

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

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

In the Matter of the Application of Charles E. See) Docket No. 17-CONS-3461-CUIC
dba See Oil ("Operator") to amend injection)
permit E-11, 453 by adding repressuring wells) CONSERVATION DIVISION
S-101, S-104, and S-105 at the Burge Lease,)
Section 2, Township 28, Range 23 East,) License No. 32723
Crawford County, Kansas.)

**RESPONSES OF CHARLES E. SEE DBA SEE OIL
TO DISCOVERY REQUESTS OF LASTACIA ROSS**

Requests for Information

1. How long has See Oil been operating on the Burge Lease?

I have owned and operated the Burge Lease for seventeen years, prior to owning the lease, I was the pumper for N&B Enterprise on this lease from 1985 forward.

2. How many active Class II wells does See Oil operate on the Burge Lease?

There are eight active injection wells and twenty-four producing wells.

3. At what depths and rates is See Oil currently injecting saltwater into the Burge Lease?

200 feet at 30 bbl/well per day

4. When did See Oil begin injecting saltwater into the Burge Lease?

My information is that Walter Duncan, a previous owner of the Burge Lease began injecting saltwater in the 1960's. During the time I was the pumper on this lease beginning in 1985 and continuing until I purchased the lease, there was continuous injecting of saltwater. Since I acquired the Burge Lease seventeen years ago, there has been continuous injection of saltwater.

5. How often does See Oil inspect the disposal wells on the Burge Lease for leaks or other defects?

I inspect the entire lease daily which would include the injection wells; however, there are no disposal wells being operated on the Burge Lease.

6. When was the last time See Oil inspected the disposal wells on the Burge Lease for leaks or other defects?

There are no disposal wells on the Burge Lease, as for injection wells, see response to #5 above.

7. Why is See Oil's current rate of injecting saltwater into the Burge insufficient?

As fluid is pumped from the producing formation it must eventually be replaced or the production of oil per well would decline to a level that the lease would become unprofitable. This must be done throughout the lease which is why I drilled the wells that are the subject matter of this application in an area that had become depleted of fluid in order to maintain or enhance the oil produced in the nearby producing wells.

8. If See Oil's application is denied, what alternative methods will See Oil use to dispose of the saltwater?

There are no disposal wells on the Burge Lease.

9. Does See Oil monitor the quality of the groundwater in the Burge Lease? If yes, please describe how.

No.

10. Does See Oil monitor seismic activity in the Burge Lease? If yes, please describe how.

With my daily presence, I believe I would feel or notice any unusual seismic activity. I have not felt or noticed any such activity.

Requests for Production

1. See Oil's Injection Permit E-11, 453

This is available from the Kansas Corporation Commission, Oil and Gas Conservation Division.

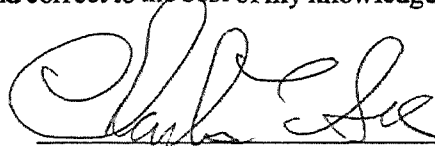
2. See Oil's Application to Amend Injection Permit E-11, 453, by adding repressuring wells S-101, S-104, and S-105 at the Burge Lease.

This is available from the Kansas Corporation Commission, Oil and Gas Conservation Division.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF Neosho)

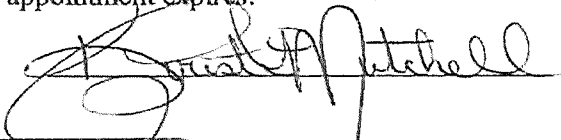
Charles E. See dba See Oil, of lawful age, being first duly sworn upon my oath, state that I have read the above Discovery Responses; that I know the contents thereof and declare that the statements made therein are true and correct to the best of my knowledge and belief.



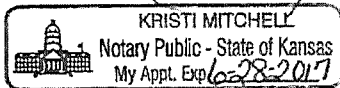
Charles E. See dba See Oil

SUBSCRIBED AND SWORN to before me this 14th day of April, 2017.

My appointment expires:



Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on the 17 day of April, 2017, I electronically filed and emailed the **Responses of Charles E. See DBA See Oil to Discovery Requests of KCC Staff** to the following:

Dustin L. Kirk
Prehearing Officer
Kansas Corporation Commission
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LaStacia Ross
rosslastacia@yahoo.com
Protestant

with a true and correct copy also sent via United States Mail, postage prepaid, addressed as follows:

LaStacia Ross
PO Box 1444
Pittsburg, KS 66762

By 
Timothy E. McKee, #7135