

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

In the Matter of the Application for Injection)	Docket No. 23-CONS- <u>3080</u> -CU1C
Well of Merit Energy Company, LLC, Permit)	
Number E-12,571 for its WMSU #1602 well,)	CONSERVATION DIVISION
located in Section 32, Township 34 South,)	
<u>Range 41 West, Morton County, Kansas.</u>)	License No. 32446

REQUEST FOR HEARING

See attached letter dated September 8, 2022.

MORRIS LAING EVANS BROCK &
KENNEDY, CHTD.

By: 

Jonathan A. Schlatter, #24848
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Attorneys for Merit Energy Company, LLC



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September 8, 2022

Kansas Corporation Commission
Attn: Conservation Division, UIC Dept. and Legal Dept.
266 N Main St., Ste. 220
Wichita, KS 67202-1513

**RE: Application for Injection Well—E-12,571
WMSU #1602—Sec. 32-T34S-R41W, Morton County, Kansas**

To whom it may concern:

Merit Energy Company, LLC (“MEC”) requests a hearing with respect to the above-referenced Application for Injection Well (“Application”). In its Application, MEC sought to amend injection well Permit Number E-12,571 to allow for injection of produced water into the Morrow formation between the depths of 4,868’ and 4,943’ within its WMSU #1602 well (API No. 15-129-20675)¹. MEC has been conducting an enhanced oil recovery operation on its Wilburton Morrow Sand Unit comprised of All of Sections 28, 29, 32, and 33 in T34S-R41, Morton County, Kansas, and All of Section 4 and the S/2 of Section 5 in T35S-R41W, and the injection of water into this well would benefit that operation. In the Application, MEC proposed to dually complete the WMSU #1602 well, with one string of tubing set beneath a packer to allow injection into the Morrow as described above, and one string of tubing continuing to produce natural gas from the Topeka formation up hole.

Commission Staff denied MEC’s Application by letter dated August 8, 2022. The basis offered for denying the Application included: (1) “[t]he corrosiveness of the Topeka formation, (2) “no casing protection above the Topeka formation” based on the belief that the “top of the cement at the WMSU #1602 well appears to be 3,754 feet, which is below the perforations of the producing Topeka formation at 3,121 feet”, and (3) “[a]fter the initial MIT, there would be no way to test the casing below the perforations once all work has been completed.”

MEC contends that the basis offered by Commission Staff for denying the Application are in error. Specifically, a remedial cementing job was performed on the WMSU #1602 in 1989 that resulted cement being set behind the production casing from a depth of 3,400 feet to 700 feet. This is evidenced by the ACO-1 which also indicates a cement bond log found good cement at such depths, and also by the relevant portions of the drilling report describing the same, both of which are enclosed each with this letter. As

¹ The WMSU #1602 was renamed the Pearson C-2 well when it was recompleted in the Topeka formation in 1989.

such, along with the cement behind the surface casing from 1,457' to surface, there is continuous cement protection from below the Topeka formation to surface. Further, there are several ways to test the casing for mechanical integrity below the perforation in the Topeka formation, including the alternative tests expressly authorized by the Commission under K.A.R. 82-3-407(a)(2). Finally, the WMSU #1602 has been completed and producing from the Topeka formation since 1989. As such, any concern regarding the corrosiveness of the Topeka formation exists regardless of whether the Application is approved. Notably, MEC has experienced no issues resulting from produced water from the Topeka since it took over operations of the WMSU #1602.

In summary, MEC respectfully requests a hearing on its Application. MEC contends that approving the Application will prevent pollution of fresh water, protect correlative rights and prevent waste. The WMSU #1602 can demonstrate mechanical integrity sufficient to show a dually completed well will prevent pollution of fresh water, and injecting such water into the Morrow formation will prevent waste and protect correlative rights through improved recovery of hydrocarbon reserves from the Wilburton Morrow Sand Unit.

Sincerely,



Jonathan A. Schlatter
For the Firm

Attorneys for Merit Energy Company, LLC

JAS/cah

Encl.

