

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

In the matter of an order to show cause issued )	Docket No.: 23-CONS-3176-CSHO
to Great Plains Petroleum, Inc. (Operator) for )	
a plugging order at the Stumps #4 well in )	CONSERVATION DIVISION
Barton County, Kansas. )	
_____ )	License No.: 30163

**PRE-FILED DIRECT TESTIMONY**

**OF**

**TODD BRYANT**

**ON BEHALF OF COMMISSION STAFF**

**JUNE 2, 2023**

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

2 A. Todd Bryant, 266 N. Main St. Wichita, KS 67202.

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

4 A. I am employed by the Conservation Division of the Kansas Corporation Commission (KCC  
5 or Commission), as Supervisor of the Production and Underground Injection Control (UIC)  
6 Departments.

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

8 A. I received my Bachelors of Science in Geology from Wichita State University (WSU) in May  
9 2017. Prior to that, I began working at the KCC on March 5, 2012, as a Geology Intern while  
10 I was completing my studies at WSU. I was promoted to a Research Analyst on September  
11 28, 2014. I was again promoted to Geologist Specialist on September 10, 2017, and most  
12 recently promoted to Supervisor of the Production and UIC Departments on July 24, 2022.

13 **Q. What are your duties with the Conservation Division?**

14 A. I manage the Conservation Division's UIC and Production Departments. This includes  
15 providing technical support concerning various applications involving UIC wells. I enforce  
16 the Commission's UIC regulations through injection permitting, I perform file reviews of  
17 active injection wells, and I monitor daily injection volumes that are reported monthly from  
18 Harper and Sumner Counties.

19 **Q. Have you previously testified before this Commission?**

20 A. Yes.

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

22 A. The purpose of my testimony is to discuss Staff's Motion for an Order to Show Cause in  
23 Docket 23-CONS-3176-CSHO. Specifically, my testimony will discuss the evidence

1 supporting Staff's contention that Operator should be ordered by the Commission to plug the  
2 Stumps #4 well (Subject Well) in Barton County, Kansas.

3 **Q. Please provide a brief history of the Subject Well.**

4 A. The Subject Well was spud on May 5, 1964. On May 29, 1964, the Commission approved  
5 injection permit D-11,083 for the well (the order is attached to my testimony as *Exhibit*  
6 *TB-1*). The Commission modified the permit on August 7, 1989, and then again on March 26,  
7 1991, to increase the maximum allowable injection quantity into the Subject Well (both orders  
8 are attached to my testimony as *Exhibit TB-2*). The Subject Well is a dually completed  
9 injection and production well, and is currently on Operator's well inventory. On May 23,  
10 2022, Staff revoked injection permit D-11,083 for the Subject Well (the letter revoking the  
11 injection permit is attached to my testimony as *Exhibit TB-3*).

12 **Q. Why did Staff revoke the injection permit?**

13 A. On July 24, 2018, the Commission issued a Penalty Order for the Subject Well in Docket  
14 19-CONS-3029-CPEN. The Commission found that Operator committed one violation of  
15 K.A.R. 82-3-407 for not conducting a current and successful mechanical integrity test (MIT)  
16 on the Subject Well. On September 19, 2018, Staff sent a Notice of Violation letter to Operator  
17 stating that the Subject Well did not meet the production tubing requirements in injection  
18 permit D-11,083 (the letter is attached to my testimony as *Exhibit TB-4*).

19 On June 11, 2019, the Commission again issued a Penalty Order for the Subject Well, this  
20 time in Docket 19-CONS-3395-CPEN. In that Penalty Order, the Commission found that  
21 Operator committed one violation of K.A.R. 82-3-408 for not being in compliance with  
22 injection permit D-11,083. The Commission concluded that the Subject Well was not  
23 constructed or operated as required by the injection permit. The Commission also found that

1 Operator failed to apply for a modification of the injection well permit as required by K.A.R.  
2 82-3-408(b).

3 On October 7, 2019, Operator submitted a modification application for injection permit  
4 D-11,083 (the application is attached to my testimony as *Exhibit TB-5*). Staff sent a reply  
5 letter on November 7, 2019, requesting Operator supply additional information regarding the  
6 application (the letter is attached to my testimony as *Exhibit TB-6*). Operator did not supply  
7 the additional information, and on October 13, 2021, Staff sent a letter to Operator indicating  
8 that the modification application had expired (the letter is attached to my testimony as *Exhibit*  
9 *TB-7*).

