

Conservation Division
266 N. Main St., Ste. 220
Wichita, KS 67202-1513

Pat Apple, Chairman
Shari Feist Albrecht, Commissioner
Jay Scott Emler, Commissioner



2017-06-27 14:48:40
Kansas Corporation Commission
/s/ Lynn M. Retz
Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Sam Brownback, Governor

NOTICE OF PENALTY ASSESSMENT 17-CONS-3684-CPEN

This is a notice of a penalty assessment for violation of Kansas oil and gas conservation statutes, rules, and regulations. For a full description of the penalty and process please refer to the Penalty Order that is attached to this notice.

IF YOU ACCEPT THE PENALTY:

The Penalty Order may include the assessment of a monetary penalty. You have 30 days from the service date of this Penalty Order to pay \$2,600. Check or money order must be made payable to the Kansas Corporation Commission. Payment is to be mailed to the Conservation Division of the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, and must include a reference to the docket number of this proceeding. Credit card payment may be made by calling the Conservation Division at 316-337-6200.

The Penalty Order may require you to perform certain actions by deadlines stated therein. Compliance must be obtained by the applicable deadlines to avoid further compliance actions. If you have any questions about how compliance can be obtained, you may contact the legal department or the appropriate department or district office.

IF YOU CONTEST THE PENALTY:

You have the right to request a hearing. A request for hearing must be made in writing, setting forth the specific grounds upon which relief is sought. Respondent must submit an original and seven copies of the request to the Commission, at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days, plus three days to account for the mail, from the mailed date on the last page of the Penalty Order. K.A.R. 82-1-215.

IF YOU FAIL TO ACT:

Failure to either comply with the penalty order or request a hearing will result in the attached Penalty Order becoming a Final Order. Failure to comply or request a hearing by the deadlines in the Penalty Order may result in additional sanctions, including additional monetary penalties, the suspension of your oil and gas operating license, and the shutting-in of all operations until compliance is obtained.

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

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

In the matter of the failure of Benjamin M.)	Docket No.: 17-CONS-3684-CPEN
Giles ("Operator") to comply with K.A.R. 82-)	
3-104 and K.A.R. 82-3-111 at the Flying J)	CONSERVATION DIVISION
Geer #2 OWWO well in Butler County,)	
<u>Kansas.</u>)	License No.: 5446

PENALTY ORDER

The above captioned matter comes before the State Corporation Commission of the State of Kansas. Having examined the files and records, and being duly advised in the premises, the Commission finds and concludes as follows:

I. JURISDICTION

1. K.S.A. 74-623 provides that the Commission has the exclusive jurisdiction and authority to regulate oil and gas activities. K.S.A. 55-152 provides that the Commission has jurisdiction to regulate the construction, operation, and abandonment of any well and the protection of the usable water of this state from any actual or potential pollution from any well. The Commission has licensing authority pursuant to K.S.A. 55-155.

2. K.S.A. 55-162 and K.S.A. 55-164 provide the Commission with authority to issue a Penalty Order regarding a violation of Chapter 55 of the Kansas Statutes Annotated, or of any rule, regulation, or order of the Commission. A Penalty Order may include a monetary penalty of up to \$10,000, and each day of a continuing violation constitutes a separate violation.

3. K.A.R. 82-3-104 provides that every person who drills a well that penetrates formations containing oil, gas, fresh water, mineralized water, or valuable minerals shall case or seal off the formations to effectively prevent migration of oil, gas, or water from or into strata

that would be damaged by such migration. The effectiveness of the casing or sealing off shall be tested in a manner prescribed or approved by an agent of the Commission.

4. K.A.R. 82-3-111 provides that within 90 days after operations cease on any well, the operator of that well shall plug the well, return the well to service, or file an application with the Conservation Division requesting temporary abandonment (“TA”) status. A well shall not be eligible for TA status if the well has been shut-in for 10 years or more without an application for an exception pursuant to K.A.R. 82-3-100 and approval by the Commission. The failure to file an application for TA status shall be punishable by a \$100 penalty. K.A.R. 82-3-111(e) provides an exemption for certain wells for 365 days if they are fully equipped and capable of production.

