20230602091054
Filed Date: 06/02/2023
State Corporation Commission
of Kansas

### BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the matter of an order to show cause issued	)	Docket No.: 23-CONS-3176-CSHO
to Great Plains Petroleum, Inc. (Operator) for	)	
a plugging order at the Stumps #4 well in	)	CONSERVATION DIVISION
Barton County, Kansas.	)	
	)	License No.: 30163

#### PRE-FILED DIRECT TESTIMONY

**OF** 

RICHARD WILLIAMS

ON BEHALF OF COMMISSION STAFF

**JUNE 2, 2023** 

- 1 Q. What is your name and business address?
- 2 A. Richard Williams, 2301 E. 13<sup>th</sup> 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 (KCC
- or 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,
- where I was responsible for completing and maintaining wells and overseeing day to day
- operations. In 1997, I began working for the Commission as a Petroleum Industry Regulatory
- Technician. After a statewide reclassification of environmental positions, I am now an ECRS.
- In 2000, I became the TA coordinator for the District #4 Office. Additionally, since 2014,
- I 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
- and prepare evidence necessary to recommend penalties for probable violations of those
- regulations. Specifically, my job includes reviewing Staff field reports, coordinating day-to-
- day operations of the District #4 Office, sending Notice of Violation (NOV) letters, and
- generally trying to resolve compliance issues. I work to coordinate scheduling of Staff-
- witnessed well completions, well pluggings, and mechanical integrity tests (MITs).
- I coordinate the investigation of spills and complaints, verify proper construction of wells,
- help train District Staff, and work with Commission Staff in Wichita. I conduct inspections

- and investigations on special projects, or in the absence of assigned Staff, whenever necessary.
- I work with lease operators, landowners, local, county, and state agencies and organizations
- 3 to 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 Staff's belief that Operator
- should be ordered by the Commission to plug the Stumps #4 well (Subject Well) at issue in
- 9 Docket 23-CONS-3176-CSHO.
- 10 Q. Please provide a brief compliance history for the Subject Well.
- 11 A. On July 24, 2018, the Commission issued a Penalty Order in Docket 19-CONS-3029-CPEN
- 12 (Docket 19-3029) for the Subject Well. The Commission found that Operator committed one
- violation of K.A.R. 82-3-407 for not conducting a current and successful MIT on the Subject
- Well.
- As Operator had not come into compliance with the Penalty Order in Docket 19-3029
- within thirty days, Staff suspended Operator's license on August 30, 2018. Operator and Staff
- subsequently reached an agreement that Operator would perform an MIT on the Subject Well
- above all perforations, and then after six months Operator would plug the well, produce oil
- from the well, or reconstruct the well. The Subject Well passed an MIT above the perforations
- on September 14, 2018, and a recording of the agreement was written on the MIT form (the
- form is attached to my testimony as *Exhibit RW-1*). Staff sent Operator a Notice of Violation
- (NOV) letter regarding the agreement, stating that the Subject Well did not meet the
- production tubing requirements in injection permit D-11,083, and providing a six-month

1 deadline of March 14, 2019, to bring the well into compliance with the agreement (the letter 2 is attached to Todd Bryant's testimony as Exhibit TB-4). As a result of the agreement, 3 Operator's license was unsuspended in Docket 19-3029 on September 18, 2018. 4 Q. Did Operator bring the Subject Well into compliance with the agreement by the 5 deadline? 6 A. No, Operator did not. On November 30, 2018, Staff sent a letter reminding Operator that an 7 MIT was due on the Subject Well by March 15, 2019 (the letter is attached to my testimony 8 as *Exhibit RW-2*). Operator performed an MIT on the Subject Well on April 17, 2019 (which 9 was after the deadline in the letter). The MIT failed because the well was still not constructed 10 or operated as required by the agreement between Staff and Operator (the failed MIT is 11 attached to my testimony as *Exhibit RW-3*). 12 As a consequence of the Subject Well still being out of compliance with the agreement 13 between Staff and Operator, the Commission issued a Penalty Order on June 11, 2019, in 14 Docket 19-CONS-3395-CPEN (Docket 19-3395). The Commission found that Operator 15 committed one violation of K.A.R. 82-3-408 for not being in compliance with injection permit 16 D-11,083. The Commission concluded that the Subject Well was not constructed or operated 17 as the injection permit required. The Commission also found that Operator failed to apply for 18 a modification of the injection permit as required by K.A.R. 82-3-408. 19 As detailed in Environmental Program Administrator Supervisor Todd Bryant's testimony, 20 Operator submitted a modification application for the Subject Well on October 7, 2019, but 21 did not supply additional information as requested by Staff. For that reason, Staff revoked 22 injection permit D-11,083 for the Subject Well on May 23, 2022.

