

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

In the matter of the failure of Novy Oil & Gas,) Docket No.: 24-CONS-3145-CPEN
Inc. (Operator) to comply with K.A.R.)
82-3-111 at the Carlin A #2, Grover #3, and) CONSERVATION DIVISION
Samms #1 wells in Reno and Saline Counties,)
Kansas.) License No.: 31714

PRE-FILED DIRECT TESTIMONY

OF

DAN FOX

ON BEHALF OF COMMISSION STAFF

MARCH 15, 2024

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

2 A. Dan Fox, 3450 N. Rock Road, Building 600, Suite 601, Wichita, Kansas, 67226.

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 (Commission), District #2 Office, as Compliance Officer and Environmental Compliance and
6 Regulatory Specialist (ECSR).

7 **Q. Would you please briefly describe your background and work experience.**

8 A. I joined the Commission in 2007 as an Underground Porosity Gas Storage Field Technician
9 in District #2. I became the District #2 Compliance Officer in 2010.

10 **Q. What are your duties with the Conservation Division?**

11 A. As Compliance Officer, I review operator data for compliance with Commission regulations
12 and prepare evidence necessary to recommend penalties for probable violations of those
13 regulations. Specifically, my job includes reviewing Staff field reports, coordinating day-to-
14 day operations of the District #2 Office, sending Notice of Violation (NOV) letters, and
15 generally trying to resolve compliance issues. I work to coordinate scheduling of Staff-
16 witnessed well completions, well pluggings, and mechanical integrity tests. I coordinate the
17 investigation of spills and complaints, verify proper construction of wells, help train District
18 Staff, and work with Commission Staff in Wichita. I conduct inspections and investigations
19 on special projects, or in the absence of assigned Staff, whenever necessary. I work with lease
20 operators, landowners, local, county, and state agencies and organizations to resolve oil and
21 gas related issues.

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

23 A. No, although I have submitted pre-filed testimony in other dockets.

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

2 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings
3 in the Penalty Order issued against Novy Oil & Gas, Inc. (Operator) in Docket 24-CONS-
4 3145-CPEN (Docket 24-3145).

5 **Q. Please provide a brief overview of the facts in this docket.**

6 A. The Commission penalized Operator for three violations of K.A.R. 82-3-111 at the Carlin A
7 #2, Grover #3, and Samms #1 wells (Subject Wells). The wells were inactive in excess of the
8 time allowed by regulation without being plugged, returned to service, or approved for
9 temporary abandonment (TA) status.

10 **Q. What are the requirements of K.A.R. 82-3-111?**

11 A. K.A.R. 82-3-111 provides that within 90 days after operations cease on any well, the operator
12 of that well shall: (1) plug the well; (2) return the well to service; or (3) file an application
13 with the Conservation Division requesting TA status, on a form prescribed in writing by the
14 Conservation Division. K.A.R. 82-3-111 also states that no well shall be temporarily
15 abandoned unless first approved by the Conservation Division, and a well shall not be eligible
16 for TA status if the well has been shut-in for ten years or more without an operator first filing
17 an application for an exception pursuant to K.A.R. 82-3-100 and receiving approval by the
18 Commission. Finally, K.A.R. 82-3-111 provides that failure by an operator to file a notice of
19 TA status for a well shall be punishable by a \$100 penalty.

20 **Q. Did Operator submit TA applications for the Carlin A #2 and Samms #1 wells?**

21 A. Yes. Operator submitted a TA application for the Carlin A #2 well on May 20, 2023. District
22 #2 Staff denied the application on May 22, 2023. On that same date, Staff sent a letter to
23 Operator indicating that the TA application had been denied because the Carlin A #2 well had

1 a high fluid level. The letter gave Operator a deadline of June 21, 2023, to bring the well into
2 compliance with K.A.R. 82-3-111. The letter is attached to the Docket 24-3145 Penalty Order
3 in Exhibit A.

4 Operator submitted a TA application for the Samms #1 well on September 27, 2023.
5 District #2 Staff denied the application on October 5, 2023. On the same date, Staff sent a
6 letter to Operator indicating that the TA application had been denied because the Samms #1
7 well had a high fluid level. The letter gave Operator a deadline of November 4, 2023, to bring
8 the well into compliance with K.A.R. 82-3-111. The letter is attached to the Docket 24-3145
9 Penalty Order in Exhibit A.

10 **Q. Did District #2 Staff send any letters to Operator regarding the Grover #3 well?**

11 A. Yes, Staff sent a Notice of Violation (NOV) letter to Operator on June 12, 2023, regarding
12 the Grover #3 well. The NOV letter stated that a lease inspection found the well was likely in
13 violation of K.A.R. 82-3-111. The NOV letter gave Operator a deadline of July 10, 2023, to
14 bring the well into compliance with K.A.R. 82-3-111. The NOV letter is attached to the
15 Docket 24-3145 Penalty Order in Exhibit A.

