

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

In the matter of the failure of Little Chief) Docket No. 21-CONS-3200-CPEN
Energy Corporation (Operator) to comply with)
K.A.R. 82-3-120 and K.A.R. 82-3-133 by) CONSERVATION DIVISION
operating under a suspended license.)
_____) License No. 35588

PRE-FILED TESTIMONY

OF

RODNEY BREEZE

ON BEHALF OF COMMISSION STAFF

SEPTEMBER 27, 2021

Q. What is your name and business address?

A. Rodney Breeze, 137 E. 21st Street Chanute, Kansas 66720.

Q. By whom are you employed and in what capacity?

A. I am employed by the Kansas Corporation Commission (KCC), Conservation Division, as an Environmental Compliance and Regulatory Specialist (ECRS) for District #3.

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

A. I graduated from Burlington High School in 2005 and from Tulsa Welding School in 2006. Prior to my work with the KCC, I worked in the oil and gas industry for approximately 12 years as a roustabout for B&B Cooperative Ventures. As a roustabout, my duties included drilling and completion operations for oil and injection wells, plugging of oil and failed injection wells, mechanical integrity well prep & testing, well maintenance, line repair, and general operational duties. In March of 2020, I started my work with the KCC as an ECRS.

Q. Have you previously testified before this Commission?

A. No.

Q. What duties does your position with the Conservation Division involve?

A. As an ECRS, I am responsible for witnessing and monitoring oil and gas related activities in Coffey, Greenwood, Lyon, Osage, and Wabaunsee Counties, Kansas. My job involves inspections, documentation, investigation, and consultation with lease operators, landowners, and Commission Staff on compliance issues related to oil and gas production in Kansas. Additionally, I witness and monitor mechanical integrity tests, the plugging of wells, and the drilling and completion of oil, gas, injection, and disposal wells. I also investigate spills and complaints. In addition, I conduct inspections on new and abandoned wells to verify the exact

1 location and the status of wells. I work with District Staff and Central Office Staff when
2 required to complete various projects and requests.

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

4 A. The purpose of my testimony is to discuss the evidence supporting the Commission's findings
5 relating to the Penalty Order issued by the Commission against Little Chief Energy
6 Corporation (Operator) in this docket - Docket 21-CONS-3200-CPEN (Docket 21-3200).
7 Specifically, my testimony is to discuss my investigation reports where Operator was
8 conducting oil and gas operations under a suspended license.

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

10 A. Operator was penalized for violations of K.A.R. 82-3-120 and K.A.R. 82-3-133 by conducting
11 oil and gas operations while its license was suspended.

12 **Q. On what dates was Operator's license suspended?**

13 A. Operator's license was suspended from January 5, 2021, to February 8, 2021, for non-
14 compliance with Docket 21-CONS-3103-CPEN (Docket 21-3103). Additionally, Operator's
15 license was suspended from February 12, 2021, to March 12, 2021, for non-compliance with
16 Docket 21-CONS-3131-CPEN (Docket 21-3131).

17 **Q. Did you witness Operator conducting oil and gas operations during those time periods?**

18 A. Yes. On January 25, 2021, while Operator was suspended for non-compliance with Docket
19 21-3103, I conducted an inspection of Operator's Fulsom B, Goode A, Trust, and Underwood
20 leases in Chautauqua County to determine whether Operator had shut-in its wells. At that
21 time, I documented wells on each of these leases running and in service. I then contacted the
22 District #3 Supervisor, Mr. Troy Russell, with the information regarding the wells in
23 operation. These findings are documented in Exhibit G of the Docket 21-3200 Penalty Order.

1 Additionally, on February 23, 2021, while Operator was suspended for non-compliance
2 with Docket 21-3131, I conducted a follow-up inspection of Operator's Fulsom B, Goode A,
3 Trust, and Underwood leases to determine whether Operator had shut-in its wells. Once again,
4 I documented wells on each of these leases running and in service. I then contacted
5 Mr Russell, with the information regarding the wells in operation. These findings are
6 documented as Exhibit I of the Docket 21-3200 Penalty Order.

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

8 A. Yes.

CERTIFICATE OF SERVICE

21-CONS-3200-CPEN

I, the undersigned, certify that a true and correct copy of the attached Prefiled Testimony of Rodney Breeze has been served to the following by means of electronic service on September 27, 2021.

JOHN ALMOND
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
j.almond@kcc.ks.gov

KEITH A. BROCK, ATTORNEY
ANDERSON & BYRD, L.L.P.
216 S HICKORY
PO BOX 17
OTTAWA, KS 66067
kbrock@andersonbyrd.com

DANIEL FOX, COMPLIANCE OFFICER, KCC DISTRICT 2
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 2
3450 N. ROCK RD BLDG 600 STE 601
WICHITA, KS 67226
d.fox@kcc.ks.gov

KELCEY MARSH, LITIGATION COUNSEL
KANSAS CORPORATION COMMISSION
CENTRAL OFFICE
266 N. MAIN ST, STE 220
WICHITA, KS 67202-1513
k.marsh@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

TROY RUSSELL
KANSAS CORPORATION COMMISSION
DISTRICT OFFICE NO. 3
137 E. 21ST STREET
CHANUTE, KS 66720
t.russell@kcc.ks.gov

/s/ Paula J. Murray

Paula J. Murray