II. FINDINGS OF FACT

5. Operator conducts oil and gas activities in Kansas under license number 5446, and is responsible for the care and control of the Flying J Geer #2 OWWO well, API #15-015-01490-00-01, (“the subject well”) located in Section 32, Township 25 South, Range 4 East, Butler County, Kansas.

6. The subject well was originally completed in 1963 and was subsequently plugged. On May 10, 2013, Operator submitted an Intent-to-Drill (C-1) Form, proposing to work over the subject well.¹ Operator also sought an exception to the Table 1 Minimum Surface Casing Requirements.² Commission Staff granted the exception with the condition that the production or long string casing nearest the formation wall would be immediately cemented from a depth of at least 250 feet back to surface. Operator was further instructed in writing to notify the KCC

¹ See, Exhibit 1 (Notice of Intent to Drill).

² See, Exhibit 2 (Letter from Operator to Commission Staff, dated May 10, 2013).

District Office prior to spudding the well, and also one day before cementing the longstring, so Staff could witness the procedure.³

7. On June 13, 2013, Operator spudded the subject well and notified Staff by telephone.

8. On January 29, 2014, Operator submitted a Well Completion (ACO-1) Form for the subject well. The ACO-1 indicated that the well was completed on November 20, 2013. No casing records, cement tickets, or perforation records were included with the ACO-1 form. Furthermore, Operator did not contact Commission Staff about cementing the casing.

9. On September 3, 2015, Commission Staff performed a lease inspection and found the subject well inactive and shut in with no lease infrastructure present. Staff subsequently met with Operator and required submission of a completed ACO-1 form, including cement tickets, and directed that Operator obtain temporary abandonment status to bring the subject well into compliance.

10. On August 30, 2016, Commission Staff conducted a lease inspection which revealed the subject well remained inactive and shut in with no lease infrastructure present. Furthermore, Operator had neither submitted a completed ACO-1 form, including cement tickets, nor obtained temporary abandonment status as required by Staff.

11. On October 19, 2016, Staff sent a notice of violation letter regarding Operator's apparent violation of the Commission's temporary abandonment regulations at the subject well. The letter gave a November 16, 2016, deadline to remedy the violation.

12. On November 18, 2016, Operator submitted a Temporary Abandonment (CP-111) Application for the subject well. No supporting documentation to verify the well construction information was provided. On December 19, 2016, Staff denied temporary abandonment status

³ See, Exhibit 3 (Commission Staff letter to Operator, dated May 14, 2013).

for the well due to Operator's failure to submit a completed ACO-1. Staff then set a deadline of January 6, 2017, for the subject well to be brought into compliance. Staff subsequently extended the deadline to January 13, 2017 to allow Operator to submit the missing well information regarding casing and production.

13. On January 13, 2017, Operator submitted a cement ticket that failed to provide information indicating whether cement was circulated or returned to surface as required by Staff. Commission Staff determined there was not sufficient evidence to demonstrate that the requirements of the surface casing exception were met by Operator. Staff then received a second copy of the cementing ticket with the addition of a handwritten note from an employee of Consolidated Oil Well Services stating "[c]ement did circulate approx. 4 BBL to pit."⁴ Since the only evidence of appropriate cement circulation was now an addition of a handwritten note to a cement ticket, for work performed over three years prior, Commission Staff requested a cement bond log be performed to ensure casing requirements were met as is authorized by K.A.R. 82-3-104.

14. On April 14, 2017, Commission Staff sent a letter to Operator, giving an April 28, 2017 deadline to run a bond log on the subject well. The letter also notified Operator that it was required to contact Staff's District Office prior to performing the work, so that Staff could witness the procedure. On April 26, 2017, Operator ran the bond log. Operator did not provide notice to Staff, which was therefore unable to witness the procedure.

