

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

In the matter of the failure of Garo Investment)	Docket No.: 24-CONS-3235-CPEN
Company (Operator) to comply with K.A.R.)	
82-3-111 at the Hrabe D #1, Hrabe D #2,)	CONSERVATION DIVISION
Westhusin #1, and Westhusin #6 wells in)	
<u>Rooks County, Kansas.</u>)	License No.: 34474

PRE-FILED DIRECT TESTIMONY

OF

RICHARD WILLIAMS

ON BEHALF OF COMMISSION STAFF

JUNE 7, 2024

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

2 A. Richard Williams, 2301 E. 13th Street, Hays, Kansas 67601.

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 #4 Office, as Compliance Officer, Temporary Abandonment (TA)
6 Coordinator, and Environmental Compliance and Regulatory Specialist (ECRS).

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

8 A. After attending college for two years, I worked for an independent oil and gas operator in
9 Kansas. During my fifteen years with this operator, I worked as a production superintendent
10 where I was responsible for completing and maintaining wells and overseeing day-to-day
11 operations. In 1997, I began working for the Commission as a Petroleum Industry Regulatory
12 Technician. After a statewide reclassification of environmental positions, I am now an ECRS.
13 In 2000, I became the TA coordinator for the District #4 Office. Additionally, since 2014, I
14 have served as the District #4 Compliance Officer.

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

16 A. As Compliance Officer, I review operator data for compliance with Commission regulations
17 and prepare evidence necessary to recommend penalties for probable violations of those
18 regulations. Specifically, my job includes reviewing Staff field reports, coordinating day-to-
19 day operations of the District #4 Office, sending Notice of Violation (NOV) letters, and
20 generally trying to resolve compliance issues. I work to coordinate scheduling of Staff-
21 witnessed well completions, well pluggings, and mechanical integrity tests (MITs). I
22 coordinate the investigation of spills and complaints, verify proper construction of wells, help
23 train District Staff, and work with Commission Staff in Wichita. I conduct inspections and

1 investigations on special projects, or in the absence of assigned Staff, whenever necessary. I
2 work with lease operators, landowners, local, county, and state agencies and organizations to
3 resolve oil and gas related issues.

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

5 A. Yes.

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

7 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings
8 in regard to the Penalty Order issued against Garo Investment Company (Operator) in Docket
9 24-CONS-3235-CPEN (Docket 24-3235).

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

11 A. The Commission penalized Operator for four violations of K.A.R. 82-3-111 at the Hrabe
12 D #1, Hrabe D #2, Westhusin #1, and Westhusin #6 wells (Subject Wells). The wells were
13 inactive in excess of the time allowed by regulation without being plugged, returned to
14 service, or approved for TA status.

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

16 A. K.A.R. 82-3-111 provides that within 90 days after operations cease on any well, the operator
17 of that well shall: (1) plug the well; (2) return the well to service; or (3) file an application
18 with the Conservation Division requesting TA status, on a form prescribed in writing by the
19 Conservation Division. K.A.R. 82-3-111 also states that no well shall be temporarily
20 abandoned unless first approved by the Conservation Division, and a well shall not be eligible
21 for TA status if the well has been shut-in for 10 years or more without an operator first filing
22 an application for an exception pursuant to K.A.R. 82-3-100 and receiving approval by the

1 Commission. Finally, K.A.R. 82-3-111 provides that failure by an operator to file a notice of
2 TA status for a well shall be punishable by a \$100 penalty.

3 **Q. Did Staff send any letters to Operator regarding the Subject Wells?**

4 A. Yes. I sent NOV letters for each of the Subject Wells to Operator on December 5, 2023. The
5 letters stated that the Subject Wells were in probable violation of K.A.R. 82-3-111, and gave
6 Operator until January 2, 2024, to return the wells to service, plug the wells, or obtain TA
7 status for the wells. Copies of the NOV letters are attached to the Docket 24-3235 Penalty
8 Order as Exhibit A.