10 As the Commission had previously found that the Subject Well was not constructed or  
11 operated as required by the injection permit, and Operator's application to modify the permit  
12 had expired, Staff revoked the injection permit on May 23, 2022.

13 **Q. Can you please describe the construction of the Subject Well?**

14 A. The Subject Well has 10-3/4 inch casing set at a depth of 277 feet with 150 sacks of cement,  
15 followed by 7 inch casing set at 3442 feet with 100 sacks of cement. The 2-3/8 inch production  
16 tubing was run to a depth of 3277 feet while the 2-3/8 inch injection tubing was run to a depth  
17 of 3450 feet set on a Backer Model D packer at 3293 feet. The Subject Well was perforated  
18 at 3337 feet to 3340 feet for production, which is about 5 feet below the top of the Arbuckle  
19 formation. The injection interval is through an open hole at a depth of 3442 feet to 3505 feet  
20 into the Arbuckle formation.

21 Dually completed wells must operate with the production zone above the injection zone,  
22 usually with two strings of tubing and one or more packers, to keep the operations independent  
23 and separate. Furthermore, there must be cement continuously across the production and

1 injection intervals to ensure that the fluid cannot migrate up hole and pollute the fresh and  
2 usable water or negatively impact other zones and cause waste.

3 **Q. Do you believe the Subject Well presents a threat to fresh and usable waters?**

4 A. Yes. If the well is not plugged to today's standards and is allowed to sit as is, it would  
5 potentially pose a threat to fresh and usable waters. The Subject Well has 277 feet of surface  
6 casing from when it was completed in 1964. Today's standards would have the Subject Well  
7 set 320 feet of surface casing to protect the fresh and usable water that is present to a depth of  
8 300 feet.

9 **Q. Please summarize your recommendations.**

10 A. The Commission should order Operator to plug the Subject Well. The Commission found in  
11 2019 that the Subject Well was not constructed or operated as required by the injection permit.  
12 The injection permit for the Subject Well has been revoked, but the well remains a potential  
13 threat to fresh and usable waters. For that reason, the Subject Well should be plugged as soon  
14 as possible.

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

16 A. Yes.

BEFORE THE STATE CORPORATION COMMISSION

OF THE STATE OF KANSAS

Before Commissioners: Willaim L. Mitchell, Chairman, John C. Woelk and Harry G. Wiles

In the matter of the application of FLOYD W. SMITH & COMPANY, INC. for an order permitting the disposal of salt water into their Well No. 4 described in paragraph "C" which is on their STUMPS LEASE, covering the NE/4 of Section 3, Township 17S, Range 12W

in the

ODIN FIELD

in

BARTON COUNTY, KANSAS

DOCKET NO. 74,010-C  
(C-11,083)

CONSERVATION DIVISION

PERMITTING:

DISPOSAL OF SALT WATER

RECEIVED  
STATE CORPORATION COMMISSION

JUN 3 1964

CONSERVATION DIVISION  
Wichita, Kansas

ORDER

Now on this 29th day of May, 1964, the above entitled matter comes before the Commission for further consideration and disposition. The Commission, having examined the application and recommendations thereon, and being advised of field conditions, finds:

THE COMMISSION FINDS: (A) That the production map shows the proposed well to be located in the Odin Field;

(B) That salt water is desired to be introduced into the Arbuckle formation, which contains water as defined in Rule 82-2-400 "B", with open hole from a depth of approximately 3441.5 feet to a bottom depth of approximately 3505 feet;

(C) That disposal is desired to be made into Well No. 4, located 330 feet from the South line and 330 feet from the West line of the NE/4 of Section 3, Township 17S, Range 12W, Barton County, Kansas;

(D) That all available elevations in the area are shown on the production map;

(E) That a complete log of the proposed disposal well will be filed upon completion of the well;

(F) That complete casing information as required under Rule 82-2-401 is as follows:

<u>SIZE</u>	<u>LENGTH</u>	<u>SEAT DEPTH</u>	<u>CONDITION</u>	<u>CEMENTED OR MUDDIED</u>	<u>EST. FT. ENCASED IN CEMENT</u>	<u>SACKS CEMENT USED</u>
10 3/4"	277'	277'	Used	Cemented	All	150
7"	3441.5'	3441.5'	Used	Cemented	500'	100