15. On April 26, 2017, Commission Staff received the bond log and noted irregularities in the log method utilized and corresponding results, which included no data from 40 feet up to surface, and identical sections between the depths of 776-899 feet and 899-1022 feet.

⁴ See, Exhibit 4 (Field Ticket & Treatment Report).

16. Operator has failed to comply with the temporary abandonment requirements of K.A.R. 82-3-111, has failed to demonstrate compliance with the requirements of the surface casing exception granted under K.A.R. 82-3-106(f), and has not tested the effectiveness of the casing or sealing off of the subject well according to Commission Staff's instructions in violation of K.A.R. 82-3-104.

III. CONCLUSIONS OF LAW

17. The Commission concludes that it has jurisdiction over Operator and this matter under K.S.A. 55-152 and K.S.A. 74-623.

18. The above findings of fact are sufficient evidence to support the conclusion that Operator committed one violation of K.A.R. 82-3-104 because Operator has failed to demonstrate the effectiveness of the casing or sealing off in a manner prescribed or approved by an agent of the Commission.

19. The above findings of fact are sufficient evidence to support the conclusion that Operator committed one violation of K.A.R. 82-3-111 because the subject well has been inactive in excess of the time allowed by regulation without being plugged, returned to service, or approved for TA status.

THEREFORE, THE COMMISSION ORDERS:

- A. Operator shall pay a \$2,500 penalty for its violation of K.A.R. 82-3-104.
- B. Operator shall pay a \$100 penalty for its violation of K.A.R. 82-3-111.
- C. Staff shall seal the subject well until such time as Operator conducts a Staff-witnessed bond log. Operator shall not perform any work on the well until such time as the bond log is conducted. If Operator either fails to perform a Staff-witnessed bond log, or if the bond log is performed and fails to demonstrate the effectiveness of the casing to the satisfaction of Staff,

then Staff is directed to notify the Commission and seek an additional \$7,500 penalty be assessed against Operator.

D. If the bond log fails to demonstrate the effectiveness of the casing to the satisfaction of Staff, then Operator shall either rework the well and then demonstrate the effectiveness of the casing to the satisfaction of Staff, or plug the well.

E. If Operator demonstrates the effectiveness of the casing to the satisfaction of Staff and does not plug the well, then Operator shall return the well to service or obtain temporary abandonment status for the well.

F. If Operator remains out of compliance with this Penalty Order after 60 days, then Staff is directed to plug the subject well and assess the costs to Operator, and to notify the Commission and seek an additional \$5,000 penalty be assessed against Operator.

G. If no party requests a hearing, and Operator is not in compliance with this Order within 30 days, then Operator's license shall be suspended without further notice. The notice and opportunity for a hearing on this order shall constitute the notice required by K.S.A. 77-512 regarding license suspension. The Commission may impose further sanctions, including additional monetary penalties and any other remedies available to the Commission by law, without further notice.

H. Checks and money orders shall be payable to the Kansas Corporation Commission. For credit card payments, include the type of card (Visa, MasterCard, Discover, or American Express), account number, and expiration date. Payments shall be mailed to the Kansas Corporation Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202. The payment must include a reference to the docket number of this proceeding.

I. Any party may request a hearing on the above issues by submitting a written request, pursuant to K.S.A. 55-164, K.S.A. 77-537, and K.S.A. 77-542, setting forth the specific grounds upon which relief is sought, to the Commission at 266 N. Main St., Suite 220, Wichita, Kansas 67202, within 30 days from the date of service of this Order. Hearings will be scheduled only upon written request. Failure to timely request a hearing will result in a waiver of Operator's right to a hearing.

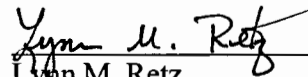
J. If a party requests a hearing, a corporation or similar entity shall not be permitted to enter an appearance except by its attorney. Attorneys for all parties shall enter their appearances in Commission proceedings by giving their names and addresses for the record.

K. The Commission retains jurisdiction over the subject matter and the parties for the purpose of entering such further order or orders as it may deem necessary.

BY THE COMMISSION IT IS SO ORDERED.

