

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the matter of the failure of Oil Producers,)
Inc. of Kansas ("Operator") to comply with)
K.A.R. 82-3-407 at the Fitzgerald #3 in)
Kingman County, Kansas.)
_____)

Docket No: 20-CONS-3134-CPEN

CONSERVATION DIVISION

License No: 8061

PRE-FILED TESTIMONY

OF

MELODY C. FLETCHER

**ON BEHALF OF
OIL PRODUCERS, INC. OF KANSAS**

1 Q. Please state your name and address, and tell us where you are employed.

2 A. **Melody C. Fletcher. I am the Chief Operating Officer for Oil Producers, Inc. of**
3 **Kansas located at 1710 Waterfront Pkwy. Wichita, Ks 67206.**

4 Q. Would you describe your background and experience in the oil and gas industry?

5 A. **My father was an independent oilman. I grew up learning all aspects of the oil and**
6 **gas business, from leasing to operating. I assumed a pivotal role in his business, and**
7 **worked with my father and brother for a number of years. When I served as a**
8 **consultant in the oil and gas industry, Oil Producers, Inc. of Kansas was my client,**
9 **and I came to know the company and its owners. In January 2013, I was offered**
10 **the COO position, and I have held that position ever since then.**

11 Q. Would you please identify and describe what is known as the Fitzgerald #3 well, the
12 subject of this action before the KCC?

1 **A. The Fitzgerald #3 was a disposal well located in Kingman County, Kansas. It was**
2 **owned and operated by Oil Producers, Inc. of Kansas (which we refer to as OPIK).**
3 **This disposal well was an important and integral part of OPIK's operations, and**
4 **served a number of producing wells in the area. The Fitzgerald was constructed as**
5 **a packer-less well, meaning it is an open hole with no packer in the wellbore.**

6 **Q. Please explain what occurred with the Fitzgerald disposal well in 2019.**

7 **A. In June 2019, OPIK personnel contacted Steve VanGieson of the KCC to witness a**
8 **MIT test on the Fitzgerald SWD. On June 19, 2019, the KCC declared that the well**
9 **failed the witnessed test, and the well was immediately shut-in. OPIK did not**
10 **necessarily agree with the KCC's failure determination. Exhibit A attached hereto**
11 **are copies of MIT recorded reports from the KCC, dating back to 1989. It includes**
12 **the KCC's 2019 report. OPIK contends the report is inconclusive and incomplete**
13 **(compare the field data recordings for the 2019 report to the prior reports). Jordan**
14 **Diskin's testimony more fully explains OPIK's contentions regarding the test and**
15 **KCC conclusions.**

16 **As it turned out, the Fitzgerald disposal well was never again operated after the**
17 **June failed MIT. Water which had been disposed of at this well were routed to the**
18 **Lock SWD also located in Kingman County, Kansas.**

19 **Q. How are mechanical integrity tests handled at OPIK?**

20 **A. OPIK keeps a record of MIT due dates and notifies our Production Supervision**
21 **when they are due. Dates are verified with Kolar. From this point, the Field**
22 **Supervisors contact the District Office of the KCC to schedule the test and allow its**
23 **witnessing.**

1 Q. In the instance of the Fitzgerald disposal well, the subject of this hearing, describe how
2 and when you learned about the mailed MIT, and what actions were taken following that
3 test by OPIK?

4 A. I was notified by Jordan Diskin, OPIK's Central Kansas Production Supervisor
5 shortly after the KCC determined that the well has been declared to have failed the
6 MIT. Jordan shared with me his observations and conclusions, as are set forth in
7 his Pre-Filed Testimony. OPIK was not certain that there was an actual leak in the
8 well, or that a failure should have been declared. A failed MIT does not always
9 mean there is an actual leak. OPIK concluded at the time, and continues to believe
10 today that, at and following the June 2019 MIT on this well, the well did not pose a
11 threat to fresh or usable water resources or endanger correlative rights. Exhibit B
12 is a copy of Injection Well Frequently Asked Questions. This can be found at
13 <https://kcc.ks.gov/oil-gas/injection-wells-frequently-asked-questions#iwfaq12>. On
14 page 2 the KCC explains the general construction standards for an injection well
15 such as the Fitzgerald disposal well. While it is a packerless well, this well is
16 constructed in a manner approved by the KCC. This well has three protective
17 layers: (a) surface casing; (b) production casing; and (c) tubing string. As the KCC
18 acknowledges on its website, "all three layers must fail at the same time to impact
19 groundwater." Based on the MIT test, as more fully explained by Mr. Diskin, it is
20 clear that there was not a failure of all three layers of protection on this well as
21 might impact groundwater. Therefore, OPIK challenges the KCC's conclusions
22 that this well was a "possible threat" to water after it was shut-in and taken out of
23 operation. When OPIK was eventually able to get a rig to the site, it was