(G) That salt water desired to be introduced will be produced from the following described wells and lease;

<u>LEASE OWNER</u>	<u>LEASE NAME</u>	<u>LEASE DESCRIPTION</u>	<u>WELL NOS.</u>
Floyd W. Smith & Co., Inc.	Stumps	NE/4 Sec. 3-17S-12W	1,2,3,4

DATE MAILED - - - 6-3-64

and from any well or wells on or that may be drilled on the above described lease, estimated at 100 barrels per day, minimum to 900 barrels per day maximum, to be introduced at gravity pressure at the well head;

(H) That a copy of this application, together with a copy of regulations on HEARINGS UPON OBJECTIONS OR COMPLAINTS, has been mailed or personally delivered to all operators of producing or drilling wells within one-half mile from the proposed disposal well, as listed below:

<u>OPERATOR'S CORRECT NAME</u>	<u>MAILING ADDRESS</u>
Alpine Oil & Royalty Company, Inc.	800 Bitting Building Wichita, Kansas

IT IS, THEREFORE, BY THE COMMISSION ORDERED: That Floyd W. Smith & Company, Inc. be, and they are hereby permitted to dispose of salt water produced from the wells on the lease described in paragraph (G) into the Arbuckle formation into Well No. 4, described in paragraph (C), with open hole from a depth of approximately 3441.5 feet to a bottom depth of approximately 3505 feet, which said formation contains water as defined in Rule 82-2-400 "B"; said water estimated at 100 barrels per day minimum to 900 barrels per day maximum, to be introduced at gravity pressure at the well head; as provided for in the Rules and Regulations of the Commission.

IT IS FURTHER BY THE COMMISSION ORDERED: That the disposal authority granted by this order shall not be assigned, sold or transferred without the approval of this Commission.

THE COMMISSION HEREBY RETAINS JURISDICTION OF THE SUBJECT matter hereof and the parties hereto for the purpose of issuing from time to time such further orders, amendments, rules and regulations as may be necessary in connection with the above entitled matter if not specifically provided for in the Rules and Regulations of the Commission applying to the Disposal of Salt Water.

BY THE COMMISSION IT IS SO ORDERED:

Mitchell, Chm.; Woelk, Com.; Wiles, Com.

\_\_\_\_\_  
RAYMOND B. HARVEY, SECRETARY

APPROVAL RECOMMENDED:

J.P. Roberts  
J. P. ROBERTS, ADMINISTRATOR

ATTEST:  
A TRUE COPY  
[Signature]  
SECRETARY STATE CORPORATION  
COMMISSION, STATE of KANSAS

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Keith R. Henley, Chairman  
Rich Kowalewski  
Margalee Wright

In the matter of the application of ) DOCKET NO. D-11,083  
K & E DRILLING, INC. for an order )  
amending paragraph G of the ) CONSERVATION DIVISION  
Commission's order dated May 29, )  
1964, permitting the disposal of ) LICENSE NO. 5266  
salt water, into WELL NO. 4, which )  
is on the STUMPS LEASE, covering )  
the NE/4 of Section 03, Township )  
17 South, Range 12 West in the ODIN )  
FIELD in BARTON COUNTY, KANSAS, to )  
increase the injection quantity on )  
the original order as described )  
in paragraph (1); )

ORDER

The above-entitled matter comes before the Commission for further consideration and disposition. The Commission, having taken the matter under advisement finds:

1. An application was filed on the 30th day of January, 1989, to amend paragraph G of the order dated May 29, 1964, in Docket No. D-11,083, to increase the injection quantity to 1,500 barrels per day maximum.

2. Proper notice has been furnished all parties having any interest herein. No protests have been filed and approval has been recommended by the Conservation Division.

3. Applicant's lease is located and described as follows:

NE/4 of Section 03, Township 17 South, Range 12 West in the Odin Field in Barton County, Kansas;

4. The application should be granted in accordance with the above findings.

IT IS, THEREFORE, BY THE COMMISSION ORDERED: That K & E Drilling, Inc., be, and is hereby granted an amendment to paragraph G of the order dated May 29, 1964, in Docket No. D-11,083 and that said applicant be permitted to increase the injection quantity as described in paragraph 1.