16 **Q. You stated that the TA applications for the Carlin A #2 and Samms #1 wells were denied
17 because of high fluid levels. What were the fluid levels for those wells?**

18 A. Operator reported that the fluid level for the Carlin A #2 well was 648 feet, and the fluid level
19 for the Samms #1 well was 1311 feet (see the TA applications attached as *Exhibit DF-1*).

20 **Q. Why were the fluid levels a concern?**

21 A. Operator measured the fluid levels for both wells from the surface of the well down to the
22 fluid level. The fluid levels Operator found in the Carlin A #2 and Samms #1 wells suggest
23 that the wells may have possible casing leaks.

1 **Q. What would Operator need to do for Staff to approve TA applications for the Carlin A**
2 **#2 and Samms #1 wells?**

3 A. Operator would need to perform successful casing integrity tests on the wells—thereby
4 showing that the wells do not have casing leaks—before Staff would approve TA applications
5 for those wells.

6 **Q. After receiving the NOV letter for the Grover #3 well, did Operator submit a TA**
7 **application for that well?**

8 A. Yes, Operator submitted a TA application for the Grover #3 well on August 4, 2023. District
9 #2 Staff denied the application on August 7, 2023. On that same date, Staff sent a letter to
10 Operator indicating that the TA application had been denied because the TA application was
11 missing production casing information, and because Staff needed to see a copy of a valid oil
12 and gas lease assignment for the Grover lease. The TA application and letter are attached as
13 *Exhibit DF-2*.

14 **Q. Why did Staff need to see a valid oil and gas lease assignment for the Grover lease?**

15 A. Staff received a letter from an attorney representing the owner of the land where the Grover
16 lease is located. The letter indicated that the landowner filed an affidavit with the Reno County
17 Register of Deeds stating that the terms of the lease agreement with Operator had been broken,
18 and the lease forfeited. The letter is attached as *Exhibit DF-3*. Staff cannot approve a TA
19 application for a well if the Operator does not have a valid oil and gas lease for the well.
20 Consequently, Staff asked Operator to provide a copy of a valid oil and gas lease assignment
21 for the Grover lease before we approved the TA application for the Grover #3 well.

1 **Q. Did Operator provide Staff with a copy of a valid oil and gas lease assignment for the**
2 **Grover lease?**

3 A. No.

4 **Q. Did Operator contact District #2 Staff regarding any of the Subject Wells?**

5 A. No.

6 **Q. Did District #2 Staff perform field inspections of the Subject Wells?**

7 A. Yes. Between June 27, 2023, and November 7, 2023, District #2 Staff performed field
8 inspections of the Subject Wells. These inspections were performed after the various
9 deadlines in the letters sent to Operator had passed. Staff found each of the Subject Wells to
10 be inactive. Consequently, the wells were still out of compliance with K.A.R. 82-3-111 after
11 the deadlines in the letters had passed. The field reports are attached to the Docket 24-3145
12 Penalty Order as Exhibit B.

13 **Q. Please summarize your recommendations.**

14 A. I believe the information gathered by District #2 Staff is sufficient to affirm the Commission's
15 Penalty Order in this docket. The Subject Wells have been inactive and unplugged without
16 TA status for longer than allowed by Commission regulations.

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

18 A. Yes.

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# 31714
 Name: Novy Oil & Gas, Inc.
 Address 1: PO BOX 559
 Address 2: _____
 City: GODDARD State: KS Zip: 67052 + 0559
 Contact Person: Kirk Glenn
 Phone: (316) 794-7200
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-169-00471-00-00
 Spot Description: _____
SW SW SW Sec. 24 Twp. 15 S. R. 3 E W
643 feet from N / S Line of Section
4681 feet from E / W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: NAD27 NAD83 WGS84
 County: Saline Elevation: _____ GL KB
 Lease Name: CARLIN A Well #: 2
 Well Type: (check one) Oil Gas OG WSW Other: _____
 SWD Permit #: _____ ENHR Permit #: _____
 Gas Storage Permit #: _____
 Spud Date: _____ Date Shut-In: 03/06/2020

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	0	8.625	5.5	0	0	0
Setting Depth	0	270	3299	0	0	0
Amount of Cement	0	175	125	0	0	0
Top of Cement	0	0	3000	0	0	0
Bottom of Cement	0	270	3299	0	0	0

Casing Fluid Level from Surface: 648 How Determined? Echometer Date: 05/18/2023
 Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
 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: _____ w / _____ sacks of cement Port Collar: _____ w / _____ sack of cement
 Packer Type: _____ Size: _____ Inch Set at: _____ Feet
 Total Depth: 3299 Plug Back Depth: 3259 Plug Back Method: CIBP & Cement

