

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

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

In the matter of an Order to Show Cause issued	)	Docket No. 17-CONS-3377-CSHO
to Norstar Petroleum, Inc. (“Operator”) for its	)	
failure to comply with either K.A.R. 82-3-400	)	CONSERVATION DIVISION
or K.A.R. 82-3-409 regarding injection that	)	
<u>took place during the 2015 calendar year.</u>	)	License No. 31652

**PRE-FILED TESTIMONY**

**OF**

**RENE STUCKY**

1 Q. What is your name and business address?  
2 A. Rene Stucky, 266 North Main Suite 220, Wichita, Kansas 67202.  
3 Q. By whom are you employed and in what capacity?  
4 A. I'm employed by the Conservation Division of the Kansas Corporation Commission, as  
5 Supervisor of the Underground Injection Control ("UIC") Department and the Production  
6 Department.  
7 Q. How long have you been employed by the KCC?  
8 A. About 11 years. Before becoming Supervisor, I was an Environmental Scientist in the  
9 UIC Department, where I reviewed and processed injection applications.  
10 Q. Have you previously testified before this Commission?  
11 A. Yes.  
12 Q. What does your position with the Conservation Division involve?  
13 A. I supervise everyone in the Conservation Division's UIC and Production Departments.  
14 Q. Are you familiar with this KCC Docket, 17-CONS-3377-CSHO?  
15 A. Yes.  
16 Q. How are you familiar with this Docket?  
17 A. Commission Staff believed it was appropriate to initiate legal proceedings in this matter.  
18 I participated in the decision, and am familiar with the issues that caused Staff's decision.  
19 Q. Why does Staff believe legal proceedings are appropriate?  
20 A. As described in Staff's motion, on July 23, 2015, Operator was penalized in Docket 16-  
21 CONS-066-CPEN for reported unauthorized injection during the 2014 calendar year at  
22 the same five wells again at issue in the present proceeding. The Penalty Order stated that  
23 in Operator's injection report, Operator reported rates of injection or pressure that  
24 exceeded its permit. It stated that if the data was correct, Operator violated K.A.R. 82-3-  
25 400 by conducting unauthorized injection. It stated that if the data was incorrect,  
26 Operator violated K.A.R. 82-3-409(b) by submitting an inaccurate report.  
27 The Penalty Order then stated that, therefore, a violation of either K.A.R. 82-3-400 or  
28 K.A.R. 82-3-409 occurred. The Penalty Order assessed a \$500 per-well penalty, for a  
29 total penalty of \$2,500 for the five wells at issue here (the total penalty was actually  
30 \$6,500, but the Commission also found violations at eight other wells), and stated that if  
31 Operator believed it misreported a rate of injection or pressure, then Operator should

1 submit a corrected report. It did not state that submitting a corrected report meant that a  
2 violation did not occur, and it did not state that the penalty would be reduced or  
3 eliminated if a corrected report was filed. In that docket, Operator appealed, but after a  
4 hearing the Commission affirmed the Penalty Order for all five of the wells now at issue  
5 here. Operator then paid the penalty. It did not submit a corrected report.

6 For the 2015 calendar year, Operator has again done the same thing at the same wells.  
7 That means a violation of either K.A.R. 82-3-400 or K.A.R. 82-3-409(b) has again  
8 occurred, and that a penalty is again appropriate.

9 Q. What constitutes a violation of K.A.R. 82-3-400?

10 A. Over-injection.

11 Q. What constitutes a violation of K.A.R. 82-3-409(b)?

12 A. Misreporting injection.

13 Q. What do you mean when you say Operator did the same thing at the same wells?

14 A. Operator's injection reports for 2014 indicated over-injection at the J.K. Corp #24-115,  
15 J.K. Corp #24-120, J.K. Corp #24-18, J.K. Corp. #24-30, and J.K. Corp #24-4.  
16 Operator's injection reports for 2015 again indicate over-injection at the same wells.

17 Q. How do Operator's injection reports for the wells indicate over-injection?

18 A. I have attached Operator's injection reports for 2015 (Exhibit A), which are also attached  
19 to Staff's motion to show cause. The data in Section II of the reports, which gives the  
20 authorized rates and pressures, is correct. I know it is correct because I have both  
21 reviewed the Commission's electronic well database, which is updated to reflect the  
22 authorized injection rate and pressure, and because I have reviewed the paper file, which  
23 contains the official injection permit documents.