1 **determined that OPIK was unable to set the packer at the bottom of well, due to**
2 **saltwater corrosion at packer depth.**

3 Q. What did OPIK do after the failed MIT on the Fitzgerald disposal well?

4 A. **The well was reported to the OPIK office and placed on the workover list. Our**
5 **Production Supervisor keeps in contact with the office on scheduling, including**
6 **delays, weather, crops, etc.**

7 Q. Did OPIK receive a June 24, 2019, letter from Steve Vangieson regarding the Fitzgerald
8 disposal well?

9 A. **Yes. He made reference to the June 19, 2019, reported failure of the MIT and the**
10 **fact that under K.A.R. 82-3-407(c) we had 90 days to repair the well and pass an**
11 **MIT, plug the well, or isolate all leaks and demonstrate the well does not pose a**
12 **threat to fresh or usable water or endanger correlative rights. We had determined,**
13 **and continue to believe, the well did not pose a risk to water or other rights, for the**
14 **reasons stated above and as stated in Jordan Diskin's Pre-Filed Testimony.**
15 **Nevertheless, we set about to free up our rig to work on the well. We kept the KCC**
16 **advised of our efforts, and were working as quickly as we could to this well, which**
17 **was very important to our production, back in service. However, we were not able**
18 **to meet the timeline established by the KCC.**

19 Q. When did you receive the penalty notice from the KCC?

20 A. **I was out of the office and do not have the exact date. OPIK did receive a copy of**
21 **the Penalty Order stating that we were being penalized \$1,000 for violating K.A.R.**
22 **82-3-407, with no specific subsection reference to that regulation, "because a current**
23 **and successful MIT has not been performed on the subject well." OPIK also**

1 received a November 7, 2019, INVOICE from the KCC, and this part of the record
2 provided the following more detailed and specific identification and description of
3 the alleged violation: "K.A.R. 82-3-407(g) – Operating wells without current
4 mechanical integrity test." K.A.R. 82-3-407(g) is in fact the apparent source of the
5 authority for the \$1,000 penalty assessed against OPIK. It reads as follows: "No
6 injection well shall be operated before having passed a mechanical integrity test.
7 The operator's failure to test a well to show its mechanical integrity or to report the
8 oil-to-water or gas-to-water ratio as required under paragraph (b)(4)(B) above shall
9 be punishable by a \$1,000 penalty, and these wells shall be shut in until the required
10 test has been passed or the reports have been furnished." OPIK denies that it
11 "operated" the Fitzgerald disposal well in violation of subsection (g) of K.A.R. 82-3-
12 407.

13 Q. Did you attempt to communicate with the KCC regarding the Penalty Notice and
14 Invoice?

15 A. I called Michael Glamann on November 27, 2019. He was not in and I left a
16 message asking him to return my call. I had not heard from Mr. Glamann and
17 called again on December 3, 2019. We spoke and discussed the penalty and all the
18 steps of contact OPIK had made with the KCC. The reason for the penalty said
19 "OPIK continued to operate the well". We did not continue to operate the well as
20 witnessed during the MIT.

21 Q. Why did OPIK request a hearing to challenge the \$1,000 penalty order?

22 A. OPIK did not request this hearing because of the money. OPIK is spending far
23 more than \$1,000 to try to remove from the record and the history of our company a

1 finding that it operates wells without current MITs and conducts operations that
2 pose risks to water. During my December 3, 2019, conversation with Michael
3 Glamann, I informed him that we were on location of the Fitzgerald SWD and it
4 appeared the cost to repair will require contacting the working interest parties for
5 their election. The owners' response time would be 30 days. Michael informed me
6 that I should go ahead and file for a hearing because it would delay everything
7 giving OPIK the time needed. I heeded that advice and requested a hearing. OPIK
8 eventually determined that it was not economical to repair this disposal well, and
9 the Fitzgerald was plugged in December.