Apple, Chairman; Albrecht, Commissioner; Emler, Commissioner

Dated: JUN 27 2017


Lynn M. Retz
Secretary to the Commission

Mailed Date: June 27, 2017

JDW

For KCC Use:
Effective Date: 06/09/2013
District # 7
SGA? ☐ Yes ☒ No

KANSAS CORPORATION COMMISSION
OIL & GAS CONSERVATION DIVISION

1138926

Form C-1
March 2010
Form must be Typed
Form must be Signed
All blanks must be Filled

NOTICE OF INTENT TO DRILL

Must be approved by KCC five (5) days prior to commencing well
Form KSONA-1, Certification of Compliance with the Kansas Surface Owner Notification Act, MUST be submitted with this form.

Expected Spud Date: 05/20/2013
month day year

OPERATOR: License# 5446
Name Giles, Benjamin M.
Address 1 346 S. LULU
Address 2
City WICHITA State KS Zip 67211
Contact Person: BEN GILES
Phone 316-265-1992

CONTRACTOR License# 5446
Name: Giles, Benjamin M.

Well Drilled For	Well Class	Type Equipment
<input checked="" type="checkbox"/> Oil	<input checked="" type="checkbox"/> Infld	<input checked="" type="checkbox"/> Mud Rotary
<input type="checkbox"/> Gas	<input type="checkbox"/> Enh Rec	<input type="checkbox"/> Pool Ext
<input type="checkbox"/> Storage	<input type="checkbox"/> Disposal	<input type="checkbox"/> Air Rotary
<input type="checkbox"/> Scismic	<input type="checkbox"/> Wildcat	<input type="checkbox"/> Cable
<input type="checkbox"/> Other	<input type="checkbox"/> Other	

☒ If OWWO: old well information as follows:

Operator SAGO OIL CO

Well Name GEER #2

Original Completion Date: 06/13/1963 Original Total Depth: 2543

Directional, Deviated or Horizontal wellbore? ☐ Yes ☒ No

If Yes, true vertical depth:

Bottom Hole Location

KCC DKT #:

Spot Description E2 E2 NE
E2 E2 NE Sec 32 Twp 25 S R 4 ☒ E ☐ W
1320 feet from ☒ N / ☐ S Line of Section
330 feet from ☒ E / ☐ W Line of Section
Is SECTION ☒ Regular ☐ Irregular

(Note: Locate well on the Section Plat on reverse side)

County: Butler
Lease Name FLYING J GEER Well # 2 OWWO
Field Name PIERCE
Is this a Prorated / Spaced Field? ☐ Yes ☒ No
Target Formation(s): MISSISSIPPI
Nearest Lease or unit boundary line (in footage): 330
Ground Surface Elevation 1338 Operator Supplied feet MSL
Water well within one-quarter mile: ☐ Yes ☒ No
Public water supply well within one mile: ☐ Yes ☒ No
Depth to bottom of fresh water: 150
Depth to bottom of usable water: 180
Surface Pipe by Alternate: ☐ I ☒ II
Length of Surface Pipe Planned to be set: 130
Length of Conductor Pipe (if any): 0
Projected Total Depth 2543
Formation at Total Depth: MISSISSIPPI
Water Source for Drilling Operations:
☐ Well ☐ Farm Pond ☒ Other: HAULED
DWR Permit #:

(Note: Apply for Permit with DWR ☐

Will Cores be taken? ☐ Yes ☒ No
If Yes, proposed zone.

AFFIDAVIT

The undersigned hereby affirms that the drilling, completion and eventual plugging of this well will comply with K.S.A. 55 et. seq.