24 The data in Section III of the reports indicates over-injection. Specifically, for each of  
25 the five wells, Operator reports injecting at between 500 and 580 pounds per square inch,  
26 but Operator was only authorized to inject at 450 pounds per square inch.

27 I have also attached Staff's penalty recommendations in Docket 16-CONS-066-CPEN,  
28 which were attached to the Penalty Order, for comparison (Exhibit B). As you can see,  
29 the issues there were almost identical.

1 Q. Staff's motion to show cause includes an inspection report on the five wells, based upon  
2 an inspection that took place in August 2016. Do the findings in that report indicate  
3 whether Operator violated either K.A.R. 82-3-400 or K.A.R. 82-3-409(b) in 2015?

4 A. No. An inspection cannot determine whether too much fluid has been injected during the  
5 course of a year, especially an inspection that takes place after the year in question. An  
6 inspection can determine whether there is too much pressure on the day of the visit. It can  
7 sometimes provide clues that over-pressurization may not have occurred in the past, for  
8 example because of the well's current set-up. But an inspection cannot demonstrate that a  
9 violation of K.A.R. 82-3-400 did not occur prior to the inspection.

10 Further, it is not Staff's position that a violation of K.A.R. 82-3-400 occurred. It is our  
11 position that either a violation of K.A.R. 82-3-400 occurred or a violation of K.A.R. 82-  
12 3-409(b) occurred. An inspection can indicate that maybe one type of violation more  
13 probably occurred compared to the other, but no matter what there was a violation of  
14 either K.A.R. 82-3-400 or K.A.R. 82-3-409(b). Either violation is unacceptable.

15 Q. Why is either violation unacceptable?

16 A. Aside from the fact that our regulations prohibit such violations, over-injection can  
17 damage fresh and useable water. Because Staff cannot be onsite at each of the  
18 approximately 16,000 injection wells statewide every day, inaccurate data makes it  
19 essentially impossible for Staff to verify annual compliance with all injection permits.  
20 Inaccurate data also makes it difficult for Staff or the public to systemically analyze  
21 wastewater injection issues, which have been of particular interest since the recent  
22 increase in seismicity. If Staff cannot rely upon operators to submit accurate data, then  
23 the only real alternative way to get that data would be to require various gauges to be  
24 installed at each well, which is generally quite expensive.

25 At a more abstract level, failure to address either over-injection or inaccurate data  
26 harms the integrity of our injection well program and could jeopardize the Commission's  
27 ongoing oversight of Class II injection wells. In short, both over-injection and the  
28 submission of inaccurate data are very problematic.

29 Q. Operator was penalized \$2,500 for its violation of either K.A.R. 82-3-400 or K.A.R. 82-  
30 3-409 regarding these five wells for its 2014 reports. You have testified that Operator has  
31 done the same thing at the same wells for a second time, as demonstrated by its 2015

1 reports. In Staff's opinion, what should be the consequences for these second-time  
2 violations?

3 A. Operator has exhibited the same behavior that in Docket 16-CONS-066-CPEN resulted  
4 in a finding of five violations and a penalty of \$2,500. The Commission should again find  
5 that five violations of either K.A.R. 82-3-400 or K.A.R. 82-3-409 occurred.

6 Further, K.S.A. 55-164 states that assessed penalties shall constitute an actual and  
7 substantial economic deterrent to the violation for which the penalty is assessed. It does  
8 not appear that \$2,500 was a sufficient economic deterrent to the violations, because  
9 Operator has exhibited the same behavior regarding the same wells. Therefore, Staff  
10 believes a more substantial penalty is appropriate.

11 Q. Does this conclude your testimony as of this date, January 27, 2017?

12 A. Yes.

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

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 31652  
Name: Norstar Petroleum, Inc.  
Address 1: 88 INVERNESS CIR E UNIT F104  
Address 2: \_\_\_\_\_  
City: ENGLEWOOD State: CO Zip: 80112 + 5514  
Contact Person: Brady Pfeiffer  
Phone: (303) 925-0696  
Lease Name: J. K. CORP  
Well Number: 24-115

API No: 15-011-22454-00-01  
Permit No: E24310.9  
Reporting Year: 2015  
(January 1 to December 31)  
NW SE NE Sec 24 Twp 26 S R 21 ☒ E ☐ W  
3916 feet from ☐ N ☒ S Line of Section  
1131 feet from ☒ E ☐ W Line of Section  
County: Bourbon