9 **Q. Why did you send the NOV letters for the Subject Wells?**

10 A. Field inspections by District #4 Staff on November 27, 2023, found each Subject Well to be
11 inactive.

12 **Q. Did Operator respond to the letters?**

13 A. No.

14 **Q. Did Staff perform field inspections of the Subject Wells after the January 2, 2024,
15 deadline in the NOV letters?**

16 A. Yes, District #4 Staff inspected the Subject Wells on February 12, 2024. Staff observed that
17 each well was still inactive; consequently, the wells were out of compliance with K.A.R. 82-
18 3-111 after the deadline in the NOV letters. Staff's field reports are attached to the Docket
19 24-3235 Penalty Order as Exhibit B.

20 **Q. Is there any additional evidence showing that the Subject Wells have been inactive for
21 longer than the 90 days allowed under K.A.R. 82-3-111?**

22 A. Yes, there is. The Hrabe D #1, Hrabe D #2, and Westhusin #1 wells are all oil wells. Records
23 from the Kansas Geological Survey (KGS) website show that the Hrabe D lease has not had

1 any production since August 2020. Records from the KGS website also show that the
2 Westhusin lease has not had any production since October 2019. Copies of the KGS records
3 are attached to my testimony as *Exhibit RW-1*.

4 The Westhusin #6 well is an enhanced oil recovery injection well. The annual fluid
5 injection reports (U3C forms) submitted by Operator show that Operator last injected fluids
6 into the Westhusin #6 well in August 2020. The subsequent U3C forms submitted by Operator
7 show there has been no injection of fluids into the well after that date. Copies of the U3C
8 forms are attached to my testimony as *Exhibit RW-2*.

9 The lack of oil production on the leases and lack of injection into the enhanced oil recovery
10 well suggest that the Subject Wells have been inactive for much longer than 90 days.

11 **Q. As of the date of this testimony, has Operator plugged, returned to service, or obtained**
12 **TA status for any of the Subject Wells?**

13 A. No.

14 **Q. Please summarize your recommendations.**

15 A. I believe the information gathered by District #4 Staff is sufficient to affirm the Commission's
16 Penalty Order in this docket. The Subject Wells have been inactive and unplugged without
17 TA status for longer than allowed by Commission regulations.

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

19 A. Yes.

LEO HRABE D-1 Lease

Lease: LEO HRABE D-1

Operator: Garo Investment Company

Location: T9S, R17W, Sec. 12

Cumulative Production: 73768.7 barrels (from 1969 to 2020)

KS Dept. of Revenue Lease Code: 110084

KS Dept. of Revenue Lease Name: HRABE D

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

Field: [Westhusin](#)

County: Rooks

Producing Zone:

Well Data (may be an incomplete list):

T9S R17W, Sec. 12, SW SW NE Lease: HRABE 'D' 1 Operator: GEORGE P CRAWFORD Current Operator: Garo Investment Company API Number: 15-163-20076	T9S R17W, Sec. 12, SE SW NE Lease: HRABE 'D' 2 Operator: S & M OIL CO Current Operator: Garo Investment Company API Number: 15-163-23043
T9S R17W, Sec. 12, SW SW NE Lease: HRABE 'D' 1 Operator: Richardson Developments Current Operator: Richardson Developments API Number: 15-163-19261	

Data are received monthly from the Kansas Department of Revenue.

Annual Oil Production, (bbls)

Year	Production	Wells
Production Plots		
1969	4,609	1
1970	3,428	1
1971	1,301	1
1972	2,294	1
1973	2,423	1
1974	2,371	1
1975	1,873	1
1976	1,005	1
1977	323	1

Recent Monthly Oil Production, (bbls)

(Complete production available in file saved using blue button at top of page.)

