

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

In the Matter of the Application of TDR	)	Docket No. 19-CONS-3167-CUIC
Construction, Inc. (Operator) to authorize	)	
injection of saltwater into the Squirrel	)	CONSERVATION DIVISION
formation at the McCoy #4#WA, #8W	)	
and #9W wells, located in Section 32,	)	License No. 32218
Township 15 South, Range 21 East,	)	
Franklin County, Kansas.	)	

**INFORMATION REQUEST**

COME NOW Scott Yeargain and Polly Shteamer, Protestants in this docket, who respectfully request that the Conservation Division of the Corporation Commission provide responses to the following to them (Scott Yeargain and Polly Shteamer) by Thursday, March 7, 2019:

1. Identify all persons who assisted in the preparation of the answers to this information request.

**RESPONSE:**

2. Please provide any and all current information you have on alluvial soils, aquifers hydrology and hydrogeology in the area of Sec.32 Township 15 South Range 21 East the KCC staff use to inform their decisions about what is necessary to protect the fresh and usable waters of Kansas from the threat of pollution. Please include any and all information related to K.C.C Docket 133,891-C (C-20,079) Conservation Division and establishing the "Eastern Kansas Rule".

**RESPONSE:**

3. Please name the confining formation above and the confining formation below the Osage Aquifer in the area of the McCoy lease, its depth to top and bottom and its permeability. Please include any and all supporting information. A map showing an area of the Osage Aquifer underlying the McCoy lease is available on-line at the Kansas Geological Survey interactive oil and gas map.

**RESPONSE:**

4. For both the confining formations above and the confining formation below the Squirrel Formation into which well #4WA, #9W, and #8W lease are to inject, please provide documentation used by the KCC regarding formations' name, permeability, depth to top and depth to bottom and its horizontal containment ability. Please include information on faults or other breaks in the formations in Franklin, Douglas and Miami Counties within 10 miles of the McCoy lease.

**RESPONSE:**

5. This question refers to the confining formations above and below the Squirrel Formation in the area of the McCoy lease. Please provide all information on human activity that may have or has the potential to affect the ability of these confining layers to prevent the movement of liquids and/or gas.

**RESPONSE:**

6. The KCC entered into the Federal Energy Regulatory Commission, Southern Star Central Gas Pipeline, Inc. Docket No. CP06-49-000, titled "Notice of Intervention, Protest and Request For Technical Conference Of The Kansas Corporation Commission" that expresses concerns about the escape of gas and fluids through abandoned wells and old oil and gas practices. Please provide any and all documents that support statements by the KCC in this letter.

**RESPONSE:**

7. Please provide the engineer's report that is part of the Federal Energy Regulatory Commission, Southern Star Central Gas Pipeline, Inc. Docket No. CP06-49-000 accession # 20060120-0079 entitled "A Geologic & Reservoir Engineering Field Study of Colony Gas Storage & West Colony Fields"

**RESPONSE:**

8. What is the "local injection formation fracture gradient," as referred to K.A.R. 82-3-401(c)(2), for the area of the McCoy lease?

**RESPONSE:**

9. What was the original formation pressure of the Squirrel formation in the area of the McCoy lease?

**RESPONSE:**

10. Has the Kansas Corporation Commission, Conservation Division contacted the Kansas Rural Water Association to discuss their Water Protection Plan?

**RESPONSE:**

11. Please supply a copy of the most recent Mechanical Integrity test all wells on the McCoy lease Sec. 32, Township 15, South Range 21 East.

**RESPONSE:**

12. Regulations require mechanical integrity tests generally using "A fluid pressure of 300 psig shall be applied. If the operator requests a pressure in excess of 300 psig on the injection application, a test pressure up to the requested pressure may be required." The Enhanced Recovery Project Docket E-31,984 on the McCoy lease has been permitted for 600 psi. State what psi the KCC will require for the mechanical integrity tests on the McCoy wells #4AW, #8W, and #9W. Please provide the reasons and supporting documents that this decision will protect the usable waters of Kansas from pollution.

**RESPONSE:**

13. For well #20, API No. 15-059-27182 on the McCoy lease please provide all information required by all parts of K.A.R. 82-3-407, all parts of K.A.R 82-3-408 through and including all parts of K.A.R 82-3-409.

**RESPONSE:**

14. For well #20, API No. 15-059-27182 on the McCoy lease, please provide and any and all reports the oil-to-water ratio of produced fluids from the well. KAR 82-3-407(a)(4)(C): "The fluid level determination and oil-to water ratios shall be performed once every three months during the first year of the well's five-year test cycle, and then once a year for the next four years. The repeat test cycle of quarterly reports for one year and annual reports for four years shall begin on the five-year anniversary of the first fluid level test."

**RESPONSE:**

15. Does the KCC Conservation collect information about the existing water quality at points in the Marais des Cygnes watershed in so that it is possible to know if the fresh and usable waters of Kansas are being polluted? Please list what data the KCC typically collects and often this is done.

**RESPONSE:**

16. On the Application for Injection Well (KCC's Form U-1) front page under "Deepest Usable Water", under "Formation" it is filled out "unknown" and immediately below when asked the "Depth to Bottom of Formation" it says "200'." Please explain.

**RESPONSE:**

17. As stated by the "Abandoned Oil & Gas Well Status, Annual Report 2019" given to the Kansas Legislature: "Legislation during the 1996 session resulted in the creation of the Abandoned Well Plugging and Site Remediation Fund. K.S.A. 55-192 and K.S.A. 55-193 for the first time provided alternative funding to the Kansas Corporation Commission for the expressed purpose of addressing the problem of abandoned oil and gas wells. The legislation requires the Commission to prepare and maintain an inventory of all abandoned wells..." Please provide a list of all (not just those abandoned wells on the Priority lists) unplugged abandoned oil and gas wells in Franklin and Miami Counties (include all wells that are thought to be abandoned but on which a responsible party is still being sought - these should be scribed on separate list).

**RESPONSE:**

18. Please provide a list of wells (excluding water wells) plugged before 1974 within 5 miles of the McCoy lease in the NE/4 Sec. 32 T15S R21E.


**RESPONSE:**

19. Please list all dates and times and methods used that KCC personnel looked for abandoned wells on the area of the McCoy lease and/or any other properties within 1/2 mile of the NE/4 of Section 32 T15S R21E. Please provide the field notes for those times and dates.

**RESPONSE:**

20. Please provide the chloride concentration of the Osage Aquifer at the location of the McCoy Lease.

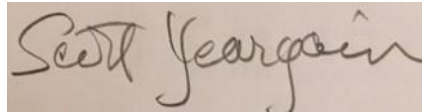
**RESPONSE:**



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### **CERTIFICATE OF SERVICE**

We, the undersigned, certify that a true copy of the attached INFORMATIN REQUEST to the Kansas Corporation Commission for information related to this docket has been filed with the Kansas Corporation Commission and served to the following parties electronically on February 25<sup>th</sup>, 2019.

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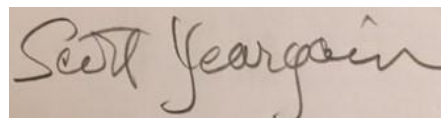
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Polly Shteamer

A handwritten signature in cursive script, reading "Scott Yeargain", on a light brown background.

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Scott Yeargain