Geological Date:

Formation Name Formation Top Formation Base Completion Information
 1. _____ At: _____ to _____ Feet Perforation Interval 3228 to 3200 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: _____

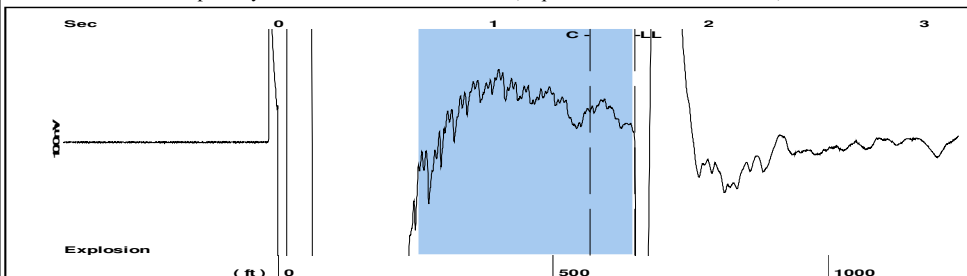
Review Completed by: Keith Karlin, ECRS Comments: Must pass MIT for TA approval. Fluid has increased last 3 years.

TA Approved: Yes Denied Date: 05/22/2023

Mail to the Appropriate KCC Conservation Office:

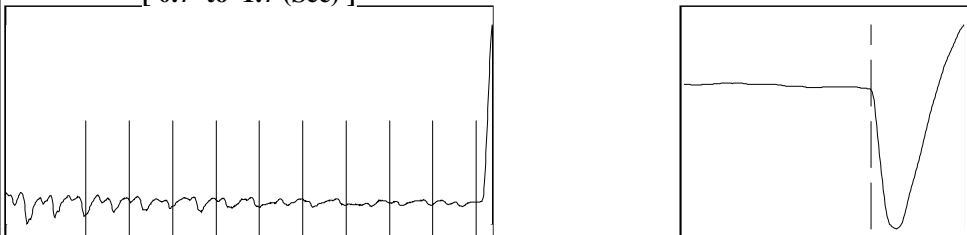
	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4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

Exhibit DF-1

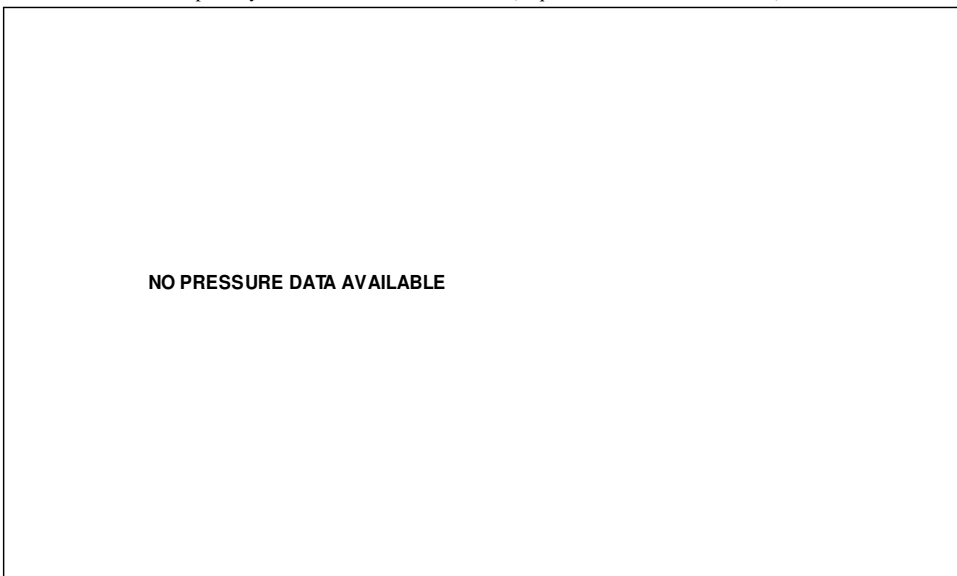


Filter Type High Pass Automatic Collar Count Yes Time 1.655 sec
 Manual Acoustic Velocity 711.56 ft/s Manual JTS/sec 11.2233 Joints 20.4321 Jts
 Depth 647.70 ft

[0.7 to 1.7 (Sec)]