Year	Month	Production	Wells	Reporter or Purchaser/ Reporting Customer
2014	1	158.01	2	Coffeyville Resources Refining & Marketing (100%)
2014	2	129.32	2	Coffeyville Resources Refining & Marketing (100%)
2014	3	163.11	2	Coffeyville Resources Refining & Marketing (92%) , CFMI LLC (8%)
2014	5	244.76	2	Coffeyville Resources Refining & Marketing (100%)
2014	6	125.11	2	Coffeyville Resources Refining & Marketing (100%)

1978	1,841	1
1979	2,948	1
1980	1,826	1
1981	2,325	1
1982	2,637	1
1983	1,891	1
1984	2,042	1
1985	2,740	1
1986	1,799	1
1987	133	1
1988	46	1
1989	1,905	1
1990	2,875	1
1991	2,568	1
1992	1,882	1
1993	206	1
1994	126	1
1995	721	1
1996	583	2
1997	101	2
1998	29	2
1999	16	2
2000	38	2
2001	182	2
2002	1,357	2
2003	2,042	2
2004	155	2
2005	217	2
2006	1,346	2
2007	1,683	2
2008	1,905	2
2009	2,000	2
2010	1,986	2
2011	1,662	2
2012	1,589	2
2013	1,309	2
2014	1,523	2
2015	1,591	2
2016	446	2
2017	510	2

2014	7	84.23	2	Coffeyville Resources Refining & Marketing (100%)
2014	8	162.38	2	Coffeyville Resources Refining & Marketing (100%)
2014	9	150.57	2	Coffeyville Resources Refining & Marketing (97%) , CFMI LLC (3%)
2014	10	164.09	2	Coffeyville Resources Refining & Marketing (100%)
2014	11	141.15	2	Coffeyville Resources Refining & Marketing (100%)
2015	1	166.8	2	Coffeyville Resources Refining & Marketing (87%) , CFMI LLC (13%)
2015	2	153.47	2	Coffeyville Resources Refining & Marketing (100%)
2015	3	172.06	2	Coffeyville Resources Refining & Marketing (95%) , CFMI LLC (5%)
2015	4	131.86	2	Coffeyville Resources Refining & Marketing (100%)
2015	5	139.07	2	Coffeyville Resources Refining & Marketing (100%)
2015	6	77.78	2	Coffeyville Resources Refining & Marketing (100%)
2015	7	162.55	2	Coffeyville Resources Refining & Marketing (100%)
2015	8	140.91	2	Coffeyville Resources Refining & Marketing (100%)
2015	9	120.89	2	Coffeyville Resources Refining & Marketing (100%)
2015	10	125.92	2	Coffeyville Resources Refining & Marketing (100%)
2015	12	200.08	2	Coffeyville Resources Refining & Marketing (100%)
2016	1	56.1	2	Coffeyville Resources Refining & Marketing (100%)
2016	2	59.44	2	Coffeyville Resources Refining & Marketing (100%)
2016	3	66.68	2	Coffeyville Resources Refining & Marketing (100%)
2016	5	66.8	2	Coffeyville Resources Refining & Marketing (100%)
2016	6	111.06	2	Coffeyville Resources Refining & Marketing (100%)
2016	7	56.89	2	Coffeyville Resources Refining & Marketing (100%)

2018	607	2
2019	336	2
2020	418	2

Reported through 8-2020.

Note: bbls is barrels; mcf is 1000 cubic feet.

2016	8	28.98	2	Coffeyville Resources Refining & Marketing (100%)
2017	2	44	2	Coffeyville Resources Refining & Marketing (74%) , CFMI LLC (26%)
2017	4	102.27	2	Coffeyville Resources Refining & Marketing (100%)
2017	5	61.69	2	Coffeyville Resources Refining & Marketing (100%)
2017	6	62.83	2	Coffeyville Resources Refining & Marketing (100%)
2017	8	115.91	2	Coffeyville Resources Refining & Marketing (100%)
2017	9	55.79	2	Coffeyville Resources Refining & Marketing (100%)
2017	10	67.57	2	Coffeyville Resources Refining & Marketing (100%)
2018	2	136.76	2	Coffeyville Resources Refining & Marketing (100%)
2018	5	158.74	2	Coffeyville Resources Refining & Marketing (100%)
2018	8	159	2	Coffeyville Resources Refining & Marketing (100%)
2018	12	152.72	2	Coffeyville Resources Refining & Marketing (100%)
2019	2	41.28	2	Coffeyville Resources Refining & Marketing (100%)
2019	5	136.71	2	Coffeyville Resources Refining & Marketing (100%)
2019	10	158.32	2	Coffeyville Resources Refining & Marketing (100%)
2020	1	155.18	2	Coffeyville Resources Refining & Marketing (100%)
2020	5	161.53	2	Coffeyville Resources Refining & Marketing (100%)
2020	8	100.93	2	Coffeyville Resources Refining & Marketing (100%)