#### 1 Q. When was the last time the Subject Well produced oil?

- 2 A. According to the Kansas Geological Survey (KGS), the last time the Stumps lease produced
- 3 oil was June 2015 (the KGS production record is attached to my testimony as
- 4 *Exhibit RW-4*). There are three wells on the Stumps lease, though, including the Subject Well.
- 5 It is therefore possible that the Subject Well has not produced oil since before 2015.

#### 6 Q. When was the last time Operator injected fluids into the Subject Well?

- 7 A. According to the Annual Fluid Injection (U3C) forms submitted by Operator, fluid was last
- 8 injected into the Subject Well in August 2017. The U3C forms show that Operator has not
- 9 injected any fluids into the well since that date. The U3C forms submitted by Operator for
- injection in calendar years 2017 through 2021 are attached to my testimony as
- 11 *Exhibit RW-5*.

#### 12 Q. Does Operator currently have a lease for the Subject Well?

- 13 A. As far as I am aware, Operator does not currently have a lease. I have spoken to the landowner
- where the Subject Well is located, and he has indicated that Operator does not have a current
- lease for the Subject Well.

#### Q. Do you believe the Subject Well presents a threat to fresh and usable waters?

- 17 A. Yes, I do. Without a current and successful MIT, the Subject Well could present a threat to
- 18 fresh and usable waters.

#### 19 Q. Do you believe the Subject Well is a potential source of waste?

- 20 A. Yes. The packer in the Subject Well is set above both the producing zone and the disposal
- 21 zone. That means that water from the disposal zone in the lower Arbuckle formation could
- potentially be flooding out oil in the producing zone in the upper Arbuckle formation. Such

- 1 flooding may not only create a potential source of waste, but may also negatively impact
- 2 correlative rights for other oil producers in the area.
- 3 Q. Please summarize your recommendations.
- 4 A. The Commission should order Operator to plug the Subject Well. The Subject Well has been
- 5 out of compliance with Commission orders and regulations since at least 2018. Additionally,
- 6 the Subject Well is a potential threat to fresh and usable waters, and a potential source of
- 7 waste. For those reasons, the Commission should order Operator to plug the Subject Well.
- 8 Q. Does this conclude your testimony?
- 9 A. Yes.

CASING MECHANICAL INTEGRITY TEST		DOCKET # 1)-11,083
Disposal Well Enhanced Recovery: Repressuring	$\frac{SW}{SW} \frac{SW}{NE}, Sec. \frac{3}{3}$	
Flood Tertiary		South Section Line East Section Line
Date injection started  API #15-009 - 19144	Lease Stomps County Beston	Well # <i>Ч</i>
Operator: Great Plains Petroleum	Operator License # 30163	KCC
	Contact Person Rud Phores	SEP 1 8 2018
wichita, KS C7218	Phone 316-685-8800	HAYS KS
Packer type Baker SPAN Coafed Size	e 3000 bbl/d; Injection below production Production Liner 7'' 3442  (and plug back) 7'' Set at 3213  Perf. or open hole 0 per	Tubing Try Size 7/8 7/3/6 Set at 3293 132' Type Sentile steel  ft. depth
Type MIT: Pressure: Radioactive Tra	ncer Survey: Tempera	ature Survey:
F Time: Start 107 Min. 2:17 Min. 30	Min.	
I Pressures: 350 350 350	Set up 1 System Pres. during test	
L D	Set up 2 Annular Pres. during tes	t
A T Tested: Casing or Casing – Tubing An A The bottom of the tested zone in shut in with	Cancelling docket or.	bbls. the operator must plug; kle producer there-by re-construct as a dual order of Rene, Stucky o ID
Test Date 4/14/2018 Using Shone's	tenk Service c	Company's Equipment
The operator hereby certifies that the zone between _	feet and 3293	feet .
was the zone tested Signature	S6DZ 9(14/1)	Title
The results were Satisfactory, Marginal _	, Not Satisfactory	demin
State Agent: Chris Nicky Title	: Profession/ gwlgy Witness: YES	SSED_
REMARKS:		
Orgin. Conservation Div.: KDHE/	T: Dist. Office	
Computer Update <u>Is there Chemical Seal</u>	ant or a Mechanical Casing patch in th	e annular space? (Y/N) (If YES please describe in REMARKS)
GPS Lat GPS Long		Exhibit RW-1Form U-7 Page 1 of 1