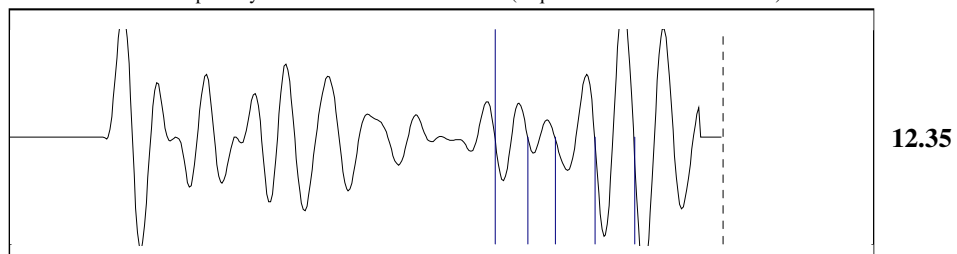


Analysis Method: Automatic



Change in Pressure 0.00 psi PT15262
 Range 0 - ? psi
 Change in Time 0.25 min

<p>Production Current Potential</p> <p>Oil - * - 0.0 BBL/D</p> <p>Water - * - 0.0 BBL/D</p> <p>Gas - * - 0.0 Mscf/D</p> <p>IPR Method Vogel</p> <p>PBHP/SBHP 0.82</p> <p>Production Efficiency 29.1</p> <p>Oil 40 deg.API</p> <p>Water 1.05 Sp.Gr.H2O</p> <p>Gas 1.17 Sp.Gr.AIR</p> <p>Acoustic Velocity 782.716 ft/s</p> <p>Formation Submergence</p> <p>Total Gaseous Liquid Column HT (TVD) 2580 ft</p> <p>Equivalent Gas Free Liquid HT (TVD) 2580 ft</p> <p>Acoustic Test</p>	<p>Casing Pressure -0.5 psi (g)</p> <p>Casing Pressure Buildup 0.004 psi</p> <p>0.25 min</p> <p>Gas/Liquid Interface Pressure -0.1 psi (g)</p> <p>Liquid Level Depth 647.70 ft</p> <p>Pump Intake Depth 3228.00 ft</p> <p>Formation Depth 3300.00 ft</p>		<p>Producing</p> <p>Annular Gas Flow 0 Mscf/D</p> <p>% Liquid 100 %</p> <p>Liquid Stream</p> <p>Below Tubing</p> <p>Oil 0 %</p> <p>Water 100 %</p> <p>Liquid Below Tubing 100 %</p> <p>Pump Intake 849.2 psi (g)</p> <p>Producing BHP 881.9 psi (g)</p> <p>Static BHP 1072.9 psi (g)</p>
--	--	--	--



12.35

Acoustic Velocity 782.716 ft/s Joints counted 4
 Joints Per Second 12.3457 jts/sec Joints to liquid level 20.4321
 Depth to liquid level 647.698 ft Filter Width 9.22334 13.2233
 Automatic Collar Count Yes Time to 1st Collar 1.124 1.448

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

TEMPORARY ABANDONMENT WELL APPLICATION

OPERATOR: License# 31714
 Name: Novy Oil & Gas, Inc.
 Address 1: PO BOX 559
 Address 2: _____
 City: GODDARD State: KS Zip: 67052 + 0559
 Contact Person: Michael E. Novy
 Phone: (316) 794-7200
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-155-21482-00-00
 Spot Description: _____
E2 NW SW Sec. 15 Twp. 23 S. R. 10 E W
1898 feet from N / S Line of Section
4247 feet from E / W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: NAD27 NAD83 WGS84
 County: Reno Elevation: _____ GL KB
 Lease Name: SAMMS Well #: 1
 Well Type: (check one) Oil Gas OG WSW Other: _____
 SWD Permit #: _____ ENHR Permit #: _____
 Gas Storage Permit #: _____
 Spud Date: 01/03/2005 Date Shut-In: 03/13/2016

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	na	8.625	5.5	NA	NA	2.875
Setting Depth		347	3785			3534
Amount of Cement		250	250			0
Top of Cement		0	3000			0
Bottom of Cement		347	3785			0

Casing Fluid Level from Surface: 1311 How Determined? Echometer Date: 09/25/2023

Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____

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: _____ w / _____ sacks of cement Port Collar: _____ w / _____ sack of cement

Packer Type: _____ Size: _____ Inch Set at: _____ Feet

Total Depth: 3789 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name	Formation Top	Formation Base	Completion Information
1. _____	At: _____	to _____ Feet	Perforation Interval <u>3764</u> to <u>3770</u> 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

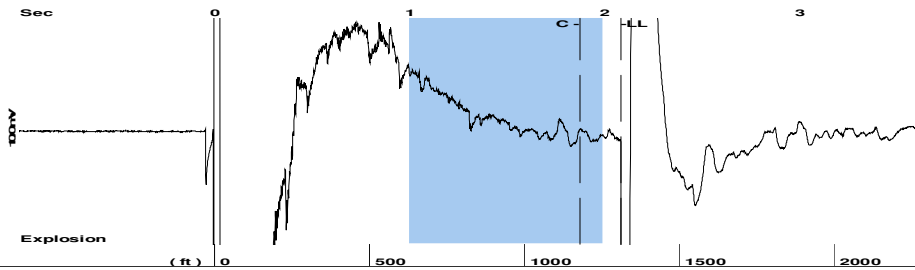
Submitted Electronically

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>Virgil Clothier</u>	Comments: <u>Well would have to pass CIT for TA status.</u>				
TA Approved: <input type="checkbox"/> Yes <input checked="" type="checkbox"/> Denied	Date: <u>10/05/2023</u>				