10 Q. Is there anything you would like to add regarding this matter?

11 A. OPIK has been operating in Kansas since the 1980's and is operated by second
12 generation owners, with the third generation involved. OPIK operates over 500
13 wells in Kansas, Oklahoma, and Texas. Since the beginning of my employment with
14 OPIK I have stressed the importance of working closely with the KCC, the roles of
15 which our company respects. We strive to keep in contact with the KCC before,
16 during and after all situations.
17 My concern is over the effect the Penalty Order and findings will have on our
18 operator's license. We are a great operator, we always operate above board, and I
19 felt that we were working with the KCC and vice versa. There were over 29 calls
20 and emails between the KCC and OPIK regarding various wells, including the
21 Fitzgerald disposal well, during this time, to keep the KCC informed and up to date.
22 It was never our intention to dodge the work or ignore what needed to be done. I
23 think we showed that. In the period of time from June 2019 through January 3,

1 2020, there were 28 wells brought online, plugged, 10-year TA extensions done, or
2 MITs in 8 Kansas counties. During the same time period, there were many factors
3 concerning some of these wells that came into play with the KCC. Because I was
4 already in contact with Michael Glamann when I spoke to Steve VanGieson, I
5 informed Michael of the Fitzgerald SWD that may or may not come across his desk.
6 He asked that I keep him informed. We had contacted another rig but they were
7 also unavailable, playing catch up due to the weather (over 55 inches of rain, crops,
8 etc.). Mr. VanGieson did provide additional time for OPIK to work on the
9 Fitzgerald disposal well, which we appreciate. OPIK does not believe it violated
10 KCC regulations, and respectfully requests that the Penalty Order be set aside.


AFFIDAVIT

STATE OF)
) ss:
COUNTY OF)

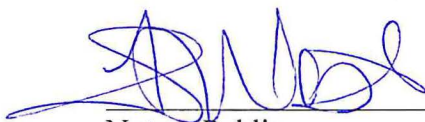
I, Melody C. Fletcher, of lawful age, being first duly sworn upon my oath, state that:

I am the Chief Operating Officer for Oil Producers, Inc. of Kansas and I have read the above and foregoing Pre-Filed Testimony; and find that said answers are true and correct.

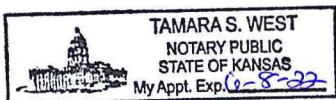
Oil Producers, Inc. of Kansas

By: 
Melody C. Fletcher

SUBSCRIBED AND SWORN to before me, a Notary Public, this 3rd day of February, 2020.


Notary Public

My Commission Expires: June 8, 2022



CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of February, 2020, a true and correct copy of the above and foregoing was e-filed with the Kansas Corporation Commission's through the e-filing Express and copy was sent by email to:

Daniel Fox, Compliance Officer, KCC District 2
Kansas Corporation Commission
District Office No. 2
3450 N. Rock Road, Bldg., 600 Ste. 601
Wichita, KS 67226
d.fox@kcc.ks.gov

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/s/ Charles E. Millsap

CASING MECHANICAL INTEGRITY TEST

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

Date injection started _____

API #15- 095-21454-00-00

DOCKET# D2387.0

NW SE SW, Sec 17, T 29, S, R 16 E W

3630 Feet from South Section Line

990 Feet from East Section Line

Lease Fitzgerald Well # 3

County Kingman

Operator: OPI OK

Operator License# 8061

Name &

Address 1710 Waterfront PKWY

Contact Person _____

Wichita, KS 67206

Phone _____

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 5/8</u>	<u>5 1/2</u>		Size	<u>2 7/8</u>
Set at		<u>225</u>	<u>4683</u>		Set at	<u>4680</u>
Cement Top		<u>0</u>	<u>3933</u>		Type	<u>Double</u>
" Bottom		<u>225</u>	<u>4683</u>			

DV/Perf. ☒ TD (and plug back) _____ ft. depth

Packer type Emul Packer Size 5 1/2 Set at _____

Zone of injection _____ ft. to ft. Perf. or open hole _____

Type MIT: _____ Pressure: ☒ Radioactive Tracer Survey: ☐ Temperature Survey: ☐

F Time: Start _____ Min _____ Min _____ Min

I Pressures: _____ Set up 1 _____

System Pres. during test _____

L In Use 100 100 100 Set up 2 _____

Annular Pres. during test _____

D Out Use 0 0 0 Set up 3 _____

Fluid loss during test _____ bbls.