SIDE ONE

STATE CORPORATION COMMISSION OF KANSAS
OIL & GAS CONSERVATION DIVISION
RECOMPLETION FORM
ACO-2 AMENDMENT TO WELL HISTORY

API NO. 15- 129-20675-0001

County Morton

CNE/4 SE/4 Sec. 32 Twp. 34 Rge. 41 East
West

1980 Ft. North from Southeast Corner of Section

660 Ft. West from Southeast Corner of Section

(NOTE: Locate well in section plat below.)
Formerly named Odell U #2

Lease Name Pearson C Well # 2

Field Name Greenwood

Producing Formation Topeka

Elevation: Ground 3464' KB Unknown

Operator: License # 5447

Name: OXY USA Inc.

Address: P. O. Box 26100

City/State/Zip: Okla. City, OK 73126-0100

Purchaser: OXY NGL

Operator Contact Person: Raymond Hui
Phone: (405) 749-2471

Designate Type of Original Completion
 New Well Re-Entry Workover

Date of Original Completion 9-10-85

Name of Original Operator Cities Service Oil & Gas Corp.

Original Well Name Odell U #2

Date of Recompletion:

4-4-89 9-26-89

Commenced Completed

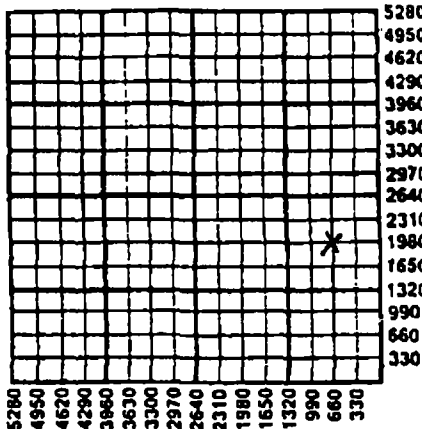
Re-entry Workover

Designate Type of Recompletion/Workover:
 Oil SWD Temp. Abd.
 Gas Inj Delayed Comp.
 Dry Other (Core, Water Supply, etc.)

Deepening Re-perforation
 Plug Back 3306 PBSD
 Conversion to Injection/Disposal

Is recompleted production:

Commingled Docket No. _____
 Dual Completion Docket No. _____
 Other (Disposal or Injection?) Docket No. _____



RECEIVED
STATE CORPORATION COMMISSION
OCT 03 1989
CONSERVATION DIVISION
Wichita, Kansas

K.C.C. OFFICE USE ONLY
F Letter of Confidentiality Attached
C Wireline Log Received
C Drillers Timelog Received
Distribution
 KCC SWD/Rep NGPA
 KGS Plug Other (Specify)

INSTRUCTIONS: This form shall be completed in triplicate and filed with the Kansas Corporation Commission, 200 Colorado Derby Building, Wichita, Kansas 67202, within 120 days of the recompletion of any well. Rules 82-3-107 and 82-3-141 apply. Information on side two of this form will be held confidential for a period of 12 months if requested in writing and submitted with the form. See rule 82-3-107 for confidentiality in excess of 12 months. One copy of any additional wireline logs and driller's time logs (not previously submitted) shall be attached with this form. Submit ACO-4 or ACO-5 prior to or with this form for approval of commingling or dual completions. Submit CP-1 with all plugged wells. Submit CP-111 with all temporarily abandoned wells. NOTE: Conversion of wells to either disposal or injection must receive approval before use; submit form U-1.

All requirements of the statutes, rules and regulations promulgated to regulate the oil and gas industry have been fully complied with and the statements herein are complete and correct to the best of my knowledge.