Mail to the Appropriate KCC Conservation Office:

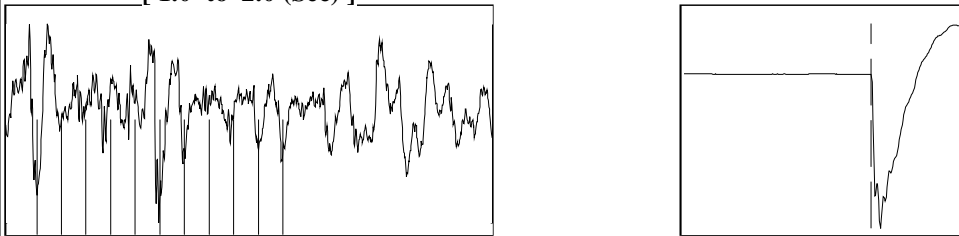
	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4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

Group: Novy Oil & Gas Well: Samms #1 (acquired on: 09/25/23 14:10:48)



Filter Type High Pass Automatic Collar Count Yes Time 2.082 sec
 Manual Acoustic Velox1252.96 ft/s Manual JTS/sec 19.7628 Joints 41.3548 Jts
 Depth 1310.95 ft

[1.0 to 2.0 (Sec)]



Analysis Method: Automatic

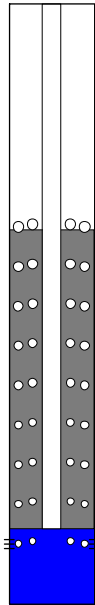
Group: Novy Oil & Gas Well: Samms #1 (acquired on: 09/25/23 14:10:48)

NO PRESSURE DATA AVAILABLE

Change in Pressure 0.03 psi PT15262
 Range 0 - ? psi
 Change in Time 0.25 min

Group: Novy Oil & Gas Well: Samms #1 (acquired on: 09/25/23 14:10:48)

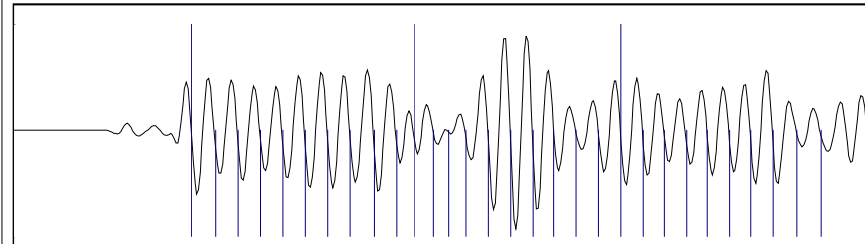
Production Current	Potential	Casing Pressure
Oil 19	76.4 BBL/D	1.8 psi (g)
Water 2600	10460.3 BBL/D	Casing Pressure Buildup
Gas 1.0	4.0 Mscf/D	0.029 psi
		0.25 min
IPR Method	Vogel	Gas/Liquid Interface Pressure
PBHP/SBHP	0.85	2.4 psi (g)
Production Efficiency	24.9	
Oil 40 deg.API		Liquid Level Depth
Water 1.05 Sp.Gr.H2O		1310.95 ft
Gas 0.72 Sp.Gr.AIR		Pump Intake Depth
		3675.00 ft
Acoustic Velocity	1259.32 ft/s	Formation Depth
		3789.00 ft
Formation Submergence		
Total Gaseous Liquid Column HT (TVD)	2364 ft	
Equivalent Gas Free Liquid HT (TVD)	2203 ft	



Producing

Annular Gas Flow	
% Liquid	93 %
Liquid Stream	
Below Tubing	
Oil	0 %
Water	100 %
Liquid Below Tubing	96 %
Pump Intake	737.8 psi (g)
Producing BHP	787.3 psi (g)
Static BHP	926.4 psi (g)

Group: Novy Oil & Gas Well: Samms #1 (acquired on: 09/25/23 14:10:48)



19.86



Acoustic Velocity	1259.32 ft/s	Joints counted	29
Joints Per Second	19.863 jts/sec	Joints to liquid level	41.3548
Depth to liquid level	1310.95 ft	Filter Width	17.7628 21.7628
Automatic Collar Count	Yes	Time to 1st Collar	0.412 1.872

