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

In the Matter of the Failure of Jeff Crawford d/b/a)	Docket No. 22-CONS-3149-CPEN
Jeff's Oilwell Supervision (Operator) to comply with)	
K.A.R. 82-3-111)	CONSERVATION DIVISION
)	
_____)	License No.32247

PRE-FILED TESTIMONY OF JEFF CRAWFORD

JANUARY 26, 2022

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

2 A. Jeff Crawford, P.O. Box 245, Natoma, KS 67651

3 **Q. Do you currently do business as Jeff’s Oil Well Supervision?**

4 A. Yes

5 **Q. Is Jeff’s Oil Well Supervision a registered entity with the State of Kansas?**

6 A. No. It is a “d/b/a” with myself as sole proprietor.

7 **Q. What is your background and experience in the oil and gas industry?**

8 A. I’ve been in the oil industry in well servicing and production for fifty years.

9 **Q. Are you familiar with Docket No. 22-CONS-3149-CPEN regarding your alleged**
10 **failure to comply with K.A.R. 82-3-111?**

11 A. Yes

12 **Q. What is your understanding of the alleged violation of K.A.R. 82-3-111?**

13 A. It is alleged that I failed to plug or return the subject wells to service by July 27, 2021.
14 Temporary abandonment applications were filed for each well on July 27, 2021, but were
15 denied on the same day.

16 **Q. Are you familiar with the Lerock #5, Lerock/Harrison #2, Schindler #B-1; Schindler**
17 **#B-2; and Schindler #B-4 wells that are the subject of this action?**

18 A. Yes

19 **Q. What is the current status of each of the subject wells?**

20 A. The Lerock #5 was not equipment to bottom when purchased in 2020. The Lerock/Harrison
21 #2 was laid out when oil prices were low and a tubing leak developed. The Schindler #B-
22 1 was laid out because it was non-commercial. The Schindler #B-2 was laid out when
23 purchased in 2020. The Schindler #B-4 was laid out when purchased in 2020.

1 **Q. What is the current fluid level of each of the subject wells?**

2 A. It is unknown at this time due to difficulties in obtaining clear fluid shots.

3 **Q. Are any of the wells subject to a valid, continuing oil and gas lease?**

4 A. Yes. All wells are subject to valid oil and gas leases.

5 **Q. Are you aware of any casing leaks in any of the subject wells?**

6 A. The Schindler #B-2 and #B-4 were laid out when purchased. Each well was broke in at
7 approximately 2700 feet or at the top of bottom cement. The LeRock/Harrison #2 was laid
8 out due to a tubing leak. There are not other known leaks.

9 **Q. If there is a casing leaking in any of the subject wells, is the casing leak within the**
10 **useable water zone?**

11 A. No

12 **Q. Have you witnessed any issues during operation of the subject wells that would cause**
13 **concern for correlative rights of neighboring operators or any other environmental**
14 **concerns?**

15 A. No

16 **Q. Did you respond to Notice of Violation letters sent on July 27, 2021?**

17 A. No.

18 **Q. Why did you not respond to these letters?**

19 A. During this time I was became ill with COVID. My wife also developed a serious issue
20 with her kidneys. Due to these issues, I was unable to work.

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1 **Q. Why have you been unable to plug or the return the subject wells to service?**

2 A. Health issues have limited my ability to work. Because I have not been working
3 consistently, my financing have also been effected and I do not have the funds to make
4 necessary repairs to the wells.

5 **Q. Do you intend to file plugging applications for the Schindler #B-1 and Schindler #B-**
6 **2?**

7 A. Yes

8 **Q. When do you anticipate plugging of the Schindler #B-1 and Schindler #B-2 wells to**
9 **occur?**

10 A. March 2022

11 **Q. Have you made any attempts to sell or transfer the subject wells?**

12 A. Yes

13 **Q. Why have you been unable to sell or transfer the subject wells?**

14 A. A verbal agreement was reached with a potential purchaser. However, the purchaser has
15 failed to complete the transaction and is no longer communicating regarding the sale.

16 **Q. Do you currently have a potential buyer for the Lerock #5 and Lerock/Harrison #2**
17 **wells?**

18 A. Yes

19 **Q. When do you anticipate a completed sale of the Lerock #5 and Lerock/Harrison #2**
20 **wells?**

21 A. The Lerock #3 is scheduled for a mechanical integrity test on January 24, 2022. If the test
22 is successful, I anticipate closing to occur within thirty (30) days.

23

1 **Q. What actions do you intend to take with the Schindler #B-4?**

2 A. Within ninety (90) days of plugging the Schindler #B-1 and #B-2 I should have the
3 financing available to repair or plug this well.

4 **Q. Do you have any other testimony to provide?**

5 A. No

CERTIFICATE OF SERVICE

The undersigned certifies that a true copy of the above document has been served to the parties and counsel listed below by means of electronic service on the 26th day of January, 2022.

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