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water, Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 450 psi Injection Zone: CATTLEMAN SAND  
Maximum Authorized Injection Rate: 320 barrels per day  
Total Number of Enhanced 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	1070	580	0		31
	February	1100	580	0		28
	March	1060	580	0		31
	April	1200	580	0		30
	May	1210	580	0		31
	June	1160	580	0		30
	July	1180	580	0		31
	August	1240	580	0		31
	September	1260	580	0		30
	October	1140	580	0		31
	November	1100	580	0		30
	December	1110	580	0		31
	TOTAL	13830		0		

Submitted Electronically

Docket 17-3377  
Exhibit A  
Page 1 of 5

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

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 31652  
Name: Norstar Petroleum, Inc.  
Address 1: 88 INVERNESS CIR E. UNIT F104  
Address 2: \_\_\_\_\_  
City: ENGLEWOOD State: CO Zip: 80112 + 5514  
Contact Person: Brady Pfeiffer  
Phone: (303) 925-0696  
Lease Name: J. K. CORP  
Well Number: 24-120

API No.: 15-011-22409-00-01  
Permit No.: E24310.10  
Reporting Year: 2015  
(January 1 to December 31)  
SW NE NE Sec. 24 Twp 26 S. R. 21 ☒ E ☐ W  
feet from ☐ N ☒ S Line of Section  
feet from ☒ E ☐ W Line of Section  
County: Bourbon

**I. Injection Fluid:**

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

**II. Well Data:**

Maximum Authorized Injection Pressure: 450 psi Injection Zone: CATTLEMAN SAND  
Maximum Authorized Injection Rate: 320 barrels per day  
Total Number of Enhanced 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	1020	560	0		31
	February	980	560	0		28
	March	1050	560	0		31
	April	1150	560	0		30
	May	1170	560	0		31
	June	1180	560	0		30
	July	1150	560	0		31
	August	1200	560	0		31
	September	1200	560	0		30
	October	1050	560	0		31
	November	1010	560	0		30
	December	960	560	0		31
	TOTAL	13120		0		

Submitted Electronically

**Docket 17-3377**  
**Exhibit A**  
**Page 2 of 5**

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

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 31652  
Name: Norstar Petroleum, Inc.  
Address 1: 88 INVERNESS CIR E. UNIT F104  
Address 2: \_\_\_\_\_  
City: ENGLEWOOD State: CO Zip: 80112 + 5514  
Contact Person: Brady Pfeiffer  
Phone: ( 303 ) 925-0696  
Lease Name: J. K. CORP  
Well Number: 24-18

API No.: 15-011-22203-00-01  
Permit No.: E24310.4  
Reporting Year: 2015  
(January 1 to December 31)  
NE NW SW Sec. 24 Twp. 26 S. R. 21 ☒ E ☐ W  
feet from ☐ N ☒ S Line of Section  
2298  
feet from ☒ E ☐ W Line of Section  
4025  
County: Bourbon

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 450 psi Injection Zone: CATTLEMAN SAND  
Maximum Authorized Injection Rate: 320 barrels per day  
Total Number of Enhanced 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	<u>600</u>	<u>500</u>	<u>0</u>		<u>31</u>
	February	<u>580</u>	<u>500</u>	<u>0</u>		<u>28</u>
	March	<u>520</u>	<u>500</u>	<u>0</u>		<u>31</u>
	April	<u>580</u>	<u>500</u>	<u>0</u>		<u>30</u>
	May	<u>620</u>	<u>500</u>	<u>0</u>		<u>31</u>
	June	<u>660</u>	<u>500</u>	<u>0</u>		<u>30</u>
	July	<u>680</u>	<u>500</u>	<u>0</u>		<u>31</u>
	August	<u>600</u>	<u>500</u>	<u>0</u>		<u>31</u>
	September	<u>620</u>	<u>500</u>	<u>0</u>		<u>30</u>
	October	<u>580</u>	<u>500</u>	<u>0</u>		<u>31</u>
	November	<u>540</u>	<u>500</u>	<u>0</u>		<u>30</u>
	December	<u>520</u>	<u>500</u>	<u>0</u>		<u>31</u>
	TOTAL	<u>7100</u>		<u>0</u>		