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# 31714
 Name: Novy Oil & Gas, Inc.
 Address 1: PO BOX 559
 Address 2: _____
 City: GODDARD State: KS Zip: 67052 + 0559
 Contact Person: Michael Novy
 Phone: (316) 794-7200
 Contact Person Email: _____
 Field Contact Person: _____
 Field Contact Person Phone: (_____) _____

API No. 15- 15-155-21722-00-00
 Spot Description: E2 W2 NE NW Sec. 20 Twp. 22 S. R. 8 E W
660 feet from N / S Line of Section
1880 feet from E / W Line of Section
 GPS Location: Lat: _____, Long: _____
 Datum: NAD27 NAD83 WGS84
 County: Reno Elevation: _____ GL KB
 Lease Name: GROVER Well #: 3
 Well Type: (check one) Oil Gas OG WSW Other: _____
 SWD Permit #: _____ ENHR Permit #: _____
 Gas Storage Permit #: _____
 Spud Date: 12/10/2014 Date Shut-In: 11/01/2021

	Conductor	Surface	Production	Intermediate	Liner	Tubing
Size	na	8.625	na	na	na	2.875
Setting Depth		268				3622
Amount of Cement		250				na
Top of Cement		0				na
Bottom of Cement		268				na

Casing Fluid Level from Surface: 3010 How Determined? Echometer Date: 08/03/2023
 Casing Squeeze(s): _____ to _____ w / _____ sacks of cement, _____ to _____ w / _____ sacks of cement. Date: _____
 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: _____ w / _____ sacks of cement Port Collar: _____ w / _____ sack of cement
 Packer Type: _____ Size: _____ Inch Set at: _____ Feet
 Total Depth: 3644 Plug Back Depth: _____ Plug Back Method: _____

Geological Date:

Formation Name Formation Top Formation Base Completion Information
 1. _____ At: _____ to _____ Feet Perforation Interval 3550 to 3558 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: Jeff Klock, District Supervisor Comments: Missing production casing information. Need copy of valid O&G lease.

TA Approved: Yes Denied Date: 08/07/2023

Mail to the Appropriate KCC Conservation Office:


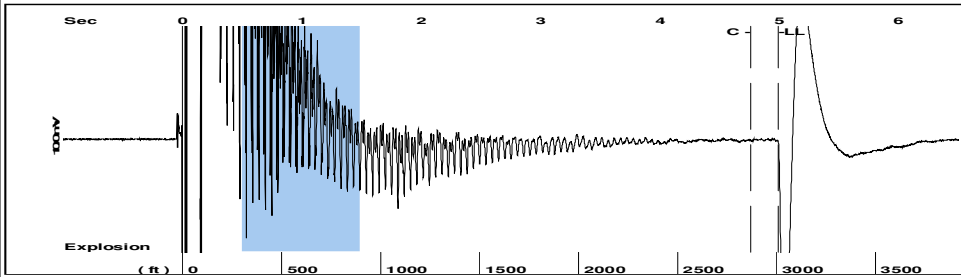
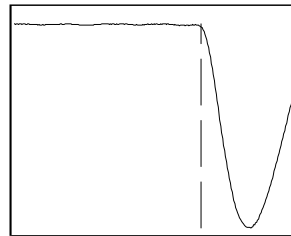
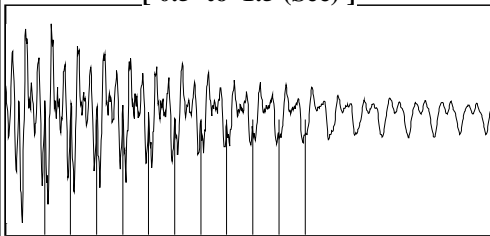
	KCC District Office #1 - 210 E. Frontview, Suite A, Dodge City, KS 67801	Phone 620.682.7933
	KCC District Office #2 - 3450 N. Rock Road, Building 600, Suite 601, Wichita, KS 67226	Phone 316.337.7400
	KCC District Office #3 - 137 E. 21st St., Chanute, KS 66720	Phone 620.902.6450
	KCC District Office #4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