It is agreed that the following minimum requirements will be met:

1. Notify the appropriate district office prior to spudding of well;
2. A copy of the approved notice of intent to drill shall be posted on each drilling rig;
3. The minimum amount of surface pipe as specified below shall be set by circulating cement to the top; in all cases surface pipe shall be set through all unconsolidated materials plus a minimum of 20 feet into the underlying formation
4. If the well is dry hole, an agreement between the operator and the district office on plug length and placement is necessary prior to plugging;
5. The appropriate district office will be notified before well is either plugged or production casing is cemented in;
6. If an ALTERNATE II COMPLETION, production pipe shall be cemented from below any usable water to surface within 120 DAYS of spud date. Or pursuant to Appendix "B" - Eastern Kansas surface casing order #133,891-C, which applies to the KCC District 3 area, alternate II cementing must be completed within 30 days of the spud date or the well shall be plugged In all cases, NOTIFY district office prior to any cementing

Submitted Electronically

For KCC Use ONLY

API # 15- 15-015-01490-00-01

Conductor pipe required 0 feet

Minimum surface pipe required 130 feet per ALT. ☐ I ☒ II

Approved by Rick Hestermann 06/04/2013

This authorization expires: 06/04/2014

(This authorization void if drilling not started within 12 months of approval date)

Spud date Agent

Remember to:

- File Certification of Compliance with the Kansas Surface Owner Notification Act (KSONA-1) with Intent to Drill;
- File Drill Pit Application (form CDP-1) with Intent to Drill;
- File Completion Form ACO-1 within 120 days of spud date;
- File acreage attribution plat according to field prorotation orders;
- Notify appropriate district office 48 hours prior to workover or re-entry;
- Submit plugging report (CP-4) after plugging is completed (within 60 days);
- Obtain written approval before disposing or injecting salt water
- If well will not be drilled or permit has expired (See authorized expiration date) please check the box below and return to the address below

☐ Well will not be drilled or Permit Expired Date: _____
Signature of Operator or Agent:

Mail to: KCC - Conservation Division,
130 S. Market - Room 2078, Wichita, Kansas 67202

Exhibit 1

1138926

For KCC Use ONLY
API # 15 - 15-015-01490-00-01

IN ALL CASES PLOT THE INTENDED WELL ON THE PLAT BELOW

In all cases, please fully complete this side of the form. Include items 1 through 5 at the bottom of this page.

Operator: Giles, Benjamin M.
Lease: FLYING J GEER
Well Number: 2 OWWO
Field: PIERCE

Number of Acres attributable to well: 10

QTR/QTR/QTR/QTR of acreage: - E2 - E2 - NE

Location of Well: County: Butler

1320

feet from ☒ N / ☐ S Line of Section

330

feet from ☒ E / ☐ W Line of Section

Sec 32 Twp. 25 S R 4 ☒ E ☐ W

Is Section: ☒ Regular or ☐ Irregular

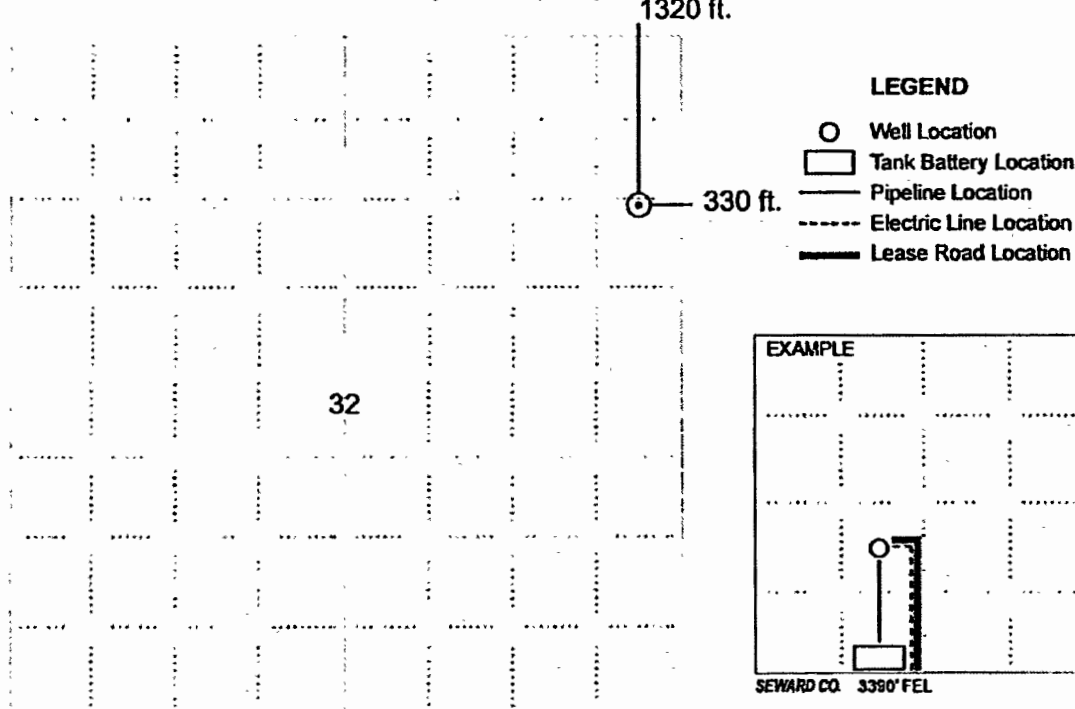
If Section is Irregular, locate well from nearest corner boundary.