K & E DRILLING, INC.      D-11,083      AMENDED DISPOSAL OF SALT WATER

IT IS FURTHER BY THE COMMISSION ORDERED: That the disposal authority granted by this Order shall not be assigned, sold or transferred without the approval of this Commission.

The Commission retains jurisdiction of the subject matter and the parties for the purpose of issuing such further Order or Orders as from time to time it may deem proper.

BY THE COMMISSION IT IS SO ORDERED.

Henley, Chmn; Kowalewski, Com.; Wright, Com.

Dated:       AUG 7 1989      

  
\_\_\_\_\_  
Executive Director

Date Mailed:       AUG 09 1989

CERTIFICATE OF SERVICE

I hereby certify that on AUG 09 1989,  
I caused a true and correct copy of the foregoing Order to be  
served by placing the same in the United States Mail, postage  
prepaid, to the following parties:

Kansas Geological Survey  
1930 Constant Avenue  
Campus West  
University of Kansas  
Lawrence, Kansas 66044

Petroleum Information  
Attn: Gene Rowe  
P. O. Box 3326  
Tulsa, Oklahoma 74101

Kansas Corporation Commission  
District Office #4  
2301 E. 13th  
Hays, Kansas 67601

K & E Drilling, Inc.  
100 S. Main  
Suite #300  
Wichita, Kansas 67202

Shirla R. McQueen  
Shirla R. McQueen  
Assistant General Counsel  
Kansas Corporation Commission

BEFORE THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS

Before Commissioners: Jim Robinson, Chairman  
Keith R. Henley  
Rachel C. Lipman

In the matter of the application of )	DOCKET NO. D-11,083
K & E DRILLING, INC. )	
for an order amending paragraph G )	CONSERVATION DIVISION
of the Commission's order dated )	
May 29, 1964, permitting the )	LICENSE NO. 5266
disposal of salt water, into WELL )	
NO. 4, which is on the STUMPS )	
LEASE, covering the NE/4 of Section )	
03, Township 17 South, Range 12 )	
West in the ODIN FIELD in BARTON )	
COUNTY, KANSAS, to increase the )	
injection quantity on the original )	
order as described in paragraph (1);)	

ORDER

The above-entitled matter comes before the Commission for further consideration and disposition. The Commission, having taken the matter under advisement finds:

1. An application was filed on the 29th day of January, 1991, to amend paragraph G of the order dated May 29, 1964, in Docket No. D-11,083, to increase the injection quantity to 3,000 barrels per day maximum.

2. Notice was personally served and published pursuant to the rules and regulations of the State Corporation Commission and the laws of the State of Kansas. No protests have been filed and approval has been recommended by the Conservation Division.

3. Applicant's lease is located and described as follows:

The NE/4 of Section 03, Township 17 South, Range 12 West in the Odin Field in Barton County, Kansas;

4. The application should be granted in accordance with the above findings.

IT IS, THEREFORE, BY THE COMMISSION ORDERED: That K & E Drilling, Inc., be, and is hereby granted an amendment to paragraph G of the order dated May 29, 1964, in Docket No. D-11,083 and that said applicant be permitted to increase the injection quantity as described in paragraph 1.

K & E DRILLING, INC. D-11,083 AMENDED DISPOSAL OF SALT WATER

IT IS FURTHER BY THE COMMISSION ORDERED: That the disposal authority granted by this Order shall not be assigned, sold or transferred without the approval of this Commission.

Any party affected by this Order may apply, by written petition, for a hearing thereon before the Commission, pursuant to K.S.A. 77-537. Such petition must be filed with the Director of the Conservation Division, 202 West First Street, Suite #200, Wichita, Kansas 67202, within three (3) days following service of this Order. If a hearing is not requested, this Order shall become effective upon the expiration of the three (3) day time period for requesting a hearing.

The Commission retains jurisdiction of the subject matter and the parties for the purpose of issuing such further Order or Orders as from time to time it may deem proper.

BY THE COMMISSION IT IS SO ORDERED.

Robinson, Chmn; Henley, Com.; Lipman, Com.

