

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

In the Matter of the Application of Mid-Continent Energy Corp. for a permit to)	Docket No. 21-CONS-3126-CUIC
Authorize the Injection of Saltwater into the)	
Pawnee and Fort Scott formations at the)	CONSERVATION DIVISION
Seamster #1A well in Section 9, Township)	
34 South, Range 8 East, Cowley County,)	License No. 5205
<u>Kansas.</u>)	

PRE-FILED DIRECT TESTIMONY OF

MITCH BUEHLER

ON BEHALF OF

MID-CONTINENT ENERGY CORP.

1 **Q. Please state your name and business address for the record.**

2 A. My name is Mitchell B. Buehler. I go by Mitch. My business address is 5920 E. Central,
3 Suite 200 Wichita, Kansas, 67208.

4 **Q. What is your occupation?**

5 A. I'm the Secretary and Treasurer of Mid-Continent Energy Corp. I am also a shareholder.
6 I am responsible for the accounting, billing, and day-to-day operations of the company.

7 **Q. Please summarize your work experience and educational background.**

8 A. I earned a BS in Accounting from Wichita State University in 1980. From 1979-1980, I
9 worked as an accountant at Search Drilling Co. in Wichita, KS. From 1980 to 1986, I
10 worked as an accountant for Mid-Continent Energy Corp. in Wichita, KS. From 1986-
11 1995, I served as Controller for the Canterbury Inn Hotel in Wichita, KS, then as the
12 Controller for Easton Manufacturing Wichita, KS, from 1995 to 1999, and finally as the
13 Controller for Affiliated Family Counselors in Wichita, KS, from 1998 to 2008. Since to
14 2008, I have served in my current role as Secretary and Treasurer, and shareholder of Mid-
15 Continent Energy Corp.

16 **Q. Can you provide a brief background of the business of Mid-Continent Energy Corp.**
17 **("Mid-Continent")?**

18 A. Mid-Continent was started in 1976 by my father Bruce Buehler and a group of investors
19 to take advantage of the oil boom at the time. Mid-Continent had early success by farming
20 out acreage from TXO and made several nice discoveries. Over the years Mid-Continent
21 has put together various drilling programs. Mid-Continent currently operates
22 approximately 33 wells in western Kansas, and also operates the Jarboe and Seamster
23 leases in Cowley County, Kansas.

1 **Q. Are you familiar with the Application for Injection Authority (“Application”) for the**
2 **Seamster #1A well that is the subject of this docket?**

3 A. Yes. I directed Jeff Burk to prepare and file it on behalf of Mid-Continent.

4 **Q. What prompted Mid-Continent to file the Application seeking injection authority at**
5 **the Seamster #1A well?**

6 A. The produced water from Jarboe and Seamster leases had been injected into the Seamster
7 ‘B’ #1 SWD well for the preceding 25 to 30 years. Recently, the Seamster ‘B’ #1 failed
8 its periodic casing integrity test. At that point, Mid-Continent determined it would be cost
9 prohibitive to repair the well and it was ultimately plugged and abandoned in November of
10 2019. Since that time, Mid-Continent has paying to haul produced water from these leases,
11 which is significantly more expensive than re-injecting the water. The ability to inject
12 produced water will also re-pressure the producing formation increasing the recovery of
13 oil. Without an injection well these leases will likely have to be abandoned soon, resulting
14 in significant oil reserves being left in place and wasted.

15 **Q. Is it your opinion that permitting the Seamster #1A as an injection well is necessary**
16 **to prevent waste?**

17 A. Yes, for all of the reasons I just mentioned.

18 **Q. Have you reviewed the Pre-Filed Direct Testimony of Jeff Burk?**

19 A. Yes.

20 **Q. Do you agree with Mr. Burk’s assessments as to why granting that the Application is**
21 **necessary to prevent waste, while still protecting fresh and usable water?**

22 A. Yes.

1 **Q. Did you analyze other options for the disposal or injection of the produced water from**
2 **the Seamster and Jarboe wells?**

3 A. Yes. We looked at other wells on the Jarboe and Seamster leases as possible candidates
4 for injection, but determined it would cost more to recomplete or convert those wells for
5 injection because they would be further from electricity, and require more trenching and
6 laying more pipe. Moreover, the Seamster #1 well that requires remedial work is also
7 within the area of review of the other wells on these leases, so we would not have been
8 able to avoid the issues encountered with that well. We also looked at trenching a line to
9 the highway and then boring a line under the highway to send the produced water to a lease
10 that could use water for EOR operations. After looking at what this might cost, it was
11 decided that this would be cost prohibitive. For these reasons, none of these other options
12 were as practical as converting the Seamster #1A for injection.

13 **Q. Are there any other facts pertaining to the Application that you would like the**
14 **Commission to consider?**

15 A. Mid-Continent has been in business for 45 years and has a very good record of doing
16 things the right way. Mid-Continent has and will continue to operate in a professional
17 manor, in compliance with Commission regulations aimed at preventing waste and
18 protecting fresh water.

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

20 A. Yes.

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SEDGWICK)

Mitch Buehler, being first duly sworn, deposes and says that he is the Mitch Buehler referred to in the foregoing "PRE-FILED DIRECT TESTIMONY OF MITCH BUEHLER" to be filed before the State Corporation Commission of the State of Kansas in Docket No. 21-CONS-3126-CUIC, and that the contents thereof are true and correct to the best of his information, knowledge, and belief.



Mitch Buehler

SIGNED AND SWORN to before me on this 2nd day of April, 2021.



Notary Public

My Commission expires: 6-26-2023



CERTIFICATE OF SERVICE

The undersigned certifies this 5th day of April, 2021, that a true and correct copy of the foregoing **Pre-filed Testimony of Mitch Buehler on Behalf of Mid-Continent Energy Corp.** has been served as described below:

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