Exhibit DF-2

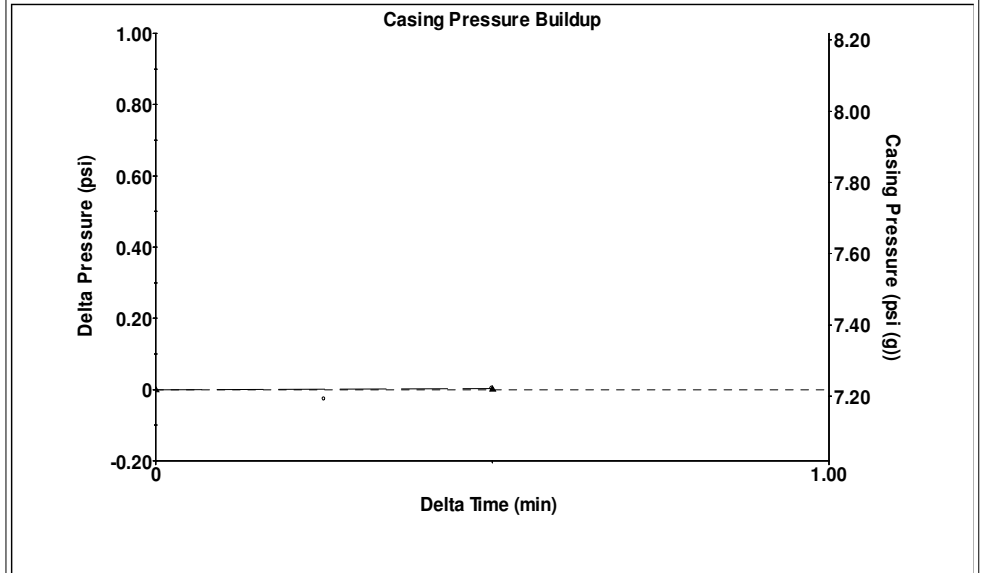


Filter Type High Pass Automatic Collar Count Yes Time 4.995 sec
 Manual Acoustic Veloc 1185.05 ft/s Manual JTS/sec 18.6916 Joints 94.9407 Jts
 Depth 3009.62 ft

[0.5 to 1.5 (Sec)]

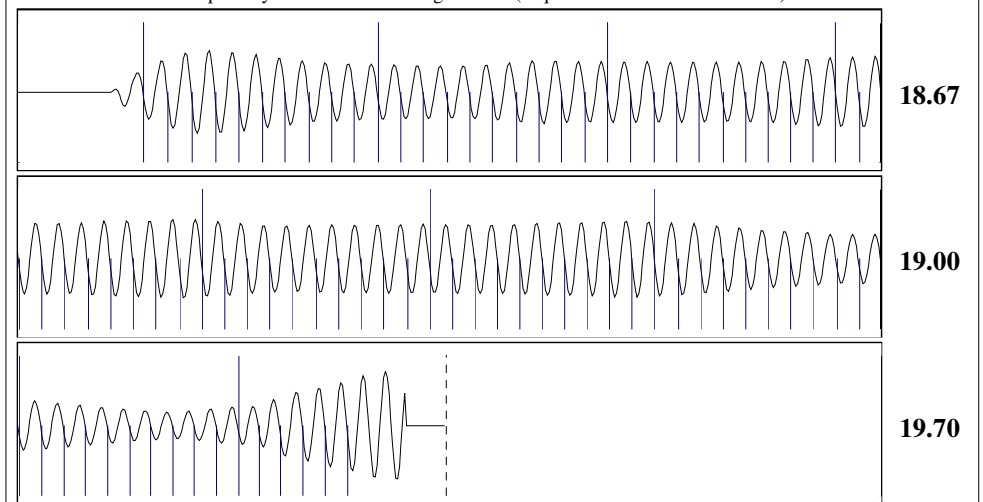


Analysis Method: Automatic



Change in Pressure 0.00 psi PT15262
 Change in Time 0.50 min Range 0 - ? psi

Production	Potential	Casing Pressure		Producing
Current		7.2 psi (g)		Annular Gas Flow
Oil - * -	- * - BBL/D	Casing Pressure Buildup		0 Mscf/D
Water - * -	- * - BBL/D	0.002 psi		% Liquid
Gas - * -	- * - Mscf/D	0.50 min		100 %
IPR Method	Vogel	Gas/Liquid Interface Pressure		
PBHP/SBHP	- * -	9.0 psi (g)		Liquid Stream
Production Efficiency	0.0	Liquid Level Depth		Below Tubing
Oil 40 deg.API		3009.62 ft		Oil 0 %
Water 1.05 Sp.Gr.H2O		Pump Intake Depth		Water 100 %
Gas 0.79 Sp.Gr.AIR		3550.00 ft		
Acoustic Velocity	1205.05 ft/s	Formation Depth	Liquid Below Tubing	
		3644.00 ft	100 %	
Formation Submergence			Pump Intake	
Total Gaseous Liquid Column HT (TVD)	540 ft		192.4 psi (g)	
Equivalent Gas Free Liquid HT (TVD)	540 ft		Producing BHP	
			235.2 psi (g)	
Acoustic Test			Static BHP	
			- * - psi (g)	



Acoustic Velocity 1205.05 ft/s Joints counted 85
 Joints Per Second 19.0072 jts/sec Joints to liquid level 94.9407
 Depth to liquid level 3009.62 ft Filter Width 16.6916 20.6916
 Automatic Collar Count Yes Time to 1st Collar 0.292 4.764

August 07, 2023

Michael Novy
Novy Oil & Gas, Inc.
PO BOX 559
GODDARD, KS 67052-0559

Re: Temporary Abandonment
API 15-155-21722-00-00
GROVER 3
NW/4 Sec.20-22S-08W
Reno County, Kansas

Dear Michael Novy:

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

Missing Production Casing Information. Must also provide a copy of valid Oil & Gas lease.

