

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

Before Commissioners:            Shari Feist Albrecht, Chair  
   Jay Scott Emler  
   Pat Apple

In the Matter of the Application of Heavy Oil	)	Docket No. 15-CONS-233-CUIC
Treatment Solutions, LLC to authorize the	)	
injection of salt water into the Arbuckle	)	CONSERVATION DIVISION
Formation at the Robbins #3 Well, located in	)	
the NE/4 of Section 23, Township 12 South,	)	License No. 34847
<u>Range 20 East, Leavenworth County, Kansas.</u>	)	

**PRE-FILED TESTIMONY  
OF  
JERRY KNOBEL**

1 Q. What is your name and business address?  
2 A. Jerry Knobel, 266 N. Main, Suite 220, Wichita, Kansas 67202.  
3 Q. By whom are you employed and in what capacity?  
4 A. I am employed by the Kansas Corporation Commission, Conservation Division, as a  
5 professional geologist in the Underground Injection Control Department.  
6 Q. Would you please briefly describe your educational background and work experience?  
7 A. I graduated from Fort Hays State University in 1975 with a B.S. degree in Geology. After  
8 graduation, I worked two years for Great Guns Logging Co. as a cased hole logging  
9 engineer. Three years were spent with Frontier Oil Company as a well site geologist and  
10 assistant well completion foreman. I worked for TXO Production Company for three years  
11 in oil/gas exploration. From 1983-1991, I was a consulting geologist doing well site geology  
12 and oil/gas prospect generation. From 1991 to present, I have worked in the UIC  
13 Department as a Professional Geologist.  
14 Q. How long have you been employed by the KCC?  
15 A. 23 years.  
16 Q. Have you previously testified before this Commission?  
17 A. Yes, I have testified as an expert witness in many similar matters.  
18 Q. What does your position with the Conservation Division involve?  
19 A. I review applications for injection authorization of Class II wells in Kansas.  
20 Q. What is a Class II well?  
21 A. The U.S. Environmental Protection Agency breaks injection wells into different categories.  
22 Class II injection wells are used for the injection of fluids associated with oil and gas  
23 production.  
24 Q. Have you reviewed the application by Heavy Oil Treatment Solutions, LLC for the Robbins  
25 #3 well to dispose of produced water from their lease wells into the Arbuckle formation  
26 from 1921' to 2092'?  
27 A. Yes I have.  
28 Q. Is the application complete?  
29 A. Yes. All surrounding parties appear to have been notified and publication is complete.  
30 Q. How is the Robbins #3 well constructed?

1 A. 8-5/8" surface casing is set at 108' and cemented to surface with 60 sacks of cement. 5-1/2"  
2 producing casing is set at 1921' and cemented to approximately 1050' with 100 sacks of  
3 cement. A DV tool is cemented from 1314' to surface with 235 sacks of cement. 2-7/8"  
4 tubing is set at 1921' with a packer at 1871'. This well is completed open hole from 1921'  
5 to 2092' in the Arbuckle formation.

6 Q. How many wells are within the 1/4-mile Area of Review?

7 A. There are 22 producers, 1 plugged and abandoned well and 1 active disposal well.

8 Q. What can you tell me about this disposal well?

9 A. This is the Mini-Farm #IJ-1 well. It is completed Alternate II fashion and disposes from 942'  
10 - 1008' into the Cattleman Sand formation.

11 Q. How are the producing wells constructed?

12 A. The producing wells are constructed in Alternate II fashion. Surface casing is usually 7", set  
13 at about 108' and cemented to surface. Production casing is usually 2-7/8", set at about 850'  
14 and cemented back to surface. Production is from the Squirrel Sand formation through  
15 perforations at about 750' - 800'.

16 Q. Is the single plugged and abandoned well plugged properly?

17 A. Yes. This is the Mini-Farm #6 well, located NE-NE-SE-NW/4 of Section 23. 7" surface  
18 casing was set at 88'; it was drilled to 108', then lost circulation; and was plugged at 108';  
19 and bore hole filled from TD to surface with 45 sacks of cement on September 4, 2013.

20 Q. What is the depth of fresh water in Section 23?

21 A. KCC water well database list the deepest usable water at 180 ft. in NE-NW-NW/4 Sec. 23-  
22 12-20E. Water formation is usually an alluvial sand in this area.

23 Q. Do you have an opinion regarding the Heavy Oil Treatment Solutions, LLC Robbins #3  
24 Arbuckle disposal request?

25 A. Yes. I believe a disposal permit should be granted to the Robbins #3, as the well appears to  
26 fully comply with Commission regulations and requirements.

27 Q. Does this conclude your testimony as of this date, November 20, 2014?

28 A. Yes. It does.

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**CERTIFICATE OF SERVICE**

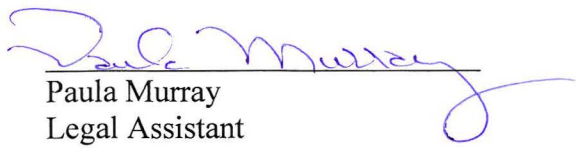
I, Paula Murray, certify that on December 8, 2014, I did cause a true and correct copy of the Pre-Filed Testimony of Jerry Knobel to be served by United States mail, first class, postage prepaid to the following:

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