CONSERVATION DIVISION 266 N. Main St., Ste. 220 Wichita, KS 67202-1513



Shari Feist Albrecht, Chair Jay Scott Emler, Commissioner Dwight D. Keen, Commissioner

November 30, 2018

Rod A Phares Great Plains Petroleum, Inc. 221 CIRCLE DR WICHITA KS 67218-1207 Jeff Colyer, M.D., Governor

License: 30163

# REMINDER MECHANICAL INTEGRITY TEST APPROACHING DEADLINE

**RE: Mechanical Integrity Test Reminder** 

Dear Operator:

Commission records indicate that the wells on the attached list will soon be due for a Mechanical Integrity Test (MIT). The applicable due date for each well is on the list.

For any questions, or to schedule a testing date, please contact the appropriate District Staff at one of the following phone numbers:

District #1, (620) 682-7933

District #2, (316) 337-7400

District #3, (620) 902-6450

District #4, (785) 261-6250

- The date of the MIT must be mutually agreed upon with District Staff.
- Please contact the appropriate district staff at least 2 days prior to your proposed testing date.
- · A representative of the operator must be on site during each MIT.

Failure to conduct any MIT by the applicable due date shall be punishable by a \$1,000 per-well penalty.

Sincerely,

KCC Underground Injection Control Staff

#### November 30, 2018

List of Wells: Due for a Mechanical Integrity Test						
DOCKET	API Well #	Lease Name / Well #	Well Location	County	MIT Expiration	
D11083.0	15-009-19144-00-00	STUMPS 4	3-17S-12W, SWSWNE	BARTON	3/15/2019	
D26925.0	15-119-20754-00-01	LARRABEE 3	14-34S-29W, S2SW	MEADE	3/24/2019	

Page 1 of 1

2323 F.E.L.







#### Yearly and monthly production

STUMPS Lease



Lease: STUMPS

Operator: Great Plains Petroleum, Inc. Cumulative Production: 297979.62 barrels (from 1964 to 2015)

KS Dept. of Revenue Lease Code: 103620 KS Dept. of Revenue Lease Name: STUMPS Field: Odin

County: Barton
Producing Zone: Arbuckle Group
Well Data (may be an incomplete list):

•	i Data (may be an incomplete list).					
Г	T17S R12W, Sec. 3, SW SW NE	T17S R12W, Sec. 3, SW NW NE				
	Lease: STUMPS 4	Lease: STUMPS 2				
	Operator: MAYFIELD-SMITH / F W SMITH	Operator: FLOYD W. SMITH				
	Current Operator: Great Plains Petroleum, Inc	Current Operator: Great Plains Petroleum, Inc.				
	API Number: 15-009-19144	API Number: 15-009-19189				
Ī	T17S R12W, Sec. 3, NW SW NE					
	Lease: STUMPS 1					
	Operator: MAYFIELD-SMITH & FLOYD SM	IITH				
	Current Operator: Great Plains Petroleum, Inc	).				
	API Number: 15-009-04669					

Data are received monthly from the Kansas Department of Revenue.

#### Annual Oil Production, (bbls)

### Recent Monthly Oil Production, (bbls) (Complete production available in file saved

using blue button at top of page.)

Year	Month Production Wel		Wells	Reporter or Purchaser/ Reporting Customer
2015	6	170.4	2	CHS McPherson Refinery Inc (100%)

Year	Production	Wells
P	roduction Pla	ots
1964	31,063	2
1965	35,016	2
1966	18,762	2
1967	19,513	2
1968	15,470	2
1969	10,850	2
1970	8,090	2
1971	7,251	2
1972	6,426	2
1973	5,831	1
1974	6,050	1
1975	5,338	1
1976	4,469	1
1977	4,669	1
1978	4,239	1
1979	4,252	1
1980	3,395	1
1981	5,582	1
1982	5,851	1
1983	6,511	1
1984	5,529	1
1985	5,657	1
1986	6,135	1
1987	5,519	1
1988	5,070	1
1989	5,857	1
1990	6,596	1
1991	4,945	1
1992	4,341	1
1993	4,245	1
1994	3,758	1
1995	2,945	1
1996	2,683	3
1997	2,328	2
1998	1,854	2
1999	1,403	2
2000	1,039	2
2001	1,684	2
2002	1,900	2

2003 1,688

	1,809	2
	1,662	2
2006	1,564	2
2007	1,483	2
	1,516	2
2009	1,511	2
	1,297	2
	1,177	2
	1,349	2
2013	637	2
2014	-	-
2015	170	2

Reported through 6-2015.