A Tested: Casing ☐ or Casing - Tubing Annulus ☐

The bottom of the tested zone in shut in with _____

Test Date 6-19-19 Using Co Tools Company's Equipment _____

The operator hereby certifies that the zone between _____ feet and _____ feet

was the zone tested ☒

Signature _____

Title _____

The results were Satisfactory ☒ Marginal _____ Not Satisfactory ☒

State Agent: [Signature] Title: _____ Witness: YES _____ NO _____

REMARKS: _____

☐ Origin, Conservation Div.; ☐ KDHE/T; ☐ Dist. Office

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

GPS Lat _____

GPS Long _____

(If YES please describe in REMARKS)
KCC Form U-7



POK 9-17-19

Attachment R7
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CASING MECHANICAL INTEGRITY TEST

DOCKET # D-23787Disposal ☒ Enhanced Recovery:Repressuring ☐Flood ☐Tertiary ☐

Date injection started

API #15 - 095-21454-0200NW SE SW, Sec 17, T 29 S, R 6 E 10990

Feet from South Section Line

3630

Feet from East Section Line

Lease FitzgeraldWell # 3County KingmanOperator: Robert F CampbellOperator License # 5348

Name &

Address 260N Rock RDContact Person Robert Campbell

KCC WICHITA

JUN 27 2014

Wichita, KS 67206Phone 316-685-6001

RECEIVED

Max. Auth. Injection Press. _____ psi; Max. Inj. Rate _____ bbl/d;

If Dual Completion - Injection above production _____

Injection below production _____

	Conductor	Surface	Production	Liner	Size	Tubing
Size		<u>8 7/8</u>	<u>5 1/2</u>			<u>2 7/8</u>
Set at		<u>225</u>	<u>4683</u>			<u>4080</u>
Cement Top		<u>0</u>	<u>3933</u>			<u>4080</u>
" Bottom		<u>225</u>	<u>4683</u>			<u>4080</u>
DV/Perf.						
Packer type	<u>Packerless</u>					
Zone of injection	<u>4683</u>	ft. to ft.	<u>4683</u>	Set at		
				Perf. or open hole	<u>Aib.</u>	

Type Mit: Pressure ☒ Radioactive Tracer Survey ☐ Temperature Survey ☐F Time: Start 10 Min. 20 Min. 30 Min.I Pressures: 80 80 80 Set up 1 System Pres. during test _____L In Use 250 250 250 Set up 2 Annular Pres. during test _____

D Set up 3 Fluid loss during test _____ bbls.

A Tested: Casing ☐ or Casing - Tubing Annulus ☒The bottom of the tested zone is shut in with PackerlessTest Date 6-19-14 Using _____ Company's EquipmentThe operator hereby certifies that the zone between 4600 feet and 0 feetwas the zone tested X Don Thompson Signature TitleThe results were Satisfactory ☒ , Marginal _____ , Not Satisfactory _____State Agent [Signature] Title PIRT Witness: Yes ☒ No _____REMARKS: 54r.☐ Origin. Conservation Div.; ☐ KIRE/T; ☐ Dist. Office;☒ Computer UpdateRCC FORM U-7 6/8
Attachment R7
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37.52024-98.00309

CASING MECHANICAL INTEGRITY TEST

Disposal ☒ Enhanced Recovery:

Repressuring ☐
Flood ☐
Tertiary ☐

Date injection started _____
API #15 - 095 - 21454-00-00

DOCKET # D-23787NW SE SW, Sec 17, T 29 S, R 6 E/W

990 Feet from South Section Line
3630 Feet from East Section Line

Lease Fitzgerald MSWD Well # 3
County KINGMAN

Operator: Robert E Campbell
Name & Address 260 N. Rock RD
Wichita KS 67206

Operator License # 5348 KANSAS CORPORATION COMMISSION
Contact Person Robert Campbell JUL 17 2009
Phone 316-685-6001 RECEIVED

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>225</u>	<u>4683</u>	_____	Set at <u>4679</u>
Cement Top _____	<u>0</u>	<u>3933</u>	_____	Type <u>Duo line</u>
" Bottom _____	<u>225</u>	<u>4683</u>	_____	
DV/Perf. _____	TD (and plug back) _____	_____	_____	ft. depth _____
Packer type <u>Packerless</u>	Size _____	Set at _____	_____	_____
Zone of injection <u>4683</u>	ft. to ft. <u>4884</u>	Perf. or <u>open hole</u>	<u>Ph</u>	_____

Type Mit: Pressure ☐ Radioactive Tracer Survey ☐ Temperature Survey ☐

F Time: Start 10 Min. 20 Min. 30 Min.

E Pressures: _____ Set up 1 System Pres. during test 30 in
L Shut in 10 lbs 10 lbs 10 Set up 2 Annular Pres. during test 10
D Operating 150 lbs 150 150 Set up 3 Fluid loss during test 0 bbls.

