

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

In the matter of the failure of Viva International,) Docket No. 20-CONS-3182-CPEN
Inc. (“Operator”) to comply with K.A.R. 82-3-)
603 at the Wright Lease in Linn County,) CONSERVATION DIVISION
Kansas.)
) License No. 5556
)

In the matter of the failure of Viva International,) Docket No. 20-CONS-3255-CPEN
Inc. (“Operator”) to comply with K.S.A. 55-164)
and K.A.R. 82-3-120 at the Campbell Carlson,) CONSERVATION DIVISION
and Gillian Simpson Leases in Wilson and)
Sedgwick County, Kansas.) License No. 5556

PRE-FILED DIRECT TESTIMONY

OF

CHARLES IKEHORN

ON BEHALF OF VIVA INTERNATIONAL, INC.

AUGUST 10, 2020

1 **Q: What is your name and business address?**

2 A: Charles Ikehorn, 702 N. Second Street, Humboldt, Kansas, 66748.

3 **Q: By whom are you employed and in what capacity?**

4 A: I am employed by Viva International, Inc. as a pumper in Wilson County, Kansas. Viva
5 International, Inc. operates approximately 200 wells in Wilson County, Kansas.

6 **Q: Would you please describe your educational background and work experience?**

7 A: In 1983, I graduated from Humboldt High School, Humboldt, Kansas. After graduating,
8 I worked at Nu-Way Industries for approximately fourteen years and in construction for
9 an additional twelve years. I also worked at two different car dealerships. Since May 24,
10 2008, I have worked for Viva International, Inc., as a pumper involving maintaining
11 leases, gauging of tanks, repairing electrical problems, treating wells with chemicals as
12 needed, coordinating pulling contractors and acquiring parts as needed on Viva
13 International, Inc.'s 200 wells in Wilson County, Kansas.

14 **Q: Have you previously testified before this Commission?**

15 A: No.

16 **Q: What is the purpose of your testimony?**

17 A: On December 19, 2019, I was working on the Campbell #2 well operated by Viva
18 International, Inc., which is located in 36-27-16. Dallas Logan of the KCC advised me
19 that Viva International, Inc.'s Operator's License had been suspended and that the well
20 needed to be shut-off. I explained to Mr. Logan that I was attempting to correct electrical
21 problems and that was why the well was running. Mr. Logan told me that it was okay to

1 continue to work on the well, but we would have to shut it down when we finished our
2 repairs. I was also working on the Carlson 99-4 lease, 25-27-15, which also had electrical
3 problems. I left the Campbell lease mid-day in order to purchase items needed for
4 electrical repair on both leases. I returned later in the afternoon and finished the electrical
5 repairs on both the Campbell #2 lease and the Carlson 99-4 lease. I left the lease between
6 6:00 p.m. to 6:30 p.m. in the evening that day and turned off both wells after the electrical
7 repairs had been completed. Neither of these leases had been in production for several
8 months before December 19, 2019, because the electricity had been turned off.

9 **Q: Have you reviewed the production history on the Campbell #2 lease?**

10 A: Yes. Attached as **Exhibit N** is a KGS report on the Campbell #2 lease. No production
11 occurred on this lease during the month of December 2019 until I was informed by Mr.
12 Bukaty, President of Viva International, Inc., on December 23, 2019 that the Operator's
13 License had been reinstated and it was okay to start back up. The Campbell #2 lease was
14 turned off from the evening of December 19, 2019 until production resumed on December
15 23, 2019.

16 **Q: Have you reviewed the production on the Carlson 99-4 lease?**

17 A: Yes. Attached as **Exhibit O** is a report from the KGS website on the Carlson lease. As
18 shown by **Exhibit O**, no production occurred on this lease after September 2019.

19 **Q: Did you have a conversation with Robert Bukaty about whether he knew that the**
20 **Operator's License for Viva International, Inc. had been suspended?**

21 A: Yes. He was not aware that his Operator's License had been suspended. In fact, he told
22 me that he had renewed his Operator's License with the KCC in June of 2019.

1 **Q: During the twelve years that you’ve worked as a pumper for Viva International, Inc.,**
2 **have you been advised to report any spills that occurred on leases operated by Viva**
3 **International, Inc. to the KCC?**

4 A: Yes. I feel that I have always promptly reported any spills on the approximate 200 wells
5 that I oversee as a pumper for Viva International, Inc. located in Wilson County, Kansas.
6 I also feel that I have promptly responded to any leaks reported to me by any member of
7 the KCC during that time with respect to the Wilson County leases that I oversee for Viva
8 International, Inc.

9 **Q: Have you had any other interactions with Dallas Logan of the KCC?**

10 A: Yes. I see Dallas Logan nearly every day because he regularly checks on the leases
11 operated by Viva International, Inc., in Wilson County, Kansas.

12 **Q: Does this conclude your testimony?**

13 A: Yes.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 10, 2020, I have caused to be served via electronic transmission a true and accurate copy of the foregoing Prefiled Testimony of Charles Ikehorn to:

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