject: Abandoned well (Doty #3)

FSL: 351

FEL: 2198

API#: 15-019-23901-00-00

Date: February 7, 2019

Staff: Duane A. Sims

KLN: 33594

Legal: 33-33-11E

PIC ID#: IMG 0922

PIC Orientation: Facing South

Latitude: 37.127958

Longitude: -96.207154

Time: 5:00PM

Additional Information: This a picture of the Doty #3. I was on site of this well on February 7, 2019 at 5:00pm and the well is still inactive. The CP-111 was denied on January 10, 2019. It was denied because it needed a current fluid level on the well. I met a representative (Darrel Hughes) for Quito, Inc. on site on January 17, 2019 and witnessed a fluid level. The fluid level was 215' from surface. This fluid level is too high and well needs a satisfactory Casing Integrity Test conducted before a CP-111 can be approved. Table I for this area is 300'. This well could also be put back into production or plugged to bring it into compliance.

## **CERTIFICATE OF SERVICE**

19-CONS-3271-CPEN  
19-CONS-3272-CPEN

I, the undersigned, certify that a true copy of the attached Prefiled Testimony of Duane Sims has been served to the following by means of electronic service on May 13, 2019.

JOHN ALMOND  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720  
Fax: 785-271-3354  
j.almond@kcc.ks.gov

JEFF KENNEDY  
MARTIN, PRINGLE, OLIVER, WALLACE & BAUER, LLP  
100 N. Broadway  
Suite 500  
Wichita, KS 67202  
Fax: 913-491-3341  
jkennedy@martinpringle.com

JONATHAN R. MYERS, ASSISTANT GENERAL COUNSEL  
KANSAS CORPORATION COMMISSION  
266 N. Main St., Ste. 220  
WICHITA, KS 67202-1513  
Fax: 316-337-6211  
j.myers@kcc.ks.gov

LAUREN WRIGHT, LITIGATION COUNSEL  
KANSAS CORPORATION COMMISSION  
266 N. Main St., Ste. 220  
WICHITA, KS 67202-1513  
Fax: 316-337-6211  
l.wright@kcc.ks.gov

DUANE SIMS  
KANSAS CORPORATION COMMISSION  
DISTRICT OFFICE NO. 3  
137 E. 21ST STREET  
CHANUTE, KS 66720  
Fax: 785-271-3354  
d.sims@kcc.ks.gov

/S/ Paula J. Murray

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Paula J. Murray