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

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.

#### 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

OPERATOR: License # 30163				API No.: 15-009-19144-00-00			
		s Petroleum, Inc.		Permit No: D11083.0			
Addre	ess 1: _221 CIRCL	E DR		Reporting Year: 2017			
Addre	ess 2:				(January 1 to Decembe	er 31)	
		State: KS Zip: 672		_ SW _SW _NE	Sec. 3 Twp. 17 S.	R. 12 E W	
•	act Person: Rod P	•		(Q/Q/Q/Q)	feet from N /		
	ne: (316) 68				feet from 🔽 E /		
	e Name: STUMF			County: Barton	1000110111 [V] 2 /		
				Oddity.			
VVCIII	Number:						
I. Ini	jection Fluid:						
_	Type (Pick one):	Fresh Water	Treated Brine	✓ Untreated Brine	Water/Brine		
	Source:	✓ Produced Water	Other (Attach list)	_	_		
	Quality: Tota	I Dissolved Solids:	mg/l Specific Grav	vity: Additives:			
	(Attach water analys	is, if available)					
II. W	<i>l</i> ell Data:						
	Maximum Authorized	Injection Pressure: 0		psi	ARBUCKLE		
		•	barrels per d	•			
	Total Number of Enh	anced 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	3472	0	0		14	
	February	0		0			
	March	0		0			
	April	2480	0	0		10	
	May	0		0			
	June	0		0			
	July	0		0			
	August	3472	0			14	
	September	0		0			
	October	0		0			
	November	0		0			
	December	0		0			
	TOTAL	9424		0			

#### KANSAS CORPORATION COMMISSION OIL & GAS CONSERVATION DIVISION

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

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

OPERATOR: License # 30163							
		s Petroleum, Inc.		Permit No: D11083.0			
Addre	ess 1: 221 CIRCL	E DR		Reporting Year: 2018			
Addre	ess 2:			. •	(January 1 to Decembe	r 31)	
		State: KS Zip: 672		<u>SWSWNE</u>	Sec. 3 Twp. 17 S.	R. 12	
•	act Person: Rod P	•		(Q/Q/Q/Q)	S Line of Section		
	Phone: (316 ) 685-8800 Lease Name: STUMPS				feet from 🔽 E /		
				County: Barton			
	_			ooding.			
vvoii i	Admisor.						
	iection Fluid:  Type (Pick one):  Source:  Quality: Total (Attach water analys.		☐ Treated Brine ☐ Other (Attach list) mg/l Specific Grav	✓ Untreated Brine  vity: Additives: _	☐ Water/Brine		
	Maximum Authorized	Injection Pressure: 0 Injection Rate: 3000	barrels per da	ay	ARBUCKLE		
	Total Number of Enh	anced Recovery Injection Wells	s 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	0		0			
	February	0		0			
	March	0		0			
	April	0		0			
	May	0					
	June	0		0			
	July	0					
	August	0		0			
	September	0		0			
	October	0		0			
	November	0		0			
	December	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

OPERATOR: License # 30163				API No.: 15-009-19144-00-00			
		s Petroleum, Inc.		Permit No: D11083.0			
Addre	ess 1: 221 CIRCL	E DR		Reporting Year: 2019			
Addre	ess 2:			. •	(January 1 to Decembe	r 31)	
		State: KS Zip: 672		<u>SWSWNE</u>	Sec. 3 Twp. 17 S.	R. 12	
•	act Person: Rod P	·		(Q/Q/Q/Q)	S Line of Section		
	e: (316) 685				feet from 🔽 E /		
	e Name: STUMF			County: Barton	[] = /		
				ooding.			
VVCIII	ramber.						
	jection Fluid:  Type (Pick one):  Source:  Quality: Total  (Attach water analys.		☐ Treated Brine ☐ Other (Attach list) mg/l Specific Grav	✓ Untreated Brine  vity: Additives: _	☐ Water/Brine		
II. W	ell Data:						
	Maximum Authorized	Injection Pressure: 0		psi	ARBUCKLE		
		Injection Rate: 3000					
	Total Number of Enh	anced Recovery Injection Wells	s 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	0		0			
	February	0		0			
	March	0		0			
	April	0		0			
	May	0		0			
	June	0		0			
	July	0		0			
	August	0		0			
	September	0		0			
	October	0		0			
	November	0		0			
	December	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