Pre-1987 cumulative data and monthly volume data is provided under license agreement to the KGS by IHS Energy. As such, it may be reviewed and used for public service and research purposes. It may not be downloaded or used for purposes of re-packaging, reselling or dissemination to third parties.

Kansas Geological Survey
Comments to webadmin@kgs.ku.edu
URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014
Data from Kansas Dept. of Revenue files monthly.

WESTHUSIN B Lease

Lease: WESTHUSIN B

Operator: Garo Investment Company

Location: T9S, R17W, Sec. 11

Cumulative Production: 109503.24 barrels (from 1986 to 2019)

KS Dept. of Revenue Lease Code: 124304

KS Dept. of Revenue Lease Name: WESTHUSIN B

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

[View T1 PDF \(from KCC\)](#)

Field: [Westhusin](#)

County: Rooks

Producing Zone: Kansas City Group

Well Data (may be an incomplete list):

[T9S R17W, Sec. 11, SE NW SE NE](#)

Lease: Westhusin 1

Operator: H K AND W OPERATING

Current Operator: Garo Investment Company

API Number: 15-163-22398

Data are received monthly from the Kansas Department of Revenue.

Annual Oil Production, (bbls)

Year	Production	Wells
Production Plots		
1986	13,458	1
1987	10,789	1
1988	9,137	1
1989	9,776	1
1990	8,352	1
1991	7,043	1
1992	6,146	1
1993	5,763	1
1994	5,465	1
1995	5,021	1
1996	4,890	1
1997	3,687	1
1998	3,364	1

Recent Monthly Oil Production, (bbls)

(Complete production available in file saved using blue button at top of page.)

Year	Month	Production	Wells	Reporter or Purchaser/ Reporting Customer
2014	2	65.84	1	Coffeyville Resources Refining & Marketing (100%)
2014	3	13.54	1	CFMI LLC (100%)
2014	7	87.22	1	Coffeyville Resources Refining & Marketing (100%)
2014	11	91.39	1	Coffeyville Resources Refining & Marketing (100%)
2015	2	85.82	1	Coffeyville Resources Refining & Marketing (100%)
2015	5	73.08	1	Coffeyville Resources Refining & Marketing (100%)
2015	7	48.1	1	Coffeyville Resources Refining & Marketing (100%)
2015	9	26.24	1	Coffeyville Resources Refining & Marketing (100%)
2015	10	54.56	1	Coffeyville Resources Refining & Marketing (100%)

1999	2,808	1
2000	1,770	1
2001	1,908	1
2002	1,688	1
2003	1,252	1
2004	952	1
2005	1,092	1
2006	643	1
2007	767	1
2008	886	1
2009	645	1
2010	619	1
2011	327	1
2012	180	1
2013	119	1
2014	258	1
2015	288	1
2016	172	1
2017	104	1
2018	111	1
2019	23	1

Reported through 10-2019.

Note: bbls is barrels; mcf is 1000 cubic feet.