Signature: Bryan Humphries Title: Manager Engineering Date: 9-29-89

Subscribed and sworn to before me this 29th day of September 19 89

Notary Public: Marsha G. Wilson Date Commission Expires: 4-1-92

SIDE TWO

Operator Name OXY USA Inc. Lease Name Pearson C Well # 2

Sec. 32 Twp. 34S Rge. 41
 East
 West

County Morton

RECOMPLETION FORMATION DESCRIPTION

Log Sample

Name	Top	Bottom
Topeka	3121'	3258'

ADDITIONAL CEMENTING/SQUEEZE RECORD

Purpose:	Depth		Type of Cement	# Sacks Used	Type and Percent Additives
	Top	Bottom			
<input checked="" type="checkbox"/> Perforate <input type="checkbox"/> Protect Casing <input checked="" type="checkbox"/> Plug Back TD <input type="checkbox"/> Plug Off Zone	3121	3258	Set CIBP at 4850'. RIM w/cement retainer & set at 3306'. Pumped 25 BFW w/300 SCF/bbl. of Nitrogen followed by 25 sx. Cl H cmt., followed by 275 sx 50/50 Cl H Poz w/6% total gel, followed by 150 sx Cl. H cmt. TOC at 700'.		

Shots Per Foot	PERFORATION RECORD		Acid, Fracture, Shot, Cement Squeeze Record (Amount and Kind of Material Used)
	Specify Footage of Each Interval Perforated		
4	3121-3125 (4'; 16 holes)		Acidized 3121-3258' w/5000 gals. 15%
	3130-3146' (16'; 64 holes)		15% FE acid
	3168-3171' (3'; 12 holes)		
	3256-3258' (2'; 8 holes)		

PBTD 3306' Plug Type CIBP & cement retainer

TUBING RECORD

Size 2-3/8" Set At 3271' Packer At --- Was Liner Run Y X N

Date of Resumed Production, Disposal or Injection ---

Estimated Production Per 24 Hours Oil --- Bbls. Water --- Bbls. Gas-Oil-Ratio

Gas 159 Mcf pd

Disposition of Gas:

Vented Sold Used on Lease (If vented, submit ACO-18.)

JOB: PB FROM MORROW & TEST TOPEKA.

CMIC T. KRAMPF; CUM. COST \$1,715;

04/05/89 PR OPNS: PREP'G TO CMT ACROSS TOPEKA;
PBTD 3,306;
CASING 5.5; @ 5,010;

06-JUN-95

CHRONOLOGICAL WELL REPORT

PAGE: 4
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OXY USA INC, PEARSON C 2
MORTON, KS; WSN: 5788
FIELD: GREENWOOD GAS AREA;
PTD 5,011; OBJ FORM TOPEKA;
ELEV RKB 3,475; AFE DH 0; CWI 100.000; CNI 87.500;

ACTIVITY SUMMARY:

SICP 780 PSIG. BLEW WELL DOWN. RU ROSEL. RIH W/JUNK BASKET AND GAUGE RING TO 4900'. RIH W/CIBP AND SET SAME @ 4850'. RU HALLIBURTON. LOADED CSG W/85 BFW & PRESSURE TESTED TO 1000 PSIG FOR 15 MINS, HELD OK. RIH W/GR & CCL LOG FROM 3600' TO 2600'. RIH W/4" HOLLOW CARRIER CASING GUN AND PERFORATED 1 FOOT W/4 DPJSPF @ 3400'. RIH WITH CEMENT RETAINER AND SET AT 3306'. RD ROSEL. RIH WITH 2-3/8" TBG AND STUNG INTO CMT RETAINER. PRESSURED CASING/TUBING ANNULUS TO 500 PSIG. PUMPED 120 BFW AND ESTABLISHED CIRCULATION. RD HALLIBURTON. POOH W/1 STAND. SDFN.