Submitted Electronically

Docket 17-3377  
Exhibit A  
Page 3 of 5



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

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 31652  
Name: Norstar Petroleum, Inc.  
Address 1: 88 INVERNESS CIR E. UNIT F104  
Address 2: \_\_\_\_\_  
City: ENGLEWOOD State: CO Zip: 80112 + 5514  
Contact Person: Brady Pfeiffer  
Phone: (303) 925-0696  
Lease Name: J. K. CORP  
Well Number: 24-30

API No.: 15-011-22455-00-01  
Permit No: E24310.6  
Reporting Year: 2015  
(January 1 to December 31)  
SE SE NW Sec 24 Twp. 26 S. R. 21 ☒ F ☐ W  
3098 feet from ☐ N ☒ S Line of Section  
2660 feet from ☒ E ☐ W Line of Section  
County: Bourbon

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water-Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 450 psi Injection Zone: CATTLEMAN SAND  
Maximum Authorized Injection Rate: 320 barrels per day  
Total Number of Enhanced Recovery Injection Wells Covered by this Permit: \_\_\_\_\_ (Include TAs)

III.	Month:	Total Fluid Injected BBL	Maximum Fluid Pressure	Total Gas Injected MCF	Maximum Gas Pressure	# Days of Injection
	January	980	540	0		31
	February	940	540	0		28
	March	950	540	0		31
	April	1010	540	0		30
	May	1040	540	0		31
	June	1000	540	0		30
	July	1000	540	0		31
	August	1080	540	0		31
	September	1050	540	0		30
	October	1040	540	0		31
	November	1000	540	0		30
	December	960	540	0		31
	TOTAL	12050		0		

Submitted Electronically

Docket 17-3377  
Exhibit A  
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# ANNUAL REPORT OF PRESSURE MONITORING, FLUID INJECTION AND ENHANCED RECOVERY

Complete all blanks - add pages if needed. Copy to be retained for five (5) years after filing date.

OPERATOR: License # 31652  
Name: Norstar Petroleum, Inc.  
Address 1: 88 INVERNESS CIR E. UNIT F104  
Address 2: \_\_\_\_\_  
City: ENGLEWOOD State: CO Zip: 80112 + 5514  
Contact Person: Brady Pfeiffer  
Phone: (303) 925-0696  
Lease Name: J. K. CORP  
Well Number: 24-4

API No.: 15-011-22017-00-01  
Permit No: E24310.1  
Reporting Year: 2015  
(January 1 to December 31)  
NE NW SW Sec. 24 Twp. 26 S. R. 21 ☒ E ☐ W  
(a) (b) (c) 2104 feet from ☐ N ☒ S Line of Section  
4505 feet from ☒ E ☐ W Line of Section  
County: Bourbon

## I. Injection Fluid:

Type (Pick one): ☐ Fresh Water ☐ Treated Brine ☐ Untreated Brine ☒ Water/Brine  
Source: ☒ Produced Water ☐ Other (Attach list)  
Quality: Total Dissolved Solids: \_\_\_\_\_ mg/l Specific Gravity: \_\_\_\_\_ Additives: \_\_\_\_\_  
(Attach water analysis, if available)

## II. Well Data:

Maximum Authorized Injection Pressure: 450 psi Injection Zone: CATTLEMAN SAND  
Maximum Authorized Injection Rate: 320 barrels per day  
Total Number of Enhanced 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	<u>920</u>	<u>540</u>	<u>0</u>		<u>31</u>
	February	<u>1000</u>	<u>540</u>	<u>0</u>		<u>28</u>
	March	<u>1040</u>	<u>540</u>	<u>0</u>		<u>31</u>
	April	<u>1080</u>	<u>540</u>	<u>0</u>		<u>30</u>
	May	<u>1110</u>	<u>540</u>	<u>0</u>		<u>31</u>
	June	<u>1100</u>	<u>540</u>	<u>0</u>		<u>30</u>
	July	<u>1060</u>	<u>540</u>	<u>0</u>		<u>31</u>
	August	<u>1000</u>	<u>540</u>	<u>0</u>		<u>31</u>
	September	<u>800</u>	<u>540</u>	<u>0</u>		<u>30</u>
	October	<u>600</u>	<u>540</u>	<u>0</u>		<u>31</u>
	November	<u>0</u>		<u>0</u>		
	December	<u>0</u>		<u>0</u>		
	<b>TOTAL</b>	<u>9710</u>		<u>0</u>		