Dated:           MAR 26 1991          

  
Executive Director

Date Mailed:           MAR 29 1991

CERTIFICATE OF SERVICE

I hereby certify that on MAR 29 1991,  
I caused a true and correct copy of the foregoing Order to be  
served by placing the same in the United States Mail, postage  
prepaid, to the following parties:

K & E Drilling, Inc.  
100 S. Main  
Suite #300  
Wichita, Kansas 67202

Kansas Corporation Commission  
District Office #4  
2301 E. 13th  
Hays, Kansas 67601

Kansas Geological Survey  
1930 Constant Avenue  
Campus West  
University of Kansas  
Lawrence, Kansas 66044

Petroleum Information  
Attn: Gene Rowe  
P. O. Box 3326  
Tulsa, Oklahoma 74101

Shari Gert Albrecht  
Assistant General Counsel  
Kansas Corporation Commission



**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS  
CONSERVATION DIVISION**

**CANCELLATION OF INJECTION AUTHORIZATION**

Oper. License #: 30163

Permit #: D-11,083

Operator: Great Plains Petroleum, Inc.

Injection Well Name & No.: Stumps #4

Address: 221 Circle Dr.

Location: 2880' FSL 2575' FEL

City: Wichita

Sec. 3 TWP 17S RGE 12  (E)  (W)

State: Kansas

County: Barton

Zip Code: 67218

API# : 15-009-19144

Project Acreage: NE/4 of Sec. 3-T17S-R12W.

On May 9, 1989, the Commission/Conservation Division granted a permit for the injection of produced salt water or other fluids approved by the Conservation Division into the above referenced well or enhanced recovery project.

The Division has determined that the well authorized by the permit failed the MIT and has not been corrected.

Based on the above information, the permit granting injection authority is hereby cancelled.

Date Cancelled: May 23, 2022

/s/ Todd Bryant  
Underground Injection Control  
Conservation Division

# STATE OF KANSAS

CORPORATION COMMISSION  
CONSERVATION DIVISION  
DISTRICT OFFICE No. 4  
2301 E. 13TH STREET  
HAYS, KS 67601-2651



PHONE: 785-261-6250  
FAX: 785-625-0564  
<http://kcc.ks.gov/>

GOVERNOR JEFF COLYER, M.D.

SHARI FEIST ALBRECHT, CHAIR | JAY SCOTT EMLER, COMMISSIONER | DWIGHT D. KEEN, COMMISSIONER

September 19, 2018

## NOTICE OF VIOLATION

Great Plains Petroleum, Inc. #30163  
221 Circle Drive  
Wichita, Kansas 67218-1207  
(316) 685-8800

Re: Stumps #4  
Docket #**D-11,083**  
SW-SW-NE  
Sec.03-17-12W  
Barton County, Kansas

Attention: Mr. Rod Phares

During a file review of the above mentioned well it was found that this well is not in compliance with the UIC permit and/or Commission Rules and Regulations. Specifically the well *doesn't meet the production tubing requirements as stated in the permit.*

**The use of this well is to be discontinued immediately until it has been brought back into compliance.** Failure to bring this well back into compliance by **March 14, 2019**, may result in this matter being referred to our legal department, with a recommendation that the Commission take formal enforcement action, including assessment of monetary penalties.

If you have any questions regarding this matter please feel free to contact me at the Hays District Office at (785)261-6250.

Sincerely,

*Darrel Dipman*

Darrel Dipman  
District 4 UIC officer

cc: Case Morris District Supervisor  
Rene Stucky UIC Supervisor  
Richard Williams Compliance officer

**KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION  
APPLICATION TO AMEND INJECTION PERMIT**

Form U-8  
July 2014  
Form must be Typed  
Form must be Signed  
All blanks must be Filled

- Salt Water Disposal
- Repressuring
- Other Enhanced Recovery

Permit Number: D11083.0 4-JK

NE 1/4 Sec. 3 Twp. 17 S. R. 12  East  West

2880 Feet from  North /  South Section Line

2575 Feet from  East /  West Section Line

Lease: Stumps

Well #: #4 15-009-19, 144-00-10

Barton County, Kansas

Originally granted to: Mayfield-Smith

*(All information above this line taken from the original permit)*

Current Operator: License # 30163 Exp. 07/30/20 Contact Person: Rod Phares

Company Name: Great Plains Petroleum, Inc.  
*(As listed on operator license)*

Address: 221 Circle Drive, Wichita, KS 67218

Phone: 316 685-8800

Received  
KANSAS CORPORATION COMMISSION  
**OCT 07 2019**  
CONSERVATION DIVISION  
WICHITA, KS

It is requested that the (caption) (paragraph # \_\_\_\_\_) of the original permit be amended as follows:

- A. Change the authorized injection pressure to: \_\_\_\_\_ psi maximum from the current permitted pressure of \_\_\_\_\_ psi.
- B. Change the authorized injection rate to: \_\_\_\_\_ bbl/day maximum from the current rate of \_\_\_\_\_ bbl/day.
- C. Add ( \_\_\_\_\_ ) or delete ( \_\_\_\_\_ ) the following leases/facilities supplying produced saltwater or other fluids approved by the Conservation Division.