2016	1	22.82	1	Coffeyville Resources Refining & Marketing (100%)
2016	2	15.13	1	Coffeyville Resources Refining & Marketing (100%)
2016	3	24.3	1	Coffeyville Resources Refining & Marketing (100%)
2016	5	35.11	1	Coffeyville Resources Refining & Marketing (100%)
2016	7	39.68	1	Coffeyville Resources Refining & Marketing (100%)
2016	9	34.62	1	Coffeyville Resources Refining & Marketing (100%)
2017	3	6.46	1	CFMI LLC (100%)
2017	4	15.52	1	Coffeyville Resources Refining & Marketing (100%)
2017	5	14.61	1	Coffeyville Resources Refining & Marketing (100%)
2017	6	14.17	1	Coffeyville Resources Refining & Marketing (100%)
2017	8	24.95	1	Coffeyville Resources Refining & Marketing (100%)
2017	10	28.64	1	Coffeyville Resources Refining & Marketing (100%)
2018	8	110.98	1	Coffeyville Resources Refining & Marketing (100%)
2019	10	23.14	1	Coffeyville Resources Refining & Marketing (100%)

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Kansas Geological Survey

Comments to webadmin@kgs.ku.edu

URL=<http://www.kgs.ku.edu/Magellan/Field/lease.html>

Programs Updated May 27, 2014

Data from Kansas Dept. of Revenue files monthly.

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form U3C
June 2015
Form must be Typed
Form must be completed
on a per well basis

**ANNUAL REPORT OF PRESSURE MONITORING,
FLUID INJECTION AND ENHANCED RECOVERY**

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 34474
Name: Garco Investment Company
Address 1: 65 E. RANCH RD
Address 2: _____
City: TEMPE State: AZ Zip: 85284 + 3182
Contact Person: Gary Ray
Phone: (480) 897-1936
Lease Name: WESTHUSIN
Well Number: 6

API No.: 15-163-21144-00-02
Permit No.: E27202.1
Reporting Year: 2020
(January 1 to December 31)
SE - NW - SE - NE Sec. 11 Twp. 9 S. R. 17 E W
(a/a/a/a)
3330 feet from N / S Line of Section
843 feet from E / W Line of Section
County: Rooks

I. Injection Fluid:

Type (Pick one): Fresh Water Treated Brine Untreated Brine Water/Brine
Source: Produced Water Other (Attach list)
Quality: Total Dissolved Solids: _____ mg/l Specific Gravity: _____ Additives: _____
(Attach water analysis, if available)

II. Well Data:

Maximum Authorized Injection Pressure: 250 psi Injection Zone: LANSING-KANSAS CITY, TORONTO
Maximum Authorized Injection Rate: 1500 barrels per day
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: _____ (Include TA's)

III. Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
January	150	150	0		31
February	150	150	0		28
March	150	150	0		31
April	150	150	0		30
May	150	150	0		30
June	150	150	0		30
July	150	150	0		31
August	150	150	0		30
September	0	0			30
October	0	0			31
November	0	0			30
December	0	0			30
TOTAL	1200		0		

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form U3C
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OPERATOR: License # 34474
Name: Garco Investment Company
Address 1: 65 East Ranch Road
Address 2: _____
City: TEMPE State: AZ Zip: 85284 + 3182
Contact Person: Gary Ray
Phone: (480) 897-1936
Lease Name: WESTHUSIN
Well Number: 6

API No.: 15-163-21144-00-02
Permit No.: E27202.1
Reporting Year: 2021
(January 1 to December 31)
SE - NW - SE - NE Sec. 11 Twp. 9 S. R. 17 E W
(a/a/a/a)
3330 feet from N / S Line of Section
843 feet from E / W Line of Section
County: Rooks

I. Injection Fluid:

Type (Pick one): Fresh Water Treated Brine Untreated Brine Water/Brine
Source: Produced Water Other (Attach list)
Quality: Total Dissolved Solids: _____ mg/l Specific Gravity: _____ Additives: _____
(Attach water analysis, if available)

II. Well Data:

Maximum Authorized Injection Pressure: 250 psi Injection Zone: LANSING-KANSAS CITY,TORONTO
Maximum Authorized Injection Rate: 1500 barrels per day
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 *(Include TA's)*

III. Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
January	0	0	0		0
February	0	0	0		0
March	0	0	0		0
April	0	0	0		0
May	0	0	0		0
June	0	0	0		0
July	0	0	0		0
August	0	0	0		0
September	0	0	0		0
October	0	0	0		0
November	0	0	0		0
December	0	0	0		0
TOTAL	0		0		

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form U3C
June 2015
Form must be Typed
Form must be completed
on a per well basis

**ANNUAL REPORT OF PRESSURE MONITORING,
FLUID INJECTION AND ENHANCED RECOVERY**

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OPERATOR: License # 34474
Name: Garco Investment Company
Address 1: 65 E Ranch Rd, Tempe, AZ, 85284
Address 2: _____
City: TEMPE State: AZ Zip: 85284 + 3182
Contact Person: Dr. Gary Ray
Phone: (480) 897-1936
Lease Name: WESTHUSIN
Well Number: 6

API No.: 15-163-21144-00-02
Permit No.: E27202.1
Reporting Year: 2022
(January 1 to December 31)
SE - NW - SE - NE Sec. 11 Twp. 9 S. R. 17 E W
(a/a/a/a)
3330 feet from N / S Line of Section
843 feet from E / W Line of Section
County: Rooks

I. Injection Fluid:

Type (Pick one): Fresh Water Treated Brine Untreated Brine Water/Brine
Source: Produced Water Other (Attach list)
Quality: Total Dissolved Solids: _____ mg/l Specific Gravity: _____ Additives: _____
(Attach water analysis, if available)

II. Well Data:

Maximum Authorized Injection Pressure: 250 psi Injection Zone: LANSING-KANSAS CITY,TORONTO
Maximum Authorized Injection Rate: 1500 barrels per day
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 *(Include TA's)*

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	_____	_____	_____	_____	0
	February	_____	_____	_____	_____	0
	March	_____	_____	_____	_____	0
	April	_____	_____	_____	_____	0
	May	_____	_____	_____	_____	0
	June	_____	_____	_____	_____	0
	July	_____	_____	_____	_____	0
	August	_____	_____	_____	_____	0
	September	_____	_____	_____	_____	0
	October	_____	_____	_____	_____	0
	November	_____	_____	_____	_____	0
	December	_____	_____	_____	_____	0
	TOTAL	<u>0</u>		<u>0</u>		

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

Form U3C
June 2015
Form must be Typed
Form must be completed
on a per well basis

**ANNUAL REPORT OF PRESSURE MONITORING,
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Address 2: _____
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Contact Person: Dr. Gary
Phone: (480) 897-1936
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Permit No: E27202.1
Reporting Year: 2023
(January 1 to December 31)
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(a/a/a/a)
3330 feet from N / S Line of Section
843 feet from E / W Line of Section
County: Rooks

I. Injection Fluid:

Type (Pick one): Fresh Water Treated Brine Untreated Brine Water/Brine
Source: Produced Water Other (Attach list)
Quality: Total Dissolved Solids: _____ mg/l Specific Gravity: _____ Additives: _____
(Attach water analysis, if available)

II. Well Data:

Maximum Authorized Injection Pressure: 250 psi Injection Zone: LANSING-KANSAS CITY, TORONTO
Maximum Authorized Injection Rate: 1500 barrels per day
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: 1 *(Include TA's)*

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	_____	_____	_____	_____	0
	February	_____	_____	_____	_____	0
	March	_____	_____	_____	_____	0
	April	_____	_____	_____	_____	0
	May	_____	_____	_____	_____	0
	June	_____	_____	_____	_____	0
	July	_____	_____	_____	_____	0
	August	_____	_____	_____	_____	0
	September	_____	_____	_____	_____	0
	October	_____	_____	_____	_____	0
	November	_____	_____	_____	_____	0
	December	_____	_____	_____	_____	0
	TOTAL	<u>0</u>		<u>0</u>		

CERTIFICATE OF SERVICE

24-CONS-3235-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Richard Williams has been served to the following by means of electronic service on June 7, 2024.

TRISTAN KIMBRELL, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
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