Pursuant to K.A.R. 82-3-111, the well must be plugged, or returned to service, or obtain temporary abandonment status by 09/06/2023.

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,
Jeff Klock, District Supervisor
KCC DISTRICT 2



P.O. Box 1349
1310 Kansas Avenue
Great Bend, KS 67530
Tel. (620)793-7279
Fax (620)793-7289
E-mail: bp@bauerpikelaw.com

GROVER #3
E/2 W/2 NE NW
SEC 20-22-8W, RN G.
15-155-21722-0000
LAST OIL SALE 9/2021
LAST GAS SALE 2015

Attorneys/Counselors
Greg L. Bauer
Charles R. Pike
Robert E. Bauer
Kate M. Wary
Julie A. Carroll
Richard G. Gunn

June 5, 2023

Kansas Corporation Commission
District Office No. 2
3450 N. Rock Road Bldg. 600, Ste. 601
Wichita, KS 67226

RE: NORTH HALF NORTHWEST QUARTER (N/2 NW/4) OF SECTION TWENTY (20),
TOWNSHIP TWENTY-TWO (22) SOUTH, RANGE EIGHT (8) WEST, RENO
COUNTY, KANSAS.
NOVY OIL & GAS, INC.

Dear Sirs:

This office represents Brad Flickinger, the landowner on the captioned property, who recently completed the statutory process provided for in K.S.A 55-201 & K.S.A 55-202. Copies of the recorded Affidavit are enclosed herewith. We received no response whatsoever from Novy Oil & Gas, Inc. in connection with this proceeding and would as that you take the steps as are required to see that the wells are properly plugged in abandoned.

Very truly yours,

BAUER, PIKE, BAUER, WARY,
CARROLL, & GUNN, LLC

By: _____

GREGG L. BAUER

GLB/yd

Enclosures

cc: Brad Flickinger, with attachments: 4110 N. Andre Rd., Sterling, KS 67579.

STATE OF KANSAS • RENO COUNTY
This instrument was filed for record on the
22 day of MAY 2023 at 1:30 AM/PM
and duly recorded in Book 574 Page 493
for a fee of \$ 55.⁰⁰ (3) page(s)
Michelle Updegrave
Michelle Updegrave, Registrar of Deeds

MP

AFFIDAVIT

To Novy Oil & Gas, Inc.:

I, the undersigned, owner of the following described property situated in Reno County, Kansas, to wit:

✓ NORTH HALF NORTHWEST QUARTER (N/2 NW/4) OF SECTION TWENTY (20), TOWNSHIP TWENTY-TWO (22) SOUTH, RANGE EIGHT (8) WEST, RENO COUNTY, KANSAS,

upon which a lease, dated December 3, 2014, was given to Novy Oil & Gas, Inc., do hereby notify you that the terms of said lease have been broken by the owner thereof, that I hereby elect to declare and do declare the said lease forfeited and void and that, unless you do, within twenty days from this date, notify the register of deeds of said county as provided by law that said lease has not been forfeited, I will file with the said register of deeds affidavit of forfeiture as provided by law; and I hereby demand that you execute or have executed a proper surrender of said lease and that you put the same of record in the office of the register of deeds of said county within twenty days from this date.

Dated this 25 day of April 2023.

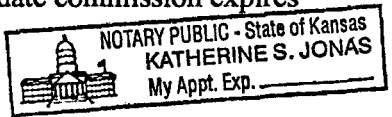
Brad Flickinger
BRAD FLICKINGER

STATE OF KANSAS; COUNTY OF Barton ; ss:

SUBSCRIBED AND SWORN to before me this 25 day of April, 2023.

11-13-2024
Seal/date commission expires

Katherine S. Jonas
Notary Public



CERTIFICATE OF SERVICE

24-CONS-3145-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Dan Fox has been served to the following by means of electronic service on March 15, 2024.

DANIEL FOX, COMPLIANCE OFFICER, KCC DISTRICT 2
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 2
3450 N. ROCK RD BLDG 600 STE 601
WICHITA, KS 67226
d.fox@kcc.ks.gov

TRISTAN KIMBRELL, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
t.kimbrell@kcc.ks.gov

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

BRADEN M. PERRY
KENNYHERTZ PERRY, LLC
2000 SHAWNEE MISSION PKWY STE 210
MISSION WOODS, KS 66205-3604
braden@kennyhertzperry.com

/s/ Paula J. Murray

Paula J. Murray