Company Name	Lease Name	Lease Description
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____
6. _____	_____	_____
7. _____	_____	_____
8. _____	_____	_____

*(Attach additional sheets if necessary)*

- D. Change the permit by: ( \_\_\_\_\_ ) add the following repressuring wells: \_\_\_\_\_;  
( \_\_\_\_\_ ) change the injection formation; or ( X ) change well construction; or ( \_\_\_\_\_ ) other:

*Operator requests that the existing Arbuckle perforation at 3338 be added to the previous injection interval from 3142-3505.*

Mall to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67212-1513

*(No CK  
w/ U-8,  
\$100.00 Required)*



Erika

U-8 page 1+2  
only received  
by UIC Dept.  
\$100.00 Required.

KANSAS CORPORATION COMMISSION  
OIL & GAS CONSERVATION DIVISION  
APPLICATION TO AMEND INJECTION PERMIT

Form U-8  
July 2014  
Form must be Typed  
Form must be Signed  
All blanks must be Filled

- Salt Water Disposal
- Repressuring
- Other Enhanced Recovery

Permit Number: D11083.0 4-JK

NE 1/4 Sec. 3 Twp. 17 S. R. 12  East  West

2880 Feet from  North /  South Section Line

2575 Feet from  East /  West Section Line

Lease: Stumps

Well #: #4 15-009-19,144-00-00

Barton County, Kansas

Originally granted to: Mayfield-Smith

(All information above this line taken from the original permit)

Current Operator: License # 30163 Exp. 07/30/20 Contact Person: Rod Phares

Company Name: Great Plains Petroleum, Inc.  
*(As listed on operator license)*

Address: 221 Circle Drive, Wichita, KS 67218

Phone: 316 685-8800

Received  
KANSAS CORPORATION COMMISSION

OCT 07 2019

CONSERVATION DIVISION  
WICHITA, KS

It is requested that the (caption) (paragraph # \_\_\_\_\_) of the original permit be amended as follows:

- A. Change the authorized injection pressure to: \_\_\_\_\_ psi maximum from the current permitted pressure of \_\_\_\_\_ psi.
- B. Change the authorized injection rate to: \_\_\_\_\_ bbl/day maximum from the current rate of \_\_\_\_\_ bbl/day.
- C. Add ( \_\_\_\_\_ ) or delete ( \_\_\_\_\_ ) the following leases/facilities supplying produced saltwater or other fluids approved by the Conservation Division.

Company Name	Lease Name	Lease Description
1. _____	_____	_____
2. _____	_____	_____
3. _____	_____	_____
4. _____	_____	_____
5. _____	_____	_____
6. _____	_____	_____
7. _____	_____	_____
8. _____	_____	_____

(Attach additional sheets if necessary)

- D. Change the permit by: ( \_\_\_\_\_ ) add the following repressuring wells: \_\_\_\_\_ ;  
( \_\_\_\_\_ ) change the injection formation; or ( X ) change well construction; or ( \_\_\_\_\_ ) other:

Operator requests that the existing Arbuckle perforation at 3338 be added to the previous injection interval from 3442-3505.

Mall to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67202-1513

(NOCK  
W/U-8,  
\$100.00 Required)

Offset Operators, Unleased Mineral Owners and Landowners

Form U-8

(Attach additional sheets if necessary)

Name \_\_\_\_\_ Legal Description of Leasehold \_\_\_\_\_

The ownership of the existing minerals on this lease and one of the leases on an offset quarter section have not been resolved at this time. We are currently preparing the documents for a title examination by our attorney.

We cannot proceed with the notice requirements until a final determination of ownership has been completed.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I hereby certify that the statements made herein are true and correct to the best of my knowledge and belief.