A Tested: Casing ☐ or. Casing - Tubing Annulus ☒

The bottom of the tested zone is shut in with Packerless

Test Date 7-8-09 Using _____ Company's Equipment _____

The operator hereby certifies that the zone between 4679 feet and 0 feet

was the zone tested Thad Stern AE Forman
Signature Title

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

State Agent B. O'Keefe Title PIRT Witness: Yes ☒ No _____

REMARKS: Annulus Fill With Hydrocarbon

☐ Origin. Conservation Div.; ☐ KHE T; ☐ Dist. Office;

Attachment R7 SAM-1
Page 14 of 37

☐ Computer Update

KCC Form U-7 6/8'

37.50000 N
098.00342 W

CASING MECHANICAL INTEGRITY TEST

DOCKET #: D-23787

Disposal ☒ Enhanced Recovery:

NW SE SW, Sec 17, T 29 S, R 6 E W

Repressuring ☐

Flood ☐

Tertiary ☐

990 Feet from South Section Line

3630 Feet from East Section Line

Date injection started _____

Lease Fitzgerald

Well #: 3

API #15 - -

County Kingman

Operator: RE Campbell

Operator License #: 5348

Name &

Address 260 N. Rock Rd.

Contact Person Robert Campbell

Wichita KS. 67206 Phone 316-685-6001

RECEIVED
KANSAS CORPORATION COMMISSION

JUN 07 2004

Max. Auth. Injection Press. 6 psi; Max. Inj. Rate 1000 bbl/d;

If Dual Completion - Injection above production _____

Injection below production _____

Conductor

Surface

Production

Liner

Size

Set at

Cement Top

" Bottom

DV/Perf.

Packer type

Zone of injection

8 7/8

225

0

225

Packerless

4683

5 1/2

4683

4683

Size

ft. to ft. 4884

Set at

Perf. or open hole

Size

Set at

Type

ft. depth

Type Mit: Pressure ☒

Radioactive Tracer Survey ☐

Temperature Survey ☐

F Time: Start 10 Min. 20 Min. 30 Min.

I NOT IN USE 80 80 80 Set up 1 360

E Pressures: 80 80 80 Set up 1 System Pres. during test Y

L IN USE 360 360 360 Set up 2 Annular Pres. during test 80

D IN USE 360 360 360 Set up 2 Annular Pres. during test 80

D IN USE 360 360 360 Set up 3 Fluid loss during test 80 bbls.

A IN USE 360 360 360 Set up 3 Fluid loss during test 80 bbls.

T Tested: Casing ☐ or Casing - Tubing Annulus ☒

A Tested: Casing ☐ or Casing - Tubing Annulus ☒

The bottom of the tested zone is shut in with Packerless

Test Date 5-25-04 Using _____ Company's Equipment

The operator hereby certifies that the zone between 4679 feet and 0 feet

was the zone tested Don Thimmesch

Signature

Title

The results were Satisfactory ☒, Marginal ☐, Not Satisfactory ☐

State Agent Shelley Title PIRT Witness: Yes ☒ No ☐

REMARKS: Backside loaded with Hydrocarbon

Origin. Conservation Div.; ☐

KCHE/T; ☐

Dist. Office; ☐

Computer Update ☐

Attachment R7

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KCC Form U-7 6/8

SAMT

CASING MECHANICAL INTEGRITY TEST

DOCKET # D-23,787Disposal ☒ Enhanced Recovery:Repressuring ☐Flood ☐Tertiary ☐

Date injection started _____

API #15 - - - - -

NW SE SW, Sec 17, T 29 S, R 6 E996 Feet from South Section Line3630 Feet from East Section LineLease FitzgeraldWell # 3
KANSAS CORPORATION COMMISSIONCounty KmOperator: Robert Campbell

Name &

Address 260 N Rock RoadWichita KS 67206Operator License # 5348Contact Person Robert CampbellPhone 316-685-6001APR 12 1999
CONSERVATION DIVISION
WICHITA, KSMax. Auth. Injection Press. 6 psi; Max. Inj. Rate 1000 bbl/d;

If Dual Completion - Injection above production _____ Injection below production _____

	Conductor	Surface	Production	Liner		Tubing
Size		<u>8 3/8</u>	<u>5 1/2</u>		Size	<u>2 3/8</u>
Set at		<u>225</u>	<u>4683</u>		Set at	<u>4679</u>
Cement Top		<u>6</u>			Type	<u>DUG-IT</u>
" Bottom		<u>225</u>	<u>4683</u>			
DV/Perf.			TD (and plug back)			ft. depth
Packer type	<u>Pack 11055</u>		Size		Set at	
Zone of injection	<u>126</u>	ft. to ft.	<u>4683-4884</u>	Perf. or open hole	<u>OH</u>	

Type Mit: Pressure ☒ Radioactive Tracer Survey ☐ Temperature Survey ☐F Time: Start 0 Min. 15 Min. 30 Min.