Section corner used: ☐ NE ☐ NW ☐ SE ☐ SW

PLAT

Show location of the well. Show footage to the nearest lease or unit boundary line. Show the predicted locations of lease roads, tank batteries, pipelines and electrical lines, as required by the Kansas Surface Owner Notice Act (House Bill 2032).

You may attach a separate plat if desired



NOTE: In all cases locate the spot of the proposed drilling location.

In plotting the proposed location of the well, you must show:

1. The manner in which you are using the depicted plat by identifying section lines, i.e. 1 section, 1 section with 8 surrounding sections, 4 sections, etc.
2. The distance of the proposed drilling location from the south / north and east / west outside section lines.
3. The distance to the nearest lease or unit boundary line (in footage).
4. If proposed location is located within a prorated or spaced field a certificate of acreage attribution plat must be attached: (CO-7 for oil wells, CG-8 for gas wells).
5. The predicted locations of lease roads, tank batteries, pipelines, and electrical lines.



MWM Oil Co., Inc.
346 S. Lulu St.
Wichita, KS 67211
Phone: (316) 265-1992
Fax: (316) 265-1999

May 10, 2013

Kansas Corporation Commission
130 S. Market
Wichita, KS 67202

Dear friends,

I have attached this letter with the electronic submission of the Intent to Drill for the Flying J Geer #2 OWWO. I have also attached a copy of the scout card and the KCC plugging report. I am requesting an exception to the 200 feet of surface casing requirement. If this well is successful and casing is set, the top 200 feet of production casing will be cemented in place.

Thank you very much for your consideration to this matter.

Very truly yours,

Benjamin M. Giles

Exhibit 2

Conservation Division
Finney State Office Building
130 S. Market, Rm 2078
Wichita, KS 67202-3802



Phone: 316-337-6200
Fax: 316-337-6211
<http://kcc.ks.gov/>

Mark Sievers, Chairman
Thomas E. Wright, Commissioner
Shari Feist Albrecht, Commissioner

Sam Brownback, Governor

May 14, 2013

Benjamin M. Giles
346 S. Lulu
Wichita, KS 67211

RE: Table I Exception
Flying J Greer 2 OWWO, E2-E2-NE Sec.32-T25S-R4E, Butler County, Kansas

Dear Mr. Giles:

The Kansas Corporation Commission (KCC) has received your request, dated May 10, 2013, for an exception to the Table 1 minimum surface pipe requirement of 200 feet for the proposed well. From your request, the KCC understands that you are to utilize the existing 130 feet of surface casing in this well bore and Alternate II cementing rules.

After review of this matter by technical staff it was determined that:

1. Bedrock at this location is the Permian Chase Group and is located at or near surface.
2. The depth of the deepest water well of record within one mile of the proposed location is 147 feet.