OPERATOR: License # 30163				API No.: <u>15-009-19144-00-00</u>				
Name	: Great Plain:	s Petroleum, Inc.		Permit No:				
Addre	ss 1: 221 CIRCL	E DR		Reporting Year: 2020				
Addre	ess 2:			. 0	(January 1 to Decembe	r 31)		
		State: KS Zip: 672		<u>SWSWNE_</u>	Sec. 3 <sub>Twp.</sub> 17 <sub>S.</sub>	R. 12		
-	ct Person: Rod P	·		(Q/Q/Q/Q)	feet from N /			
	e: (316)_688				_	<del></del>		
	Name: STUMF							
				ooding.				
VVCIII	varribor:							
	ection Fluid: Type (Pick one): Source:	☐ Fresh Water	☐ Treated Brine ☐ Other (Attach list)	Untreated Brine	Water/Brine			
(	Quality: Total	Dissolved Solids:	mg/l Specific Grav	vity: Additives: _				
(	(Attach water analys	is, if available)						
	ell Data:	_						
		Injection Pressure: 0			ARBUCKLE			
		Injection Rate: 3000						
	Total Number of Enh	anced Recovery Injection Wells	s 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	0		0				
	February	0		0				
	March	0		0				
	April	0						
	May	0		0				
	June	0						
	July	0						
	August	0		0				
	September	0						
	October							
	November			0				
	December							
	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

OPERATOR: License # 30163				_   API No.: 15-009-19144-00-00			
Name	: Great Plain	s Petroleum, Inc.		_ Permit No: _ D11083.0			
Addre	ss 1: 221 CIRCL	E DR		Reporting Year: 2021			
Addre	ss 2:				(January 1 to Decembe	r 31)	
		State: KS Zip: 672		<u>SW</u> _ <u>SW</u> _NE	Sec. 3 Twp. 17 S.	R. 12 E	
Conta	ct Person: Rod P	hares		(Q/Q/Q/Q)	feet from N /		
Phone	Phone: (316 ) 685-8800			0575	feet from 🔽 E /		
	Name: STUMF			Dorton			
Well N	Number: 4			·			
_	ection Fluid:	□ <b>-</b>	□ <b>-</b>		□ w /p :		
	Type (Pick one):	Fresh Water	Treated Brine	Untreated Brine	Water/Brine		
	Source: Quality: Tota		Other (Attach list)	vity: Additives:			
	(Attach water analys		mg/i Specific Grav	nty Additives			
'	rttaon water analys	is, ii availabio)					
II W	ell Data:						
		Injection Pressure: 0		psi	ARBUCKLE		
		Injection Rate: 3000					
		anced Recovery Injection Wells					
III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection	
	January	0		0			
	February	0		0			
	March	0		0		_	
	April	0		0			
	May	0		0			
	June	0					
	July	0		0			
	August	0		0			
	September	0					
	October	0		0			
	November			0			
	December	0		0			
	TOTAL	0		0			

#### **CERTIFICATE OF SERVICE**

#### 23-CONS-3176-CSHO

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Richard Williams on Behalf of Commission Staff has been served to the following by means of electronic service on June 2. 2023.

TODD BRYANT, GEOLOGIST SPECIALIST KANSAS CORPORATION COMMISSION 266 N. Main St., Ste. 220 WICHITA, KS 67202-1513 t.bryant@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 DIANA E. STANLEY
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WICHITA, KS 67206-2936
dstanley@depewgillen.com

CHARLES C STEINCAMP
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WICHITA, KS 67206-2936
chris@depewgillen.com

RICHARD WILLIAMS
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 4
2301 E. 13TH STREET
HAYS, KS 67601-2654
r.williams@kcc.ks.gov

/s/ Nancy D Borst

Nancy D Borst