	Pressures	Set up 1	System Pres. during test
I	<u>130</u>	<u>130</u>	<u>130</u>
E			
L			
D			
D			
A			
T			
A			

Tested: Casing ☐ or Casing - Tubing Annulus ☒The bottom of the tested zone is shut in with Pack 11055Test Date 3-25-99 Using Pack 11055 Manufacturer's EquipmentThe operator hereby certifies that the zone between 0 feet and 4679 feetwas the zone tested Wm E. Richardson Signature Agm T TitleThe results were Satisfactory ☒, Marginal ☐, Not Satisfactory ☐State Agent Jack L. Gubler Title Dist II Witness: Yes ☒ No ☐REMARKS: Monitoring - Back side 758816 of Creade oil☐ Origin. Conservation Div.; ☐ KCHE/T; ☐ Dist. Office;☐ Computer Update

Attachment R7

Page 16 of 27 U-7 6/8'

CASING MECHANICAL INTEGRITY TEST

DOCKET # D-23787Disposal ☒ Enhanced Recovery:Repressuring ☐Flood ☐Tertiary ☐

Date injection started _____

API #15 - _____

NW SE SW, Sec 17, T 29 S, R 6 E990

Feet from South Section Line

3630

Feet from East Section Line

Lease FitzgeraldWell # 3County KmOperator: Robert E. Campbell Operator License # 5248

Name &

Address 260 N Rock Rd.Contact Person Rob. CampbellWichita KS 67206Phone 316-685-6001Max. Auth. Injection Press. 3 psi; Max. Inj. Rate 1000 bbl/d;

If Dual Completion - Injection above production _____ Injection below production _____

	Conductor	Surface	Production	Liner	Size	Tubing
Size		<u>8 5/8</u>	<u>5 1/2</u>			<u>2 3/8</u>
Set at		<u>225</u>	<u>4683</u>			<u>4679</u>
Cement Top		<u>0</u>	<u>4683</u>			<u>Duo-lined</u>
" Bottom		<u>225</u>	<u>4683</u>			

DV/Perf. _____ TD (and plug back) _____ ft. depth

Packer type Packless

Size _____

Set at _____

Zone of injection Ann. ft. to ft. 4683-4881 Perf. or open hole 54Type Mit: Pressure ☒Radioactive Tracer Survey ☐Temperature Survey ☐F Time: Start 0 Min. 15 Min. 30 Min.I Pressures: 60 60 60 Set up 1 System Pres. during test 28" WACL Set up 2 Annular Pres. during test 60D Set up 3 Fluid loss during test 60 bbls.D Tested: Casing ☐ or Casing - Tubing Annulus ☒A The bottom of the tested zone is shut in with PacklessTest Date 3-25-94 Using Monitoring Company's EquipmentThe operator hereby certifies that the zone between 4679 feet and 0 feetwas the zone tested Robert E. Campbell Agent

Signature

Title

The results were Satisfactory ☒, Marginal ☐, Not Satisfactory ☐State Agent Jack L. Lutha Title Asst. II Witness: Yes ☒ No ☐REMARKS: monitoring - Back side loaded 25 bbls of Code.☐ Origin. Conservation Div.;☐ KDHE/T;☐ Dist. Office;☐ Computer Update

KCC Form U-7 6/84

Attachment R7

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CASING MECHANICAL INTEGRITY TEST

DOCKET # D-23787Disposal ☒ Enhanced Recovery:Repressuring ☐Flood ☐Tertiary ☐

Date injection started _____

API #15 - _____

NW SE SW, Sec 17, T 29 S, R 6 E 10990 Feet from South Section Line3630 Feet from East Section LineLease Fitzgerald Well # 3County KingmanOperator: Robert E. CampbellOperator License # 5348

Name &

Address 260 N. Rock Rd.Contact Person RE CampbellWichita Ks.Phone 316. 685-6001Max. Auth. Injection Press. 6 psi; Max. Inj. Rate 1000 bbl/d;

If Dual Completion - Injection above production _____ Injection below production _____

Conductor	Surface	Production	Liner	Tubing
Size <u>8 1/2</u>	Size <u>5 1/2</u>	Size <u>2 7/8</u>		
Set at <u>225</u>	Set at <u>4683</u>	Set at <u>4679</u>		
Cement Top		Type <u>Dual lined</u>		
" Bottom				
DV/Perf.	TD (and plug back)			ft. depth
Packer type <u>NONE</u>	Size <u>-</u>	Set at <u>-</u>		
Zone of injection <u>4683</u>	ft. to ft. <u>4884</u>	Perf. or open hole <u>0+1</u>		

Type Mit: Pressure ☒ Radioactive Tracer Survey ☐ Temperature Survey ☐F Time: Start 10 Min. 20 Min. 30 Min.