Based on this information, an exception is granted for the Table 1 Minimum Surface Casing Requirements with the following stipulations:

1. Upon completion of the well, the production or long string casing nearest the formation wall shall be immediately cemented from a depth of at least 250 feet back to the surface. Notify the KCC District #2 office prior to spudding the well and one day before cementing the longstring so they may have the opportunity to witness the procedure.
2. In the event the well is dry and no additional production pipe has been cemented in-place, plugging will be performed according to KCC rules and KCC District #2 requirements.

Sincerely Yours,

Doug Louis
Director

cc: Steve Bond *SB*
Jeff Klock - Dist #2 *via e-mail*



CONSOLIDATED
Oil Well Services, LLC

PO Box 884, Chanute, KS 66720
820-431-9210 or 800-457-8878

FIELD TICKET & TREATMENT REPORT
CEMENT

...LET NUMBER **48590**
LOCATION **El Dorado**
FOREMAN **Ernst**

269685

DATE	CUSTOMER #	WELL NAME & NUMBER	SECTION	TOWNSHIP	RANGE	COUNTY
7-23-11	3079	Flying T	32	25S	4E	Bullwa
CUSTOMER MWM OIL CO. - BEN GILES						
MAILING ADDRESS 532 S. Main St						
CITY Winfield	STATE KS	ZIP CODE 67202	TRUCK #	DRIVER	TRUCK #	DRIVER
			446	Tough		
			713	Dunkin		
			574	B. H.		
			692	Tracy		

JOB TYPE Leak	HOLE SIZE	HOLE DEPTH	CASING SIZE & WEIGHT 4 1/2 11.6
CASING DEPTH 2545	DRILL PIPE	TUBING	OTHER
SLURRY WEIGHT	SLURRY VOL	WATER GEL	CEMENT LEFT IN CASING
DISPLACEMENT 39.2	DISPLACEMENT PSI	MIX PSI	RATE

REMARKS: Safety meeting on location. Pump load hole with 67 bags
no returns mix 150 ccs class A' 4700 4200 54115, 1/2 to 2000
14" x 14" C&F 38. Wash pump and lines. Drop blue and dialer
39.2 bags 600' high. 1200' land. Press casing to 500' and
skit in.
Cement did circulate approx 4896 Top it
Done. Thanks Ernie & crew

ACCOUNT CODE	QUANTITY or UNITS	DESCRIPTION of SERVICES or PRODUCT	UNIT PRICE	TOTAL
5401	1	PUMP CHARGE	1085.00	1085.00
5406	15	MILEAGE	4.20	63.00
5407A	7.1 down	Ten mileage Delivery (extra)	368.00	368.00
5506	3 bags	water Transport	120.00	360.00
11046	150 gals	Class A'	15.20	2280.00
1114B	56 gals	Bridgman	1.22	124.32
4135A	70 lb	CFL-115	11.00	770.00
4137	70 lb	CAF-26	8.40	588.00
1146	21 lb	CAF-38	8.25	173.25
4404	1	4 1/2" Dotted plug	47.25	47.25
4156	1	4 1/2" Flashed shoe	238.00	238.00
5502-L	3 bags	80 Bbl. Ure	90.00/hr	270.00
		3020 disc - cement materials only		6458.55
		subtotal		5250.12
		SALES TAX		198.66
		ESTIMATED TOTAL		5448.78

AUTHORIZATION [Signature] TITLE _____ DATE _____

I acknowledge that the payment terms, unless specifically amended in writing on the front of the form or in the customer's account records, at our office, and conditions of service on the back of this form are in effect for services identified on this form.

CERTIFICATE OF SERVICE

I certify that on 6/27/17, I caused a complete and accurate copy of this Order to be served via United States mail, with the postage prepaid and properly addressed to the following:

Benjamin M. Giles
346 S. Lulu
Wichita, KS 67211

and delivered by e-mail to:

Dan Fox
KCC District #2

Rene Stucky
KCC Central Office

/s/ Paula J. Murray
Paula J. Murray
Legal Assistant
Kansas Corporation Commission