Received  
KANSAS CORPORATION COMMISSION

OCT 07 2019

CONSERVATION DIVISION  
WICHITA, KS

*Paul A. Adams*  
\_\_\_\_\_  
Applicant or Duly Authorized Agent

Subscribed and sworn to before me this 7th day of October, 2019

*Cygnus Paul Sw*  
\_\_\_\_\_  
Notary Public

My Commission Expires: 4-30-2022

CINDY PATTON SMITH  
Notary Public - State of Kansas  
My Appl. Expires 2/20/2022

Instructions for Form U-8

Application to Amend Injection Permit

1. All requested changes in injection authority must be submitted with this form.
2. Complete the top portion, (side 1) of the form with the information requested for the pilot well, as shown on the original order or permit.
3. Complete the current operator information, listing the license number, current name and address, contact person and phone number.
4. Fill in the type of change or amendment desired. Leave blank any sections not applicable.
5. For amendments adding additional input wells to enhanced recovery permits, the following information must be submitted in addition to pages 1 and 2 of form U-8:
  - a) pages 1 and 2 of form U-1
  - b) an updated map, showing the new well(s) and all existing wells; page 4 of the form U-1.
  - c) a complete log of the well(s) to be added;
  - d) verification of cement (cement tickets, bond log, etc.)
6. Attach Affidavit of Notice Served, page 5 of form U-1.
7. Attach Affidavit of Publication from the official county newspaper.
8. This form must be signed by the applicant or an authorized agent. A notarization of the signature is required.
9. All applicable fees must accompany this application.

Mail to: KCC - Conservation Division, 266 N Main St, Ste 220, Wichita, Kansas 67202-1513

Date: 11-7-2019

Operator: Great Plains Petroleum, Inc.  
221 Circle Drive  
Wichita, KS. 67218

RE: D-11083  
Stumps #4  
NE/4 SEC. 3-T17S-R12W  
Barton Co. , KS.

Dear Operator,

KCC has reviewed your request to add additional perforations( from 3337-3340') to the existing permitted open hole interval in the Arbuckle ( 3342' to 3505'). The additional interval looks to be noncommercial, so this interval can be permitted for disposal purposes. I will need additional information.

- 1) Need page 2 of Form U-8 with the legal notices and names of surrounding Operators, Unleased mineral owners and land owners. Also, list the Surface owner of NE/4 SEC. 3-T17S-R12W.
- 2) Need pages 1-2-4-5 of Form U-1.
- 3) Need Publication stating you want to add additional perforations ( 3337'-3340') in the Arbuckle to the existing Permit. State the permitted rate is 3000 BWPD @ 0 psig.
- 4) Application fee is \$100.00

Thank you for your cooperation in this matter.

If you have any questions you may contact me at 316-337-6192.

Very truly yours,  
Jerry Knobel- Geologist





**THE STATE CORPORATION COMMISSION  
OF THE STATE OF KANSAS  
CONSERVATION DIVISION**

**DISMISSAL OF INJECTION APPLICATION  
FOR INJECTION AUTHORITY**

Oper. License #: 30163

Permit #: D-11,083

Operator: Great Plains Petroleum, Inc.

Injection Well Name & No.: Stumps #4

Address: 221 Circle Drive

Location: 2880' FSL 2575' FEL

City: Wichita

Sec. 3 TWP 17S RGE 12  (E)  (W)

State: Kansas

County: Barton

Zip Code: 67218

API #: 15-009-19144

Project Acreage: NE/4 of Sec. 3-T17S-R12W

On October 7, 2019, the Commission/Conservation Division received the above application seeking injection authorization. On October 7, 2020, the application expired and the Operator has not advised the Commission/Conservation Division of any progress or renewal of this application.

Based on the above information, the above application seeking injection authority is hereby dismissed without prejudice. If the Operator wishes to pursue injection authority for this well a new application will be required

Date Dismissed: October 13, 2021

*/s/ Rene Stucky*  
Director, Underground Injection Control  
Conservation Division

## **CERTIFICATE OF SERVICE**

23-CONS-3176-CSHO

I, the undersigned, certify that a true and correct copy of the attached Prefiled Direct Testimony of Todd Bryant on Behalf of Commission Staff has been served to the following by means of electronic service on June 2, 2023.

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/s/ Nancy D Borst

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Nancy D Borst