Pressures	Set up 1	System Pres. during test
<u>95</u> [#]	<u>95</u> [#]	<u>95</u> [#]
	Set up 2	Annular Pres. during test <u>95</u> [#]
	Set up 3	Fluid loss during test <u>75</u> bbls.

T Tested: Casing ☐ or Casing - Tubing Annulus ☒

The bottom of the tested zone is shut in with _____

Test Date 8-3-89 Using Nicholas Water Service Company's EquipmentThe operator hereby certifies that the zone between 4600 feet and 0 feetwas the zone tested Don Thimesch

Signature

Title

The results were Satisfactory ☒, Marginal ☐, Not Satisfactory ☐State Agent Steve V. Siew Title PIRT Witness: Yes ☒ No ☐REMARKS: Monitoring - Backside loaded the 75 bbls of Crude Oil☐ Origin. Conservation Div.;☐ KDHE/T;☐ Dist. Office;☐ Computer UpdateAttachment R7
KCP 8/18/89 6/84



Injection Wells Frequently Asked Questions (FAQ)

Updated: 10/11/13

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What is an injection well?

Injection wells allow for the placement of fluids into the ground. The United States Environmental Protection Agency (EPA) has created six "classes" of injection wells. In Kansas, Class I, III, IV, V, and VI injection wells are regulated by either the Kansas Department of Health and Environment (KDHE) or the EPA.

The Kansas Corporation Commission (Commission) regulates Class II injection wells. Class II injection wells are used to inject fluids associated with oil and gas production into the ground. Class II injection wells are the type of wells addressed in this FAQ document.

How many Class II injection wells are there?

In Kansas, there are approximately 16,600 permitted injection wells.

What types of Class II injection wells are there?

Class II injection wells come in two varieties: disposal wells and secondary/enhanced oil recovery wells.

Disposal wells are used to inject fluids into rock formations that do not produce oil or gas. The formations are isolated from usable quality groundwater and are sealed above and below by unbroken and impermeable rock formations. There are about 5,000 disposal wells in Kansas.

Secondary/enhanced oil recovery wells are used to inject fluids into formations/reservoirs that produce oil or gas. The formations are also isolated. Injection of fluid into these formations often allows for increased recovery of oil or gas reserves. There are about 11,600 secondary/enhanced oil recovery wells in Kansas.

What types of fluid are injected into Class II wells?

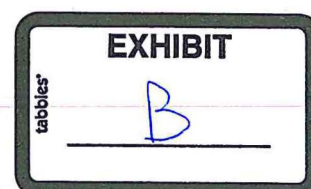
Two types of fluid are typically injected into Class II wells.

The first fluid is saltwater. Saltwater is sometimes referred to as brine water, or produced water. Oil and gas reservoirs often contain significant amounts of saltwater. When oil and gas are produced, saltwater is also produced. Operators must dispose of the saltwater in a manner that will not pollute surface or subsurface waters. Often, the most effective and economical way to do that is to inject the saltwater back into the rock formation.

The second fluid is hydraulic fracturing fluid. Fracking fluid is primarily water, but may also include sand and various additives. Used hydraulic fracturing fluid must be disposed of in a manner that will not pollute surface or subsurface waters, and operators often dispose of the fluids down disposal wells.

Saltwater represents the overwhelming majority of the fluid injected into Class II wells.

What else might be in saltwater?



It is possible that small quantities of drilling mud, well treatment fluids, or residual hydrocarbons will be in the produced saltwater. These are generally found in no more than trace quantities. Fluids must be injected into formations that are isolated from usable quality groundwater, sealed above and below by unbroken, impermeable rock formations.

Aside from water, what else might be in hydraulic fracturing fluid?

In small quantities, sand and various additives may be found in hydraulic fracturing fluid. Within the next few months, Commission Staff anticipate that interested citizens will be able to view more data on these additives at <http://www.fracfocus.org>. These fluids must also be injected into formations that are isolated from usable quality groundwater, sealed above and below by unbroken, impermeable rock formations.

Why is hydraulic fracturing fluid injected instead of recycled?

Some hydraulic fracturing fluid is recycled, although a majority is disposed of by injection. The primary reason cited by operators for injecting the fluid is that it is significantly less expensive than recycling.

Does hydraulic fracturing use a lot of water?

Yes and no. Although a hydraulic fracturing treatment may use hundreds of thousands of gallons of water, hydraulic fracturing accounts for much less than 1 percent of statewide water use.