CMIC T. KRAMPF; CUM. COST \$7,001;

04/06/89 PR OPNS: WOC;
PBTD 3,306;
CASING 5.5; @ 5,010;

ACTIVITY SUMMARY:

RU HALLIBURTON. LOADED CSG/TBG ANNULUS AND PRESSURED TO 500 PSIG. ESTABLISHED INJECTION RATE INTO PERFS @ 3 BPM W/800 PSIG. HAD CIRC TO PIT. PUMPED 25 BFW W/300 SCF/BBL OF NITROGEN FOLLOWED BY 25 SX CLASS "H" CMT MIXED @ 11 PPG W/300 SCF/BBL OF NITROGEN FOLLOWED BY 275 SX 50/50 CLASS "H" POZMIX W/6% TOTAL GEL FOLLOWED BY 150 SX CLASS "H" CMT. DISPLACED CMT TO CMT RETAINER. REVERSED CMT OUT OF TBG. RD HALLIBURTON. POOH W/TBG, SN & STINGER. SDFN.

CMIC T. KRAMPF; CUM. COST \$14,970;

04/07/89 PR OPNS: PREP'G TO RUN CBL;
PBTD 3,306;
CASING 5.5; @ 5,010;

ACTIVITY SUMMARY:

WOC.

CMIC T. KRAMPF; CUM. COST \$14,970;

04/08/89 PR OPNS: PREP'G TO RIH W/SN AND 2-3/8" TBG;
PBTD 3,306;

CASING 5.5; @ 5,010;
ACTIVITY SUMMARY:
RU ROSEL. RAN CBL FROM PBD TO 500'. TOP OF CEMENT AT
700'. CEMENT BOND WAS MARGINAL THRU ZONE OF INTEREST AND
ADEQUATE ABOVE AND BELOW ZONE OF INTEREST. WILL CONTINUE
W/COMPLETION. RD ROSEL. SDFN.

CMIC T. KRAMPF; CUM. COST \$16,665;

04/09/89 PR OPNS: SDFS;
06-JUN-95

CHRONOLOGICAL WELL REPORT

PAGE: 5
G8MH77ON.REP

OXY USA INC, PEARSON C 2
MORTON, KS; WSN: 5788
FIELD: GREENWOOD GAS AREA;
PTD 5,011; OBJ FORM TOPEKA;
ELEV RKB 3,475; AFE DH 0; CWI 100.000; CNI 87.500;

PBD 3,306;
CASING 5.5; @ 5,010;
ACTIVITY SUMMARY:
RIH W/SN AND 2-3/8" TBG TO 3300'. SWB'D CSG DRY TO 3200'.
POOH W/2-3/8" TBG AND SN. SDFN.

CMIC T. KRAMPF; CUM. COST \$17,665;

04/10/89 PR OPNS: PREP'G TO PERFORATE TOPEKA;
PBD 3,306;
CASING 5.5; @ 5,010;
ACTIVITY SUMMARY:
SDFS.

CMIC T. KRAMPF; CUM. COST \$17,665;

04/11/89 PR OPNS: PREP'G TO ACIDIZE TOPEKA; FORM: TOPEKA 3121'-3258' (6
SETS);

PBD 3,306; PERFS(MD) 3,121 - 3,258;
CASING 5.5; @ 5,010;
ACTIVITY SUMMARY:

RU PERF'G TRUCK. RIH W/4" HOLLOW CARRIER CSG GUN AND
PERF'D TOPEKA W/4 DPJSPF AS FOLLOWS:

INTERVAL	NET FEET	PERFORATIONS
3121'-25'	4'	16
3130'-46'	16'	64
3168'-71'	3'	12
3224'-26'	2'	8
3242'-44'	2'	8
3256'-58'	2'	8
TOTAL	29'	116

RD PERF'G TRUCK. SLIGHT BLOW AFTER PERF'G. RIH W/PKR, SN
AND 103 JTS 2-3/8" TBG. LEFT PKR SWINGING @ 3093'. RIH
W/SWAB. FOUND FL @ 2950'. GOOD BLOW AFTER EACH SWAB RUN.
GAS RATE TSTM. SDFN.

CMIC T. KRAMPF; CUM. COST \$22,746;

04/12/89 PR OPNS: SWAB TESTING; FORM: TOPEKA 3121'-3258' (6 SETS);