

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

Before Commissioners: Shari Feist Albrecht, Chair
Jay Scott Emler
Dwight D. Keen

In the Matter of the Application)
of Vulcan Resources, LLC, for an) Docket No. 19-CONS-3206-CUIC
application for a permit for salt -)
water disposal in the Hatch I-1,) CONSERVATION DIVISION
located at NE SE NW NE of Section 2)
Township 23S, Range 13E in Coffey) License No. ? Permit No. E-32,766
County, Kansas)

In the Matter of Vulcan Resources, LLC for an application for a permit for the disposal of salt water into the Squirrel Formation at the Hatch I-1 well, located at the NE SE NW NE of Section 2, Township 23S, Range 13E in Coffey County, Kansas, with a maximum operating pressure of 600 PSI and a maximum injection rate of 500 bbls. per day. Docket Number 19-CON-3206-CUIC.

PROTESTANT'S MOTION TO COMPEL DISCOVERY REQUEST
FOR INFORMATION FROM VULCAN RESOURCES, LLC
Originally Filed on December 18, 2018 and
RELATED TO THE ABOVE REFERENCED HATCH I-1 APPLICATION

Protestant Susan Royd-Sykes comes now and presents the following **Motion to Compel the Discovery** Request for information from Vulcan Resources, LLC originally filed and served on Applicant via US Mail on December 18, 2018 regarding their application for a permit for the disposal of salt water into the Squirrel Formation at the Hatch I-1 well, located at the NE SE NW NE of Section 2, Township 23S, Range 13E in Coffey County, Kansas, with a maximum operating pressure of 600 PSI and a maximum injection rate of 500 bbls. per day.

In support of her Motion to Compel Discovery, Protestant states:

- 1) her original Discovery Request for Information was filed and served via US mail on Vulcan Resources, LLC on December 18, 2018.
- 2) Responses to such Discovery Requests are due within 10 days of receipt of such request (excluding Sat., Sun. or legal holidays) and that 10 day deadline would have tolled on January 4, 2019.
- 3) To date, Protestant has received no response regarding that same Discovery Request for Information from Vulcan Resources, LLC.
- 4) The Requested Information as listed in original December 18, 2018 Discovery Request is reiterated below:

1) Please provide a copy of the lease agreement between Vulcan Resources, LLC and the Hatch I-1 well site property owners in Coffey County, KS.

2) Please state the current status of the Hatch I-1 well, to include whether or not the Hatch I-1 is currently producing oil; and if so, how many bbls per day it is producing.

- 3) Please provide a specific list of all oil-related wells in Coffey County leased or operated by Vulcan Resources, LLC that w
- 4) Please provide a specific list of all oil-related wells in Coffey County, KS leased or operated by Vulcan Resources, LLC that will be contributing produced water to be disposed of in the Hatch I-1 well; and please provide a specific list of the chemical contents of those same produced waters intended for injection into the Hatch I-1 well, if the application is approved by the Kansas Corporation Commission.
- 5) Please provide a list of all abandoned and/or plugged wells related to the Hatch I-1 well site in Coffey County, KS.
- 6) Please provide a copy of your safety record for all oil wells, EOR wells, and SWD wells that Vulcan Resources, LLC leases and/or operates in Coffey County, Ks., specifically to include:
 - a) Any and all oil or brine spills that have taken place in the last 10 years, their locations and the related clean-up and/or remediation methods applied
 - b) Any and all related well construction, operation or spill penalties assessed to Vulcan Resources, LLC by the Kansas Corporation Commission in the last 10 years
 - c) A list of any and all oil-related wells in Coffey County, KS leased or operated by Vulcan Resources, LLC that the Kansas Corporation Commission has taken out of production in the last 10 years.

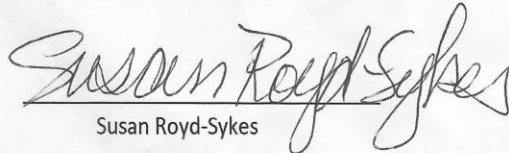
Wherefore Protestant Susan Royd-Sykes comes now to the Commission and asks that her Motion to Compel the Discovery Request for information from Vulcan Resources, LLC originally filed and served on Applicant via US Mail on December 18, 2018 regarding their application for a permit for the disposal of salt water into the Squirrel Formation at the Hatch I-1 well, located at the NE SE NW NE of Section 2, Township 23S, Range 13E in Coffey County, Kansas, with a maximum operating pressure of 600 PSI and a maximum injection rate of 500 bbls. per day BE GRANTED and that the Commission demand that Vulcan Resources, LLC. complies with said request immediately.

Susan Royd-Sykes
504 S. 6th St., Burlington, Ks 66839
moondrummer88@gmail.com

VERIFICATION

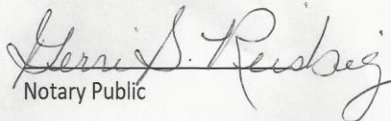
STATE OF KANSAS)
)
County of Coffey) ss.

Susan Royd-Sykes, of lawful age, being first duly sworn upon oath, deposes and states: that she is responsible for the response to which this verification is attached, that she has read the above and foregoing and that the statements therein contained are true and correct according to her knowledge, information and belief.


Susan Royd-Sykes

Subscribed and sworn to before me this 8th day of January, 2019.

My appointment expires: 4/15/2020


Notary Public



CERTIFICATE OF SERVICE

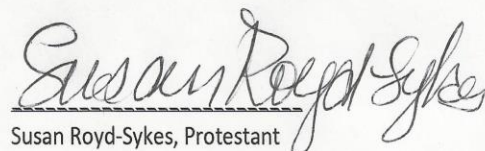
I hereby certify that on this 8th day of January, 2019, the above Protestant's Motion to Compel Discovery Request for Information from Vulcan Resources, LLC.... as Related to the Hatch I-1 Application was electronically served (with hard copies following in the US Mail) on:

Lynn Retz, KCC
Michael Duenes
KCC Litigation Department
1500 SW Arrowhead Rd.
Topeka, KS 66604-4027

Kansas Corporation Commission
Conservation Division Staff
266 N. Main St., Ste. 220
Wichita, KS 67202-1513

with hard copy through certified US Mail on:

Vulcan Resources, LLC
1102 Lenapah Ave.
Skiatook, OK 74070


Susan Royd-Sykes, Protestant