Operators must have proper authority to use water in hydraulic fracturing, and industry continues to look for technological advances to reduce fresh water use. The Commission recognizes the value of fresh, usable water to the citizens of Kansas.

What about truck traffic and road damage from injection activities?

The Commission does not have authority to regulate truck traffic or road damage. Concerned citizens should contact relevant county or municipal governments, or the Kansas Department of Transportation, which may be able to address these issues.

Where are the Commission's regulations for Class II injection wells?

The Commission has three statutory duties: to protect correlative rights, to prevent waste, and to protect fresh and usable water. With injection wells, the primary concern is to protect fresh and usable water.

The Commission's regulations for injection wells are found in K.A.R. 82-3-400 through K.A.R. 82-3-412. The regulations are specifically tailored to protect underground sources of drinking water from harm from improper injection. The regulations follow national guidelines under the federal Safe Drinking Water Act regarding surface and groundwater protection.

How does the Commission regulate Class II injection wells?

Within the Commission, the Underground Injection Control (UIC) department has primary responsibility for Class II injection wells.

There are three main aspects to the regulatory process. First, an injection well must be properly constructed. Second, an injection well must be properly permitted. Third, the Commission monitors all injection operations.

What are the construction standards for an injection well?

Commission rules for the construction of all oil and gas wells, and also injection wells, are found in K.A.R. 82-3-106. The rules require multiple layers of cement and steel casing to ensure that usable groundwater is not impacted by injection operations.

Specifically, an injection well's construction standards require three layers of casing.

The first protective layer is surface casing. Surface casing consists of a steel pipe, partially or totally encased in cement, reaching from the surface to below the deepest usable groundwater level. Surface casing acts as a protective sleeve through which deeper drilling occurs.

The second protective layer is the production casing. Production casing is steel pipe, encased in cement, reaching from the surface to the well's total depth. Production casing goes inside the surface casing.

The third protective layer, used by most injection wells, is the tubing string and packer. The tubing string and packer conduct fluids down through the production casing to the bottom of the well, where the fluids are injected.

Thus, all three protection layers must fail at the same time to impact groundwater.

What is involved in the permitting process for injection wells?

There are four steps to the permitting process.

First, the operator must file an application. When filing the application, the operator must notify the landowner, as well as all owners of unleased acreage and all oil and gas well operators within a ½ mile radius of the project boundary. The operator must also publish notice in the official county newspaper.

Second, Commission Staff determines whether the operator is in good standing with the Commission.

Third, Commission Staff checks whether the well is properly completed to protect groundwater.

Fourth, Commission Staff conducts an "area of review" study, to confirm that there are no improperly completed, improperly plugged, or abandoned wells within ¼ mile of the proposed injection well. This helps ensure that there is no pathway of migration from the injection zone to usable water.

If Commission Staff identifies an issue, it must be resolved. After Commission Staff determines that the well complies with all rules ensuring protection of fresh and usable water, the Commission will administratively approve the application.

However, if an interested party protests the application, stating reasons why the proposed plan may cause damage to oil, gas, or water resources, then a hearing may be held. Based on the evidence presented, the Commission will either approve or deny the application.

How does the Commission monitor injection wells?

There are three major ways in which the Commission monitors injection wells.

First, operators must report average injection pressures and monthly injection volumes to the Commission. This assures that the well is operating within the authority of the permit.

Second, injection wells are periodically inspected based on several factors, including the operator's compliance record and the injection well's vicinity to sensitive environmental groundwater and public areas. If an inspection indicates a problem, the well must be shut in until the issue is resolved.

Third, each injection well must be tested for mechanical integrity. An initial test, before the well is permitted, must demonstrate that there are no leaks. Afterwards, wells must pass a mechanical integrity test (MIT) at least once every 5 years. Commission Staff sometimes direct operators to conduct MIT's more frequently when troubleshooting potential problems.

Any well that fails an MIT must be immediately shut-in. The operator is then given 90 days to repair the well or to plug it. The Commission's standard MIT is designed to identify small leaks or a loss of well integrity before it becomes a larger problem.

Operators are required to notify the Commission before conducting an MIT. Federal guidelines only require the Commission to witness 25% of MIT's, but Commission inspectors witness over 85% of these tests, as the Commission wishes to ensure protection of fresh water supplies.

Is it possible to look up injection wells on the Commission's website?

Not at this time. You can, however, view maps that include injection wells on the Kansas Geological Survey (KGS) website, at <http://maps.kgs.ku.edu/oilgas/index.cfm>.

The KGS website provides many details about oil and gas wells in Kansas. If you cannot find what you are looking for, call the Commission at 316-337-6200. We may be able to assist you.

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