Submitted Electronically

**Docket 17-3377**  
**Exhibit A**  
**Page 5 of 5**

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Norstar Petroleum, Inc.
Operator License Number:	31652
Well/Lease Name & Well Number:	J. K. CORP #24-115
API Number:	15011224540001
Well/Lease Location, and County:	24-26S-21E, BOURBON County
UIC Permit Number:	E24310.9
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	560
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	450
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

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Exhibit B  
Page 1 of 5

Docket 16-066  
Exhibit A  
Page 2 of 13

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Norstar Petroleum, Inc.
Operator License Number:	31652
Well/Lease Name & Well Number:	J. K. CORP #24-120
API Number:	15011224090001
Well/Lease Location, and County:	24-26S-21E, BOURBON County
UIC Permit Number:	E24310.10
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	570
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	450
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3377  
Exhibit B  
Page 2 of 5

Docket 16-066  
Exhibit A  
Page 3 of 13

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Norstar Petroleum, Inc.
Operator License Number:	31652
Well/Lease Name & Well Number:	J. K. CORP #24-18
API Number:	15011222030001
Well/Lease Location, and County:	24-26S-21E, BOURBON County
UIC Permit Number:	E24310.4
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	500
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	450
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3377  
Exhibit B  
Page 3 of 5

Docket 16-066  
Exhibit A  
Page 5 of 13

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Norstar Petroleum, Inc.
Operator License Number:	31652
Well/Lease Name & Well Number:	J. K. CORP #24-30
API Number:	15011224550001
Well/Lease Location, and County:	24-26S-21E, BOURBON County
UIC Permit Number:	E24310.6
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	570
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	450
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3377  
Exhibit B  
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Docket 16-066  
Exhibit A  
Page 7 of 13

## PENALTY ORDER RECOMMENDATION

\*\*\*ROUTINE REPORTED OVER-PRESSURIZATION VIOLATION\*\*\*

*Note: this sheet will be attached to the Order that is mailed to the operator.*

Date of Recommendation:	July 2, 2015
District/Department:	Underground Injection Control
Person Recommending Penalty:	Sanita Dean (Rene Stucky, Supervisor)
Operator Name:	Norstar Petroleum, Inc.
Operator License Number:	31652
Well/Lease Name & Well Number:	J. K. CORP #24-4
API Number:	15011220170001
Well/Lease Location, and County:	24-26S-21E, BOURBON County
UIC Permit Number:	E24310.1
Regulation Number:	K.A.R. 82-3-400 or K.A.R. 82-3-409
Description of Violation:	Unauthorized or misreported injection for 2014
Nature of Unauthorized Injection	In its Annual Injection Report, Operator reported over-pressurization at the subject well.
Maximum Pressure Reported in 2014, Per Operator's Annual Injection Report (pounds per square inch):	560
Maximum Pressure Allowed, Per UIC Permit (pounds per square inch):	450
Requested Monetary Penalty:	\$500
Requested Operator Activity:	Pay monetary penalty. Submit corrected report if applicable.

Docket 17-3377  
Exhibit B  
Page 5 of 5

Docket 16-066  
Exhibit A  
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**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS**

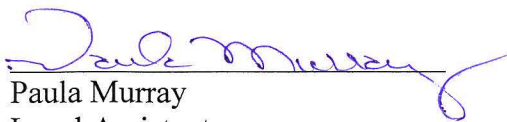
Before Commissioners:           Pat Apple, Chair  
  Shari Feist Albrecht  
  Jay Scott Emler

In the matter of an Order to Show Cause issued	)	Docket No. 17-CONS-3377-CSHO
to Norstar Petroleum, Inc. ("Operator") for its	)	
failure to comply with either K.A.R. 82-3-400	)	CONSERVATION DIVISION
or K.A.R. 82-3-409 regarding injection that	)	
<u>took place during the 2015 calendar year.</u>	)	License No. 31652

**CERTIFICATE OF SERVICE**

I, Paula Murray, certify that on January 27, 2017, I did cause a true and correct copy of the Pre-Filed Testimony of Rene Stucky to be served by United States mail, first class, postage prepaid to the following:

Jeff Kennedy  
Martin, Pringle, et al.  
100 North Broadway, Suite 500  
Wichita, Kansas 67202  
*Attorney for Norstar Petroleum, Inc.*

  
Paula Murray  
Legal Assistant  
Kansas Corporation Commission